

## SUPPORTING STATEMENT - PART A

### Family Advocacy Program (FAP): Child Abuse and Domestic Abuse Incident Reporting System – OMB Control Number 0704-0536

#### 1. Need for the Information Collection

For 36 years, the Department of Defense (DoD) Family Advocacy Program (OSD FAP) has worked to prevent and respond to child abuse, neglect, and domestic abuse in military families. This information collection provides the child abuse and domestic abuse incident data from the DoD FAP Central Registry as required by Section 574 of the FY17 National Defense Authorization Act (NDAA). In addition to meeting the congressional requirement, this report has historically provided critical aggregate information on the demographics of domestic abuse and child abuse/neglect incidents which informs ongoing prevention and response services. The aggregated FAP Central Registry data derived from this information collection and submitted from each Military Service (Army, Navy, Marine Corps, and Air Force) offers the DoD a systems-wide picture of the child abuse and neglect (hereafter referred together as child maltreatment) and domestic abuse incidents that are reported to FAP.

#### 2. Use of the Information

Respondents to the collection are military members and associated family members who have been referred to the installation FAP after a reported incident of family maltreatment, either domestic abuse or child maltreatment. The purpose of the collection is to determine eligibility for FAP services and to initiate a clinical record. The aggregated information on the is originally collected during a clinical interview with the respondents and is entered into the Military Service's clinical case record system by either the clinician or the data specialist depending on the staffing of the installation FAP. Each quarter, the data specialist or analyst at the Military Service's FAP Headquarters extracts the specific fields required for this information collection and sends a batch file to the DMDC-held DoD FAP Central Registry. At the end of the calendar year, the Military Service's FAP Headquarters extracts the previous FY data and sends an annual batch file to DMDC. The analyst at DMDC prepares an annual workbook of aggregated data containing de-identified information to OSD FAP and the OSD FAP analyst prepares an annual report as required by Section 574 of the FY17 NDAA.

#### 3. Use of Information Technology

Information is collected 100% electronically. The annual aggregated data and information transmitted by the Services to DMDC and then by DMDC to OSD FAP is processed entirely by using information technology and systems. Data collection relies on

technological collection techniques with entries being made by data specialists and clinicians depending on requirements.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

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 Office of the Secretary of Defense Family Advocacy Program together with DMDC conducts an annual collection and reporting of aggregated data from all of the Military Departments concerning domestic abuse and child abuse and neglect to meet the requirements of Section 574 of the FY17 NDAA. Less frequent collection will result in no ability to provide this annual report.

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 Thursday, September 14, 2017. The 60-Day FRN citation is 82 FRN 43227.

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

A 30-Day Federal Register Notice for the collection published on Friday, June 29, 2018. The 30-Day FRN citation is 83 FRN 30704.

Part B: CONSULTATION

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

9. Gifts or Payment

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

10. Confidentiality

When respondents provide information for benefit determination and for clinical services, they receive copies of the Privacy Information Act and the Health Information Portability and Protection Act (HIPPA) from the installation Family Advocacy Program provider. All personally identifiable information data are protected by the Privacy Act of 1974 and are protected according to the regulations therein and by related DoD directives and instructions. No PII is transferred or transmitted from or by DMDC to the OSD Family Advocacy Program (FAP) office.

The Central Registry falls under the Defense Manpower Data Center Data Base (November 23, 2011, 76 FR 72391) Privacy Act System of Records Notice (SORN) DMDC 01 which can be found at (<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570563/dmdc-01/>). A draft copy of the PIA, Defense Manpower Data Center Data Base (DMDC 01) Department of Defense Manpower Data Center (DMDC), has been provided with this package for OMB's review.

Input/source records are deleted or destroyed after data have been entered into the master file or when no longer needed for operational purposes, whichever is later. Exception: Apply NARA-approved disposition instructions on the data files residing in other DMDC data bases.

The Master File is retained permanently. At the end of the fiscal year, a snapshot is taken and transferred to the National Archives in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

Outputs records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.

System documentation (codebooks, record layouts, and other system documentation) are retained permanently and transferred to the National Archives along with the master file in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

11. Sensitive Questions

Social security numbers are collected in this process. The Social Security Number Justification Memo is attached. The aggregated data provided to OSD FAP by DMDC from the Central Registry does not contain any PII or answers to sensitive questions.

