

## SUPPORTING STATEMENT - PART A

### DoD Safe Helpline/Victim-Related Inquires

OMB Control Number 0704-AAKE

#### 1. Need for the Information Collection

In February 2004, then Secretary of Defense Donald Rumsfeld directed the Under Secretary of Personnel and Readiness to complete a 90-day review of all sexual assault policies and programs within the DoD and to make recommendations to improve victim services and the prevention of sexual assault. The first recommendation of the Task Force was to "Establish a single point of accountability for all sexual assault policy matters within the Department of Defense." The Ronald W. Reagan national Defense Authorization Act for Fiscal Year 2005 (Public Law 108-375), as codified in 10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces, required the Secretary of Defense to implement the recommendations of the Task Force. This requirement led to the creation of the DoD Sexual Assault Prevention and Response Office (SAPRO) to serve as the single point of authority, accountability, and oversight for the program.

As part of program oversight, SAPRO must ensure that all victim-related requests for assistance received by SAPRO and referred to the Military Services, National Guard Bureau, DoD Inspector General, DoD Family Advocacy Program, and other agencies receives a response. Additionally, per 28 CFR 115.22, SAPRO tracks and facilitates Unrestricted and anonymous notifications of sexual abuse and harassment in Military Correctional Facilities (MCF), in accordance with the Prison Rape Elimination Act (PREA). To ensure that each victim-related inquiry and PREA notification is answered in a timely manner, the Victim Related Inquiry (VRI) system is used to track and maintain the communication between SAPRO, the inquirer, and the agency that the inquiry is referred to, as well as records documenting permission for SAPRO to refer the inquiry to the appropriate organization for action.

Additional authorities include:

DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR) Program; DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures

#### 2. Use of the Information

a. Military sexual assault victims, parents, other family members, and friends requesting assistance can contact SAPRO by completing the DD Form 2985, "Department of Defense Sexual Assault Prevention and Response Office (SAPRO) Request for Assistance" on SAPR.mil, DD Form 2985-1, "Military Feedback Form" on safehelpline.org/anonymous-feedback.cfm, or by phone, email, or postal service. Additionally, prisoners and employees in MCFs, as well as third-parties, can notify DoD of sexual abuse or harassment in an MCF by contacting the Safe Helpline via phone. After receiving permission from the requesting individual, the request for assistance is referred to the appropriate agency for action to facilitate a resolution. For each inquiry, an electronic case file is created in the VRI system with the requestor's information and

a synopsis of the request. Requestors will not be granted information about a military sexual assault victim or another's inquiry without the permission of the victim or requesting individual, as appropriate.

For requests completed via the DD Form 2985 on SAPR.mil, the form can be completed by the requestor and submitted electronically. The form may also be completed by a DoD SAPRO staff member on behalf of the requestor when a request is received by phone. Once completed, the form is delivered to the following SAPRO staff members: the Senior Victim Assistance Advisor, the Victim Assistance Program Analyst-Safe Helpline Operations Manager, the Victim Assistance Analyst, and/or the Military Victim Assistance Advisor at SAPRO, who then will contact the inquirer to verify the information provided and determine what actions can be taken to assist the inquirer. The backside of the DD Form 2985 is completed by the SAPRO staff member documenting all follow up actions. The form is then forwarded to the appropriate agency which completes the information and provides SAPRO a response. The DD Form 2985 is saved within the individual's electronic case file along with any communications from the requestor and the agency to which the request was sent.

For requests received via the DD Form 2985-1 on safehelpline.org or via email, the request is received by the same SAPRO staff as detailed above. Upon receipt, the SAPRO staff then contact the inquirer to verify the information provided and determine what actions can be taken to assist the individual. Once permission is obtained from the requestor, the DD Form 2985-1 or email is forwarded to the appropriate agency for action. The DD Form 2985-1 or email is saved within the individual's electronic case file along with any communications from the requestor and the agency to which the request was sent.

For any requests (DD Form 2985, DD Form 2985-1, or letters) received via postal service, upon receipt, the SAPRO staff detailed above contact the requestor to verify the information and determine what actions can be taken to assist the inquirer. Once permission is obtained from the requestor, the document is scanned and electronically forwarded to the appropriate agency for action. The scanned document is saved within the individual's electronic case file along with any communications with the requestor and the agency to which the request was sent.

For PREA notifications received via the Safe Helpline, upon receipt, Safe Helpline staff obtain permission from the caller to forward the information provided to SAPRO electronically via the DD 2985-1. Upon receipt by SAPRO, the information is then captured in a VRI case file. From there the information is provided to Army Corrections Command who ensures the information is transmitted to the correct Service for further investigation based on the Military Correctional Facility in which the incident took place.

All respondents are provided a privacy act statement, which indicates the applicable authorities, purpose, routine uses, and disclosures, via the DD Form 2985, DD Form 2985-1, or via email follow-up for requests otherwise received via email, telephone, or postal service or telephone for PREA notifications made by MCF prisoners.

