

SUPPORTING STATEMENT - PART A

USMC Dependency Statement Child Born Out of Wedlock Under Age 21 – 0703-DEPE

1. Need for the Information Collection

The NAVMC Form 1750/13, “USMC Dependency Statement Child Born Out of Wedlock Under Age 21” is needed to assist USMC Installation command representatives and the Marine and Family Programs Division, Defense Enrollment Eligibility Reporting System (DEERS) / Dependency Determination Section (MFP-1) in properly making informed Basic Allowance for Housing (BAH) entitlement determinations for claimed children under the age of 21 born out of wedlock to non-service member partners and who do not reside within the household of the service member. The collection provides formal documentation and respondent attestation of overall financial support case facts, which is a particularly critical piece of documentation in cases where the legitimacy of primary dependency status or service member BAH entitlement claim is deemed questionable to the USMC.

Authorities to collect the information:

- 10 U.S.C. 5041, “Headquarters, Marine Corps,” is to assist the Secretary of the Navy in carrying out his responsibilities.
- DoD FMR 7000.14-R, Vol. 7A, Ch. 26, “Housing Allowances,” assigns dependency determination responsibility for the Marine Corps to the Marine and Family Programs Division, Defense Enrollment Eligibility Reporting System (DEERS) / Dependency Determination Section (MFP-1) to determine relationships and dependency for secondary dependents and individuals whose status as a primary dependent is questionable for the USMC.
- MCO 1751.3, “Marine Corps Dependency Determination and Support Program...” establishes policy and procedural guidance for commanders and administrative personnel regarding dependency determinations for BAH entitlements as mandated by DoD FMR 7000.14-R, Vol. 7A, Ch. 26 “Housing Allowances.”

2. Use of the Information

The information collected will be used to support Installation/Command level and MFP-1 dependency determinations and BAH entitlement decisions for children under the age of 21 born out of wedlock to non-service member guardians not residing in the service member’s household. Respondents are made aware of this collection through MCO 1751.3 Ch1 and their Installation Personnel Administration Center (IPAC). The respondents can obtain a copy of NAVMC 1750/13 through the Navy/Marine Corps forms website (<https://forms.documentservices.dla.mil/order/>) or from their IPAC via email. IPAC contact information for respondents to seek assistance with obtaining, completing, or submitting the NAVMC 1750/13 is outlined in their IPAC’s Standard Operating Procedures (SOP). A sample of the IPAC SOP is attached to this package.

The service member requesting the BAH entitlement completes sections 1 and 2 on the digitally fillable NAVMC 1750/13 and signs the form. The non-service member guardian of the claimed dependent completes sections 3-12 on the NAVMC 1750/13, prints the document, signs in the presence of a Notary Public, and has the form notarized to officially confirm their responses. The minors themselves are not authorized respondents. Respondents submit their completed and notarized NAVMC 1750/13, along with any appropriate supporting documentation related to their individual responses, via email or in person to their IPAC personnel officer as directed by their IPAC's SOP. Cases are typically adjudicated by the IPAC personnel officer at the Installation/Command level and the approval decision for BAH entitlement is communicated to the respondent telephonically. The IPAC personnel officer elevates cases that can't be resolved at the Installation/Command level to MFP-1 at mfp1@usmc.mil. MFP-1 will then make a final determination based on the provided documentation and reply back to the IPAC personnel officer, who telephonically notifies the respondent of the result of the dependency determination/BAH entitlement decision.

3. Use of Information Technology

The NAVMC 1750/13 is distributed and collected via email, and respondents complete sections 1-12 electronically on the fillable PDF. The collection cannot be conducted 100% electronically, as signatures required in section 13 must be done on a printed hard copy with a Notary Public present to certify the legitimacy of the provided information.

4. Non-duplication

The Defense Finance and Accounting Service (DFAS) is the dependency determination authority for Army, Air Force, and Navy, and previously sponsored DD Form 137-4 (under OMB 0730-0014) to collect dependency determination information for dependents born out of wedlock. DD 137-4 was discontinued in 2015 due to a change in policy where DFAS considers children born out of wedlock to be considered primary dependents who do not require further dependency determination. Under DoD FMR 7000.14-R, Vol. 7A, Ch. 26 "Housing Allowances," USMC dependency determinations are conducted at the Installation/Command level, with final decision authority on cases deemed questionable conducted at the MFP-1 level. The proposed NAVMC 1750/13 replaces DD Form 137-4 to assist Installation command personnel officers and MFP-1 in making informed and fact-based dependency and BAH eligibility determinations, and provides justification and formal documentation of due diligence conducted in cases where legitimacy of the dependency claim is deemed questionable. Due to the discontinuation of DD 137-4, 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

Frequency of the dependency statement is on occasion, at the discretion and desire of the guardian to claim dependents. The frequency is dependent on update of the collection instrument.

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, June 22, 2022. The 60-Day FRN citation is 87 FR 37321.

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

A 30-Day Federal Register Notice for the collection published on Friday, December 23, 2022. The 30-Day FRN citation is 87 FR 78948.

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

The Privacy Act Statement is located at the top of NAVMC Form 1750/13.

A SORN is required. SORN M01070-6, Marine Corps Official Military Personnel Files, is published at:

<https://dpcl.dod.mil/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570626/m01070-6/>

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Record retention and disposition schedule 1000-47: Records are retained as part of the service member's permanent Official Military Personnel File and are transferred to the National Archives and Records Administration (NARA) 62 years after the completion of the service member's obligated service.

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)

USMC Dependency Statement Child Born out of Wedlock under Age 21

- a) Number of Respondents: 20
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 20
- d) Response Time: 75 minutes
- e) Respondent Burden Hours: 25 hours

2) Total Submission Burden

- a) Total Number of Respondents: 20
- b) Total Number of Annual Responses: 20
- c) Total Respondent Burden Hours: 25 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

USMC Dependency Statement Child Born out of Wedlock under Age 21

- a) Number of Total Annual Responses: 20
- b) Response Time: 75 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$43.44
- e) Total Labor Burden: \$868.75

2) Overall Labor Burden

- a) Total Number of Annual Responses: 20
- b) Total Labor Burden: \$869

Hourly wage was based on Department of Labor, Bureau of Labor Statistics for "Management, Professional, and Related Occupations," accessed at <https://www.bls.gov/cps/cpsaat39.htm>. This wage was used as it best aligned with the labor category of the majority of respondents.

13. Respondent Costs Other Than Burden Hour Costs

A one-time Notary Public fee estimated at \$25 is required to complete section 13, annually totaling \$500 for 20 respondents.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

USMC Dependency Statement Child Born out of Wedlock under Age 21

- a) Number of Total Annual Responses: 20
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$32.73
- d) Cost to Process Each Response: \$5.46
- e) Total Cost to Process Responses: \$109.10

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 20
- b) Total Labor Burden: \$109.10

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

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

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$109.10

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$109

15. Reasons for Change in Burden

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.