

SUPPORTING STATEMENT - PART A

Dependency Statements: Parent, Incapacitated Child Over Age 21, Full Time Student 21-22,
Ward of a Court – OMB Control Number 0730-0014

Summary of Changes:

- The number of respondents and burden have increased due to a reevaluation of respondent data from previous collections.

1. Need for the Information Collection

This information collection allows DFAS to determine the extent of support a member is providing to a dependent and that the dependent's income is less than 50% of their expenses, which authorizes the benefits. Pursuant to 5 U.S.C. 301, "Departmental Regulations," 37 U.S.C., "Pay and Allowances of the Uniformed Services," DoD Directive 5154.29, "DoD Pay and Allowances Policy and Procedures," Joint Travel Regulations (JTR), current edition, the member must provide at least one-half of claimed dependents' monthly expenses. The DoD Financial Management Regulation (FMR) 7000.14, Volume 7A, "Military Pay Policy – Active Duty and Reserve Pay," defines the definition of dependent, directs the requirement to prove in fact dependency, and also prescribes the forms to be used. To prevent abuse of these benefits, and to comply with the above cited statutes, the information requested is needed to substantiate the receipt of the benefit.

2. Use of the Information

DD Form 137-3, Dependency Statement – Parent, DD Form 137-5, Dependency Statement – Incapacitated Child Over Age 21, DD Form 137-6, Dependency Statement – Full-Time Student 21-22 Years of Age, and DD Form 137-7, Dependency Statement – Ward of a Court are submitted by members to apply for benefits. Members who can apply for secondary dependency are active members in the military, retired or considered an annuitant from the military, or in a reserve status in the military. In order for the member to receive benefits, the member must provide proof through the appropriate DD Forms that they are providing 50% or more of a dependent's support. The member must also provide additional documentation providing proof that the dependent's income is less than 50% of their living expenses. If the proper documents are not provided, it is uncertain if an entitlement to a benefit exists. The requirement to complete these forms alleviates the opportunity for fraud, waste, and abuse of dependent benefits.

DFAS reviews the Dependency Statements to determine if the member is eligible for benefit. Upon completion of the claim review process; the Claims Examiner either approves or disapproves the claim for benefits. If the claim is disapproved, the form, with all supporting documentation, is returned to the member with the reason that the

claim was disapproved. If approved, the member is notified, and the benefits applied for begin.

The form is available on the DoD Forms website (<https://www.esd.whs.mil/Directives/forms/>), and can be returned through the askDFAS submission portlet on [dfas.mil](https://www.dfas.mil/militarymembers/SecondaryDependency/SDC.html) (<https://www.dfas.mil/militarymembers/SecondaryDependency/SDC.html>), or through the U.S. mail to the address listed on the form.

3. Use of Information Technology

75% are received electronically. Respondents may complete the form online, print and either mail the completed form and documentation for processing or submit the through the ask DFAS submission portlet on the [dfas.mil](https://www.dfas.mil) 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

Financial information and living arrangements change frequently; therefore, new dependency statements must be updated on an annual basis. When a qualified family event occurs, a new form must be submitted. Less frequent collection of information could result in ineligible members receiving 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, January 6, 2020. The 60-Day FRN citation is 86 FRN 526.

A 30-Day Federal Register Notice for the collection published on Monday, May 17, 2021. The 30-Day FRN citation is 86 FRN 26707.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-day Federal Register Notice 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(s) covered by this system are:

T7340, Defense Joint Military Pay System – Active Component at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570191/t7340/>.

T7344, Defense Joint Military Pay System – Reserve Component at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570195/t7344/>.

T7347b, Defense Military Retired and Annuity Pay System Records at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>.

M01040-3, Marine Corps Manpower Management Information System at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570625/m01040-3/>.

PIA(s) covered by this system are:

T7340, Defense Joint Military Pay System – Active Component
T7344, Defense Joint Military Pay System – Reserve Component
T7347b, Defense Military Retired and Annuitant Pay System Records

DFAS PIA(s) can be found at:

<https://www.dfas.mil/foia/privacyimpactassessments.html%20>.

M01040-3, Marine Corps Manpower Management Information System at:

http://www.doncio.navy.mil/uploads/USMC_MCTIMS_PIA_summary_508.pdf.

