

SUPPORTING STATEMENT - PART A

Application for Correction of Military Records Under the Provisions of Title 10, U.S. Code, Section 1552 - OMB 0704-0003

Summary of Changes from Previously Approved Collection

- Increase in burden due to the following:
 1. Several DoD-directed group application submissions over the last few years, such as the submission of over 1,000 applications for discharge upgrade last year as part of the remedy for those discharged under Don't Ask, Don't Tell. There were also several applicants who sought records correction and return to duty after the COVID vaccination requirement was removed.
 2. A steady increase in applications under a policy called "liberal consideration" in which the Boards are directed to liberally grant discharge upgrades for those who provide some evidence that they suffered from combat or sexual assault/harassment related PTSD or TBI at the time of their discharge. As this policy has become more widely known, more people have applied to the Boards.
 3. Some of the Services (Army and Air Force) have made it easier for applicants to submit applications through an online portal. The Navy also now allows members to submit applications by email, whereas previously they would only accept applications through the mail.

1. Need for the Information Collection

Under Title 10 U.S.C. §136: "Under Secretary of Defense for Personnel and Readiness," 10 U.S.C. §1552: "Correction of Military Records: Claims Incident Thereto," and DODD 1332.41, "Boards for Correction of Military Records (BCMRs) and Discharge Review Boards (DRBs)," Active Duty and Reserve Component Service members, Coast Guard, former Service members, their lawful or legal representatives, spouses of former Service members on issues of Survivor Benefit Program (SBP) benefits, and civilian employees with respect to military records other than those related to civilian employment, who feel that they have suffered an injustice as a result of error or injustice in military records (hereafter referred to as Respondent), may apply to their respective Board for Correction of Military Records (BCMR) for a correction of their military record. The BCMR is the highest level of administrative review authority regarding official personnel records, except for administrative discharge reviews, in the Military Departments. The information collected is needed to provide the BCMR the basic data to process and act on the Respondent's request.

2. Use of the Information

The Respondent submits to the respective BCMR review the DD Form 149, "Application for Correction of Military Record under the Provisions of Title 10, U.S. Code, Section 1552," as

the collection instrument. This form is available in both electronic and paper format with text or hand-written fillable entries. The information from the DD Form 149 is used by the respective Service Review Board in processing the Respondent's request authorized under 10 USC § 1552. The DD Form 149 was devised to standardize application to these Boards. Information on the form is also used to determine status, allow respondents to designate counsel of choice, identify the issues involved, and determine if the request was filed within the three-year statute of limitations established by Congress.

The request is initiated by the Respondent; therefore, there is no preemptory request or invitation sent to the respondent associated with the information collection. The completed DD form 149, collection instrument, is filed either online or submitted via mail by the respondent. The information collected from the DD Form 149 is used by the respective BCMR to determine if an error or injustice has occurred in an individual's military record and, if applicable, the BCMR will promulgate a correction based on justice, equity, and compassion.

3. Use of Information Technology

Approximately 50% of respondents submit the DD Form 149 electronically. The DD Form 149 is available to the public electronically on-line from the Department of Defense forms website https://www.esd.whs.mil/Directives/forms/dd0001_0499/DD149/.

The Air Force and Army both provide online portals through which a respondent may file an application to the Board of Corrections, in addition to allowing them to submit their application forms and supporting documents by mail. The Navy does not provide an online application process, but requests respondents email their forms and supporting documents but also allows them to mail their applications.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. The DD Form 149 is used by all the Services for identical purposes.

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

This information is collected from the Respondent on occasion and is initiated by the Respondent. Respondents would be unable to request corrections to their military records through the BCMRs if this information was not collected or collected less frequently. Without this collection of information, DoD would be unable to comply with statutory requirements in Title 10, U.S. Code, Section 1552.

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 Monday, August 18, 2025. The 60-Day FRN citation is 90 FRN 40066.

No comments were received during the 60-Day comment period.

A 30-Day Federal Register Notice for the collection published on Tuesday, December 16, 2025. The 30-Day FRN citation is 90 FR 58234.

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 page 3 of the DD Form 149.

