

SUPPORTING STATEMENT - PART A

Physician Certificate for Child Annuitant – 0730-0011

1. Need for the Information Collection

10 U.S.C., “Armed Forces,” sections 1435, “Eligible Beneficiaries,” and 1447, “Definitions,” gives the Defense Finance and Accounting Service (DFAS) the authority to offer the Survivor Benefit Plan (SBP) and the Retired Serviceman’s Family Protection Plan (RSFPP), which provides for the coverage of children who are unmarried and incapable of self-support because of mental and/or physical incapacitation. In accordance with DoD Financial Management Regulation (FMR), Volume 7B, Chapter 46, “Survivor Benefit Plan – Annuity Amount and Offsets,” states that a medical certification must be submitted to DFAS every two years for an incapacitated child over 18 years of age; unless medical prognosis indicates the disability is permanent.

2. Use of the Information

The DD Form 2828, “Physician Certificate for Child Annuitant,” is required bi-annually for re-certification of annuitants that were originally determined to have a “temporary” incapacitation. The system generates the form and is mailed to the trustee or guardian of incapacitated child annuitant. The trustee or guardian is required to complete their part of the form and to obtain certification from the physician indicating that the temporary incapacitation is still valid. If form is not completed fully, a request is sent to the trustee or guardian of incapacitated child annuitant, along with the original form. This request is being submitted as part of the submission package. The trustee or guardian returns the completed form by email to address indicated on form. DFAS reviews for to determine continued eligibility or cancellation of annuity. Technician annotates that form was received, updates disability status and when the next update is required. The form is then archived into the Retired and Annuitant Pay imaging system. If for is not returned, with physician certification, the annuity payment is suspended. The form is also completed during the time of application for annuity payments if there is a disabled child applying.

The form is available on both the DoD Forms website (<http://www.dtic.mil/whs/directives/forms/index.htm>) and the DFAS website (www.dfas.mil). The Privacy Act Statement and Agency Disclosure Notice are available to the respondent on the form.

3. Use of Information Technology

0% electronic submissions are received. This is a bi-annual re-certification of an incapacitated annuitant and requires the wet signatures of respondents. DD Form 2828 is available in fillable PDF form from the DoD Forms Repository. Respondents may complete the form online, print and mail the completed form for processing.

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, entitlement is discontinued. 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 for the collection published on Wednesday, February 5, 2020. The 60-Day FRN citation is 85 FR 6536 FRN 6536-6537.

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

A 30-Day Federal Register Notice for the collection published on Thursday, May 7, 2020. The 30-Day FRN citation is 85 FRN 27212.

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.

SORN covered by this system is:

T7347b, Defense Military Retiree and Annuitant Pay System at:

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>.

PIA covered by this system is: [https://www.dfas.mil/dam/jcr:5cf8a068-89c7-47eb-b844-1e2020ed5f73/Defense%20Retiree%20and%20Annuitant%20Pay%20System%20\(DRAS\)%202016.pdf](https://www.dfas.mil/dam/jcr:5cf8a068-89c7-47eb-b844-1e2020ed5f73/Defense%20Retiree%20and%20Annuitant%20Pay%20System%20(DRAS)%202016.pdf).

Records Retention: 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 56 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.

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 2828, Physician Certificate for Child Annuitant]

- a) Number of Respondents: 240
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 240
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 240 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 240
- b) Total Number of Annual Responses: 240
- c) Total Respondent Burden Hours: 240 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DD Form 2828, Physician Certificate for Child Annuitant (Trustee or Guardian)]

- a) Number of Total Annual Responses: 120
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$7.25
- e) Total Labor Burden: \$870.00

[DD Form 2828, Physician Certificate for Child Annuitant (Physician)]

- a) Number of Total Annual Responses: 120

- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$100.00
- d) Labor Burden per Response: \$100.00
- e) Total Labor Burden: \$12,000.00

2) Overall Labor Burden

- a) Total Number of Annual Responses: 240
- b) Total Labor Burden: \$12,870.00

** The "total" number of responses is still 120, as each of the 120 applications completed by annuitants or payees requires coordination with a physician.*

The Trustee/Guardian respondent wage was determined by using the federal minimum wage website (<https://www.dol.gov/whd/minimumwage.htm>)

The Physician respondent wage was determined by using the Bureau of Labor Statistics website (<https://www.bls.gov/ooh/healthcare/physicians-and-surgeons.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no start-up or capital costs to the respondents. There is a postage cost of \$.55 per trustee/guardian in order for respondent to return completed form. Total cost is \$66.00.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[DD Form 2828, Physician Certificate for Child Annuitant]

- a) Number of Total Annual Responses: 120
- b) Processing Time per Response: 0.25 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$16.35
- d) Cost to Process Each Response: \$4.09
- e) Total Cost to Process Responses: \$490.44

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 120
- b) Total Labor Burden: \$490.00

*Federal Civil Service 2020 Pay Structure

(https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/GS_h.pdf)

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0

- b) Printing: \$7.20
- c) Postage: \$66.00
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$73.20

*Printing is based on 120 forms x \$.06 costs to print form equaling \$7.20.

**Postage is based on mailing 120 forms x \$.55 equaling \$66.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$490.44

2) Total Operational and Maintenance Costs: \$73.20

3) Total Cost to the Federal Government: \$563.64

15. Reasons for Change in Burden

The burden has increased since the previous approval due to changes in wages of respondents as well as Physicians.

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.