<u>DISM</u>

SUPPORTING STATEMENT – PART A

Summary of Changes of the Previously Approved Information Collection:

• Burden increased due to an increase in estimated number of annual respondents, based on historical data of the last three years

A. JUSTIFICATION

1. <u>Need for the Information Collection</u>

The Defense Institute of Security Cooperation Studies (DISCS) Information Technology Mission System (DISM): Is a system designed to hold the DEAMS application for the purposes of efficient administration of U.S. and international students, and the effective management of DISCS personnel and guest lecturers. The portal provides DISCS personnel the ability to submit travel request and travel arrangements. Finally, the web based portal uses a relational database to record, manage and report information about students, personnel, and travel.

Legal or administrative requirements that mandate the collection of data are;

22 U.S. CODE § 2394 (Foreign Assistance Act (FAA)) and 22 U.S. CODE § 2770A (Arms Export Control Act (AECA)) the Joint Security Cooperation Education and Training Regulation, 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347; 10 U.S.C. 134, Under Secretary of Defense for Policy; DoD Directive 5105.65, Defense Security Cooperation Agency (DSCA); DoD Directive 5105.38-M, DSCA Manual, Chapter 10; DoD Directive 5101.1, DoD Executive Agent; DoD Directive 5132.03, DoD Policy and Responsibilities Relating to Security Cooperation; DoD Directive 5105.38-M, DSCA Manual; Joint Security Cooperation Education and Training (JSCET) regulation, (AR12-1, SECNAVINST 4950.4B, AFI 16-105); Foreign Assistance and Arms Export Act §548; Executive Order 9397, as amended by Executive Order 13478.

2. Use of the Information

The information collected in DISM is used by DISCS to provide an efficient management of DISCS resources in support of U.S. and international students that attend DISCS courses on-site, overseas, or on-line. The information is used to manage personnel actions to include the validation and reconciliation of travel orders, time off, course instruction schedules, recall roster, academic rank & degree and emergency points of contact. The management of student/participant activities including all events and courses attended at DISCS or at offsite courses both CONUS and OCONUS, we can provide the students with their academic achievement at DISCS along with a record of completion. Further, DISM provides both personnel and class scheduling throughout the Fiscal/Calendar Year. To sum up DISM is a collaborative work tool for all of DISCS.

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

99% of the information collection will be conducted electronically. Potential students input their information through the DISCS registration form; as a secondary option, they can email the registration forms to the registrar's office at <u>dsca.wright-patt.discs.list.registrars@mail.mil</u>. Once the student's information is uploaded into the DISM database and approved, the student is assigned to the class. Faculty submit travel request on DISM which provides for future planning of the courses and budgetary management within DISCS. Visiting guest speaker information is loaded into the database by the administrators for tax purposes and as part of the course management. DISM provides an overview of the courses and compiles reports on DISCS resources for management of the programs.

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 Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities

6. <u>Less Frequent Collection</u>

The collection information is voluntary; however failure to provide the information could result in the individual not being accepted into a DISCS course.

7. Paperwork Reduction Act Guidelines

No special circumstances exist that would not adhere to the guidelines in 5 CFR 1320.5(b)(2).

8. Consultation and Public Comments

60-day Federal Register Notice was published on 24 October 2018 (83 FR 53613). Public comments ended on 24 December 2018.

30-Day Federal Register Notice was published on 26 December 2018 (83 FR 66254).

9. Gifts or Payment

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

10. <u>Confidentiality</u>

A Privacy Act Statement is required for this collection and is included on the collection instrument for the respondent to see.

A Statement of Record Notice (SORN) is required for this collection and can be accessed at the following link: <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/794048/dsca-05/</u>

The DISM Privacy Impact Assessment is included as a supplementary document.

Records are cut off annually and destroyed at 25 years old.

11. <u>Sensitive Questions</u>

The justification for use of the social security number (SSN) is dated 29 June 2018. Guest speakers need to provide their full name, SSN, honorarium, course information and their position in order to receive funding for their services as speaker/ instructor.

The minimum data needed for the student to register is their full name, email, student type (includes service branch and grade/rank), DoD Identification Number (DoD ID Number) and Cyber Awareness training completion date. Students are allowed to input information related to any special needs or requirements (i.e., food, disability, etc.). This is done to assist the registrar office in advising the student where they can find food per their religious dietary requirements, places of worship or to make special arrangements the student may require during their training.

For DISCS personnel the information collected; such as full name, DoD ID number, gender, date of birth, home address, personal cell phone and work numbers, duty hours, emergency name contact, funding source, directorate and office names, employment status, academic rank and degree, salary, job series, civilian grade, military; is used for human resources, TDY and emergency contact purposes.

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

a. Estimation of Respondent Burden.

DISCS STUDENT REGISTRATION FORM:

ANNUAL BURDEN HOURS: 6177 hours NUMBER OF RESPONDENTS: 12353 RESPONSES PER RESPONDENT: 2 ANNUAL RESPONSES: 24706 AVERAGE BURDEN PER RESPONSE: 15 minutes

DISCS GUEST SPEAKER FORM:

ANNUAL BURDEN HOURS: 52 NUMBER OF RESPONDENTS: 206 RESPONSES PER RESPONDENT: 1 ANNUAL RESPONSES: 206 AVERAGE BURDEN PER RESPONSE: 15 min

ANNUAL TOTALS:

ANNUAL BURDEN HOURS: 6,229 hours TOTAL ANNUAL RESPONDENTS: 12,559 TOTAL ANNUAL RESPONSES: 24,912

b. Labor Cost of Respondent Burden

Estimated Hourly Rate: \$67.35 Rate Per Response (67.35 x .25): \$16.84 Annual Responses: 24,912 Total Labor Cost (24,912 x 16.84): \$419,518.08

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

Although DISM funding for individuals is provided through the Foreign Military Sales Program, Software development costs incurred for the collection of the data is \$201K. Annual operations and maintenance costs are \$10K

Estimated hourly rate: \$68.51 Average burden per response: 15 mins/\$17.18 Total Cost to Gov't (17.18 x 24,912): \$427,988.16

TOTAL ANNUAL COST TO GOVT: \$638,988.16

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

There has been an increase in burden due to an increase in the estimated number of annual respondents, based on historical data of the last three years.

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. Exceptions to "Certification for Paperwork Reduction Submissions"

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