The SORNs are published at the links below:

- a) A0015-185 SFMR, "Correction of Military Records Cases"
<https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/Article/4006840/a0015-185-sfmr/>
- b) F036 SAFCB A "Air Force Correction Board Records"
<https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/Article/4011044/f036-safcb-a/>
- c) NM01000-1, "Board for Correction of Naval Records Tracking System (BCNRTS) and Case Files"
<https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/Article/4010085/nm01000-1/>
- d) DHS/ALL-036 Board for Correction of Military Records System of Records Notice,
<http://www.gpo.gov/fdsys/pkg/FR-2013-10-02/html/2013-23991.htm>

- e) DoD-0020 "Military Human Resource Records"
<https://www.federalregister.gov/documents/2024/05/15/2024-09967/privacy-act-of-1974-system-of-records>
- f) DHS/USCG-014 "Military Pay and Personnel System of Records"
<https://www.govinfo.gov/content/pkg/FR-2011-10-28/html/2011-27881.htm>
- g) T7340b "Case Management System" for Defense Finance and Accounting Service"
<https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNSIndex/Article/4008876/t7340b/>

Copies of the relevant PIAs associated with DD Form 149, "Application for Correction of Military Record Under the Provisions of Title 10, U.S. Code, Section 1552", are provided with this package for OMB's review.

The records and retention and disposition schedule is the following:

- a) A0015-185 SFMR, Records are retained at the Army Review Boards Agency for at least 6 months after case is closed and then retired to the National Personnel Records Center where they are retained for 20 years.
- b) F036 SAFCB A, Case files are maintained for 75 years then destroyed. Records are destroyed by tearing into pieces, shredding, pulping, macerating or burning.
- c) NM01000-1, Three years after record is closed, it is transferred to the Federal Records Center for storage. It is destroyed when 40 years old or when the military personnel service record is destroyed, whichever is earlier.
- d) DHS/ALL-036, Records are retained locally for three years, after which records are then sent to NARA and destroyed after 40 years.
- e) DoD-0020, Military records of current active, Reserve, or Guard members are maintained in imaged record systems operated by each of the Military Services. Records of inactive Service members are transferred to the National Archives and retained as permanent records 62 years after the Service member's discharge, retirement, or death in service.
- f) DHS/USCG-014, The records and retention and disposition schedule for the Department of Homeland Security U.S. Coast Guard DHS/USCG-014 Military Pay and Personnel System of Records are retained locally for three years, after which records are then sent to NARA and destroyed after 40 years.
- g) T7340b, Records will be retained for 6 years and 3 months after the case is closed.

11. Sensitive Questions

SSN is requested as the sole means of properly identifying the records of former service members never having received an EDIPI/DoD ID number during their time in the Armed Forces or those service members no longer in possession of an EDIPI/DoD ID number. No additional 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

DD Form 149

- a) Number of Respondents: 29,065
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 29,065
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 29,065 hours

2) Total Submission Burden

- a) Total Number of Respondents: 29,065
- b) Total Number of Annual Responses: 29,065
- c) Total Respondent Burden Hours: 29,065 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DD Form 149]

- a) Number of Total Annual Responses: 29,065
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$7.25
- e) Total Labor Burden: \$210,721

2) Overall Labor Burden

- a) Total Number of Annual Responses: 29,065
- b) Total Labor Burden: \$210,721

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<https://www.dol.gov/general/topic/wages>)

13. Respondent Costs Other Than Burden Hour Costs

Based on a 50% rate of electronic submission, 14,532 respondents file by post. At the base cost of \$0.78 per respondent, the overall cost is \$11,335.35.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

DD149

- a) Number of Total Annual Responses: 29,065
- b) Processing Time per Response: 10 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$74.95

- d) Cost to Process Each Response: \$750
- e) Total Cost to Process Responses: \$21,784,218
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 29,065
 - b) Total Labor Burden: \$21,784,218

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$3,643
 - c) Postage: \$24,350
 - d) Software Purchases: \$1,650
 - e) Licensing Costs: \$0
 - f) Other: \$3,960
- 2) Total Operational and Maintenance Cost: \$33,603

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$21,784,218
- 2) Total Operational and Maintenance Costs: \$33,603
- 3) Total Cost to the Federal Government: \$21,817,821

15. Reasons for Change in Burden

There has been an increase in burden since the previous approval due to the following:

- 1. Several DoD-directed group application submissions over the last few years, such as the submission of over 1,000 applications for discharge upgrade last year as part of the remedy for those discharged under Don't Ask, Don't Tell. There were also a number of applicants who sought records correction and return to duty after the COVID vaccination requirement was removed.
- 2. A steady increase in applications under a policy called "liberal consideration" in which the Boards are directed to liberally grant discharge upgrades for those who provide some evidence that they suffered from combat or sexual assault/harassment related PTSD or TBI at the time of their discharge. As this policy has become more widely known, more people have applied to the Boards.
- 3. Some of the Services (Army and Air Force) have made it easier for applicants to submit applications through an online portal. The Navy also now allows members to

submit applications by email, whereas previously they would only accept applications through the mail.

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.