

SUPPORTING STATEMENT

for

Medical Screening of Military Personnel, (DD Form 2807-1 and DD Form 2807-2)

A. JUSTIFICATION

1. Need for Information Collection

Title 10 U.S. C. Sections 504, 505, 507, 532, 978, 1201, 1202, 4356, and DoD Instruction 6130.03, Medical Standards for Appointment, Enlistment, or Induction in the Military Services, require applicants to meet medical accession standards for enlistment, induction, and appointment to the Armed Forces. The DD Form 2807-1, "Report of Medical History" and the DD Form 2807-2, "Medical Prescreen of Medical History Report" are designed to appropriately collect this information. Data are needed from applicants to elicit a more accurate picture of their well being and medical history.

This information collected is the basis for determining medical eligibility of applicants for entry in the Armed Forces. This information is needed to determine the medical qualifications of applicants based upon their current and past medical history.

2. Use of Information

Applicants for initial entry into the Armed Forces and Service members requiring mandatory medical examinations, medical boards and other physical examinations will complete the DD Form 2807-1. All initial entry applicants required to complete a chapter #2 physical examination will complete the DD Form 2807-2 prior to the medical examination. The purpose of this information is to gather the necessary initial data for determining the applicants' medical eligibility and qualification for the Armed Forces and to establish the initial medical record.

The DD Form 2807-1, which goes into more detail than the DD Form 2807-2, is needed as part of the required medical examination to assist physicians in making determinations as to acceptability of applicants for military service and verifies disqualifying medical condition(s) noted on the prescreening form. Approximately 100,000 applicants will not meet the medical entry standards and will not require medical examinations after completing the DD Form 2807-2, due to pre-existing medical conditions. The DD Form 2807-1 may also be used by all Service members for retention and medical boards and other essential medical examinations as required by the Services. The DD Form 2807-1 is completed at the Military Entrance Processing Station by applicants and medical personnel. This information is collected and reviewed by physicians performing the entrance medical examination to determine the applicants' eligibility. The information collected becomes part of the applicant's medical records.

The information obtained on the DD Form 2807-2 ensures the recruiter that an applicant has identified any medical disqualifying condition(s) prior to the application process and meets the Congressional requirements to obtain both the applicant's health care and insurance provider. Additionally, it allows the military examining physician to obtain medical records critical to evaluating the applicant's medical condition(s) prior to their medical examination. The DD Form 2807-2 will be completed by the recruiter, the applicant, and

possibly a family member. It will be used to determine any disqualifying medical condition prior to physical examination and will be used to assist the physician in collecting medical information essential for completing the medical examination and determining the applicants' qualification or disqualification.

The Military Services and the Coast Guard will use these data to evaluate the applicant's medical status in determining eligibility for enlistment, appointment or induction and to evaluate the entry standards for the Armed Forces. Data are also used to decrease premature medical discharges categorized as "Existing Prior to Service."

3. Improved Information Technology

The Department has determined that the DD Form 2807-1 and DD Form 2807-2 are appropriate for electronic generation. Recruiting stations able to use the form electronically will reduce the burden for not only the respondent, but for the recruiter as well. The forms are available on the DoD Electronic Forms Website in Fillable Adobe PDF files and used by the Military Entrance Processing Command (MEPCOM) Integrated Resource System (MIRS) at the Military Entrance Processing Stations (MEPS), the Department of Defense Medical Examination Review Board (DODMERB), and by the medical practitioners performing physical examinations.

The Military Entrance Processing Command (MEPCOM) is responsible for loading the DD Form 2807-1 and DD Form 2807-2 into the MEPCOM Integrated Resource System (MIRS) to enable respondents to electronically complete the form.

Strategic planning has led to research and development for ongoing initiatives, including biometrics, towards the creation of an e-Medical record. Conceptually, these forms will be the genesis of the individual's e-Medical record. This improvement will lessen the burden on moving paper between agencies and will ensure better accuracy of data. Progress of this on-going initiative is contingent upon funding availability.

4. Efforts to Identify Duplication

The medical prescreen will identify medical conditions which are permanently disqualifying for applicants, resulting in stopping the recruiting process and decreasing medical cost and recruiter time. The duplication of data between the medical prescreen and the medical history form will allow MEPCOM to validate the data obtained from an applicant thus decreasing the incidence of conditions listed as "Existing Prior to Service." It will allow the applicants to obtain medical records, prior to their medical examination, based upon their answers and their consent to release the medical records to the examining facility. These data will assist the practitioner in determining their qualification or disqualification for the Armed Services.

