

SUPPORTING STATEMENT - PART A

Application for Identification Card/DEERS Enrollment: OMB Control Number 0704-0415

1. Need for the Information Collection

This information collection is consistent with Department of Defense (DoD) guidelines that have been outlined in DoD Instruction (DoDI) 1000.25, "DoD Personnel Identity Protection (PIP) Program," which directs DoD identification (ID) cards be issued from an authoritative database, using authoritative information, DoDI 1000.13, "Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals," which outlines the requirements for issuance of DoD ID cards to DoD personnel and their eligible dependents and prescribes the benefits to DoD personnel and their eligible dependents, and DoD Manual (DoDM) 1000.13 Volume 1, "DoD Identification (ID) Cards: ID Card Life-Cycle," which outlines the requirements for CAC issuance to DoD personnel and other eligible individuals.

This information collection is needed to obtain the necessary data to establish eligibility for DoD benefits, including the issuance of a DoD ID card. The need for this information has not changed since the previous approval and all of the information remains within this supporting statement remains the same. This is submitted as an extension without change.

2. Use of the Information

This information shall be used to establish an individual's affiliation with DoD, in support of DoD ID card issuance and benefits access. Once this information has been collected and proofed to the standard requisite in Federal Information Processing Standards 201-2, "Personal Identity Verification (PIV) of Federal Employees and Contractors" (for CAC applicants), and according to DoDI 1000.13, "Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals" (for all other DoD ID card applicants), a record will be established in the Defense Enrollment Eligibility Reporting System (DEERS) that shall allow for the issuance of the appropriate ID card. The information that is collected may be released to Federal and State agencies and private entities, on matters relating to utilization review, professional quality assurance, program integrity, civil and criminal litigation, and access to Federal government facilities, computer systems, networks, and controlled areas.

The respondents included in this information collection are all incoming DoD contractor personnel and foreign nationals; and all eligible dependents of DoD personnel, including:

current, former, and retired uniformed services members, DoD contractor personnel, and foreign nationals.

The DD Form 1172-2 is accessed by the respondent either online, <http://www.dtic.mil/whs/directives/forms/eforms/dd1172-2.pdf> or it is provided to them in person at an ID card site. The respondents return the collection in person at an ID card site to an individual responsible for the issuance of a DoD ID card. The appropriate disclosures are provided to the respondent via a Privacy Act Statement and Agency Disclosure Notice on the instructions page of form. No invitations or other communications are sent to the respondent. Information is collection from respondents at their initial hiring or, in the case of dependents, eligibility. Information is also requested from respondents already enrolled in the DEERS system every three or four years to ensure that data is as up to date as possible. Finally, information may also be collected from enrolled respondents as needed, such as replacing a lost or stolen ID card.

Consistent with DoDI 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) facilitates the collection of the information on the DD Form 1172-2, "Application for Identification Card/DEERS Enrollment," links the data collected to DEERS, and produces DoD ID cards in an authoritative manner. This system limits the opportunity for error for data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information. DEERS users access the system through biometric validation and PKE logon which restricts access to DEERS to authorized users only.

3. Use of Information Technology

14% of the 3,700,000 responses are submitted electronically, as the majority of forms are provided, completed, and submitted on-site at a DoD ID card site. Past approvals of this collection demonstrated higher rates of electronic collection — but current USD(P&R) staff can find no evidence that indicates these levels of electronic collection. The 14% electronic figure is taken directly from processing statistics that break down submissions by electronic and paper submission.

1. Non-duplication

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

2. Burden on Small Businesses

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

3. Less Frequent Collection

If information collection were stopped, the DoD would not register and issue a PKI certificate to newly hired DoD employees or other eligible CAC holders who are authorized access to DoD facilities and systems. If collection were less frequent, eligible employees who are not already in DEERS would not be able to use computer systems and support provided would suffer. Furthermore, eligible DoD beneficiaries would not have an appropriate way of identifying themselves in order to receive the benefits to which they are entitled.

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, January 17, 2020. The 60-Day FRN citation is 85 FRN 3041.

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

A 30-Day Federal Register Notice for the collection published on Friday, March 20, 2020. The 30-Day FRN citation is 85 FRN 16088.

