

SUPPORTING STATEMENT - PART A

Application for Identification Card/DEERS Enrollment - OMB Control Number 0704-0415

Summary of Changes from Previously Approved Collection

- Burden decrease due to a reduction in annual responses. In 2023, Trusted Associate Sponsorship System (TASS) required all applicants to reapply every three years. However, since Mission Partner, Identity, Credential, Access Management (MPICAM) became the system of record, the previous three-year application limit has been extended.

1. Need for the Information Collection

This information collection is consistent with Department of War (DoW) guidelines that have been outlined in DoD Instruction (DoDI) 1000.25, "DoD Personnel Identity Protection (PIP) Program," which directs DoW 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 DoW ID cards to DoW personnel and their eligible dependents and prescribes the benefits to DoW 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 DoW personnel and other eligible individuals.

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

2. Use of the Information

The information collected on the DD Form 1172-2 "Application for Identification Card/DEERS Enrollment" shall be used to establish an individual's affiliation with DoW, in support of DoW ID card issuance and benefits access. Once this information has been collected and proofed to the standard requisite in Federal Information Processing Standards 201-3, "Personal Identity Verification (PIV) of Federal Employees and Contractors" (for CAC applicants), and according to the DoD Instruction (DoDI) 1000.13, "Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals" (for all other DoW ID card applicants), a record will be established in the Defense Enrollment Eligibility Reporting System (DEERS) that shall allow for the issuance of the appropriate ID card. 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. The collection instrument is available online (https://www.esd.whs.mil/Directives/forms/dd1000_1499/DD1172-2/) and in hard copy form at DoW ID card offices. Once completed, respondents must bring their completed form with them to their ID card appointment. ID card office personnel will review the form and scan a copy into the respondents DEERS record.

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

3. Use of Information Technology

Consistent with DoDI 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) facilitates the collection of the information on the DD Form 1172-2, "Application for Identification Card/DEERS Enrollment," links the data collected to DEERS, and produces DoW ID cards in an authoritative manner. This system limits the opportunity for error for data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information.

The Director, DHRA, released the memorandum, "DEERS/RAPIDS Lockdown for Additional Populations" on October 29, 2010, designating additional populations to be enrolled securely into DEERS via an automated data feed provided by the Mission Partner Identity, Credential, Access Management (MP ICAM) system. This eliminates the requirement to use the manual version of the DD Form 1172-2 for contractors and eligible non-DoW civilian personnel. Individuals who cannot be entered via MP ICAM, 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; these populations may include dependents of DoW sponsors and foreign affiliates.

42% of the 2,153,182 responses are submitted electronically, as the majority of forms are provided, completed, and submitted on-site at a DoW ID card site. The 42% electronic figure is taken directly from processing statistics that differentiate between electronic and paper submissions.

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 DoW would not register and issue a Public Key Infrastructure (PKI) certificate to newly-hired DoW employees or other eligible CAC holders who are authorized access to DoW 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 DoW 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, February 20, 2026. The 60-Day FRN citation is 91 FRN 8211.

One comment was received during the 60-Day comment period on the DD Form 1172-2. Response is as follows:

Comment:

I was recently contacted to notarize a DD Form 1172-2. When I reviewed the document, I noticed that block 21, where the Notary Signature and Seal is, there is no Notarial certificate. Every state required specific notarial wording. A Notary can not just stamp and sign. Please consider revising this for to either include general notarial wording/certificate, or give instructions on how to accomplish this legally. Please see attached Kansas Notary Handbook, page 9 (Completing a Notarial Certificate)

Response:

DoD appreciates the comment. We recognize that state laws dictate specific notarial wording, which varies significantly by jurisdiction. Due to these variations and space constraints on the form, a universal notarial certificate is not pre-printed. To comply with state laws, notaries are fully authorized to append a state-compliant loose notarial certificate directly to the DD Form 1172-2. Alternatively, notaries may write or use a stamp containing their state's requisite legal wording within the Block 21 Remarks area alongside their official seal and signature.

A 30-Day Federal Register Notice for the collection published on Wednesday, March 27, 2026. The 30-Day FRN citation is 91 FRN 31433.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed 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

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 Public Key Encryption (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://www.federalregister.gov/documents/2022/05/31/2022-11610/privacy-act-of-1974-system-of-records>

The DEERS Privacy Impact Assessment (PIA) is available at:
https://www.dhra.mil/Portals/52/Documents/Privacy/PIA/DMDC-02_DEERS-PIA_Section-1_20250121_FINAL.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 (NARA) 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 DoW 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 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 DoW 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 DoW 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: 2,153,182
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 2,153,182
 - d) Response Time: 1/20th of an hour (3 minutes)
 - e) Respondent Burden Hours: 107,659 hours
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- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 2,153,182
 - b) Total Number of Annual Responses: 2,153,182
 - c) Total Respondent Burden Hours: 107,659 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: 2,153,182
 - b) Response Time: 3 minutes
 - c) Respondent Hourly Wage: \$30.38
 - d) Labor Burden per Response: \$1.519
 - e) Total Labor Burden: \$3,270,683
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- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 2,153,182
 - b) Total Labor Burden: \$3,270,683

The respondent hourly wage is the median usual weekly earnings of full-time wage and salary working men and women in the third quarter of 2025 (\$1,215.00) divided by 40. The median usual weekly earnings of full-time wage and salary working men and women in 2025 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: 2,153,182
 - b) Processing Time per Response: 2 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$21.82
 - d) Cost to Process Each Response: \$0.73
 - e) Total Cost to Process Responses: \$1,566,081

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 2,153,182
 - b) Total Labor Burden: \$1,566,081

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: \$62,865.70
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0

- 2) Total Operational and Maintenance Cost: \$62,865.70

*Cost of printing is for the 1,257,314 forms that are printed and provided in person, printed at \$0.05 per form. The remaining 895,868 forms are electronically processed.

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,566,081

- 2) Total Operational and Maintenance Costs: \$62,866

- 3) Total Cost to the Federal Government: \$1,628,947

15. Reasons for Change in Burden

The burden has decreased due to a reduction in annual respondents. In 2023, Trusted Associate Sponsorship System (TASS) required all applicants to reapply every three years. However, since Mission Partner, Identity, Credential, Access Management (MPICAM) became the system of record, the previous three-year application limit has been extended.

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.