

SUPPORTING STATEMENT - PART A

Application for Trusteeship – OMB No. 0730-0013

Summary of Changes from Previously Approved Collection

- *None*

1. Need for the Information Collection

According to 37 USC, Chapter 11, Section 602, “Pay and Allowances of the Uniformed Services – Payments to Mentally Incompetent Persons,” the Department of Defense has the authority to provide entitlement benefits. Department of Defense (DoD) Financial Management Regulation (FMR) 7000.14, Volume 7A, Chapter 33, “Certifying Officers, Departmental Accountable Officials, and Review Officials,” DoDFMR 7000.14, Volume 7B, Paragraph 160204, “Physical or Mental Incapacitation,” states that “all applications to appoint a trustee and related documentation should be submitted to Defense Finance and Accounting Service (DFAS), Retired Pay Department, P.O. Box 998021, Room 1579, Cleveland, OH 44199-8021. While next-of-kin or other relative of the retiree ordinarily is preferred for designation as trustee unless a committee, guardian, or other legal representative is appointed by a court of competent jurisdiction. If more than one qualified person applies to be named as trustee for mentally incompetent retiree, the DFAS designee shall determine which applicant is a more appropriate trustee.”

2. Use of the Information

DD Form 2827 is used by DFAS to determine the proper entitlement of an incompetent services members and retirees. When member is determined to be mentally incompetent by medical board or physician report, a relative, friend, or agency applying to be appointed trustee is either mailed the form to complete or accesses a fillable electronic version through the DoD Forms repository. DFAS reviews the completed form and assigns trustee. The approved DD 2827 is mailed to the new trustee. The appropriate payments are made to the trustee until the demise of the member or trustee, or evidence of the misuse of funds. If the form is not received with the completed certification, the retired payments are suspended until a trustee can be assigned through the successful submission of DD Form 2827.

3. Use of Information Technology (1-4 sentences)

DD Form 2827 is generally sent by mail to the trustee, but is also available in fillable PDF format from the DoD Forms Repository. Respondents may complete the form online, print and mail the completed form for processing. Taking that into consideration, electronic technology use is approximately 20%. This has increased from 10% at last approval. At this time, further electronic submission is not possible due to the need for wet signatures for the legal assignment of a trustee. However, there are future plans to readdress the

process of mailing forms and instead direct 100% of respondents to the DoD Forms website.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

If DFAS does not receive the information, retired payments are suspended. The requirement to complete the form ensures and helps alleviate the opportunity for fraud and abuse of member benefits.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, August 16, 2019. The 60-Day FRN citation is 84 FRN 41973.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, November 12, 2019. The 30-Day FRN citation is 84 FRN 61045.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

Respondents are assured confidentiality, to the extent provided by law, via the Privacy Act Statement on the form. DFAS certifies that the information collected is maintained in accordance with the Privacy Act of 1974, and OMB Circular A-130, Management of Federal Information Resources.

The SORN covered by this system is T7347b, "Defense Military Retiree and Annuitant Pay System," which can be viewed at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>

The PIA that covers this system is "Defense Retired and Annuitant Pay System," found at: http://www.dfas.mil/dam/jcr:4c735dde-6b84-4f24-8153-bd83643c98b1/PIA_DRAS_2010.pdf.

The Records Retention reads as follows: "Disposition for Retired and Annuitant Pay records range from 30 days to 56 years. The administrative records such as, change of address, electronic messages or tax records that are not pay affecting, are destroyed using retention of 30 days to less than 6 years. All pay affecting documents such as retirement documents, account computation information or entitlement/eligibility records are retained for six years or more and the pay histories are retained for 56 years. Records are destroyed by tearing, shredding, pulping, macerating, burning, or degaussing the electronic storage media."

Records retention for these forms is 6 years as stated in the DFAS 5015.2-M, Records Disposition Schedules (<https://dfas4dod.dfas.mil/library/pubs/rmp5015/dfas50152m-signpg.pdf>) under schedule 7347, rule 7.

11. Sensitive Questions

Disclosure of the Social Security Number (SSN) is used for positive identification due to the payment of a benefit. A justification memo is being submitted as part of the OMB submission package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DD Form 2827]

- a) Number of Respondents: 75
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 75
- d) Response Time: 15 mins
- e) Respondent Burden Hours: 18.75 hours

2) Total Submission Burden

- a) Total Number of Respondents: 75
- b) Total Number of Annual Responses: 75
- c) Total Respondent Burden Hours: 18.75 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DD Form 2827]

- a) Number of Total Annual Responses: 75
- b) Response Time: 15 mins
- c) Respondent Hourly Wage: \$15.35
- d) Labor Burden per Response: \$3.84
- e) Total Labor Burden: \$287.81

2) Overall Labor Burden

- a) Total Number of Annual Responses: 75
- b) Total Labor Burden: \$287.81

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[DD Form 2827]

- a) Number of Total Annual Responses: 75
- b) Processing Time per Response: 5 mins
- c) Hourly Wage of Worker(s) Processing Responses : \$28.14
- d) Cost to Process Each Response: \$2.34
- e) Total Cost to Process Responses: \$175.50

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 75
- b) Total Labor Burden: \$175.50

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$
- b) Printing: \$4.50
- c) Postage: \$36.75
- d) Software Purchases: \$
- e) Licensing Costs: \$
- f) Other: \$41.25

2) Total Operational and Maintenance Cost: \$41.25

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$175.50
- 2) Total Operational and Maintenance Costs: \$41.25
- 3) Total Cost to the Federal Government: \$216.75

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.