### 3. Use of Information Technology

Consistent with DoDD 6495.01 and DoDI 6495.02, SAPRO uses information technology as a means to:

- a. Provide additional channels for the DoD community to seek resources and obtain crisis support, if they choose;
- b. Increase the likelihood of victims reporting their sexual assaults to an official military authority and obtaining needed services and care;
- c. Connect victims to support provided by trained personnel.

Individuals may initiate an inquiry via the DD Form 2985 on SAPR.mil, DD Form 2985-1 on safehelpline.org, or via email. In total, an estimated 80% of the VRI collections are submitted electronically.

### 4. Non-duplication

The Sexual Assault Prevention and Response Office is responsible for the Department's sexual assault policy and oversight, as well as management of the Department's PREA Hotline, the Safe Helpline. As the sole entity responsible for these programs, there is currently no precedence for the collection of this type of information by any other government agency.

### 5. Burden on Small Business

The VRI system will not collect or maintain information related to small businesses or other small entities.

### 6. Consequences of Not Collecting the Information

If the VRI information collection were stopped, the DoD would not be able to fulfill its oversight responsibilities and provide services to victims of sexual assault. If the collection were less frequent, individuals who suffered an assault would have to wait to receive assistance. This would potentially negatively impact the reporting of an assault and the victim's access to care.

### 7. Paperwork Reduction Act Guidelines

There are no special circumstances that require the collection of information for VRI to be conducted in a manner inconsistent with the guidelines delineated in 5 Code of Federal Regulations (CFR) 1320.5(d)(2).

### 8. Consultation and Public Comments

a. Public comments were solicited in the Federal Register on March 29, 2016 (81 FR 17449). No comments were received.

A 30-Day Federal Register Notice for the collection published on March 31, 2017. The 30-Day FRN citation is 82 FRN 16029.

b. In 2012, SAPRO worked closely with the Military Services, National Guard Bureau, DoD Inspector General, and DoD Family Advocacy Program in creating the process for responding to victim-related inquiries. This process came about after the number of victims, parents, other family members and friends contacting SAPRO to request assistance greatly increased. This communication has created a continued open dialog between SAPRO and the other agencies that provide timely and responsive direct victim assistance, and allows for SAPRO to better answer the questions or needs of the inquirer. Since the process was initially designed, both the accuracy of tracking the number of inquiries received and the capability to provide timely response of the inquiries has improved due to collaborative and streamlined communication.

c. SAPRO coordinated with the Military Services and DoD's PREA Council in order to meet the reporting standards as outlined in the Prison Rape Elimination Act. The process established the Safe Helpline as the PREA hotline for Department of Defense Military Correctional Facilities, and was outlined in a memorandum from the Under Secretary of Defense for Personnel and Readiness, published on July 6, 2015.

The Services are also given the regular opportunity to provide feedback on new initiatives, trainings, and marketing tools on all SAPRO initiatives through formal coordination. Other partners include the DoD Veteran's Affairs Office, Health Affairs, and even leading subject matter experts from civilian agencies that are championing changes in how individuals are provided the assistance to aid victims in recovery from sexual assault, moving them from victim to survivor.

## 9. Gifts or Payments

Gifts or payments will not be provided to respondents.

## 10. Confidentiality

VRI collects personally identifiable information in order to provide one-on-one support and information to victims of sexual assault under the jurisdiction of the Military Services worldwide. The respondents are provided a privacy act statement on the DD Form 2985, DD Form 2985-1, or via email follow-up for requests otherwise received via email, telephone, or postal service or telephone for PREA notifications made by MCF prisoners

In order to safeguard individual privacy, victim inquiry records are maintained in a controlled facility that employs physical safeguards including the use of combination locks and identification badges. Access to electronic data files in the system is role-based, restricted to personnel with a need to know, and requires a Common Access Card (CAC) and password.

Electronic data is also protected via encrypted. The database cannot be accessed from the outside as it does not reside on a server and all records are accessible only to authorized persons with a need to know who are properly screened, cleared, and trained.

A draft copy of the SORN, DHRA.nn, “DoD Sexual Assault Prevention and Response Office Victim Assistance Data Systems,” has been provided with this package for OMB’s review. A draft copy of the PIAs, “DoD Safe Helpline” and “Victim Related Inquiry Tracking Files,” have been provided with this package for OMB’s review

The applicable Records Retention and Disposition Schedule is as follows: Temporary. Cut off resolved case files at the end of calendar year. Destroy 25 year(s) after cut off. (DAA-0330-2016-005)

## 11. Sensitive Questions

The Victim-Related Inquires System ensures all inquiries are directed to the appropriate service organization for action and that inquiries receive a sensitive and timely response. Sensitive information includes victim’s name, offender’s name, type of assault, and other information related to the report of sexual assault. The level of detail of information provided is determined by the victim and will only be shared with the victim’s permission. In some instances, the victim may choose to remain anonymous. No collected information violates the Privacy Act, as implemented by DoD 5400.11-R.

