

SUPPORTING STATEMENT – PART A

Exchange Official Personnel Folders-Privilege Card (0702-XXXX)

A. JUSTIFICATION

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. Pursuant with Army Regulation 215-8/AFI 34-211(I) collection of information is required to enable the Exchange to carry out 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 Exchange employee dependents and Exchange retirees the opportunity to become or remain eligible Exchange patrons.

The collection of information on Exchange Form 1100-016 Identification & Privilege Card Application” is authorized by Title 10 U.S.C. §3013, “Secretary of the Army,” Title 10 U.S.C. §8013, “Secretary of the Air Force”; Army Regulation 215-3, “Nonappropriated Funds Personnel Policy”; Army Regulation 215-8/AFI 34-211(I), “Army and Air Force Exchange Service Operations,” and Executive Order 9397 (SSN), as amended.

In addition to Form 1100-016 mentioned above, the original Exchange notice included another three forms. These three forms are not further addressed in this supporting statement for the following reasons: 1) Exchange Form 1200-038 “Employment Reference Request” is no longer in use, 2) Exchange Form 3250-005 “Request for Official Personnel Folder” is a NARA form (Standard Form 127, prescribed by NARA, 36 CFR 1228.154(e)), and 3) Exchange Form 1200-718 “Local National Employment Application – Germany Only,” has already been addressed in the Exchange’s “Employment Applications” submission.

2. Use of the Information

The Information collected is used by the Exchange Human Resource (HR) staff at the Exchange Headquarters to provide authorized patronage to individuals, who are classified: 1) as dependents to active Exchange Headquarters associates or 2) Headquarters associates who are retiring from employment. These individuals must visit the Exchange Headquarters HR directorate for completion of Exchange Form 1100-016. This form contains the Privacy Act Statement.

Information collected includes the sponsor's and individual's full name; date of birth; biological features such as: eye color and hair color, height and weight; social security number and office phone number. The individual also provides information regarding any special requirements and their status as a spouse/significant other, an unmarried surviving spouse or a child dependent.

When the form is completed it is turned over to an Exchange HR associate who 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 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.

3. Use of Information Technology

The information collected on this form is performed manually. The respondents cannot access or complete the form on-line. The data entered on the form is prepared in the presence of an Exchange Human Resource associate, who then verifies the information for accuracy and completeness. The information is then typed onto a dependent card (DD Form 2574) and presented to the individual for signature. At this time, there is no practical or cost effective way to facilitate the limited submission of this form electronically.

The Exchange uses Information Technology to rapidly input data directly into an electronic database. The Exchange Personnel Management Information System (PMIS) maintains the collected information allowing immediate access for purposes in addressing employee's questions or following up on expiration dates of their 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

This specific information is not available from other sources, as it is only collected during the application process.

5. Burden on Small Business

The collection of information does not have an impact on small businesses or other entities.

6. Less Frequent Collection

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

7. Paperwork Reduction Act Guidelines

No special circumstances exist that 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

a. A notice of proposed collection was published in the Federal Register on January 7, 2015, 80 FRN 869. No comments were received. A 30 Day Federal Register Notice was published on November 17, 2015, 80 FRN 72052.

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

9. Gifts or Payment

No payments or gifts will be provided to the respondents.

10. Confidentiality

The information is protected under the Privacy Act of 1974, as amended. Respondents are assured confidentiality through a Privacy Act Statement printed on form 1100-016. Access to the information collected is restricted: Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel; Access to records is limited to person(s) with an official “need to know” who are responsible for servicing the record in performance of their official duties; Persons are properly screened and cleared for access; and Access to computerized data is role-based and further restricted by passwords, which are changed periodically. In addition, integrity of automated data is ensured by internal audit procedures, database access accounting reports and controls to preclude unauthorized disclosure.

Disclosure of respondent information is made upon submission of the individuals’ original, notarized, written request for documents either disclosed to themselves or to a third party representative. Other disclosures may be made to law enforcement authorities for investigatory purposes or through the routine uses disclosures as authorized by statute. Draft copies of the altered SORN AAFES 0401.04, “Official Personnel Folder” as well as the draft copy of SORN AAFES 0903.06

for our PMIS system have been provided. These two systems work in concert with one another.