Data collected on the DD Form 2807-1 and DD Form 2807-2 provide a wide range of medical data needed to establish eligibility for enlistment, commissioning or appointment in the Armed Forces. No culmination of data from other sources would provide the necessary information for entrance.

5. Methods Used to Minimize Burden on Small Entities

Small businesses and other small entities will not be affected by this collection.

6. Consequences of Not Collecting the Information

Information is collected only once per applicant. If collection was stopped, ability to make determinations for enlistment, appointment or commissioning into the military would be hampered and the present and past medical status of the applicant could not be ascertained. Additionally, force readiness and health postures would be affected.

7. Special Circumstances

There are no special circumstances in this data collection. This collection will be conducted in a manner consistent with guidelines in 5 CFR 1320.5 (d) (2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

The 60-day Federal Register Notice announcing this information collection (as required by 5 CFR 1320.8(d)) was published in *Vol. 74, No. 215, Monday, November 9, 2009, Federal Register, page 57665, as required by 5 CFR 1320.8(d)*. No public comments were received in response to the notice. This information has been reviewed by the Military Services. A Joint Service working group reviewed all enlistment forms to determine which forms would be candidates for electronic generation and to make recommended changes. Per the Terms of Clearance of the Notice of OMB Action (NOA), this collection can be re-submitted without the submission of another 60-day notice. Additionally, as required in the NOA, the privacy section of the form(s) to describe and link to the routine uses were made.

9. Payments to Respondents

No payments, gifts, or guarantees are made to respondents who provide this information.

10. Assurance of Confidentiality

Respondents are advised that statements will be protected in accordance with Federal laws and regulations and procedures are in place to protect the information. The paper forms will be secured to protect Personally Identifiable Information (PII) in accordance to DoD regulations. Records are maintained in secure, limited access, or monitored areas and are only seen by individuals who have a need to verify information contained on the form. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or other administrative procedures. Access to personal information is limited to those individuals who require the records to perform their official assigned duties. The Privacy Act statement is contained on the DD Form 2807-1 and DD Form 2807-2.

11. Personal Identifying Information, Sensitive Questions, and Protection of

Information

The DD Form 2807-1 and DD Form 2807-2 include questions which may be considered sensitive in nature. These forms are the genesis for the personnel record, the medical record, and the security record.

Personal Identifying Information (PII): Respondents are advised that their data are for OFFICIAL USE ONLY and will be maintained and used in accordance with Federal law and regulations and those procedures are in place to protect the information. The paper forms will be secured to protect PII in accordance with DoD regulations. The erroneous release of PII might cause legal action from individuals against DoD and/or the government.

Protection of the Information: Records are maintained in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or other administrative procedures. Access to personal information is limited to those individuals who require the records to perform their official assigned duties.

Social Security Number (SSN): The SSN is obtained and stored in the initial record (personnel, finance, medical, and security) for proofing, vetting, and maintaining unambiguous personal identity for U.S. persons. With the SSN being used for personal identification in major DoD human resource systems (personnel, finance, and medical) it remains the only unique identifier that ensures accuracy across all the systems for proper data retrieval. It is used to correctly identify the applicant through the accession process and to ensure the proper information is obtained from medical authorities.

Sensitive Questions: Questioning applicants solicits information which may not readily be divulged by applicants. Certain questions help reveal if there are congenital anomalies which are disqualifying for entrance into the military. Questions concerning family history may reveal a history of active disease(s) which would require additional reporting and precautionary procedures (i.e., drug and alcohol abuse, psychiatric treatment, or other medical conditions that would require additional evaluation). Any positive history of specific medical conditions may disqualify the applicant for entrance into the military service.

PIA: USMEPCOM Privacy Impact Assessment (PIA).

