

## SUPPORTING STATEMENT - PART A

### Application for Identification Card/DEERS Enrollment – 0704-0415

#### Summary of Changes from Previously Approved Collection

- Burden has decreased since the previous approval 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 Instruction (DoDI) 1000.25, “DoD Personnel Identity Protection (PIP) Program,” which directs DoD identification (ID) cards be issued from an authoritative database, using authoritative information, DoD Instruction (DoDI) 1000.13, “Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals,” which outlines the requirements for issuance of DoD ID cards to DoD personnel and their eligible dependents and prescribes the benefits to DoD personnel and their eligible dependents,” and Directive-type Memorandum 08-003, “Next Generation Common Access Card (CAC) Implementation Guidance,” which outlines the requirements for CAC issuance to DoD personnel and other eligible individuals.

This information collection is needed to obtain the necessary data to establish eligibility for DoD benefits, including the issuance of a DoD ID card.

#### 2. Use of the Information

DD Form 1172-2, “Application for Identification Card/DEERS Enrollment,” is used to establish an individual’s affiliation with DoD, in support of DoD ID card issuance and benefits access. Verifying Officials (VO) at Real-time Automated Personnel Identification System (RAPIDS) Sites use the information collected by the DD Form 1172-2 to enroll eligible individuals in DEERS or to update an eligible individual’s existing DEERS record.

The respondents included in this information collection are eligible DoD personnel, and their eligible dependents, which include: current, former, and retired uniformed services members, civilian employees (e.g., DoD civilian employees, DoD contractor personnel), foreign nationals, their eligible dependents, and other eligible personnel.

DD Form 1172-2 is available online and in hard copy form at DoD ID card offices. Respondents set up an appointment and bring their completed form to the RAPIDS site, or with the assistance of the VO, they may complete a system generated DD Form 1172-2 during their appointment. ID card office personnel will review the form and scan a copy into the respondents’ DEERS record. The DEERS record will allow for the issuance of the appropriate ID card. Contractors and other eligible non-DoD civilian personnel may be enrolled securely via an automated data feed provided by the Trusted Associate Sponsorship System (TASS). TASS electronically incorporates the DD Form 1172-2 information collection into its application process. 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.

3. Use of Information Technology

21% of the 2,288,877 responses are submitted electronically, as the majority of forms are provided, completed, and submitted on-site at a DoD ID card site. The 21% electronic figure is taken directly from processing statistics that differentiate between electronic and paper submissions.

RAPIDS facilitates the collection of the information on the DD Form 1172-2, "Application for Identification Card/DEERS Enrollment," and feeds the data collected to DEERS. TASS also provides an automated data feed direct to DEERS for the information it collects.

This eliminates the requirement to use the manual version of the DD Form 1172-2 for contractors and eligible non-DoD civilian personnel.

Individuals who cannot be entered via TASS, or another system providing an automated data feed to DEERS, will use the manual version of the DD Form 1172-2 for DEERS enrollment and ID card issuance.

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

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 register and issue a PKI certificate to newly-hired DoD employees or other eligible CAC holders who are authorized access to DoD facilities and systems. If collection were less frequent, eligible employees who are not already in DEERS would not be able to use computer systems and support provided would suffer. Furthermore, eligible DoD beneficiaries would not have an appropriate way of identifying themselves in order to receive the benefits to which they are entitled.

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 Friday, January 20, 2023. The 60-Day FRN citation is 88 FR 3725.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, April 11, 2023. The 30-Day FRN citation is 88 FR 21655.

## Part B: CONSULTATION

The Defense Manpower Data Center (DMDC) coordinated and administered testing and observation to 100 users at 10 ID card issuing facilities. The users were asked to complete the form and provide any comments and/or suggestions. The users responded that the form was logical and clear.

### 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 provided with the DD Form 1172-2. Personal and personnel data information is securely collected, stored, and managed in DEERS in accordance with the DEERS System of Records Notice (SORN). 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 DD Form 1172-2. All data is protected by the Privacy Act of 1974 and by related DoD issuances.

