Military OneSource Intake

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

10 U.S.C. 1781 note, Establishment of Online Resources To Provide Information About Benefits and Services Available to Members of the Armed Forces and Their Families provides that:

An Internet Outreach Website be established (or other online resource) for the purpose of providing comprehensive information to members of the Armed Forces and their families about the benefits and services that are available to members of the Armed Forces and their families. The covered benefits and services that are relevant to Military OneSource include information regarding the following benefits and services that may be available to a member of the Armed Forces and dependents of the member: financial compensation including financial counseling, educational assistance and benefits, relocation planning and preparation, quality of life programs, and family and community programs.

Department of Defense Instruction 6490.06, Counseling Services for DoD Military, Guard and Reserve, Certain Affiliated Personnel, and Their Family Members applies to:

OSD, the Military Departments, the Office of the Chairman of the Joint Chiefs of Staff and the Joint Staff, the Combatant Commands, the Office of the Inspector General of the Department of Defense, the Defense Agencies, the DoD Field Activities, and all other organizational entities within the Department of Defense; Members of the Active Component and of the Army National Guard, Army Reserve, Air National Guard, Air Force Reserve, Marine Corp Reserve, and Naval Reserve and their family members; and DoD civilian personnel designated as Civilian Expeditionary Workforce members pursuant to Department of Defense Directive 1404.10 and their family members.

DoDI 6490.06 states, it is DoD Policy to promote a culture that encourages delivery and receipt of counseling; eliminate barriers to and the negative stigma associated with seeking counseling support; empower leaders to advocate for those in their charge to receive counseling; provide easy access to a continuum of counseling support to include prevention, early intervention, and treatment to enhance coping and build resilience; view counseling support as a force multiplier enhancing military and family readiness.

Responsibilities assigned specific to DoDI 6490.06 include:

Deputy Assistant Secretary of Defense for Military Community and Family Policy (DASD(MC&FP)) shall:

Provide through Military OneSource and the Military and Family Life Consultant (MFLC) Program, non-medical, brief counseling support to augment counseling provided by the Active and Reserve Components and provide, through Military OneSource and the MFLC Program, personal financial counselors to augment personal financial planning and counseling provided by the Active force and Reserve Components.

Procedures specific to DoDI 6490.06 include:

Military OneSource and MFLC Program counselors provide non-medical, shortterm, solution-focused counseling and briefings for circumstances amenable to brief intervention, including but not limited to stress and anger management, grief and loss, the deployment cycle, parent-child relationships, couples communication, marital issues, relationships, and relocations based on the needs of the community being served. The counseling approach is psychoeducational, which helps participants learn to anticipate and resolve challenges associated with the military lifestyle. This non-medical support is aimed at preventing the development or exacerbation of mental health conditions that may detract from military and family readiness.

As stated in DoDI 6490.06, Military OneSource and MFLC Programs shall implement privacy and confidentiality policies to promote participation and reduce stigma, except to meet legal obligations or to prevent harm to self or others. Information disclosed to Military OneSource and MFLC Program counselors shall be kept confidential, except to meet legal obligations or to prevent harm to self or others. At a minimum, any personally identifiable information recorded by Military OneSource and MFLC Program counselors is subject to section 552a of title 5, United States Code (U.S.C.), commonly referred to as the "Privacy Act of 1974" and DoD 5400.11-R; however, because Military OneSource and the MFLC Program are not healthcare programs, this information may not be subject to DoDI 6025.18. At a minimum, this confidentiality statement shall be provided to all eligible individuals seeking counseling services pursuant to this Instruction: "Information you provide to me or other counselors will be kept confidential, except to meet legal obligations or to prevent harm to self or others. Legal obligations include requirements of law and DoD or military regulations. Harm to self or others includes suicidal thought or intent, a desire to harm oneself, domestic violence, child abuse or neglect, violence against any person, and any present or future illegal activity."

Furthermore, DoDI 6490.06 states that Military OneSource services are provided face-to-face (continental United States (CONUS) only) to individuals, couples, families, and groups, and telephonically or over the Internet to individuals worldwide. Military OneSource services may be accessed 24 hours a day, 7 days a week using the toll free number 1-800-342-9647 or on the Internet at http://www.militaryonesource.mil. Eligible participants may receive twelve non-medical counseling sessions per person per issue. In addition to non-medical counseling support, Military OneSource provides personalized assistance with special-needs family members, relocation, health and wellness, translation services, and more. Military OneSource financial counselors are available face-to-face or by phone at 1-800-342-9647.

