

## SUPPORTING STATEMENT - PART A

Security Assistance Network (SAN) – 0704-0555

### Summary of Changes from Previously Approved Collection

- The burden has decreased since the previous approval due to the Component Office AO reporting individual records vs the collection of Individual records that makes up one response. The number of respondents in the 2016 package were reported in excess of 12,000.

#### 1. Need for the Information Collection

The Security Cooperation Training Management System portion of the Security Assistance Network (SAN) collects International Student Information (IMSI) that is used by the Defense Security Cooperation Agency (DSCA), military departments and others within the security cooperation community. This data is collected on non U.S. citizens that have been selected by their government to attend various training through the Department of Defense (DoD) schools and DoD-contracted facilities. The IMSI is also used by the receiving organization to provide background information on the student assisting in the student's arrival and stay in the United States. The SAN also includes the Security Cooperation Workforce Database (SCWD) and International Affairs Certification Database (IACD) which tracks and provides the status of training for the Security Cooperation workforce certification levels.

This collection is authorized by 10 U.S.C. 134, Under Secretary of Defense for Policy; DoD Directive 5105.65, Defense Security Cooperation Agency (DSCA); DSCA Security Assistance Management Manual, Chapter 10, International Training; DoD Directive 5101.1, DoD Executive Agent; DoD Directive 5132.03, DoD Policy and Responsibilities Relating to Security Cooperation; Joint Security Cooperation Education and Training (JSCET) regulation, (AR12-1, SECNAVINST 4950.4B, AFI 16-105); Foreign Assistance and Arms Export Act § 548.

#### 2. Use of the Information

The IMSI that is collected on the SAN is used by the International Military Student Officer (IMSO) assigned to each training installation to prepare for the arrival and stay in the United States of the international training student. The collection of this information, in addition to the above, is for the issuance of invitational travel orders, student screening purposes, and to determine the student's likes and dislikes; his/her recreation activities; dietary restrictions; etc.

The Security Cooperation Organization/Officer (SCO) collects the biographical data from International Military Students (IMS) or their country to populate the DD Form 2239. SCOs may access the system via username and password or if they are active DoD (civilian, military or contractor) members through CAC and pin. Data may also be collected from automated uploads from the Regional Center Persons Activity Management System (RCPAMS) and Defense Security Assistance Management System (DSAMS) DoD systems. Using the Security Cooperation-Training Management System (SC-TMS) that is hosted on the Security Assistance Network (SANWeb), the SCO enters the collected biographical data.

The IMS trains at United States Military schoolhouses. The IMSO at the schoolhouse/training activity logs onto SC-TMS to view or download an electronic copy of the SC-TMS generated DD-2339 and uses it to support the IMS while during their arrival and stay for training.

### 3. Use of Information Technology

0% of responses are collected electronically through the SC-TMS. Biographical data is collected verbally from the IMS or their country of origin, as this is the most effective way to communicate and capture the data requirements. There are no plans at this time to amend the collection process.

### 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

This information is collected on occasion, as it is necessary so that the IMSO knows any specified general requirements of the international student before their arrival resulting in less of a workload for the IMSO and efficiency of processing the student.

### 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 (FRN) for the collection published on Thursday, March 21, 2019. The 60-Day FRN citation is 84 FRN 10482.

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

A 30-Day Federal Register Notice (FRN) for the collection published on Thursday, May 23, 2019. The 30-Day FRN citation is 84 FRN 23776.

## Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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

A Privacy Act Statement (PAS) is required for this collection. The PAS is provided as a pop-up page before information is collected.

This information collection requires a System of Record Notice (SORN). The SORN, Security Assistance Network (SAN) is available at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/952339/dsca-07/>.

This information collection requires a Privacy Impact Assessment (PIA). The PIA, Security Assistance Network (SAN) is available at [https://www.dsca.mil/sites/default/files/privacy\\_impact\\_assessment\\_-\\_san.pdf](https://www.dsca.mil/sites/default/files/privacy_impact_assessment_-_san.pdf).

Records are cut off annually and destroyed 5 years after cut off.

### 11. Sensitive Questions

International students provide input information related to their religious affiliation and preferences (i.e., food, entertainment, etc.). This is done to assist the IMSO in advising the student where they can find food per their religious dietary restrictions and places of worship during their training.

### 12. Respondent Burden and its Labor Costs

## Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Security Cooperation-Training Management System (SC-TMS) Student Information IMSI Bio tab.
  - a) Number of Respondents: 1,784
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 1,784
  - d) Response Time: 15 minutes
  - e) Respondent Burden Hours: .25 hours
  
- 2) Total Submission Burden
  - a) Total Number of Respondents: 1,784
  - b) Total Number of Annual Responses: 1,784
  - c) Total Respondent Burden Hours: 446 hours

#### Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Security Cooperation-Training Management System (SC-TMS) Student Information IMSI Bio tab
  - a) Number of Total Annual Responses: 1,784
  - b) Response Time : 15 minutes
  - c) Respondent Hourly Wage: \$20.17
  - d) Labor Burden per Response: \$5.0425
  - e) Total Labor Burden: \$8,995.82
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 1,784
  - b) Total Labor Burden: \$8,995.82

Respondent labor burden was estimated using comparative wage data (O-2 Basic Pay Rate – US Military Payscale) provided by the DoD Cost Guidance Portal at <https://costguidance.osd.mil/CGPortal/?source=collection>.

#### 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

##### Part A: LABOR COST TO THE FEDERAL GOVERNMENT

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

1. Security Cooperation-Training Management System (SC-TMS) Student Information IMSI Bio tab
  - a) Number of Total Annual Responses: 1,784
  - b) Processing Time per Response: 15 minutes

- c) Hourly Wage of Worker(s) Processing Responses: \$39.90
- d) Cost to Process Each Response: \$9.975
- e) Total Cost to Process Responses: \$17,795.40

- 2. Overall Labor Burden to Federal Government
  - a. Total Number of Annual Responses: 1,784
  - b. Total Labor Burden: \$17,795.40

Respondent labor burden was estimated using comparative wage data (GS-9 Basic Pay Rate – US Military Payscale) provided by the DoD Cost Guidance Portal at <https://costguidance.osd.mil/CGPortal/?source=collection>.

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$10,000; this is an estimation for the maintenance to hold the small amount of data that makes up DD Form 2339.
- 2) Total Operational and Maintenance Cost: \$10,000.

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$17,795.40
- 2) Total Operational and Maintenance Costs: \$10,000
- 3) Total Cost to the Federal Government: \$27,795.40

#### 15. Reasons for Change in Burden

The burden has decreased since the previous approval due to the Component Office AO reporting individual records vs the collection of Individual records that makes up one response. The number of respondents in the 2016 package were reported in error as 43,980. The system does not have 43,980 students.

#### 16. Publication of Results

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.