

SUPPORTING STATEMENT
for
Department of Defense Education Activity Student Registration SY ___/___
OMB 0704-TBD

A. JUSTIFICATION

1. Need for Information Collection.

The Department of Defense Education Activity (DoDEA) is mandated by titles 10 United States Code (U.S.C.) Section 2164, title 20 U.S.C. Section 921-932, and DoDEA Regulation 1342.13 (atch 1) to provide free education to authorized minor dependents of Department of Defense (DoD) military and civilian sponsors who would otherwise not have access to a high-quality public education from pre-kindergarten to 12th grade. DoDEA is also authorized to provide educational services to dependents of other Federal employees and to other U.S. citizens living overseas, and to foreign nationals. DoDEA is a DoD field activity that operates under the direction and control of the Assistant Secretary of Defense (Readiness and Force Management). DoDEA operates two school systems, each of which has unique enrollment eligibility requirements: the Department of Defense Dependents Schools (DoDDS) located overseas, and the Domestic Dependent Elementary and Secondary Schools (DDESS) located on certain military installations in the United States, its territories and possessions. Student eligibility in both systems is dependent upon the nature of the sponsor's relation to the DoD and the relation of the enrolled children to the sponsor. The DoDEA Form 600, DoDEA Student Registration SY ___/___, similar to registration forms used universally by schools, is used to obtain necessary data from each sponsor who enrolls a child in a DoDEA school, to determine the child's eligibility for enrollment, and to enroll the student. The form also gathers information about the student that is needed to make decisions concerning programs and academic services offered to DoDEA students. This information is necessary to operate and manage the global school system; for example, to plan and distribute resources, hire staff, ensure the availability of facilities, and deliver educational services to all authorized students.

2. Use of Information.

The information collected on the DoDEA Form 600 is used internally by DoDEA administrators to determine whether a student is authorized to enroll on a tuition-free or tuition-paying basis, and whether the child is space-required or eligible to enroll on a space-available basis. The information is used by DoDEA staff to ensure that DoDEA makes available the appropriate classrooms, staffing, and supportive educational services, places students in the appropriate grade, identifies students with special needs under laws that protect children with disabilities (specifically the Individuals with Disabilities Education Act, as amended at 20 U.S.C. sections 1400 *et seq.*, and the Rehabilitation Act of 1973, as amended, 29 U.S.C. sections 701 *et seq.*), and to ensure compliance with laws protecting student civil rights. (Executive Order 13160, "Nondiscrimination on the Basis of Race, Color, National Origin, Disability, Religion, Age, Sexual Orientation, and Status as a Parent in Federally Conducted Education and Training Programs," June 23, 2000). The information is also used to identify emergency contact numbers

to ensure that schools can notify the appropriate person when a student's health or welfare is in jeopardy.

Information collected on the form may be shared on a need to know basis within the DoD, and otherwise as provided by the Privacy Act, 5 U.S.C. 552a. In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a (b)(3) as identified on the DoDEA SORN 26 and the DoD Routine Blanket Uses published at http://dpclo.defense.gov/privacy/SORNS/blanket_routine_uses.html.

3. Improved Information Technology.

The Department has determined that DoDEA Form 600 is appropriate for electronic generation. The DoDEA Form 600 will be made available in electronically fillable Adobe PDF files on-line and will allow an electronic signature. Parents and/or sponsors can access DoDEA Form 600 through a secure internet link available on the DoDEA home page at www.dodea.edu. Parents and/or sponsors may complete the form at any computer with an internet connection. If they do not own a computer or do not have internet access, parents and/or sponsors may use a school computer, and schools are encouraged to publicize the availability of other computers with free Internet access.

4. Efforts to Identify Duplication.

The information collected by DoDEA about students is unique to DoDEA, with the exception that many military dependents are enrolled in the Defense Enrollment Eligibility Reporting System (DEERS). DoDEA is working with DEERS to enable the system to populate many of the fields on the DoDEA Form 600. Currently the DEERS cannot populate DoDEA Form 600 fields because there is no common student or sponsor identifier available to both systems, the DEERS data base is not accessible by all DoDEA schools or students, and the necessary security safeguards to protect against inappropriate data sharing are not in place. Efforts are underway to resolve these limitations. However, DoDEA also enrolls children who are not in, and properly, would not be included within, the DEERS data base (i.e., the dependents of other Federal employees and U.S. citizens residing overseas and foreign nationals). DoDEA Form 600 will remain the critical information collection vehicle to permit student enrollments in a DoDEA school.

5. Methods Used to Minimize Burden on Small Entities.

The collection of this information does not involve small businesses.

6. Consequences of Not Collecting the Information.

If the information cannot be collected, DoDEA would lack critical data that is necessary to make available a quality education for eligible dependents. It could not budget or plan for school operations, or know the distribution of students to its various school locations in order to ensure adequate facilities, staffing, and educational resources at its schools.

7. Special Circumstances.

There are no special circumstances. This collection will be conducted in a manner consistent with the requirements of 5 CFR 1320.5(d) (2).

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

An Agency 60-Day Federal Notice was published in Volume 75, No. 154, Wednesday, August 11, 2010, Federal Register, pages 48645-48646, as required by 5 CFR 1320.8(d). No public comments were received in response to the notice (atch 3).

Consultations were conducted with the following:

DoDEA Office of the General Counsel
4040 North Fairfax Drive
Arlington, VA 22203-1635
Tel: 703-588-3063

9. Payments to Respondents.

The respondents will not receive any monetary payments or gifts associated with completing DoDEA Form 600.

