SUPPORTING STATEMENT - PART A

(USMC Children, Youth and Teen Programs (CYTP) – 0703-AADP)

1. Need for the Information Collection

The collection is needed to gather participants' data in order to safely participate in USMC Children, Youth and Teen Programs (CYTP). Military Family Programs and Military Child Care: Military Child Care (10 U.S.C. Ch. 88, Subch. II) spells out the responsibilities of eligible patrons of the CYTP and CYTP professionals. The mission of the USMC Children, Youth and Teen Programs is to support the operational readiness, mission accomplishment and retention and to provide high quality, affordable child care programs and services that support eligible families. The authorities listed below authorize the collection of information:

10 U.S.C. 5013, Secretary of the Navy,
10 U.S.C. 5041, Headquarters, Marine Corps,
DoD Instruction 6060.02, Child Development Programs,
DoD Instruction 6060.4, Youth Programs,
DoD 6025.18-R, DoD Health Information Privacy Regulation,
OPNAV Instruction 1700.9E, Child and Youth Program; Marine Corps Order 1710.30F,
Marine Corps Child and Youth Programs (CYP) and
E.O. 9397 (SSN), as amended

2. Use of the Information

Respondents (eligible patrons, as defined by MCO P1710.30E) who want to register their children in USMC CYTP obtain NAVMC 1750/5 USMC Children, Youth and Teen Programs (CYTP) Registration Form, NAVMC 1750/4 USMC Children, Youth and Teen Programs (CYTP) Health Assessment And Health Screening Tool For Inclusion Action Team (IAT) and NAVMC 11720 USMC Family Care Programs: Consent to Release Information. These forms are obtained physically from the installation CYTP. Once completed, the forms are returned to CYTP via email or physically. The information provided by the respondents is used by USMC professionals to: (1) verify child required immunizations per admission requirements; (2) be used by the Inclusion Action Team (IAT) to determine necessary and appropriate accommodations in CYTP activities.; (3) execute emergency medical procedure for chronic illnesses/conditions; (4) refer child for enrollment in Exceptional Family Member Program; and (5) determine if at time of enrollment child is physically fit to participate in USMC CYTP programs.

The information collected on these forms is used by Marine Corps Family Care Programs (MFP) and Inclusion Action Team (IAT) professionals for purposes of respondent registration, to determine the general health status of patrons participating in CYTP activities and if necessary the appropriate accommodations for the patron for full enjoyment of CYTP services, and provides consent for information to be exchanged between MFP personnel and other designated individuals or organizations about a patron participating in MFP. An Agency Disclosure Notice and Privacy Act Statement are listed on each form.

3. <u>Use of Information Technology</u>

CYTP stores the USMC Children, Youth and Teen Programs (CYTP) clean Registration Packet forms via their website, at https://ehqmc.usmc.mil/sites/family/mfy/mfy3/default.aspx for installation program access, and can be downloaded from the Program Protocols Library. The installation programs then physically provide forms to respondents. Once respondents complete their forms, the forms are returned to the CYTP office physically or via e-mail. Most of the forms are not returned electronically because all respondents do not have access to computers/email. Therefore, 25% of responses are collected electronically. There are no plans for incorporation of additional technology at this time.

4. <u>Non-duplication</u>

There is not information already available which can be used, or modified for use for the purposes of this collection.

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

The consequence, if we would not collect any data, would adversely impact individuals from participation in CYTP activities.

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 for the collection published on 4 MAY 2017. The 60-Day FRN citation is 82 FRN 20867.

A 30-Day Federal Register Notice for the collection published on Thursday, September 07, 2017. The 30-Day FRN citation is 82 FR 42337.

No comments were received during the 60-Day Comment Period.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. <u>Gifts or Payment</u>

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. <u>Confidentiality</u>

Each collection device displays a privacy act statement and agency disclose notice at the top of each form.

This system of records contains individually identifiable health information covered by draft SORN NM01754-3. A draft copy of the SORN is included in the PRA submission package.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Retention for these records are under SSIC 1754.2 (Destroy when 2 years old (N1-NU-86-4).

11. <u>Sensitive Questions</u>

CYTP collects data concerning health and special needs/disabilities to determine appropriate childcare accommodations. All respondents are made aware of the need to collect this data via the privacy act statements on each form within the USMC Children, Youth and Teen Programs (CYTP) Registration Packet. No SSNs are being collected.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

- 1. NAVMC 1750/5
- a. Number of Respondents:112,000
- b. Number of Responses Per Respondent:1
- c. Number of Total Annual Responses: 112,000
- d. Response Time: .5 hours
- e. Respondent Burden Hours: 56,000
- 1. NAVMC 1750/4
- a. Number of Respondents:112,000
- b. Number of Responses Per Respondent:1
- c. Number of Total Annual Responses: 112,000
- d. Response Time: .5 hours
- e. Respondent Burden Hours: 56,000
- 1. NAVMC 11720
- a. Number of Respondents: 112, 000
- b. Number of Responses Per Respondent:1
- c. Number of Total Annual Responses: 112000
- d. Response Time: .17 hours
- e. Respondent Burden Hours:19,040

2. Total Submission Burden

- a. Total Number of Respondents: 112,000
- b. Total Number of Annual Responses:1
- c. Total Respondent Burden Hours: 131,040 hours

b. Labor Cost of Respondent Burden

- 1. NAVMC 1750/5
- a. Number of Total Annual Responses: 112,000
- b. Response Time: .5 hours
- c. Respondent Hourly Wage: \$17.71
- d. Labor Burden per Response: \$8.86
- e. Total Labor Burden: 991,760
- 1. NAVMC 11720
- a. Number of Total Annual Responses: 112,000
- b. Response Time: .17 hours

- c. Respondent Hourly Wage: \$17.71 d. Labor Burden per Response :\$3.01
- e. Total Labor Burden: 337,198.4
- 1. NAVMC 1750/4
- a. Number of Total Annual Responses: 112.000
- b. Response Time: .5 hours
- c. Respondent Hourly Wage: \$17.71 d. Labor Burden per Response: \$8.86
- e. Total Labor Burden: 991,760

2. Overall Labor Burden

- a. Total Number of Annual Responses: 112,000
- b. Total Labor Burden: 2,320,718.4

The Respondent hourly wage was determined by using the average wage rate/hour using the Child Development Program Fees Ranges School Year 15/16: https://ehgmc.usmc.mil/sites/family/mfy/mfy3/default.aspx

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

a. Labor Cost to the Federal Government

1. NAVMC 1750/5

- a. Number of Total Annual Responses:112,000
- b. Processing Time per Response: .17 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$20.73
- d. Cost to Process Each Response: \$3.52
- e. Total Cost to Process Responses: \$394,240

1. NAVMC 1750/4

- a. Number of Total Annual Responses:112,000
- b. Processing Time per Response: .17 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$20.73
- d. Cost to Process Each Response: \$3.52
- e. Total Cost to Process Responses: \$394,240
- 1. NAVMC 1720
- a. Number of Total Annual Responses:112,000

- b. Processing Time per Response: .17 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$20.73
- d. Cost to Process Each Response: \$3.52
- e. Total Cost to Process Responses: \$394,240

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 112,000
- b. Total Labor Burden: 1,182,720

The hourly wage of workers was determined by using the Department of Labor Wage Website: http://www.dol.gov/dol/topic/wages/index.htm

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$100
- c. Postage: \$
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total:\$100
- 1. Total Operational and Maintenance Costs: \$100
- 2. Total Labor Cost to the Federal Government: 1,182,720
- 3. Total Cost to the Federal Government: \$1,182,820

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

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

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. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.