SORNs: Applicable SORNs are as follows:

Accession:

Army (<http://privacy.defense.gov/notices/army/A0601-210c-TRADOC.shtml>)

Navy (<http://privacy.defense.gov/notices/usn/N01133-2a.shtml>)

Marine Corps (<http://privacy.defense.gov/notices/usmc/M01133-3.shtml>)

Air Force (<http://privacy.defense.gov/notices/usaf/F036AFRESB.shtml>)

Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29845.htm>)

Medical Evaluation Boards:

Army (http://privacy.defense.gov/notices/army/A0040-3b_DASG.shtml)

Navy and Marine Corps (<http://privacy.defense.gov/notices/usn/N01850-2.shtml>)

Air Force (<http://privacy.defense.gov/notices/usaf/F044AFPCA.shtml>)

Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29803.htm>)

Official Military Personnel Files:

Army (http://www.privacy.defense.gov/notices/army/A0600-8-104_AHRC.shtml)

Navy (<http://privacy.defense.gov/notices/usn/N01070-3.shtml>)

Marine Corps (<http://privacy.defense.gov/notices/usmc/M01070-6.shtml>)

Air Force (<http://www.defenselink.mil/privacy/notices/usaf/F036AFPCC.shtml>)

Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29793.htm>)

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information

a. Response Burden:

(1) DD Form 2807-1

Total annual respondents:	350,000
Frequency of response:	1
Total annual responses:	350,000
Burden per response:	10 minutes
Total burden hours:	58,333

(2) DD Form 2807-2

Total annual respondents:	450,000
Frequency of response:	1
Total annual responses:	450,000
Burden per response:	10 minutes
Total burden hours:	75,000

(3) Medical Providers (required civilian medical records)

Total annual respondents:	50,000
Frequency of response:	1
Total annual responses:	50,000
Burden per response:	3 minutes
Total burden hours:	2,500

(4) Total Average Estimated Response Burden

Total annual respondents:	800,000
Frequency of response:	1
Burden per response:	10 minutes
Total burden hours:	133,333
Total annual respondents:	50,000
Frequency of response:	1
Burden per response:	3 minutes
Total burden hours:	2,500

TOTAL RESPONDENTS: 850,000

TOTAL BURDEN HOURS: 135,833
ANNUAL AVERAGE MINS: $135,833/850,000 = .1598\text{hrs} \times 60$
mins. = 9.6mins.

b. Explanation of How Burden was Estimated. An observed overall average of 10 minutes was taken to complete the DD Form 2807-1 and DD Form 2807-2.

c. Labor Cost to Respondents.

(1) There is a labor cost to the respondent to fill out these forms (DD Form 2807-1 and DD Form 2807-2).

800,000 respondents at \$7.25hr* at 10 minutes per form = \$966,666.

*Hourly rate based on U.S. Department of Labor federal minimum wage.

(2) Medical Providers (civilian medical records)

The requirement estimated for a medical provider to review and provide information annotated on the form has been estimated at:

50,000 respondents x \$ 32.25 hr**@ 3 mins per form = \$80,625

**Hourly rate based on average Chief Medical Officer (GS12/Step 05) salary.

13. Estimates of Other Cost Burden for the Respondent for Collection of Information

a. Total Capital and Start-up Cost. There is no capitol or set up cost associated with this information collection.

b. Operation and Maintenance Cost. There are no operational or maintenance costs associated with this information collection. The medical records from the medical providers during the initial entry process are paid for in accordance with their civilian fee for records; as a result we are not including operational cost for this process.

14. Estimates of Cost to the Federal Government

a. Work load requirements.

1. E-5 / E-7 recruiter processes form. Estimated completion time is 10 minutes.

2. GS-06/Step 03 medical personnel review items to determine completeness of the responses. Estimated completion time is 5 minutes per form.

b. Estimated Costs (DD Form 2807-1and DD Form 2807-2):

1. E-5 / E-7 hourly pay = \$15.08 at 20mins (both forms) \$5.03

2. GS-06/ Step 03 hourly pay = \$15.40 at 10mins (both forms)	\$2.57
Cost to the Federal Government per respondent	<u>\$7.60</u>
Total Cost for forms (800,000 x \$7.60)	\$6,080,000
c. Cost for Medical Records (50,000 x \$5.03 average)	<u>\$251,500</u>
Total DoD Cost	\$6,331,500

15. Changes in Burden

There are no changes in burden for this information collection.

16. Publication Plans/Time Schedule

Results of this information collection will not be published.

17. Approval Not to Display Expiration Date

Approval not to display the expiration data is not being sought.

18. Exceptions to the Certification Statement

No exceptions to the certification statement are being sought.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for this collection of information.