Department of Defense Instruction 1342.22, Military Family Readiness states:

It is DoD policy that the type and level of family readiness services provided to Service members and their families shall be correlated to needs resulting from the unique challenges associated with military service across three domains of family readiness: mobilizations and deployment readiness; mobility and financial readiness; and personal and family life readiness.

DoDI 1342.22 defines the Family Readiness System (FRS) as composed of DoDoperated and community-based family readiness services that are delivered through a variety of access points, e.g., Military and Family Support Centers and Military OneSource. The mission of the FRS is to help service members and their families manage the challenges of daily living experienced in the unique context of military service. The FRS performs the critical roles of: assisting commanders in preventing, identifying, and addressing family readiness-related challenges in order to maintain unit cohesion and operational readiness. Family readiness service providers serve as consultants to commanders in this effort; providing a network of highquality integrated services and support that mitigate the challenges of daily living and those associated with military life; family readiness services shall emphasize personal growth, positive development, and improved individual and family functioning; and except where otherwise required by law, DoD regulation or command authority, accessing family readiness services is voluntary. In addition, the FRS shall provide non-medical counseling services that are shortterm and solution focused, and address topics related to personal growth, development, and positive functioning. Such services are governed by DoDI 6490.06. The FRS shall also offer education and enrichment services that focus on helping families build and maintain healthy relationships, strengthen interpersonal competencies and problem-solving skills, and master respective roles, tasks, and responsibilities throughout the family life cycle. DoDI 1342.22 also states Military OneSource shall augment family readiness services provided by the Military Departments by providing information, referrals, and confidential non-medical counseling services and be available to service members and their families 24 hours a day, 365 days a year.

Military OneSource is Department of Defense-funded program (non-personal services contract) providing comprehensive information on every aspect of military life at no cost to active duty, Guard and reserve service members, and their families. Military OneSource can be especially helpful to those who live at a distance from installations. Information includes, but is not limited to, deployment, reunion, relationships, grief, spouse employment and education, parenting and much more. Services are available 24 hours a day by telephone and online from any location in the world. In addition to the website support, Military OneSource offers call center and online support for consultations on a number of issues such as career opportunities, issues specific to families with a member with special needs, health coaching, financial and tax counseling and resources, and non-medical counseling. Military OneSource has masters-level consultants available by telephone and email, to provide service members and their families with practical suggestions and support for issues that nearly everyone faces, like locating resources for elder care, handling a move, or nurturing a relationship with a deployed spouse. The Military OneSource website provides access to online tools and information, including articles, audios, and announcements. The site also provides scheduling and registration information for live online webinars, locators for installation-based support, subscription information for monthly electronic newsletters, and links to other official resources.

Military OneSource also provides a variety of social media to reach service members and their families and help them connect with each other. These include a Facebook page, a Twitter feed, and the Blog Brigade.

Individuals access Military OneSource for support for an inquiry or issue. The Military OneSource Case Management System allows the documentation of an individual's eligibility; identification of the caller's inquiry or issue to provide a warm hand-off, referral and/or requested information; the development towards a final solution and referral information. The categories of records in the Military OneSource Case Management System includes the following: name, date of birth, gender, marital status, relationship to service member, rank, unit, branch of military service, military status, current address and mailing address, telephone number, email address, participant ID and case number (automatically generated numbers), presenting issue/information requested, handoff type to contractor; handoff notes, if interpretation is requested and the language; referrals, and feedback from quality assurance follow-up with participants. Non-medical counseling information includes psychosocial history; assessment of personal concerns; provider name, phone number, and location; authorization number; and outcome summary.

2. Use of the Information

One of the primary reasons for the Military OneSource Case Management System is to document an individual's eligibility, identify the individual's issue, document referrals and warm handoffs, and record a final solution. Records may be used as a management tool for statistical analysis, tracking of trends, reporting, and assessing program effectiveness and conducting research. Information about individuals indicating a threat to self or others will be reported to the appropriate authorities in accordance with DoD/Military Branch of Service and Component regulations and established protocols.

Routine uses of records maintained in the system, including categories of users and the purposes of such uses: In addition to those disclosures generally permitted under 5 U.S.C 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b) (3) as follows:

To authorized DoD Military OneSource contractors for the purpose of responding to service member or family member need.

To contractors and grantees for the purpose of supporting research studies concerned with the effectiveness of non-medical counseling interventions.

