SUPPORTING STATEMENT

DoD Child Development Program – Family Information OMB Control Number 0704-0515

Summary of Changes from Previously Approved Collection

- Change to title of IC to clarify the forms are used to collect family information
- Change to form title(s): Department of Defense Child Development Program Request for Care Record and Application for Department of Defense Child Care Fees
- Changes in burden increased to reflect current program operations.

A. **JUSTIFICATION**

1. Need for the Information Collection

The DoD requires the information in the proposed collection for program planning and management purposes. This collection includes two instruments to include DD Form 2606, "Department of Defense Child Development Program Request for Care Record" and DD Form 2652 "Application for Department of Defense Child Care Fees". DoD is seeking clearance of DD Form 2606 and DD Form 2652 with this submission:

- a. The completion of DD Form 2606, "Department of Defense Child Development Program Request for Care Record" is required for all patrons to apply for child care and collects general information in regards to the sponsor and family. This form is only completed at the time a sponsor requests child care. The DD Form 2606 is included in DODI 6060.02 "Child Development Programs" and,
- b. The completion of DD Form 2652, "Application for Department of Defense Child Care Fees" is utilized for patrons to apply for DoD child care subsidies based on total family income (TFI). Basic family information and income data is collected. This form is completed annually. The DD Form 2652, "Application for Department of Defense Child Care Fees" is included in DODI 6060.02 "Child Development Programs".

The information collected through DD Form 2606 and DD Form 2652 is collected under the authority of PL 101-89 and EO 9397.

2. Use of the Information

Respondents for the information collection through DD Form 2606 and DD Form 2652 are patrons requesting child care and patrons enrolled in CDPs. The DoD CDP requires the information in the proposed collections for program planning, management purposes and the determination of child care fees.

The DD Form 2606 is used to collect information for the type of care needed and sponsor status which determines eligibility and priority for child development program services. It is also used to assist management in the planning of present and future program requirements. The information from the DD Form 2652 is used to determine total family income to determine child care fees for families enrolled in the DoD CDP.

The respondents access the forms from the programs offering DoD CDPs. The respondents complete and return the forms to the DoD CDPs. No invitations are sent to the respondents. Forms are reviewed and verified for accuracy by DoD CDP administrative personnel. The DD Form 2606 determines the child care need and waitlist management processes. The DD Form 2652 collects total family income data to determine child care fees. Information collected on the forms may be shared on a need to know basis within the DoD, and otherwise as provided by the Privacy Act, 5 U.S.C. 552a.

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

While these forms can be downloaded as fillable .pdf's, there is not an electronic collection system in place for these forms. As electronic collection systems are developed, a Privacy Impact Assessment will be conducted for all forms by the respective Military service. DoD is exploring the opportunities to move to a primarily electronic based collection in the future.

Non - Duplication

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

4. <u>Burden on Small Businesses</u>

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

5. Less Frequent Collection

The DD Form 2606 is only completed at the time a sponsor requests child care. The statutory requirement of collecting total family income data via DD Form 2652 is

required once per year. If DD Form 2652 is not completed by patrons once per year, the programs would not be compliant with statutory requirements.

6. 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).

7. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Friday, May 1, 2020. The 60-Day FRN citation is 85 FR 25407 FRN Pages 25407-25408

No comments were received during the 60-Day Comment Period

A 30-Day Federal Register Notice for the collection published on Friday, July 17, 2020. The 30-Day FRN citation is $85\ FR\ 43559\ FRN\ Pages\ 43559-43560$

Part B: CONSULTATION

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

8. Gifts or Payment

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

9. <u>Confidentiality</u>

This information collection does not ask the respondent to submit proprietary, trade secret or confidential information to the Department of Defense.

Each form contains a Privacy Act Statement outlining the applicable Authorities, Purposes, Uses and Disclosure of the provided information.

All information is collected, maintained and used in accordance with Federal Law and regulations and information is secured to protect information. All records are maintained as a hard copy and stored in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or similar system. Access to personal information is limited to those individuals who require the records to perform official assigned duties.

As electronic collection systems are developed, a Privacy Impact Assessment will be conducted for all forms by the respective Military service.

Each Military Service has an applicable SORN as stated below:

ARMY

SORN ID Number: A0608-10 CFSC

SORN Title: Child Development Services (CDS) (CDS) (February 22, 1993, 58 FR

10002).

SORN Website address:

http://dpclo.defense.gov/privacy/SORNs/component/army/A0608-10 CFSC.html

AIR FORCE

SORN ID Number: F034 AF SVA C

SORN Title: Child Development/Youth Programs Records (March 13, 1998, 63 FR

12457)

SORN Website address: https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-

wide-SORN-Article-View/Article/569755/f034-af-sva-c/

NAVY

SORN ID Number: NM01754-3

SORN Title: DON Child and Youth Program (May 27, 2010, 75 FR 29728)

SORN Website address: https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-

wide-SORN-Article-View/Article/570428/nm01754-3/

10. Sensitive Questions

DD Form 2652 uses personal income data to document total family income to determine child care fees. In accordance with P.L. 106-104,"The Secretary of Defense shall prescribe regulations establishing fees to be charged parents for the attendance of children at military child development centers. Those regulations shall be uniform for the military departments and shall require that, in the case of children who attend the centers on a regular basis, the fees shall be based on family income".

11. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[Department of Defense Child Development Program Request for Care Record]

- a) Number of Respondents: 12,500
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 12,500
- d) Response Time: 5 Minutes
- e) Respondent Burden Hours): 1,042 hours

[Application for Department of Defense Child Care Fees]

- a) Number of Respondents: 50,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 50,000
- d) Response Time: 5 Minutes
- e) Respondent Burden Hours: 4,167 hours

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

- a) Total Number of Respondents: 50,000
- b) Total Number of Annual Responses: 62,500
- c) Total Respondent Burden Hours: 5,209 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[Department of Defense Child Development Program Request for Care Record]

- a) Number of Total Annual Responses: 12,500
- b) Response Time: 5 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$.60 cents
- e) Total Labor Burden: \$7,500

[Application for Department of Defense Child Care Fees]

- a) Number of Total Annual Responses: 50,000
- b) Response Time: 5 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$.60 cents
- e) Total Labor Burden: \$30.000

2) Overall Labor Burden

- a) Total Number of Annual Responses: 62,500
- b) Total Labor Burden: \$37,500

The Respondent hourly wage was determined by using the Federal minimum wage found on the Department of Labor Wage Website 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. <u>Cost to the Federal Government</u>

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

Collection Instrument(s)

[Department of Defense Child Development Program Request for Care Record]

- a) Number of Total Annual Responses: 12,500
- b) Processing Time per Response: 10 Minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.43
- d) Cost to Process Each Response: \$2.41
- e) Total Cost to Process Responses: \$30,125

[Application for Department of Defense Child Care Fees]

- a) Number of Total Annual Responses: 50,000
- b) Processing Time per Response: 10 Minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.43
- d) Cost to Process Each Response: \$2.41
- e) Total Cost to Process Responses: \$120,500
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 62,500
 - b) Total Labor Burden: \$150,625

The labor burden to the Federal Government was determined by using the 2020 General Schedule (Base) of a GS-5 employee found on the Office of Personnel Management Website

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/general-schedule/

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$3,000
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$3,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$150,625
- 2) Total Operational and Maintenance Costs: \$3,000
- 3) Total Cost to the Federal Government: \$153,625
- 15. Reasons for Change in Burden

This is a reinstatement of a previously approved collection forms for which approval has expired. The number of respondents were updated to reflect current program operations.

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.