

SUPPORTING STATEMENT – PART A

Army & Air Force Exchange Service

Exchange Identification and Privilege Card Application

OMB Control Number 0702-0129

Summary of Changes from Previously Approved Collection

- IC Title change to improve public understanding.
- Small increase in Total Respondent Burden Hours and Labor Cost due to slightly higher number of annual responses.
- Small increase in Cost to the Federal Government due to annual pay increases.

1. Need for the Information Collection

The Army and Air Force Exchange Service (Exchange) is a Non-Appropriated Fund (NAF) instrumentality of the United States of America under the direction of the Department of Defense. Pursuant with Army Regulation 215-8/DAFI 34-110(I) collection of information is required to enable the Exchange to conduct its mission to enhance the quality of life for authorized Exchange patrons. Patronage may include active-duty members of the uniformed services, retired members and their dependents, National Guard personnel, and active Exchange associates and their dependents. This collection allows dependents of Exchange associates and Exchange retirees the opportunity to become or remain eligible Exchange patrons.

The collection of information on Exchange Form 1100-016, Army & Air Force Exchange Service Identification & Privilege Card Application is authorized by Title 10 U.S.C. §7013, “Secretary of the Army,” Title 10 U.S.C. §9013, “Secretary of the Air Force”; Army Regulation 215-8/DAFI 34-110(I), “Army and Air Force Exchange Service Operations,” and Executive Order 9397 (SSN), as amended.

2. Use of the Information

The Exchange Human Resource (HR) staff uses the information collected to provide authorized patronage to individuals, who are classified as: 1) dependent/family members to active Exchange associates or 2) Headquarters associates who are retiring from employment. These individuals must visit the Exchange HR directorate/office for completion of Exchange Form 1100-016.

When the form is completed, the individual returns it to an Exchange HR associate who then verifies the individual’s identity as an approved dependent or an eligible Exchange

retiree. If verification requirements are not fulfilled, the application for patronage is denied and Exchange Form 1100-016 is shredded, i.e., not maintained.

If verification is approved, the HR associate provides the individual with a personalized, laminated dependent card (DD Form 2574). The DD Form 2574 is not considered to be a collection instrument and does not require an OMB control number, as all information is collected on the Exchange Form 1100-016. The DD Form 2574 is simply a repository for information that is collected on the Exchange Form 1100-016. The completed Exchange Form 1100-016 is then transferred to another Exchange HR associate who scans the form into the Exchange employee's official personnel folder. The original paper form is then shredded and destroyed.

3. Use of Information Technology

The Exchange encourages respondents to fully utilize technology possible to reduce burden on the public. However, because the forms require a witnessed signature there is currently no means to submit them electronically. The percentage of responses collected electronically is zero.

Once information is collected, Exchange Form 1100-016 is presented to an Exchange Human Resource associate, who verifies the information for accuracy and completeness. The associate then types the information onto a dependent card (DD Form 2574) and presents it to the individual for final signature.

The associate rapidly inputs the collected information into an Exchange Information Technology System of Records housing the sponsored individual's Official Personnel Folder. This permits immediate access to the collected information for purposes in addressing individual's questions or following up on expiration dates of dependent privileges. The use of technology allows disclosure to the individual or their designee upon written request pursuant to the Privacy Act of 1974, as amended, Title 5 U.S.C. §552a, or for any investigatory or legal action, as necessary.

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 Business

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

6. Less Frequent Collection

Information collected from members of the public is upon their request to obtain patronage. Collection is “as needed” or “on occasion.” Less frequent collection is not possible.

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 Title 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, August 5, 2024. The 60-Day FRN citation is 89 FR 63417.

No comments were received during the 60-Day Period.

A 30-Day Federal Register Notice for the collection published on Friday, January 10, 2025. The 30-Day FRN citation is 90 FRN 1980.

Part B: CONSULTATION

Significant information was received from the Exchange HR Directorate in relation to the continued use and burden relative to the collection of information. It was determined that the information is maintained in one database and used in accordance with Section 2 of this statement.

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 of 1974, as amended protects the information collected. Respondents are assured confidentiality through a Privacy Act Statement printed on Form 1100-016. Physical entry restrictions enforced by locks and guards protects access to the information. Only authorized personnel with an official “need to know” who are responsible for servicing the record in performance of their official duties may access the records. Access to computerized data is role-based and further restricted by passwords, which are changed periodically. Integrity of automated data is ensured by internal audit procedures, database access accounting reports and controls to preclude unauthorized disclosure.

