

## SUPPORTING STATEMENT - PART A

Application for Discharge of Member or Survivor of Member of Group Certified to Have Performed Active Duty with the Armed Forces of the United States; DD Form 2168; OMB Control Number 0704-0100

### Summary of Changes from Previously Approved Collection

- Decrease in burden due to less respondents and program change due to agency discretion

#### 1. Need for the Information Collection

38 U.S.C. § 106, Certain service deemed not to be active service, note (Public Law No. 95-202, § 401, 91 Stat. 1449) directs the Secretary of Defense to determine if civilian employment or contractual service rendered by groups to the Armed Forces of the United States shall be considered active duty. This information collection is necessary to assist each of the Military Departments in determining if an applicant was a member of a group which has been found to have performed active military service and to assist in issuing an appropriate certificate of service. The information is also needed by the Veterans Administration to provide substantiation for benefits eligibility.

#### 2. Use of the Information

The purpose of this information collection is to assist the Secretary of a Military Department or United States Coast Guard (USCG) in determining if an applicant was a member of a group that has been found to have performed active military service. If the information requested on the DD Form 2168, Application for Discharge of Member or Survivor of Member of Group Certified to Have Performed Active Duty with the Armed Forces of the United States, is compatible with that of a corresponding approved group and the applicant can provide supporting evidence, he or she will receive veteran's status in accordance with the provisions of DoD Directive 1000.20, as established by 38 U.S.C. § 106. The information from the DD Form 2168 will be extracted by the appropriate military personnel office and used to complete the DD Form 214, "Certificate for Release or Discharge from Active Duty." The Veterans Administration uses information on the DD Form 2168 to verify benefits eligibility. The form can be electronically accessed and downloaded from the following Defense Link Publication site: <http://www.dod.gov/pubs/>. The form can be filled out electronically using a computer, or if a computer cannot be used, it can be filled out by a typewriter or printed by hand. The form must be submitted in original copy only, and additional documentation to support the information on the form must be included. Mail the completed application to the appropriate Service address listed on the back of the form.

#### 3. Use of Information Technology

It was determined that there is no cost-effective way to apply current information technology to this information collection, other than through access to the electronically-generated form which will be available on the World Wide Web at the Defense Link/Publications site <http://www.dod.gov/pubs>. The form can be filled out on the computer and downloaded. It is estimated that approximately 20% of the forms are filled out electronically. After further review, the Services continue to agree that it would not be beneficial to the government for members of the public to submit this form on line with an electronic signature, since there would be more chances of fraudulent claims being filed. In addition each DD Form 2168 must be accompanied by supporting documentation to verify benefits eligibility and not all persons submitting applications will have the capability to create Adobe Acrobat files to transmit documentation via email. Submittal by mail is the best proven method for each Service to process these claims.

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 the collection of information were not accomplished, the Department of Defense and the United States Coast Guard would not be able to comply with the current law. The program can only be administered using information collected from the individual.

7. Paperwork Reduction Act Guideline

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 Monday, December 14, 2015. The 60-Day FRN citation is 80 FRN 61389.

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

A 30-Day Federal Register Notice for the collection published on Monday, July 27, 2020. The 30-Day FRN citation is 85 FR 45204 FRN 45204-45205.

Part B: CONSULTATION

The DD Form 2168 was reviewed by the Service Representatives. The following changes were made to the current version of the DD Form 2168 with this renewal of the OMB license:

The Principle Purpose section of the Privacy Act Statement was updated to reflect that the DoD systems of records notices are found at <http://dpclo.defense.gov/privacy/SORNsIndex/DODComponentNotices.aspx>.

The Routine Use(s) section of the Privacy Act Statement was updated to reflect that the DoD Blanket Routine Uses are found at <http://dpclo.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>

The first line of the Air Force address was changed to: AFPC/DPSO.  
The ZIP code for the Coast Guard address was changed to: 25404.  
The ZIP code for the Navy address was changed to: 38055-3120.

#### 9. Gifts or Payment

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

#### 10. Confidentiality

Privacy Impact Assessments (PIAs): The URLs for the Navy and Air Force URLs are as follows:

Navy: Electronic Military Personnel Records System:

[http://www.doncio.navy.mil/uploads/Summary\\_BUPERS\\_EMPRS\\_PIA\\_11-17-08.pdf](http://www.doncio.navy.mil/uploads/Summary_BUPERS_EMPRS_PIA_11-17-08.pdf)

USAF:

<http://www.privacy.af.mil/shared/media/document/AFD-110324-108.pdf>

System of Records Notice (SORNs): The following SORNs oversee the collection of the SSN for DD Form 2168. SORNs are maintained by each of the Services. Each of the Services and the United States Coast Guard has a Systems of Records Notice (SORN) in support of the DD Form 2168. Not included is a SORN for the U.S. Marine Corps. Those who seek credit for service with the U.S. Marine Corps submit their completed DD Form 2186 to the Department of the Navy for consideration and are reviewed by the Secretary of the Navy for approval or denial. The DoD Blanket Routine Uses, assessed at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>, applies to this collection.

Applicable SORNs:

Navy

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570310/n01070-3.aspx>

Army

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/569933/a0015-34-ahrc.aspx>

Air Force

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/569821/f036-af-pc-c.aspx>

Coast Guard

<http://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14911.htm>

#### Records Retention and Disposition:

Information is privileged, and restricted to individuals who have a need for the record in the performance of their official duties. Computer terminals with access to the records are located in rooms with authorized personnel. These rooms are locked when unoccupied. Common Access Card (CAC) certificates and PIN, or login and passwords are used to support the minimum requirements of accountability, access control, least privilege, and data integrity. Additionally, intrusion detection systems, malicious code protection, and firewalls are used. Records are retained at the Army Review Boards Agency for at least 6 months after case is closed and then retired to the National Personnel Records Center where they are retained for 20 years.

#### 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

#### 12. Respondent Burden and its Labor Costs

##### Part A: ESTIMATION OF RESPONDENT BURDEN

##### 1) Collection Instrument(s)

[DD 2168]

- a) Number of Respondents: 500
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 500
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 250 hours

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

- a) Total Number of Respondents: 500
- b) Total Number of Annual Responses: 500
- c) Total Respondent Burden Hours: 250 hours

##### Part B: LABOR COST OF RESPONDENT BURDEN

##### 1) Collection Instrument(s)

[DD 2168]

- a) Number of Total Annual Responses: 500
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$3.63
- e) Total Labor Burden: \$1,815

2) Overall Labor Burden

- a) Total Number of Annual Responses: 500
- b) Total Labor Burden: \$1,815

The respondent wage was determined by the Federal Minimum Wage of \$7.25

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 2168]

- a) Number of Total Annual Responses: 500
- b) Processing Time per Response: 0.25 hours
- c) Hourly Wage of Worker(s) Processing Responses : \$21.94
- d) Cost to Process Each Response: \$5.48
- e) Total Cost to Process Responses: \$2,740

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 500
- b) Total Labor Burden: \$2,740

Labor cost to the Federal Government was determined by the minimum hourly wage of a GS-9 of \$21.94 per hour.

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$300
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$300

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$2,740

2) Total Operational and Maintenance Costs: \$300

3) Total Cost to the Federal Government: \$3,040

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. Respondent burden has decreased due to a decline in respondent applications.

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.