All Exchange forms are currently being reviewed for update by the Exchange Forms Manager to include the Agency Disclosure Notice, Privacy Act Statement (PAS) and basic instructions. In the interim, The Exchange will provide the Agency Disclosure Notice, Privacy Act Statement (PAS) and instructions as a separate coversheet or via e-mail to all respondents to read prior to completing. If Social Security Number is requested and provided, it is authorized per DoDI 1000.30 Enclosure 2 sections 2.c.(2)-(9).

The enclosed Privacy Impact Assessment (PIA) was completed by the Exchange in July 2013 for the electronic maintenance of information. This PIA for the Exchange APMS Portfolio located in the DoD Information System Register (DITPR) Number 15980 (DA 301730) and may be viewed at <http://ciog6.army.mil/Portals/1/PIA/2013/EXHRM-TMG.pdf>.

The records retention of the electronic form submitted with this collection will be maintained for the life of the employee's official personnel file. While the employee is active, the form will remain within the Exchange PMIS system. Upon the separation of the employee, the file will be transferred to the National Personnel Records Center (NPRC) in Valmeyer, IL, and maintained for an additional 65 years.

11. Sensitive Questions

Respondents are asked to provide 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.

12. Respondent Burden and its Labor Cost

a. Estimation of Respondent Burden

The average annual burden estimate for reporting and recordkeeping requirements were derived from estimates from the Exchange HR directorate based upon the history of obtaining information. Because this proposal is altered from our original notice we have adjusted the burden as follows. It is estimated the Exchange collects information from 2,500 individuals during the course of a year. Each collection only requires one response from the individual. This information is submitted by the individual during the application process.

- Number of Annual Respondents = 2,500
- Number of Responses per Respondent = 1
- Number of Annual Responses = 2,500
- Response Time = 15 minutes
- Total Annual Burden Hours = 625
- Information Frequency = On occasion

b. Labor Cost of Respondent Burden

Each respondent is estimated to spend about 15 minutes of time completing form 1100-016. Using the United States Department of Labor Wage and Hour Division's Federal Minimum wage of \$7.25/hour (July 24, 2009), it is estimated the annual total labor cost to respondents is \$4,531.25.

- Number of Annual Respondents = 2,500
- Number of Responses per Respondent = 1
- Number of Annual Responses = 2,500
- Response Time = 15 minutes
- Avg. Labor Cost per Response based upon current minimum wage = \$1.81
- Information Frequency = On occasion

13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this information collection.

14. Cost to the Federal Government

The estimated costs for the required recordkeeping and reporting activities were derived from consultations with the Exchange HR Directorate. It is estimated the Exchange utilizes only HQ Exchange HR associates for collection of this information. This amounts to approximately 5 associates with an average salary of \$24.00 per hour. (NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.) It takes approximately 30 minutes to obtain the information and input into the database.

- 5 – Number of personnel who dedicate time to collecting/processing information collected from the respondent.
- 2,500 = Number of annual responses.
- 30 Minutes = Time in hours per response to collect/process the information collected; including time for refining, interpreting, analyzing and documenting the information received.
- \$24.00 = Average salary of the individuals who collect and process the information collected.
- \$12.00 = Average cost per response.
- $2,500 \times 12.00 = \$30,000$ = Annual burden cost.

This is an existing system of records. Start-up costs cannot be estimated. Maintenance to this system includes the average salary of IT System Support Team, the burden cost to the Exchange, and the overhead to maintain such database. The

maintenance fee was determined from consultations with the Exchange IT/LP team who manage the system.

- Annual cost to the federal government:
\$30,000 (Burden) + \$42,026 (Maintenance Time) + \$4,000 (Maintenance of System, estimated) = \$76,026 (NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.)

15. Reasons for Change in Burden

This is an existing collection in use without an OMB Control number.

16. Publication of Results

There are no plans to publish the results of this collection.

17. Non-Display of OMB Expiration Date

There is no request for approval to omit the display of the expiration date of the OMB approval on the instrument.

18. Exceptions to “certification for Paperwork Reduction Submissions”

There are no exceptions.