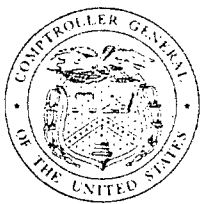


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PLM II

DECISION



**THE COMPTROLLER GENERAL
OF THE UNITED STATES**
WASHINGTON, D.C. 20548

FILE: B-195546

DATE: October 17, 1979

MATTER OF: Recertification of dependency certificates

[Acceptability of Procedural Change For]

DIGEST: Recertification of dependency certificates for entitlement to BAQ by members of the Army Reserves may be accomplished by the use of computer-generated listing. Further, such recertification may be made for a period exceeding 1 year where annual training cannot be programmed within 12 months of the prior training period. 51 Comp. Gen. 231 (1971), modified.

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The Assistant Secretary of the Army (Installations, Logistics and Financial Management) requests a decision regarding the acceptability of a change in procedures for recertification of dependency certificates for entitlement to basic allowance for quarters (BAQ) by members of the Army Reserves. He proposes using computer-generated listings in place of the current form and that recertification be allowed for a period exceeding 1 year where annual training cannot be programmed within 12 months of the prior training period. We have no objection to the proposed procedures.

The request was presented in a letter dated July 18, 1979, and was assigned Department of Defense Military Pay and Allowance Control Number SS-A-1332.

The submission refers to the annual recertification of dependency certificates by Army members receiving BAQ with dependents required by 51 Comp. Gen. 231 (1971). That decision was modified by 54 Comp. Gen. 92 (1974) to provide in lieu of such annual requirement for recertification of primary dependents only each time an active Army member makes a permanent change of station and for verification of entitlement by Army installations through the use of a periodic computer-generated listing provided by the Joint Uniform Military Pay System (JUMPS-Army).

The discussion further states that:

"The initial submission and annual recertification of the BAQ entitlement for members of the Selected Reserves currently is accomplished annually based upon the DA Form 3298, Authorization to Start and Stop BAQ Credit and contact with the member. The form is filed in the member's Personal Financial Records (PFR) folder maintained by the unit. Recertification is indicated by the member's

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signature and date on the DA Form 3298. Under concepts being tested at Fort McCoy, Wisconsin, the member's PFR is located at and maintained by the Finance Office (FO) at Fort McCoy. As the units serviced by Fort McCoy FO are located in 3 different states, the member is not readily available to accomplish the recertification. In this respect the Commander, US Army Forces Command (FORSCOM) has requested a deviation from the recertification requirements specified in 51 CG 231, citing 54 CG 92 as a precedence.

"Under proposed FORSCOM procedures, the recertification would be accomplished during or within 30 days following the annual training performed by units of the Reserve Components. The recertification process would involve the use of a computer-generated listing * * *. The listing would be produced by a mechanized system which will be used to pay the members for annual training and would identify every member who would receive BAQ. The member would sign and date opposite his/her name on the listing to indicate recertification of entitlement. Recertification by members performing individual or fragmented annual training (other than with unit) will be accomplished by means of a form letter * * *. The DA Form 3298 on file in the PFR will be annotated by FO personnel to reflect the recertification with the listing or form letter filed in the FO as supporting documentation. A new DA Form 3298 will be completed by the member, when a change in dependent status occurs."

There is further indication that under this concept, it is conceivable that not all recertification would be on an annual basis due to variances in the schedule for performing annual training, e.g., a unit performing training in May 1979 may not be scheduled for training again before August 1980. Although this deviation is requested for the system concepts tested at Fort McCoy, expansion throughout the Army Reserve components is a possibility.

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Since the proposed system is not authorized by previous decisions, and 54 Comp. Gen. 92, supra, specifically related to the active Army, a decision is requested as to the following questions:

1. May the recertification of entitlement to BAQ be accomplished by the use of a computer-generated listing?
2. May the period of the recertification exceed one year for members of the Army Reserve Components?

The importance of these certifications lies in the support they provide for the credit claimed by disbursing officers for dependency payments made during the periods involved and this support covers the continued existence of the dependent and the dependency status. Consequently, recertifications are important to the proper audit of disbursing officers' accounts. See 32 Comp. Gen. 232 (1952), 38 id. 369 (1958), and 51 Comp. Gen. 231.

It appears that the proposed system of having reservists accomplish the recertification of entitlement to BAQ by the use of a computer-generated listing and extending the period for recertification to exceed 1 year in those cases where the scheduled 2 weeks for performing annual training cannot be programmed within 12 months of the prior training period still provide reasonable assurance that changes in status do not go undetected.

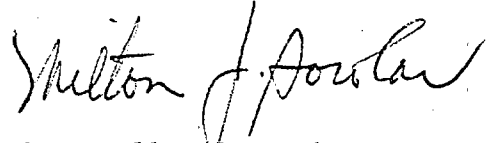
In implementing this system, however, the Army should be aware that there is a basic inconsistency between the proposed procedures as contained in the submission and a pay system design for Reserve and National Guard drill pay that the Army previously submitted for informal evaluation by our Office. The inconsistency arises in that under the concepts being tested at Fort McCoy, the member's Personal Financial Records (PFR) folder containing the DA Form 3298, Authorization to Start and Stop BAQ Credit, is located and maintained at the Finance Office at Fort McCoy. However, the design documentation for the Reserve Components Pay System indicate that the same PFR folder is located at each Reserve unit.

The Army pay system design previously submitted for approval is only for drill pay of Reserve and National Guard members and does not cover the annual training pay and other

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aspects of the reservist's pay system design such as the BAQ recertification. However, should the Army expand the Fort McCoy experiment, the Army would have to make some changes in the system design for drill pay we are currently evaluating. The Army has not told us what those changes will be. We will follow up on this inconsistency during our evaluation of the drill pay system design.

Within the aforesaid limitations, questions 1 and 2 are answered in the affirmative, and 51 Comp. Gen. 231 is modified accordingly.

A handwritten signature in cursive script, reading "Milton J. Fowler".

For the Comptroller General
of the United States