To local law enforcement entities for the purpose of intervention to prevent harm to the individual (self) in accordance with DoD/Military Branch of Service and Component regulations and established protocols.

Contacts with Military OneSource, whether by telephone, online or face-to-face non-medical counseling, are private. Military OneSource ensures that personal information is

secure and each user is treated confidentially and with respect. Privacy exceptions include suspected family maltreatment (e.g., domestic violence, child or elder abuse/neglect), threats to harm self or others and illegal activities. In these cases, Military OneSource consultants have a duty to report to the appropriate military and civilian authorities. Face-to-face counselors are an extension of Military OneSource, so these reporting requirements apply to them as well.)

Individuals wishing to utilize Military OneSource services must provide identifying information to the Triage Consultant, though if the individual has contacted Military OneSource previously, his/her identifying information may already be contained in the case management system, at which time the Triage Consultant would just verify the information is still correct. The information in the case management system will be used (in a de-identified format) for all of the following: monthly, yearly and ad hoc reports (reports are distributed internally to government offices/staff); statistical analysis (ongoing: completed, tracked and analyzed by program staff), evaluating program effectiveness (ongoing: completed, tracked and analyzed by government and program staff) and conducting research.

3. Use of Information Technology

Individuals who call Military OneSource for support provide information telephonically to the Triage Consultant who will then enter the information in the case management system. Based upon respondent feedback and requests and to ensure that all individuals have access to services, Military OneSource also implemented a web-based registration form for two services (secure web-based non-medical counseling and health and wellness coaching sessions). If respondents so desire, they are able to complete the registration form online, rather than providing information telephonically for these two forms of support.

4. Non-duplication

The information captured in the Military OneSource Case Management System is specific to Military OneSource services and because one of the primary reasons for the Military OneSource Case Management System is to document an individual's eligibility, identify the individual's issue, document referrals and warm handoffs, and record a final solution, it is not possible to capture this information from anyone other than the individual contacting Military OneSource requesting support.

5. Burden on Small Business

The collection of information does not involve small businesses or other small entities.

6. Less Frequent Collection

The information captured in the Military OneSource Case Management System is utilized to determine eligibility, identify the individual's issue, document referrals and warm

handoffs, and record a final solution. The individual contacting Military OneSource for support will only need to provide information (to determine eligibility) during the initial Triage Consultant contact for each type of support s/he requests. Information gathering is required to determine eligibility for each type of service the individual requests; thus, it is not possible to capture information less frequently as an eligibility determination must be made each time an individual requests support.

7. Paperwork Reduction Act Guidelines

None

8. Consultation and Public Comments

The 60 Day Notice was published in the Federal Register soliciting public comment on January 2, 2014 (79 FR 114). No comments were received. The 30 Day Notice published on June 24, 2014 (79 FR 35730). Comments will be accepted until July 23, 2014.

The Military OneSource Program office consulted with the Resource & Oversight, Research Lead about the information collection process. The Military OneSource Program office also received information from the Cost Assessment and Program Evaluation (CAPE) office specific to the type of support provided to service members and their families. Lastly, the Military OneSource Program office and the vendor continuously receive feedback/input from the users of Military OneSource about the type of services received and whether the services were satisfactory.

9. Gifts or Payment

Not applicable

10. Confidentiality

SORN identifier and name: DPR 42 DoD entitled "Military OneSource (MOS) Case Management System (CMS)". The Privacy Impact Assessment (PIA) has also been completed. Both will be attached with this Statement.

Military Community and Family Policy has carefully reviewed all safeguards established for the system of records to ensure they are compliant with DoD requirements and appropriate to the sensitivity of information stored in the system. Specific routine uses have been established to ensure that minimal personally identifiable information is provided. Military Community and Family Policy recognizes the sensitive nature of the information collected and stored in this System of Records and has considered this when developing the system, implementing ways to minimize any potential effects to the individuals on whom records might be retained. The Military OneSource Case Management System is hosted on a DIACAP certified and accredited infrastructure. Records are maintained in a secure building in a controlled area accessible only to authorized personnel. Physical entry is restricted by the use of locks and passwords and administrative procedures which are changed periodically. Records are encrypted while not in use (encrypted at rest). The system is designed with access controls, comprehensive intrusion detection, and virus protection. Access to personally identifiable information in this system is role based and restricted to those who require the data in the performance of the official duties and have completed information assurance and privacy training annually. PII data is encrypted during transmission to protect session information.