SORN DHRA-23 DoD covers Exchange Human Resources Systems including the collection and maintenance of form 1100-016 as a benefit to Exchange retirees. This SORN is

viewable under 89 FRN 77498 published at <https://www.federalregister.gov/documents/2024/09/23/2024-21715/privacy-act-of-1974-system-of-records>.

Enclosed is a draft copy of the Exchange Privacy Impact Assessment (PIA) for the electronic maintenance of information. The PIA is in the process of being approved and will replace the Human Resource Systems PIA published at <https://www.aafes.com/about-exchange/public-affairs/FOIA/assessments.htm>.

The records retention for the electronic information submitted with this collection is maintained for the life of the sponsored employee's official personnel file. System records are retained and disposed of according to both the National Archives and Records Administration (NARA) codified in 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B, and the General Services Administration (GSA) regulations codified in 41 CFR Parts 201-2, 201-22 and 201-45. Disposition of electronic files occur when records are 129 years old. Employment files for aliens and local/foreign nationals employed outside the Continental United States are destroyed five years after the end of the fiscal year of separation. Host government agreements may require longer retention. If the file is used for certification for Federal employment admitting refugees into the United States, the file is offered to the Department of State instead of being destroyed.

11. Sensitive Questions

To complete the dependent card (DD Form 2574), the respondents must provide the Exchange their gender, date of birth, eye and hair color, height, weight, and social security number. This collection is authorized by DoD 5400.11-R, C4. Justification for use of the SSN is provided and will be updated to address the new applicable SORN.

12. Respondent Burden and its Labor Cost

Part A: ESTIMATION OF RESONDENT BURDEN

1) Collection Instrument

Army & Air Force Exchange Service Identification & Privilege Card Application
(Exchange Form 1100-016)

- a) Number of Respondents: 220
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 220
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 55

2) Total Submission Burden

- a) Total Number of Respondents: 220
- b) Total Number of Annual Responses: 220
- c) Total Respondent Burden Hours: 55

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument
Army & Air Force Exchange Service Identification & Privilege Card Application
(Exchange Form 1100-016)
 - a) Number of Total Annual Responses: 220
 - b) Response Time: 15 minutes
 - c) Respondent Hourly Wage: \$7.25
 - d) Labor Burden per Response: \$1.81
 - e) Total Labor Burden: \$399

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 220
 - b) Total Labor Burden: \$399

We based our hourly burden on the current federal minimum wage posted at the Department of Labor Wage Website:

<https://www.dol.gov/general/topic/wages/minimumwage#:~:text=The%20federal%20minimum%20wage%20for%20covered%20nonexempt%20employees%20is%20%247.25%20per%20hour.>

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
Army & Air Force Exchange Service Identification & Privilege Card Application
(Exchange Form 1100-016)
 - a) Number of Total Annual Responses: 220
 - b) Processing Time per Response: 30 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$30.00
 - d) Cost to Process Each Response: \$15.00
 - e) Total Cost to Process Responses: \$3,300

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 220
 - b) Total Labor Burden: \$3,300

Average wages are slightly over the middle range pay for NF level 3 associates as displayed in the August 16, 2024, 152 DFW Pay Band Schedule 039-62 listed at

<https://wageandsalary.dcpas.osd.mil/Content/NAF%20Schedules/survey-sch/152/152-039-62-NF.pdf> for the Dallas, Texas.

Part B: OPERATIONAL AND MAINTENANCE COST

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$46,026 (The Exchange does not maintain itemized records for the operational and maintenance cost associated with this collection. Other cost includes the average salary of IT System Support associates, necessary upgrades to equipment, printing of forms, and overhead costs such as utilities.)

- 2) Total Operational and Maintenance Cost: \$46,026

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$3,300
- 2) Total Operational and Maintenance Costs: \$46,026
- 3) Total Cost to the Federal Government: \$49,326

15. Reasons for Change in Burden

Exchange Human Resource reporting was analyzed for determination of cost for collection of information. There is a slight increase in annual responses, which has resulted in a small increase in total respondent burden. Additionally, the estimated average hourly wage for workers processing Form 1100-016 has increased due to pay increases for performance.

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.