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

Personal and personnel data information is securely collected, stored, and managed in DEERS in accordance with the DEERS System of Records Notice (SORN).

The DEERS SORN, DMDC 02 DoD, is available at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/627618/dmdc-02-dod/>.

The DEERS Privacy Impact Assessment (PIA) is available at:
https://www.dmdc.osd.mil/appj/dwp/rest/download?fileName=DEERS_PIA.pdf&groupName=websiteDocuments .

Respondents are asked to read the Privacy Act Statement, which is included on the instructions page of DD Form 1172-2, prior to filling out and signing the DD Form 1172-2. The Privacy Act Statement is up to date with a link to the latest version of the SORN.

The Records Retention and Disposition Schedule states the following:

“Hardcopy version of DD Form 1172: Destroy once written to optical disk.

Optical disks: Destroy primary and backup copies after 5 years.

The DEERS database is Permanent: Cut off (take a snapshot) at end of Fiscal Year and transfer to the National Archives and Record Administration in accordance with 36 CFR 1228.270 and 36 CFR 1234. (N1-330-03-01)

Output records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.”

11. Sensitive Questions

The gender of the individual is requested for demographic tracking purposes only. Gender is not a factor in the determination of eligibility.

In accordance with the requirement established in DoDI 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” a memorandum justifying the collection and continued use of the SSN on the DD Form 1172-2 has been included with the materials submitted to OMB for this collection.

The SSN that is collected on the DD Form 1172-2 is used in documented and published computer matching agreements to verify an individual’s eligibility for benefits from other Federal agencies (e.g., Social Security Administration and Department of Veteran Affairs.) The collection of SSN allows the DoD to minimize the risk of providing benefits to those that are not eligible and helps minimize fraudulent claims. The DD Form 1172-2 is also used to issue the CAC as required by Homeland Security Presidential Directive 12. The SSN is used in conjunction with other approved documentation to affirmatively establish the

identity that the CAC represents. These requirements are consistent with the guidance for acceptable uses of the SSN as specified in DoDI 1000.30.

In support of the Department's SSN reduction plan, the DD Form 1172-2 only requires the collection of SSN for initial DEERS enrollment. After initial DEERS enrollment, an individual will be assigned a unique DoD ID number which the individual may use in lieu of the SSN when repopulating the DD Form 1172-2 for future updates. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with the DEERS SORN.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[DD Form 1172-2]
 - a) Number of Respondents: 3,700,000
 - b) Number of Responses Per Respondent: 3,700,000
 - c) Number of Total Annual Responses: 3,700,000
 - d) Response Time: 3 minutes
 - e) Respondent Burden Hours: 185,000 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 3,700,000
 - b) Total Number of Annual Responses: 3,700,000
 - c) Total Respondent Burden Hours: 185,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[DD Form 1172-2]
 - a) Number of Total Annual Responses: 3,700,000
 - b) Response Time: 3 minutes
 - c) Respondent Hourly Wage: \$20.85
 - d) Labor Burden per Response: \$1.04
 - e) Total Labor Burden: \$3,848,000

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 3,700,000
 - b) Total Labor Burden: \$3,848,000

The respondent hourly wage is the median usual weekly earnings of full-time wage and salary working men and women in the 3rd quarter of 2018 (\$834.00) divided by 40. The median usual weekly earnings of full-time wage and salary working men and women in the 3rd quarter of 2018 were provided by the Bureau of Labor Statistics at, <https://www.bls.gov/news.release/wkyeng.t01.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 1172-2]

- a) Number of Total Annual Responses: 3,700,000
 - b) Processing Time per Response: 1 minute
 - c) Hourly Wage of Worker(s) Processing Responses : \$16.62
 - d) Cost to Process Each Response: \$0.55
 - e) Total Cost to Process Responses: \$2,035,000
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 3,700,000
 - b) Total Labor Burden: \$2,035,000

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
 - b) Printing: \$140,800
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$140,800

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$2,035,000
- 2) Total Operational and Maintenance Costs: \$140,800
- 3) Total Cost to the Federal Government: \$2,175,800

15. Reasons for Change in Burden

There has been no change in burden.

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.