Specific to Department of Defense Instruction (DoDI) 6490.06, Military OneSource and MFLC Programs shall implement privacy and confidentiality policies to promote participation and reduce stigma, except to meet legal obligations or to prevent harm to self or others. Information disclosed to Military OneSource and MFLC Program counselors shall be kept confidential, except to meet legal obligations or to prevent harm to self or others. At a minimum, any personally identifiable information recorded by Military OneSource and MFLC Program counselors is subject to section 552a of title 5, United States Code (U.S.C.), commonly referred to as the "Privacy Act of 1974") and DoD 5400.11-R; however, because Military OneSource and the MFLC Program are not healthcare programs, this information may not be subject to DoDI 6025.18. At a minimum, this confidentiality statement shall be provided to all eligible individuals seeking counseling services pursuant to this Instruction: "Information you provide to me or other counselors will be kept confidential, except to meet legal obligations or to prevent harm to self or others. Legal obligations include requirements of law and DoD or military regulations. Harm to self or others includes suicidal thought or intent, a desire to harm oneself, domestic violence, child abuse or neglect, violence against any person, and any present or future illegal activity."

11. Sensitive Questions

Not applicable

12. <u>Respondent Burden, and its Labor Costs</u>

a. Estimation of Respondent Burden

The average number of yearly respondents requesting services through Military OneSource is almost 900,000. The average amount of time that a respondent is in conversation with a Triage Consultant to provide the initial information required to determine eligibility and the type of service the respondent is requesting averages 3 minutes. This is also true for respondents who register for web-based non-medical counseling and health and wellness coaching sessions online. The average number of individuals registering for online health and wellness sessions or non-medical counseling sessions using the online registration form is only 5% of the overall participant number. Because the average yearly number of respondents is 900,000 and each of these respondents must spend an average of 3 minutes providing information to determine eligibility and the type of service requested, the total number of annual hours equals 45,000.

b. Labor Cost of Respondent Burden

The large majority of individuals who request services from Military OneSource are in the enlisted ranks. On average, over 60% of the requests for non-medical counseling are from individuals in the ranks E-1 through E-5. Thus, to calculate the annualized costs, we are using the annual salary for an E-5 with 4 years' experience (\$30,359, which is \$16.87 an hour, or about 28 cents a minute). We are also assuming that the annual hours worked is 1800.

45,000 hours (total annual hours) x \$16.87 an hour = \$759,150 respondent labor cost burden (annual total for all respondents combined)

\$759,150 respondent labor cost burden (total) / 900,000 respondents = estimated 84 cents per respondent annually

13. <u>Respondent Costs Other Than Burden Hour Costs</u>

a. Total capital and start-up costs

Not applicable

b. Total operation and maintenance costs.

Not applicable

14. Cost to the Federal Government

Military OneSource is a non-personal services contract funded by the Department of Defense. The capture of information to determine eligibility, identify the individual's issue, document referrals and warm handoffs, and record a final solution are all contractual requirements and regular duties of the Triage Consultant as defined by the Performance Work Statement. Thus, other than contract costs, there are no additional costs incurred by the Federal Government for the capture of this information. The estimated total contractual cost (burdened rate) for a triage consultant to capture general demographic information to determine eligibility is \$2.13 per participant. There are an estimated 900,000 respondents who access Military OneSource for support who must be screened for eligibility; thus, 900,000 x \$2.13 = \$1,917,000(total estimated contractual cost to ensure that all respondents contacting Military OneSource are screened by a Triage Consultant to determine eligibility).

15. <u>Reasons for Change in Burden</u>

This collection does not have prior approval and is considered a new collection.

16. <u>Publication of Results</u>

All published results from this collection will be de-identified (no PII). DoD will use the results to implement effective practices across the Department. Moreover, DoD will share its findings with other Federal agencies and with state and local governments who work with the military families dispersed in their communities, all of whom are challenged to provide resources within a constrained fiscal environment. Lessons learned about the role of an information and assistance program (to include innovative delivery of non-medical counseling) could have application as a model for providing resources to at-risk families in the civilian communities, many of whom face the same basic challenges under stress – financial, relationship, communication, work and parenting issues – before their concerns create situations which demand more expensive interventions.

DoD anticipates beginning data collection in the Spring 2014 and data capture will continue for a two year timeframe. The proposed research packet is being created separately from this package and is currently under review by the Privacy office.

17. Non-Display of OMB Expiration Date

None.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

None.