## 12. Estimates of Response Burden and Annual Cost to the Respondent

### a. Estimation of Respondent Burden

#### 1.a. DD 2985

- a. Number of Respondents: 8
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 8
- d. Response Time: 30 minutes (0.5 hours)
- e. Respondent Burden Hours: 4 hours

#### 1.b. DD 2985-1

- a. Number of Respondents: 18
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 18
- d. Response Time: 30 minutes (0.5 hours)
- e. Respondent Burden Hours: 9 hours

1.c. Requests received via postal service (DD Form 2985, DD Form 2985-1, or letters)

- a. Number of Respondents: 4
- b. Number of Responses Per Respondent: 1

- c. Number of Total Annual Responses: 4
- d. Response Time: 30 minutes (0.5 hours)
- e. Respondent Burden Hours: 2 hours

- 1.d. PREA Notifications received via phone
  - a. Number of Respondents: 3
  - b. Number of Responses Per Respondent: 1
  - c. Number of Total Annual Responses: 3
  - d. Response Time: 30 minutes (0.5 hours)
  - e. Respondent Burden Hours: 1.5 hours

**2. Total Submission Burden** (Summation or average based on collection)

- a. Total Number of Respondents: 33
- b. Total Number of Annual Responses: 33
- c. Total Respondent Burden Hours: 16.5 hours

b. Labor Cost of Respondent Burden

- 1.a. DD 2985
  - a. Number of Total Annual Responses: 8
  - b. Response Time: 30 minutes (0.5 hours)
  - c. Respondent Hourly Wage: \$22.71
  - d. Labor Burden per Response: \$11.36
  - e. Total Labor Burden: \$90.84

- 1.b. DD 2985-1
  - a. Number of Total Annual Responses: 18
  - b. Response Time: 30 minutes (0.5 hours)
  - c. Respondent Hourly Wage: \$22.71
  - d. Labor Burden per Response: \$11.36
  - e. Total Labor Burden: \$204.39

1.c. Requests received via postal service (DD Form 2985, DD Form 2985-1, or letters)

- a. Number of Total Annual Responses: 4
- b. Response Time: 30 minutes (0.5 hours)
- c. Respondent Hourly Wage: \$22.71
- d. Labor Burden per Response: \$11.36
- e. Total Labor Burden: \$45.42

- 1.d. PREA Notifications received via phone
  - a. Number of Total Annual Responses: 3
  - b. Response Time: 30 minutes (0.5 hours)
  - c. Respondent Hourly Wage: \$22.71

- d. Labor Burden per Response: \$11.36
- e. Total Labor Burden: \$34.07

**2. Overall Labor Burden**

- a. Total Number of Annual Responses: 33
- b. Total Labor Burden: \$374.72

**13. Respondent Costs Other Than Burden Hour Costs**

The estimated annualized costs to respondents, other than the burden hour costs addressed in Item 12, resulting from the collection of information is as follows:

- a. Total capital and start-up costs annualized over the expected useful life of the item(s) are \$0.00.
- b. Total operation and maintenance costs to respondents are \$0.00.

**14. Cost to the Federal Government**

**a. Labor Cost to the Federal Government**

**1a. DD 2985**

- a. Number of Total Annual Responses: 8
- b. Processing Time per Response: 0.75 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$47.39<sup>1</sup>
- d. Cost to Process Each Response: \$35.54
- e. Total Cost to Process Responses: \$284.32

**1b. DD 2985-1**

- a. Number of Total Annual Responses: 18
- b. Processing Time per Response: 0.33 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$47.39<sup>2</sup>
- d. Cost to Process Each Response: \$15.64
- e. Total Cost to Process Responses: \$281.52

**1c. Requests received via postal service (DD Form 2985, DD Form 2985-1, or letters)**

- a. Number of Total Annual Responses: 4
- b. Processing Time per Response: 0.75 hours

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<sup>1</sup> Hourly wage for a GS-14, Step 5 per "SALARY TABLE 2016-GS, INCORPORATING THE 1% GENERAL SCHEDULE INCREASE, EFFECTIVE JANUARY 2016," [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf)

<sup>2</sup> Ibid.

- c. Hourly Wage of Worker(s) Processing Responses : \$47.39<sup>3</sup>
- d. Cost to Process Each Response: \$35.54
- e. Total Cost to Process Responses: \$142.16

**1d. PREA Notifications received via phone**

- a. Number of Total Annual Responses: 3
- b. Processing Time per Response: 0.75 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$47.39<sup>4</sup>
- d. Cost to Process Each Response: \$35.54
- e. Total Cost to Process Responses: \$106.62

**2. Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 33
- b. Total Labor Burden: \$814.62

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$115,000<sup>5</sup>
- g. Total: \$115,000

- 1. Total Operational and Maintenance Costs: \$115,000
- 2. Total Labor Cost to the Federal Government: \$814.62
- 3. Total Cost to the Federal Government: \$115,814.62

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The wholesale collection of information will not be published. De-identified information may be used as part of SAPRO annual reports.

17. Non-Display of OMB Expiration Date

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

18. Exceptions to “Certification for Paperwork Reduction Submissions”

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<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Contract costs with RAINN



We are not requesting an exemption to the provisions certified.