<u>SUPPORTING STATEMENT - PART A</u>

Application for the Review of Discharge or Dismissal from the Armed Forces of the United States OMB 0704-0004

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 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.

1. Need for the Information Collection

Under 10 U.S.C. \$ 1553 and DoD Directive 1332.41, "Boards for the Correction of Military Records (BCMRs) and Discharge Review Board (DRBs)," former Service members who received an administrative discharge have the right to appeal the characterization or reason for separation, provided they do so within 15 years from the date of separation. Accordingly, each Military Department has established a Board of Review to examine appeals of former members of the Armed Forces. The DD Form 293, "Application for Review of Discharge from the Armed Forces of the United States" provides the respondent a vehicle to present to the Military Department Discharge Review Boards their reasons and justifications for a discharge upgrade as well as providing the Military Departments the essential data needed to process the appeal. The data collected is covered by the Systems of Record Notices correction of discharge review board and official military records maintained by each of the Military Departments (available http://dpclo.defense.gov/Privacy/SORNs.aspx).

2. Use of the Information

The primary purpose of the information provided by respondents on the DD Form 293 is to allow respondents to explain the reasons for the alleged error or injustice, designate counsel of choice, select the method of hearing desired, and request a records review or personal hearing. The respondents for this information collection are former members of

the Military Departments requesting a change in the characterization of their discharge or the reason for their separation. 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 respective Service DRB uses the information from the DD Form 293 in processing the respondent's discharge appeal authorized under 10 U.S.C. § 1553 and DoD Directive 1332.41. While in Service custody, this information is privileged and restricted to individuals who have a need for the record in the performance of their official duties. The end result or successful effect would be the change in characterization of their discharge.

3. <u>Use of Information Technology</u>

Approximately 85% of respondents in the Air Force submit the DD Form 293 electronically. Approximately 25% of respondents in the Army submit the DD Form 293 electronically. The Navy does not allow for electronic submission. The DD Form 293 is available on the Department of Defense forms website:

https://www.esd.whs.mil/Directives/forms/dd0001 0499/DD293

Service members download the form online and complete it on the computer or print it out to submit it via mail or email to their respective DRB. A signed DD Form 293 is required from each respondent that indicates the information provided is true and that the respondent has full knowledge of penalties involved for willfully making a false statement.

The Air Force and Army both provide online portals through which a respondent may file an application to the DRB, 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 mail their forms and supporting documents.

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 293 is used by all of the Services for identical purposes.

5. <u>Burden on Small Businesses</u>

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

6. <u>Less Frequent Collection</u>

This information is collected from the respondent on occasion and is initiated by the respondent. Respondents would be unable to appeal to their respective DRBs to request a change in their characterization of discharge or reason for separation. Without this collection of information, DoD would be unable to comply with statutory requirements in 10 U.S.C. \$ 1553.

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 58235.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. <u>Gifts or Payment</u>

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. <u>Confidentiality</u>

A Privacy Act Statement is located on the instructions page of DD Form 293.

Copies of the relevant PIAs associated with DD Form 293, "Application for the Review of Discharge from the Armed Forces of the United States" are provided with this package for OMB's review.

The SORNs are published at the links below:

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"

 $\underline{https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/Article/4010085/nm01000-1/}$

- 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/

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

DD Form 293 asks respondents to furnish only that information relevant and necessary to process their request. Respondents are asked to affirmatively identify if an issue/condition such as: post-traumatic stress disorder, traumatic brain injury, other mental health, sexual assault/harassment, "Don't Ask Don't Tell," and reprisal/whistleblower are related. If the basis of their request involves the effects of one or more physical, mental, and/or behavioral health condition(s), that information would also be furnished by the respondent.

Social Security Numbers (SSN) are requested to ensure accuracy of data involving the specified individual respondent. The form states this information is voluntary; however, failure of the applicant to provide their SSN may delay the processing of the application. An SSN memo has been provided with this package for OMB's review.

Personal Identifying Information (PII): Respondents are advised their data is for Official Use Only and will be maintained and used in strict confidence in accordance with Federal law and regulations and that the procedures are in place to protect the confidentiality of

the information. The erroneous release of PII might cause legal action from individuals against DoD and/or the government.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) DD Form 293
 - a) Number of Respondents: 4,835
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 4,835
 - d) Response Time: 30 minutes
 - e) Respondent Burden Hours: 2,417.5 hours
- 2) Total Submission Burden
 - a) Total Number of Respondents: 4,835
 - b) Total Number of Annual Responses: 4,835
 - c) Total Respondent Burden Hours: 2,418 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) DD Form 293
 - a) Number of Total Annual Responses: 4,835
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$7.25
 - d) Labor Burden per Response: \$3.63
 - e) Total Labor Burden: \$17,527
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 4,835
 - b) Total Labor Burden: \$17,527

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 the rate of electronic submission, 3,871 respondents file by post. At the base cost of \$0.78 per respondent, the overall cost is \$3,019.

14. <u>Cost to the Federal Government</u>

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) DD Form 293
 - a) Number of Total Annual Responses: 4,835
 - b) Processing Time per Response: 12 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$82.16

d) Cost to Process Each Response: \$985.92

e) Total Cost to Process Responses: \$4,766,923.20

2) Overall Labor Burden to the Federal Government

a) Total Number of Annual Responses: 4,835

b) Total Labor Burden: \$4,766,923.20

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

a) Equipment: \$26,997.85b) Printing: \$24,990.68c) Postage: \$54,334.94

d) Software Purchases: \$24,767.52

e) Licensing Costs: \$0f) Other: \$1837.55

2) Total Operational and Maintenance Cost: \$132,929

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$4,766,923.20

2) Total Operational and Maintenance Costs: \$132,929

3) Total Cost to the Federal Government: \$4,899,852

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. <u>Publication of Results</u>

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

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.