

SUPPORTING STATEMENT - PART A

DoDEA Student Registration – 0704-0495

Summary of Changes from Previously Approved Collection

- Burden substantially increased as all students educated by DoDEA are now registered through the DoDEA Form 600.
- The DoDEA Form 600, Student registration, has been redesigned with an updated Privacy Act Statement.
- The DoDEA Sure Start Program is now included as part of this collection.

1. Need for the Information Collection

The Department of Defense Education Activity (DoDEA) is mandated by titles 10 U.S.C., Section 2164, title 20, U.S.C., Section 921-932, and DoDEA Regulation 1342.13 to provide free education to authorized minor dependents of Department of Defense (DoD) military and civilian sponsors who would otherwise not have access to a high-quality public education from pre-kindergarten to 12th grade. To accomplish this mission, the DoDEA Student Registration is used to obtain necessary data of each sponsor who enrolls a child in a DoDEA school to determine the child's eligibility for enrollment. The information on the sponsorship of students who attend DoDEA schools provide the basis of enrollment categories: space-required, tuition-free; space-available, tuition-free; space-required, tuition-paying; and space-available, tuition-paying.

A small subset of students may additionally enroll in the DoDEA Sure Start Program, which is located in OCONUS locations and modeled after the federally funded Head Start program. Like Head Start, DoDEA Sure Start includes a health and nutrition component. The health component has a requirement that sponsors provide up-to-date child health and dental status via the Sure Start Medical/Dental Form. This is necessary to determine if the child is up-to-date on scheduled age-appropriate preventive and primary medical and oral health care. The information about an enrolling student is also to protect and enhance student health and to promote a safe school environment. The physician has the opportunity to identify important health concerns that are necessary for the school nurse to know in order to provide appropriate services.

2. Use of the Information

The primary purpose of this information collection for the DoDEA Student Registration is to determine enrollment categories whether the students are authorized on a tuition-free or tuition-paying basis and space-required or space-available basis. Sponsor entitlement to dependent education in DoDEA schools is determined by documentation provided, whether the sponsor is: (1) a member of the Armed Forces, or a DoD civilian and which element and component of the Armed Forces or DoD; (2) an employee of another Federal

Agency, or of a DoD contractor; (3) whether the sponsor is a U.S. citizen or a foreign national; and, (4) whether the sponsor is assigned overseas or to a military installation in the U.S. Student eligibility also depends on whether the student is a dependent of a member of the Armed Forces or of the Federal Government who is authorized Federally-funded transportation to an overseas assignment. The Student Registration also secures information about each enrolled student to ensure that DoDEA makes available the appropriate classrooms, staffing, and supportive services. The form associated with this information collection is DoDEA Form 600, "Student Registration." The paper forms and electronic data systems containing the sponsor and dependent personally identifying information are secured in accordance with the requirements of Federal law and implementing DoD regulations.

During school year 2018-2019, the Department of Defense Education Activity served over 72,000 students in 163 schools. Each student provides a new DoDEA Form 600 every year that they are enrolled.

For students providing additional health and nutrition information for the Sure Start program, that information is collected by the DoDEA Sure Start Child Medical/Dental Examination form (paper), which is completed by three (3) respondents: the child's sponsor, the primary care physician and the dentist. The sponsor is providing identifying information, the physician is providing information regarding the child's health status and the dentist is providing information regarding the child's dental health status. The sponsor is provided the form by the school then completes their part and takes it to the medical and dental treatment facilities. The form is completed by hand with information either from a previous medical/dental examination or the child's four-year old medical examination. The completed form is then returned to the parent who in turn gives the completed form to the school nurse at the school their child is enrolled. The school nurse discusses the form with the parent if there are any concerns.

The school nurse then records the information in the DoDEA Student Information System (SIS) and the form is placed in the student's health record file. The student's health record is placed in the Elementary school student record file and securely maintained at the school. The record is destroyed after 5 years after transfer, withdrawal or death of the student (TWD). When the student transfers to another school a copy of the record may be released to the parent for hand carrying, if transferring outside DoDEA, an official copy shall be provided on receipt of an authorized request. Records are maintained in accordance with the Office of the Secretary of Defense Records Disposition Schedules, Record Group 330, Series 1900. End result is that the school is ensured that children in their program are receiving appropriate medical and dental care and are up-to-date on required immunizations, and school is aware of any identified medical conditions or restrictions so that they can be handled appropriately in the educational setting.

3. Use of Information Technology

100% of all responses are received electronically. Respondents may download and submit the required registration forms through the DoDEA Registration System, located at the following link: <https://www.dodea.edu/registration-forms.cfm>.