12. Respondent Burden and its Labor Costs

The burden estimate was determined by calculating the average number of child abuse and domestic abuse reports made to the FAP over the past ten years. Members of the public; civilian spouses, intimate partners, and parents provide a response in 70% of the reports. The total, 23,143, represents 70% of the average number of reports received in a year. Each response takes approximately 45 mins to complete which translates into a total of 17,357 hours of respondent burden.

a. Estimation of Respondent Burden

1. Central Registry: Child Abuse and Domestic Abuse Incident Reporting System

- a. Number of Respondents: 23,143
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 23,143
- d. Response Time: 45 min
- e. Respondent Burden Hours: 17,357 hours

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

- a. Total Number of Respondents: 23,143
- b. Total Number of Annual Responses: 23,143
- c. Total Respondent Burden Hours: 17,357 hours

b. Labor Cost of Respondent Burden

1. Central Registry: Child Abuse and Domestic Abuse Incident Reporting System

- a. Number of Total Annual Responses: 23,143
- b. Response Time: 45 mins/.75 hour
- c. Respondent Hourly Wage: \$17.76
- d. Labor Burden per Response: \$13.32
- e. Total Labor Burden: \$308,265

**2. Overall Labor Burden**

- a. Total Number of Annual Responses: 23,143

b. Total Labor Burden: \$308,265

The Respondent hourly wage was determined by using the Department of Labor Wage Website under retail services (<http://www.dol.gov/dol/topic/wages/index.htm>).

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

The following breakdown accounts for the four quarterly updates to the DoD FAP Central Registry from the automated central registries owned by the Military Services and the annual report on data from the previous fiscal year.

**1. Central Registry: Child Abuse and Domestic Abuse Incident Reporting System – Quarterly Batch Files**

- a. Number of Total Annual Responses: 4
- b. Processing Time per Response: 10 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$30.47
- d. Cost to Process Each Response: \$304.70
- e. Total Cost to Process Responses: \$1,218.80

**2. Central Registry: Child Abuse and Domestic Abuse Incident Reporting System – Annual Report**

- a. Number of Total Annual Responses: 1
- b. Processing Time per Response: 58 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$30.47
- d. Cost to Process Each Response: \$1,767.26
- e. Total Cost to Process Responses: \$1,767.26

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

- a. Total Number of Annual Responses: 5
- b. Total Labor Burden: \$2986.06

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0

- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$0

- 1. Total Operational and Maintenance Costs: \$0
- 2. Total Labor Cost to the Federal Government: \$2986.06
- 3. Total Cost to the Federal Government: \$2986.06

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. The DoD Manual, DoDM 6400.01, Vol 2, Family Advocacy Program (FAP): Child Abuse and Domestic Abuse Incident Reporting System, which provides policy guidance on this information collection, was under review by the Family Advocacy Program and the Office of General Counsel pending legislative changes. The burden has increased since the previous approval due to revisions made to the formulas used to calculate respondent burden, personnel costs, and operational and maintenance costs. For respondent burden, a 10 year average was used to calculate the number of respondents to reflect a more realistic burden in any given year. The labor costs for the federal government's personnel costs were revised to more accurately capture the number of hours an employee devotes to collecting, entering, and processing this information collection. Likewise, the operational and maintenance costs were adjusted to capture the percentage of the total cost to the Services in order to capture, process, and transmit the data specific to the data elements related to this information collection.

16. Publication of Results

To meet the requirements of Section 574 of the FY17 NDAA, the OSD FAP will release a Annual Report on Child Abuse and Domestic Violence annually through April 30, 2021, to the Committees on Armed Services of the House of Representatives and the Senate. This report provides aggregate information on the demographics of individuals involved in reports of child abuse and domestic abuse reported to the installation FAPs and does not contain any PII. Using aggregated FAP Central Registry data submitted from each Military Service (Army, Navy, Marine Corps, and Air Force), this report offers a Department-wide picture of the child maltreatment and domestic violence incidents that were reported to FAP in the respective FY.

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. Exceptions to “Certification for Paperwork Reduction Submissions”

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