

SUPPORTING STATEMENT - PART A

Request for Information Regarding Deceased Debtor – OMB Control Number 0730-0015

1. Need for the Information Collection

According to 31 U.S.C., Section 3111, “New Issue Used to Buy, Redeem, or Refund Outstanding Obligations,” Public Law 102-484, Section 614, “National Defense Authorization Act for Fiscal Year 1993,” Department of Defense (DoD) Financial Management Regulation (FMR) 7000.14, Volume 16, Chapter 3, “Collection of Debt Owed by Individuals to the Department of Defense,” actions must be taken to recover delinquent debts owed the DoD by individuals, including those who are no longer drawing salary or pay and allowances from the United States. This category of debtors includes former United States government civilian employees and former members of the Armed Forces. Indebted individuals may die before a debt due the DoD is fully collected. Should this occur, it may be possible to collect all or part of the indebtedness from the estate of the deceased.

2. Use of the Information

When a debtor passes, a family member notifies Defense Finance and Accounting Service (DFAS) by calling the Debt and Claims Customer Care Center, indicated on the debt notification letters, and submitting a death certificate by mail. Once DFAS receives the death certificate, a Customer Care Representative will annotate the debt record, suspend the debt, and complete the DD Form 2840, Request for Information Regarding Deceased Debtor, and submit to appropriate probate office to determine if there is an active estate. If a positive response is received from the probate office, DFAS will update the suspense and send an affidavit claim against the estate. If there is no response after 30 days, we take necessary action to write the debt off.

3. Use of Information Technology

0% electronic submissions are received. At this time, electronic submissions are not possible as pre-populated forms are sent to probate courts across the US requesting data. Respondents complete the form, sign, and return for processing.

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

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

6. Less Frequent Collection

If DFAS does not collect this information, the final opportunity to collect delinquent individual indebtedness will be lost. There are no technical or legal obstacles to collecting indebtedness from estates.

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 Monday, April 22, 2024. The 60-Day FRN citation is 89 FR 29314.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, June 26, 2024. The 30-Day FRN citation is 89 FR 53401.

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) associated with this collection:

T7332, Defense Debt Management System at:

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570181/t7332/>

PIA(s) associated with this collection:

T7332, Defense Debt Management System at:

[https://media.defense.gov/2024/Jan/19/2003378850/-1/-1/0/DEFENSE%20DEBT%20MANAGEMENT%20SYSTEM%20\(DDMS\).PDF](https://media.defense.gov/2024/Jan/19/2003378850/-1/-1/0/DEFENSE%20DEBT%20MANAGEMENT%20SYSTEM%20(DDMS).PDF)

Records Retention: All cases will remain active until settled by full payment, waiver, write-off, or close out. The system contains records requiring a retention period of up to 10 years after final action. Records are retired to National Records Centers. Destruction is accomplished by tearing, shredding, pulping, macerating, or burning.

11. Sensitive Questions

Use of the SSN is necessary in order to obtain information from state probate courts or executors of the deceased members' estates concerning the establishment of an estate and to pursue collection of the indebtedness from the estate, as appropriate.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

DD Form 2840 (Family Member)

- a) Number of Respondents: 150
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 150
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 38 hours

DD Form 2840 (Probate Clerk)

- a) Number of Respondents: 150
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 150
- d) Response Time: 5 minutes
- e) Respondent Burden Hours: 13 hours

2) Total Submission Burden

- a) Total Number of Respondents: 300
- b) Total Number of Annual Responses: 300
- c) Total Respondent Burden Hours: 51 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

DD Form 2840 (Family Member)

- a) Number of Total Annual Responses: 150
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$1.81
- e) Total Labor Burden: \$271.88

DD Form 2840 (Probate Clerk)

- a) Number of Total Annual Responses: 150
- b) Response Time: 5 minutes
- c) Respondent Hourly Wage: \$23.44
- d) Labor Burden per Response: \$1.95
- e) Total Labor Burden: \$293

2) Overall Labor Burden

- a) Total Number of Annual Responses: 300
- b) Total Labor Burden: \$565

The respondent (Family Member) hourly wage was determined by using the Federal minimum wage of \$7.25.

The respondent (Probate Clerk) hourly wage was determined by using the Bureau of Labor Statistics Occupational Employment and Wage estimates for Court, Municipal, and License Clerks (<https://www.bls.gov/oes/current/oes434031.htm>).

13. Respondent Costs Other Than Burden Hour Costs

There are no additional costs, such as start-up or capital costs, to the respondents. Cost of returning the form is \$73.50 (150 forms x \$.49). Additional postage consists of mailing a copy of the death certificate is \$73.50 (150 x \$.49). Total cost is \$147.00 (\$73.50 + 73.50).

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

DD Form 2840

- a) Number of Total Annual Responses: 150
- b) Processing Time per Response: 5 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$20.51
- d) Cost to Process Each Response: \$1.71
- e) Total Cost to Process Responses: \$256.38

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 150
- b) Total Labor Burden: \$256

The hourly wage was determined by using the 2024 Federal Salary Table, GS-6, step 5 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS_h.aspx).

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$15
 - c) Postage: \$74
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0

- 2) Total Operational and Maintenance Cost: \$89

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$256
- 2) Total Operational and Maintenance Costs: \$89
- 3) Total Cost to the Federal Government: \$345

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

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.