

## SUPPORTING STATEMENT - PART A

Application for Surrogate Association for DoD Self-Service (DS) Logon

OMB Control Number 0704-0559

### Summary of Changes from Previously Approved Collection

- Burden decreased due to a decrease in respondents.

#### 1. Need for the Information Collection

This information collection is consistent with Department of Defense (DoD) guidelines that have been outlined in DoD Manual (DoDM) 1341.02, Volume 1, "DoD Identity Management: DoD Self-Service (DS) Logon Program and Credential," which authorizes Defense Enrollment Eligibility Reporting System (DEERS) enrollment and DS Logon credential issuance to surrogates. A surrogate may be established as the custodian of a deceased Service member's unmarried minor child(ren) who is under 18, who is at least 18 but under 23 and attending school full-time, or who is incapacitated. A surrogate may also be established as the agent of an incapacitated dependent (e.g., spouse, parent) or of a wounded, ill, or incapacitated Service member.

This information collection is needed to obtain the necessary data to establish eligibility for a DS Logon credential and enrollment in DEERS.

#### 2. Use of the Information

This information shall be used to establish an individual's eligibility for DEERS enrollment and DS Logon credential issuance as a surrogate. Information is collected via the DD Form 3005, "Application for Surrogate Association for DoD Self-Service (DS) Logon," and used to establish a record in DEERS and issue a DS Logon credential in accordance with DoDM 1341.02, Volume 1. The information that is collected may be released to Federal and State agencies and private entities, on matters relating to utilization review, professional quality assurance, program integrity, civil and criminal litigation, and access to Federal government facilities, computer systems, networks, and controlled areas.

The collection instrument, DD Form 3005, is made available electronically through public facing DoD websites for download and in person at DoD ID Card sites. Once the hard copy form is completed, it must be hand delivered by the respondent to a DoD ID Card site to complete the respondent's DEERS enrollment process as a surrogate. Consistent with DoDI 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) facilitates the collection of the information on the DD Form 3005, links the data collected to DEERS, and issues a DS Logon credential in an authoritative manner. This system limits the opportunity for error for data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information.

The respondents included in this information collection are members of the public.

3. Use of Information Technology

0% of responses are collected electronically. All personal information is collected through the DD Form 3005 which can only be submitted in hard copy to a DoD ID Card site.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. No other government agency is responsible for this program. There is no other information collection which duplicates the information collected on this form.

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

If information collection were stopped, the DoD would not be able to provide online self-service access to surviving children under the age of 18, or to incapacitated dependent (e.g., spouse, parent) or of a wounded, ill, or incapacitated Service member who are unable to access self-service websites on their own.

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, April 9, 2024. The 60-Day FRN citation is 89 FRN 24806.

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

A 30-Day Federal Register Notice (FRN) for the collection published on Friday, November 8, 2024. The 30-Day FRN citation is 89 FRN 88742.

## 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

A Privacy Act Statement is located on DD form 3005.

The personal data information collected on the DD Form 3005 is securely stored and managed within DEERS in accordance with the DEERS System of Records Notice (SORN). The DEERS SORN, DMDC 02 DoD, is available at: <https://www.federalregister.gov/documents/2022/05/31/2022-11610/privacy-act-of-1974-system-of-records>.

The DEERS Privacy Impact Assessment (PIA) has been attached. DEERS users access the system through biometric validation and PKE logon which restricts access to DEERS to authorized users only. Respondents are asked to read the Privacy Act Statement prior to signing the form. All data is protected by the Privacy Act of 1974 and by related DoD issuances.

The DEERS database is permanent: Cut off (take a snapshot) at end of Fiscal Year and transfer to the National Archives and Record Administration in accordance with 36 CFR 1228.270 and 36 CFR 1234. (N1-330-03-01) Output records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes.

### 11. Sensitive Questions

In accordance with DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD," the memorandum justifies the collection of the SSN on the DD Form 3005. The SSN that is collected on the DD Form 3005 is used to support the creation of a DEERS Record. The collection of SSN allows the DoD to minimize the risk of providing a DS Logon to those that are not eligible. The SSN is used in conjunction with other approved documentation to affirmatively establish the identity that the DS Logon represents. These requirements are consistent with the guidance for acceptable uses of the SSN as specified in DoDI 1000.30. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with the DEERS SORN.

### 12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[DD Form 3005]
  - a) Number of Respondents: 2,500
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 2,500
  - d) Response Time: 8 minutes
  - e) Respondent Burden Hours: 333 hours
  
- 2) Total Submission Burden (Summation or average based on collection)
  - a) Total Number of Respondents: 2,500
  - b) Total Number of Annual Responses: 2,500
  - c) Total Respondent Burden Hours: 333 hours

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

- 1) Collection Instrument(s)  
[DD Form 3005]
  - a) Number of Total Annual Responses: 2,500
  - b) Response Time: 8 minutes
  - c) Respondent Hourly Wage: \$35.21
  - d) Labor Burden per Response: \$4.69
  - e) Total Labor Burden: \$11,737.00
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 2,500
  - b) Total Labor Burden: \$11,737.00

The respondent hourly wage was determined by using average hourly earning on private nonfarm payrolls for August 2024 taken from the U.S. Bureau of Labor Statistics website, <https://www.bls.gov/news.release/empsit.t17.htm>.

#### 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)  
[DD Form 3005]
  - a) Number of Total Annual Responses: 2,500
  - b) Processing Time per Response: 3 minutes
  - c) Hourly Wage of Worker(s) Processing Responses: \$15.19 or \$16.50

- d) Cost to Process Each Response: \$0.76 or \$0.83
  - e) Total Cost to Process Responses: \$1,980.65
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 2,500
  - b) Total Labor Burden: \$1,980.65

The cost to process each response is different based on the grade of the employees processing responses.

<u>Personnel</u>	<u>Average Pay Grade</u>	<u>Estimated Cost</u>	<u>Labor Cost</u>
Military Personnel	E4 / hourly pay \$15.19	62.5 hours x \$15.19	\$949.40
Civilian Employee	GS-4 step 5 / hourly pay \$16.50	62.5 hours x \$16.50	\$1031.25
Total Cost to Federal Government			\$1,980.65

**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: \$1,980.65
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$1,980.65

15. Reasons for Change in Burden

The burden has decreased due to a decrease in respondents.

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.