10. Assurance of Confidentiality.

This information collection does not ask the respondent to submit proprietary, trade secret or confidential information to the Department of Defense.

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

Personal Identifying Information (PII): Respondents are advised that their data is collected under the protection of the Privacy Act, 5 USC 552a. The data collected on DoDEA Form 600 is covered by the DoDEA System of Records Notice DoDEA 26 available at: <http://privacy.defence.gov/notices/osd/DODEA26.shtml>, Department of Defense Education Activity Dependent Children's School Program Files." (atch 4) The data is collected, maintained, and used in strict confidence in accordance with Federal Law and regulations to protect the confidentiality of PII. The paper forms and electronic data are secured to protect PII. DoD Instruction 5400.16 provides DoD Privacy Impact Assessment (PIA) (atch 5) guidance. Governing this collection is found on-line at the following URL: <http://www.dodea.edu/home/dodea.cfm?gnav=pa> .

Protection of the Information: Paper and electronic records are maintained in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or similar system. Computer terminal access is controlled by use of Common Access Card (CAC) or terminal identification and the use of a password or similar

system. Access to personal information is limited to those individuals who require the records to perform official assigned duties.

Respondents will access DoDEA Form 600 through a DoDEA school or be able to print the form from an official and secure DoDEA Web site. The server uses an authenticating message sender called Public Key Infrastructure (PKI). This enables users of an insecure public network, such as the Internet, to securely and privately exchange data through the use of a public and private cryptographic key pair. In addition, the computer server is protected by a tiered or layered security scheme. At the network edge router, the entire DoDEA network is protected by Access Control Lists (ACLs). These ACLs inspect both in-bound and out-bound network traffic. Behind the router is a firewall which further inspects and filters traffic. The server is located behind the firewall within the DoDEA network. The DoDEA security strategy is consistent with the recommendations found in DISA’s Network Infrastructure Security Implementation Guide, Version 5, Release 2.

Sensitive Questions (i.e., gender, race and ethnicity): Responses regarding gender are requested to determine the total number of male and female students to ensure the availability of suitable gender specific supporting facilities and to track Agency compliance with Federal Civil Rights laws protecting gender parity of access to federal programs (Exec. Order 13160). Race and ethnicity questions are collected to ensure compliance with Federal Civil Rights Laws (Exec. Order 13160). Collection of race and ethnicity data complies with OMB Standards for Maintaining, Collecting, and Presenting Data for Race and Ethnicity, dated 30 October 1997. Sensitive data collected is maintained for “Statistical Use Only” and is protected in accordance with the Privacy Act (93-579), OMB Circular A-108, and DoD Directive 5400.11.

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

a. Response Burden:

DoDEA Form 600 Student Registration

Foreign National Respondents:

Table 1. Burden Hours for Collection

Total annual respondents	3,392
Frequency of response	1
Total annual responses	3,392
Burden per response	30 minutes
Total burden hours	1,696

Total average burden hours: total annual responses = 3,392 multiplied by 30 minutes (average burden per response minutes) = 101,760 minutes divided by 60 minutes/hour = 1,696 total average burden hours.

Other Respondents (Total annual respondents: 86,182 - 3392 foreign nationals=82,790 remaining “other” respondents)

Table 1. Burden Hours for Collection

Total OTHER annual respondents	82,790
Frequency of response	1
Total annual responses	82,790
Burden per response	30 minutes
Total burden hours	41,395

Total average burden hours: total annual responses = 82,790 multiplied by 30 minutes

(average burden per response minutes) = 2,483,700 minutes divided by 60 minutes/hour = 41,395 total average burden hours.

b. Explanation of How Burden was estimated.

The estimated 30 minute burden per response was estimated by observing respondents completing DoDEA Form 600 and talking to individuals who have completed the form.

c. Labor Cost to Respondent.

The respondents will be completing DoDEA Form 600 on their own time.

The estimated labor costs to the respondents based on an average of 30 minutes are: using the per hour minimum wage \$5.85 divided by 30 minutes = \$2.93 per respondent.

The total labor costs to the foreign national respondents: 3,392 total annual respondents multiplied by \$2.93 estimated labor costs = \$9,938.56

**TOTAL LABOR COSTS TO THE FOREIGN NATIONAL RESPONDENTS:
\$9,938.56**

The total labor costs to the other remaining respondents: 82,790 total annual respondents multiplied by \$2.93 estimated labor costs = \$242,574.70

TOTAL LABOR COSTS TO THE OTHER remaining RESPONDENTS: \$242,574.70.

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

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

b. Operation and Maintenance Cost. There is normally internet access; however, it is unlikely that the respondents will be using the internet solely for this purpose. The cost involved for connectivity for this purpose is negligible.

14. Estimated Cost to the Federal Government.

Initial Review and Processing: Foreign National Respondents
School Registrar
Hourly Cost GS-5/7, \$16.96/hr. x 20 min = \$5.65
3,392 respondents X \$5.65 = \$19,164.80

Initial Review and Processing: Other remaining Respondents
School Registrar
Hourly Cost GS-5/7, \$16.96/hr. x 20 min = \$5.65
82,790 respondents X \$5.65 = \$467,763.50

15. Changes in Burden.

This is a collection in use without an OMB Control Number.

16. Publication Plans/Time Schedule.

The results of this collection of information will not be published.

17. Approval Not to Display Expiration Date.

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

18. Exceptions to the Certification Statement.

A. Exceptions to the Certification Statement are being sought:

Subparagraph (c). This subparagraph states, "It reduces burden on small entities."
An exception is taken to this statement because the collection of this information does not involve small businesses.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for this collection of information.