Records Retention (T7340) – Records may be temporary in nature and destroyed when actions are completed, superseded, obsolete, or no longer needed. Other records may be cut off at the end of the payroll year or fiscal year, and destroyed 6 years and 3 months after cutoff. Active duty pay records created prior to automation were cut off on conversion to the Defense Joint Military Payroll System (DJMS), and will be destroyed October 1, 2033, or 56 years after implementation of DJMS. The records are destroyed by tearing, shredding, pulping, macerating, burnings, or degaussing the electronic storage media.

Records Retention (T7344) – Records may be temporary in nature and destroyed when actions are completed, superseded, obsolete, or no longer needed. Other records may be cut off at the end of the payroll year or fiscal year, and destroyed 6 years and 3 months after cutoff. Reserve pay records created prior to automation were cut off on conversion to the Joint Uniformed Military Payroll System (JUMPS), and will be destroyed 56 years after the year in which created. Records created after conversion to Defense Joint Military Pay System- Reserve Component (DJMS-RC) are cut off at end of payroll year and destroyed 56 years after year in which created. The records are destroyed by tearing, shredding, pulping, macerating, burnings, or degaussing the electronic storage media.

Records Retention (T7347b)- 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 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 6 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 (M01040-3) – Disposition pending (until the National Archives and Records Administration approves retention and disposal schedule, records will be treated as permanent).

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time	Respondent Burden Hours
DD 137-3, Dependency Statement - Parent	6,925	1	6,925	1 hour	4,640 hours
DD 137-5, Dependency Statement - Incapacitated Child Over Age 21	3,471	1	3,471	45 minutes	2,603.25 hours
DD 137-6, Dependency Statement - Full Time Student 21-22 Years of Age	2,495	1	2,495	30 minutes	1,247.50 hours
DD 137-7, Dependency Statement - Ward of a Court	3,480	1	3,480	1 hour	3,480 hours
Total	16,371	1	16,371		11,970.75 hours

b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of	Response Time per	Respondent Hourly Wage *	Labor Burden per Response	Total Labor Burden

	Responses	Response			
DD 137 -3, Dependency Statement- Parent	6,925	1 hour	\$22.14	\$22.14	\$153,319.50
DD 137-5, Dependency Statement – Incapacitated Child Over Age 21	3,471	45 minutes	\$22.14	\$16.61	\$57,635.96
DD 137-6, Dependency Statement – Full Time Student 21- 22 Years of Age	2,495	30 minutes	\$22.14	\$11.07	\$27,619.65
DD 137-7, Dependency Statement – Ward of a Court	3,480	1 hour	\$22.14	\$22.14	\$77,047.20
Total	16,371		\$22.14		\$315,622.31

*The respondent wage was determined by using the 2021 Military Pay Chart
<https://www.dfas.mil/MilitaryMembers/payentitlements/Pay-Tables/>

12. Respondent Costs Other Than Burden Hour Costs

25% of the respondents (25% x 16,371 = 4093) currently mail the form and supporting documentation back through the US Post Office at an average cost of \$1.50 (4093 x \$1.50 = \$6,139.50).

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

	DD Form 137 series, Dependency Statements	Total
Number of Responses	16,371	16,371
Processing Time Per Response (in hours)	30 minutes	30 minutes
Hourly Wage of	\$16.24	\$16.24

Worker(s) Processing Responses *		
Cost to Process Each Response	\$8.12	\$8.12
Total Cost to Process Responses	\$126,875.25	\$126,875.25

*Federal Civil Service 2021 Pay Structure (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf)

b. Operational and Maintenance Costs

Operational and Maintenance Costs						
Equipment	Printing*	Postage**	Software Purchases	Licensing Costs	Other	Total
	\$982.26	\$9,004.05				\$9,986.31

*Printing (16,371 decision letters x \$.06 = \$982.26).

**Postage (16,371 x\$.55 = \$9,004.05).

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost
\$9,986.31	\$126,875.25	\$136,861.56

15. **Reasons for Change in Burden**

This is a extension with change to an expired collection. The number of respondents were reevaluated and found to have increased.

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.

