

SUPPORTING STATEMENT - PART A

Application for Survivor Access Card – 0702-SACA

1. Need for the Information Collection

Section 562 of Public Law 109-163, commonly referred to as the National Defense Authorization Act for Fiscal Year 2006, directed the Department of Defense (DoD) to establish a uniform policy on casualty assistance that includes both short and long-term assistance for a deceased service member's eligible survivors. In 2007, the Army initiated the Survivor Outreach Services (SOS) Program. The program developed a case management system that integrates multiagency casualty assistance and long-term services for eligible survivors. SOS Program policies are outlined in Army Directive 2021-01.

Section 626 of the 2019 National Defense Authorization Act (Public Law 115-232) requires the implementation of procedures for access to military installations for those surviving spouses and next of kin. In accordance with these laws, Army Regulation 190-13, "The Army Physical Security Program," permits eligible Surviving Family members of deceased personnel to have unescorted access to Army installations via the Survivor Access Card (SAC). The SAC enables Surviving Family members to receive SOS and other services, attend events, view memorials, and similar activities. Eligible survivors are those who meet the eligibility criteria to receive the Gold Star Lapel Button or Next of Kin Lapel Button. The Gold Star Lapel Button is presented to Family members of Soldiers who die while deployed in support of Overseas Contingency Operations, or who die from wounds in theater. The Lapel Button, Next of Kin of Deceased Personnel (also referred to as the Next of Kin Lapel Button) is provided to Family members of armed service members who lost their lives while serving on active duty or while stationed in an Army Reserve or Army National Guard unit in a drill status (not in support of Overseas Contingency Operations). Eligible Survivors to receive the Gold Star Lapel Button or NOK Lapel Button include the following: widow or widower, parents, each child, stepchild, child through adoption, brother, half-brother, sister, half-sister or step-siblings. Survivors must first contact the installation level SOS support coordinator to verify eligibility and coordinate issuance of an installation access credential.

2. Use of the Information

Survivor Outreach Services (SOS) is a network of Department of Army Civilians serving as Survivor advocates. They facilitate support groups, provide life skills education, assist Survivors in managing applicable life-long benefit transition milestones, connect Survivors with counseling resources, represent the command in contacts with community organizations, and assist eligible Survivors with obtaining the Survivor Access Card (SAC) which grants Survivors ease of access to military installations to receive services, attend events, view memorials and similar activities.

Current procedures for obtaining a SAC directs the SOS staff members to assist Survivors in completing the application process for the SAC, verifying the Survivor's eligibility, and coordinating with the installation office responsible for issuing cards. The SAC is issued through the installation's Visitor Control Center.

The collection instrument, Application for Survivor Access Card (IMCOM Form 44), is obtained by eligible Surviving Family members from the SOS staff members. The collection instrument is completed in person by eligible Surviving Family members, SOS staff members and Physical Security Personnel. Eligible Surviving Family members are responding to the information collection to obtain the SAC which grants unescorted access onto Army installations to authorized facilities. The SOS staff member collects the information from the Surviving Family member and forwards the request to the local garrison Physical Security Office to conduct a National Crime Information Center Interstate Identification Index (NCIC-III) check. After an applicant is approved, a SAC is issued through the local identification card section or the Automated Installation Entry digital SAC is issued through the installation's Visitor Control Center.

3. Use of Information Technology

None. Applications are received from the Respondents by mail or by physical submission to the SOS staff members. Electronic submission is not available due to adequate technology security measures not yet being in place. Future plans to incorporate technology security measures on digital platforms will be coordinated and developed thus increasing percentage of electronic submissions.

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

In addition to new applicants which are received on a rolling basis, Survivors are required to re-validate every three years to receive a new SAC in accordance with AR 190-13. The consequence of not re-validating their SAC is expiration of their access three years after issuance.

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 Tuesday, October 5, 2021. The 60-Day FRN citation is 86 FR 54949.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, December 22, 2021. The 30-Day FRN citation is 86 FR 72581.

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

The Privacy Act Statement is located on the Application for Survivor Access Card, IMCOM Form 44. A draft copy of the Application for Survivor Access Card has been provided with this package for OMB's review.

The information collection requires a System of Record Notice (SORN). A draft copy of the SORN (USA-2019-XXXX SORN Survivor Outreach Service (SOS) Case Management System, A0608-01) has been provided with this package for OMB's review.

The information collection requires a Privacy Impact Assessment (PIA). A copy of the approved PIA is provided in the packet for OMB's review.

The Records Retention and Disposition Schedule for this action is RN 190-13e "Security Identification Application" and Disposition Authority N1-AU-10-12.

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)
Application for Survivor Access Card (IMCOM Form 44)
 - a) Number of Respondents: 670
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 670
 - d) Response Time: 1 Hour (60 minutes)
 - e) Respondent Burden Hours: 670 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 670
 - b) Total Number of Annual Responses: 670
 - c) Total Respondent Burden Hours: 670 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
Application for Survivor Access Card (IMCOM Form 44)
 - a) Number of Total Annual Responses: 670
 - b) Response Time: 1 Hour (60 Minutes)
 - c) Respondent Hourly Wage: \$7.25
 - d) Labor Burden per Response: \$7.25
 - e) Total Labor Burden: \$4,857.50

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 670
 - b) Total Labor Burden: \$4,858

Due to the diverse background of respondents, the federal minimum wage of \$7.25 was used to estimate the Respondent Hourly Wage.

(<https://www.dol.gov/general/topic/wages/minimumwage>).

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)
Application for Survivor Access Card (IMCOM Form 44)
 - a) Number of Total Annual Responses: 670
 - b) Processing Time per Response: 1 hour (60 minutes)

- c) Hourly Wage of Worker(s) Processing Responses: \$35.11
- d) Cost to Process Each Response: \$35.11
- e) Total Cost to Process Responses: \$23,523.70

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 670
 - b) Total Labor Burden: \$23,523.70

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$ 0
 - b) Printing: \$26.80
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$26.80

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$23,523.70
- 2) Total Operational and Maintenance Costs: \$26.80
- 3) Total Cost to the Federal Government: \$23,551

15. Reasons for Change in Burden

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This is a new collection with a new associated 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.