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

If the information cannot be collected, DoDEA would lack critical data that are necessary to make available a quality education for eligible dependents of DoD military and civilian personnel on official assignments. The information gathered for students is used to verify age; determine class and transportation schedules; record attendance, absence and withdrawal; record and monitor student progress, grades, courses and grade credits; educational services and placement, activities, awards, special interests and accomplishments. DoDEA schools, districts, areas, and headquarters would not gain critical insights which could impede data-based decision making in regard to programs and academic services offered to DoDEA students. For the DoDEA Sure Start program, information is only required for initial enrollment for each enrolled Sure Start child and is not collected in subsequent years.

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 Wednesday, March 27, 2019. The 60-Day FRN citation is 84 FRN 11531.

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

A 30-Day Federal Register Notice for the collection published on Friday, August 30, 2019. The 30-Day FRN citation is 84 FRN 45740.

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 is provided to all respondents on both forms.

The data collected on the DoDEA Student Registration is covered by the DoDEA System of Records Notice DoDEA 26, which is available at:

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/570573/dodea-26/>, "Department of Defense Education Activity Educational Records"

A Privacy Impact Assessment (PIA) has been published online at <https://www.dodea.edu/upload/pia OPS.pdf>.

Records are retained and disposed of per the following schedule: Destroy/delete files, other than secondary transcripts, of all information except report cards or other records of academic promotion or retention data after 1 year. Destroy or delete all non-secondary transcript files 3-5 years after graduation, transfer, withdrawal, or death of student.

11. Sensitive Questions

Responses regarding gender are requested to determine the total number of male and female students. Race and ethnicity questions comply with OMB Standards for Maintaining, Collecting, and Presenting Data for Race and Ethnicity, dated 30 October 1997. The data collected is maintained for "Statistical Use Only" and is protected in accordance with the Privacy Act (93-579), OMB Circular A-108, and DoD Directive 5400.11.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DoDEA Form 600 "Registration"]

- a) Number of Respondents: 72,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 72,000
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 36,000 hours

[DoDEA Form 1307 "Sure Start Medical/Dental Examination"]

- a) Number of Respondents: 950
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 950
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 237.5 hours

2) Total Submission Burden

- a) Total Number of Respondents: 72,950
- b) Total Number of Annual Responses: 72,950
- c) Total Respondent Burden Hours: 36,237.5 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DoDEA Form 600 "Registration"]

- a) Number of Total Annual Responses: 72,000
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$3.63
- e) Total Labor Burden: \$261,360

[DoDEA Form 1307 "Sure Start Medical/Dental Examination"]

- a) Number of Total Annual Responses: 950
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$1.81
- e) Total Labor Burden: \$1719.50

2) Overall Labor Burden

- a) Total Number of Annual Responses: 72,950
- b) Total Labor Burden: \$263,079.50

The Respondent hourly wage was determined by using the Federal minimum wage of \$7.25/hr.

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

The total cost to the Federal Government is estimated to be approximately \$320,000. This cost includes the time spent by school registrars processing student registration and filing medical information as well as any operational and maintenance costs.

Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

(P): Repeat . 1a-e for each collection instrument (using copy and paste)

1) Collection Instrument(s)

[DoDEA Form 600 "Registration"]

- a) Number of Total Annual Responses: 72,000
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses : \$17.42
- d) Cost to Process Each Response 4.36: $\$(P: B \text{ multiplied by } C)$
- e) Total Cost to Process Responses : $\$(P: A \text{ multiplied by } D)$ 313,920

[DoDEA Form 1307"] Sure Start Medical/Dental Examination "

- a) Number of Total Annual Responses: 950
- b) Processing Time per minutesResponse: 15
- c) Hourly Wage of Worker(s) Processing Responses : \$17.42
- d) Cost to Process Each Response 4.36: $\$(P: B \text{ multiplied by } C)$
- e) Total Cost to Process Responses : $\$(P: A \text{ multiplied by } D)$ 4,142

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses 72,950: *(P: add all "a's" in this section)*
- b) Total Labor Burden $\$(P: \text{add all "e's" in this section})$: 318,062

Labor burden to the Federal Government was determined using the hourly wage for a GS-7 government employee of \$17.42/hour.

Part B: OPERATIONAL AND MAINTENANCE COSTS

(P): To determine Operational and Maintenance Costs, think of the incidental or miscellaneous costs to owning this collection. How much does equipment, printing, or postage for this collection cost? Are there any overhead costs for purchasing or licensing software? If a database or system is involved, how much money does it take to maintain the system? If you do have incur any Operational and Maintenance costs through this collection, please put "\$0" next to each category.

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$0
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: 0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$318,062
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: 318,062

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. Burden is increasing to better reflect the number of responses provided over a given calendar year by each student re-enrolling in a DoDEA program. The DoDEA Sure Start program, which was in existence without an OMB Control Number, is also being included in this collection for the first time.

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.