The DEERS SORN, DMDC 02 DoD, is available at:

<https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/OSDJS/DMDC-02-DoD.pdf?ver=2019-12-09-111827-743>

The DEERS Privacy Impact Assessment (PIA) is available at:

<https://www.dhra.mil/Portals/52/Documents/Privacy/PIA/DEERS PIA 2021 Public.pdf>

The Records Retention and Disposition Schedule states the following:

“Hardcopy version of DD Form 1172: Destroy once written to optical disk.

Optical disks: Destroy primary and backup copies after 5 years.

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. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.”

11. Sensitive Questions

The Sex of the individual is requested for demographic tracking purposes only. Sex is not a factor in the determination of eligibility.

In accordance with the requirement established in DoDI 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” the memorandum justifies the collection and continued use of the SSN on the DD Form 1172-2.

The SSN that is collected on the DD Form 1172-2 is used in documented and published computer matching agreements to verify an individual's eligibility for benefits from other Federal agencies (e.g., Social Security Administration and Department of Veteran Affairs). The collection of SSN allows the DoD to minimize the risk of providing benefits to those that are not eligible and helps minimize fraudulent claims. The DD Form 1172-2 is also used to issue the CAC as required by Homeland Security Presidential Directive 12. The SSN is used in conjunction with other approved documentation to affirmatively establish the identity that the CAC represents. These requirements are consistent with the guidance for acceptable uses of the SSN as specified in DoDI 1000.30.

In support of the Department's SSN reduction plan, the DD Form 1172-2 only requires the collection of SSN for initial DEERS enrollment. After initial DEERS enrollment, an individual will be assigned a unique DoD ID number which the individual may use in lieu of the SSN when repopulating the DD Form 1172-2 for future updates. 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

DD Form 1172-2 Application for Identification Card/DEERS Enrollment

- a) Number of Respondents: 2,288,877
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 2,288,877
- d) Response Time: 3 minutes
- e) Respondent Burden Hours: 114,444 hours

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

- a) Total Number of Respondents: 2,288,877

- b) Total Number of Annual Responses: 2,288,877
- c) Total Respondent Burden Hours: 114,444 hours

## Part B: LABOR COST OF RESPONDENT BURDEN

### 1) Collection Instrument

DD Form 1172-2 Application for Identification Card/DEERS Enrollment

- a) Number of Total Annual Responses: 2,288,877
- b) Response Time: 3 minutes
- c) Respondent Hourly Wage: \$27.13
- d) Labor Burden per Response: \$1.40
- e) Total Labor Burden: \$3,204,427.8

### 2) Overall Labor Burden

- a) Total Number of Annual Responses: 2,288,877
- b) Total Labor Burden: \$3,204,427.8

The respondent hourly wage is the median usual weekly earnings of full-time wage and salary working men and women in the fourth quarter of 2022 (\$1,085.00) divided by 40. The median usual weekly earnings of full-time wage and salary working men and women in 2019 was provided by the Bureau of Labor Statistics at <https://www.bls.gov/news.release/wkyeng.nr0.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

DD Form 1172-2 Application for Identification Card/DEERS Enrollment

- a) Number of Total Annual Responses: 2,288,877
- b) Processing Time per Response: 2 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$18.79
- d) Cost to Process Each Response: \$0.63
- e) Total Cost to Process Responses: \$1,441,992.51

### 2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 2,288,877
- b) Total Labor Burden: \$1,441,992.51

The hourly wage of workers processing responses is the average salary of a customer service representative provided by the Bureau of Labor Statistics found at, <https://www.bls.gov/oes/current/oes434051.htm>.

## Part B: OPERATIONAL AND MAINTENANCE COSTS

### 1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$91,026.30
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

### 2) Total Operational and Maintenance Cost: \$91,026.30

\*Cost of printing is for the 1,820,526 forms that are printed and provided in person, printed at \$0.05 per form. The remaining 468,351 forms are electronically processed.

## Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

### 1) Total Labor Cost to the Federal Government: \$1,441,992.51

### 2) Total Operational and Maintenance Costs: \$91,026.30

### 3) Total Cost to the Federal Government: \$1,533,018.18

### 15. Reasons for Change in Burden

The burden has decreased since the previous approval due to a decreased 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.