# **SUPPORTING STATEMENT - PART A**

Assistance Reporting Tool – 0720-0060

Summary of Changes from Previously Approved Collection

- The respondent burden has increased since the previous approval due to an increase in responses.
- The labor cost of respondent burden has increased since the previous approval due to an increase in the respondent hourly wage (\$7.25 to \$27.07). Instead of using the Federal minimum wage of \$7.25 per hour, we used the mean hourly wage for all occupations as listed on the U.S. Bureau of Labor Statistics website.
- Although there was a decrease in the hourly wage of workers (\$52.66 to \$18.51), there was an increase in the labor cost to the federal government. This was due to the increase in the number of responses (174,385 to 222,195). To calculate the hourly wage of workers, we used the mean hourly wage for Customer Service Representatives as listed on the U.S. Bureau of Labor Statistics website. This figure is more in line with the hourly wage of the users of the system.

## 1. <u>Need for the Information Collection</u>

The information collection requirement is necessary to:

- Provide pre-authorization for civilian medical care for remotely located Active Duty and Reserve Component service members
- Authorize payment of civilian medical claims for remotely located Active Duty and Reserve Component service members
- Coordinate civilian health care services for remotely located service members
- Collaborate with unit representatives regarding line of duty (LOD) care for remotely located service members
- Provides authorization for active duty service members accepted for VA medical care under the DOD/VA MOA for diagnosis for SCI, TBI or blindness
- Review claims for Fitness for Duty determinations
- Assist beneficiaries and others with TRICARE-related inquiries
- Research healthcare-related concerns
- Assist TRICARE Prime Remote Enrolled Service members deferred to MTFs for specialty referrals upon request
- Assist beneficiaries who have a negative credit report or debt collection action taken against him or her related to a TRICARE claim

The following authorize this collection of information:

• Defense Health Agency-Procedural Instruction Number 6015.02, "Beneficiary Counseling and Assistance Coordinator (BCAC) and Debt Collection Assistance Officer (DCAO)," April 12, 2021

- Under Secretary of Defense (Personnel and Readiness) Memorandum, "Debt Collection Assistance Officer Program to Assist Service Members with TRICARE Claims Collection Problems," June 27, 20001
- TRICARE Operations Manual 6010.59-M, April 1, 2015, Chapter 16
- TRICARE Operations Manual 6010.59-M, April 1, 2015, Chapter 17

## 2. <u>Use of the Information</u>

The Assistance Reporting Tool (ART) is a web-based Customer Relationship Management (CRM) system. ART is not open to public access. Rather, access is limited only to personnel with current and appropriate affiliation with the DoD Military Health System (MHS). Users of the system are comprised of individuals who serve in a customer service role within the MHS (e.g., Beneficiary Counseling and Assistance Coordinators, Debt Collection Assistance Officers, Patient Advocates). All users must have a CAC and must have completed ART and operations security (OPSEC) training before they are granted access to the system.

Respondents are made up of TRICARE beneficiaries (including Service Members), providers, and other individuals who may have questions or issues relating to TRICARE or care at an MTF.

The respondent, not the ART user, initiates contact. Contact may be via phone, in person, email, correspondence, social media, or web application. Information is collected when a respondent contacts a member of the MHS customer service community (CSC) for assistance with a TRICARE question/issue or MTF care-related question/issue. Depending on the question/issue, the ART user will ask the respondent for information needed to research and answer/solve the respondents question/issue. This information may not already be in ART and the customer service representative will enter the information into ART. Examples of information collected include name, DoD Benefits Number, date of service for claim, provider name, and prescription name. Providing the information to the ART user is voluntary. If the respondent refuses to provide information, the ART user may only be able to provide general information. For example, if a respondent would like to check on the status of a claim, but refuses to provide demographic information and the date of service, then the ART user may only provide general information on claims processing timelines. Any information the respondent provides is entered into ART and is used to answer/resolve the respondents' question/issue. Once the question/issue has been answered/resolved, the ART user closes the case.

Respondents do not have access to ART. Since ART is a system and not a form or survey, the respondents cannot complete or return information via ART. There are no other invitations or other communications sent to the respondents associated with the information collection.

#### 3. <u>Use of Information Technology</u>

100% of responses are collected electronically. An ART user enters responses directly into ART. The collection of information does not involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

# 4. <u>Non-duplication</u>

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

# 5. <u>Burden on Small Businesses</u>

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

# 6. <u>Less Frequent Collection</u>

Collections are driven by the needs of the respondents. If collection were conducted less frequently, beneficiary satisfaction would be impacted because the beneficiary's question/issue would not be answered/resolved.

7. <u>Paperwork Reduction Act Guidelines</u>

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. <u>Consultation and Public Comments</u>

# Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, January 25, 2022. The 60-Day FRN citation is 87 FRN 3783.

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

A 30-Day Federal Register Notice for the collection published on Monday, March 28, 2022. The 30-Day FRN citation is 87 FRN 17277.

# Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. <u>Gifts or Payment</u>

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

# 10. <u>Confidentiality</u>

A Privacy Act Statement (PAS) is required for this collection. It is provided in ART and can be accessed via a link. ART users are required to read the PAS to the respondent if the collection occurs via telephone. If the collection is in person, the ART user may read the PAS or provide a printed copy to the respondent.

ART is currently under the EDTMA 04 SORN, which can be viewed here: <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570707/edtma-04/</u>

A Privacy Impact Assessment (PIA) "Assistance Reporting Tool" is currently published. It can be viewed here:

https://www.health.mil/Military-Health-Topics/Privacy-and-Civil-Liberties/Privacy-Impact-Assessments/MHS-PIA-List

Records Retention and Disposition Schedule: "Congressional Correspondence (NC1-330-79-001, item 102-18a): Temporary. Cut off every 6 months and destroy 7 years after cutoff. (Used as a bucket for all correspondence). TRICARE Contractor Claims Records (Authorizations) (DAA-0330-2014-0014-0001): Temporary. Cut off at end of the calendar year in which received. Destroy 10 years after cutoff."

#### 11. <u>Sensitive Questions</u>

ART collects information of a sensitive nature. The types of personal information about individuals collected in the system will include:

Social Security Number (SSN) Truncated SSN DOD Benefits Number DOD ID Number Date of Birth Health Information (ICD-10, CPT/HCPCS) Employment Information Financial Information Anecdotal Notes (reflecting TRICARE-related inquiries/concerns, and authorization and claims related information.

The information collection is only required to verify eligibility for DoD benefits, process medical authorizations, issue line of duty determinations, and answer TRICARE-related benefit questions. All personally identifiable information (PII) and protected health information (PHI) collected is voluntarily given by the respondent. At any time during the

case resolution process, individuals may object to the collection of PII/PHI via verbal or written notice. Individuals will be informed that, without PII/PHI, the authorized ART user may not be able to assist in case resolution, and that answers to questions/concerns would be generalities regarding the topic at hand.

An SSN Justification Memorandum has been included as a part of this submission package.

12. <u>Respondent Burden and its Labor Costs</u>

## Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Assistance Reporting Tool (ART)
  - a) Number of Respondents: 222,195
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 222,195
  - d) Response Time: 15 minutes
  - e) Respondent Burden Hours: 55,548.75 hours

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

- a) Total Number of Respondents: 222,195
- b) Total Number of Annual Responses: 222,195
- c) Total Respondent Burden Hours: 55,548.75 hours

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

- 1) Assistance Reporting Tool (ART)
  - a) Number of Total Annual Responses: 222,195
  - b) Response Time: 15 minutes
  - c) Respondent Hourly Wage: \$27.07
  - d) Labor Burden per Response: \$6.77
  - e) Total Labor Burden: \$1,503,704.66
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 222,195
  - b) Total Labor Burden: \$1,503,704.66

The Respondent hourly wage was determined by using the U.S. Bureau of Labor Statistics Website: <u>https://www.bls.gov/oes/2020/may/oes\_nat.htm/#00-0000</u>

# 13. <u>Respondent Costs Other Than Burden Hour Costs</u>

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. <u>Cost to the Federal Government</u>

## Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Assistance Reporting Tool (ART)
  - a) Number of Total Annual Responses: 222,195
  - b) Processing Time per Response: 15 minutes
  - c) Hourly Wage of Worker(s) Processing Responses: \$18.51
  - d) Cost to Process Each Response: \$4.63
  - e) Total Cost to Process Responses: \$1,028,207.36

## 2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 222,195
- b) Total Labor Burden: \$1,028,207.36

The Hourly Wage of Worker(s) was determined by using the U.S. Bureau of Labor Statistics Website: <u>https://www.bls.gov/oes/2020/may/oes\_nat.htm/oes131161.htm</u>

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$22,166.00
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other:
    - i. Other G&A (System Management): \$4,058.00
    - *ii.* Operating Site Personnel (Annual Operations): \$35,800.00
- 2) Total Operational and Maintenance Cost: \$62,024.00

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,028,207.36
- 2) Total Operational and Maintenance Costs: \$62,024.00
- 3) Total Cost to the Federal Government: \$1,090,231
- 15. <u>Reasons for Change in Burden</u>

The respondent burden has increased since the previous approval due to an increase in responses.

The labor cost of respondent burden has increased since the previous approval due to an increase in the respondent hourly wage (\$7.25 to \$27.07). Instead of using the Federal minimum wage of \$7.25 per hour, we used the mean hourly wage for all occupations as listed on the U.S. Bureau of Labor Statistics website.

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## 16. <u>Publication of Results</u>

The results of this information collection will not be published.

## 17. <u>Non-Display of OMB Expiration Date</u>

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

## 18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.