

## SUPPORTING STATEMENT - PART A

### **Department of Defense Installation Records Check (IRC) DD 3058**

OMB Control Number: 0704-0586

#### 1. Need for the Information Collection

The information collection requirement is necessary to obtain pertinent information that is a critical part of a criminal history background investigation and suitability determination of individuals working with children in DoD programs. The form will allow vetting of an individual's criminal history records and by establishing suitability and/or fitness determination to work with children. Authority is granted by 34 United States Code § 20351, DoDI 1402.05 and DoDI 1400.25 (731) of individuals providing care and services to children in DoD programs.

#### 2. Use of the Information

The installation records check (IRC) is a critical part of a criminal history background investigation and suitability determination of any individual providing care and services to children in DoD Programs. The form will allow vetting of an individual's criminal history records and by establishing suitability and/or fitness determination to work with children using military law enforcement records, the Defense Central Index of Investigations (DCII) and information pertaining to the Family Advocacy Records (child and/or domestic abuse) maintained in the Family Advocacy Program (FAP) Central Registry. The DD 3058 is initiated and completed by the applicant at the office or installation staff responsible for the oversight of individuals who provide services to children. It is important to note that this is not a childcare form, but rather a form for individuals who work on an installation with children.

Programs and Services that will use this form includes but not limited to: Child Protective Services (CPS) (including the investigation of child abuse and neglect reports), faith-based (religious) programs, Social Services Programs, Health and Mental Health Care Programs, to include Physicians, Dentists, Nurse Practitioners, Technicians; Childcare, Education Programs (whether or not directly involved in teaching), Foster Care, Residential care, Recreational or Rehabilitative programs, and Detention, Correctional, and Treatment services. In addition, Civilian Employees, Military Members, Family Child Care providers and family members will also be required to use this form.

These critical checks that will help to ensure all individuals working with children have been thoroughly vetted and that all background check findings have been properly adjudicated before they are authorized to have access to children.

In the past, Service components had developed their own IRC forms that included variations and inconsistencies. To ensure standardization throughout the DoD, Service Components requested DoD develop a uniform IRC Form (DD Form 3058). The form will ensure PII is protected and required collection of data that would uncover needed information leading to a mandatory or presumptive disqualification of an individual working with children in DoD Programs.

Disclosure is voluntary; however, failure to furnish requested information may impact the individual's ability to work with and around children. The collection instrument is electronic

and/or optional hard copy. Respondents are provided the collection instrument during the initial hiring and upon the 5 year reverification or per DoD guidance, for employees and volunteers. The collection instrument requires each respondent to complete the form using a computer. The respondent may receive assistance in filling out the form, such as having the form read to them by the human resource officer or security manager. The individual must sign the form. The form is completed at the program site and electronically filed in the program's system of record or employees' personnel file. There are no other communications sent to the respondent associated with the information collection. Installation Family Advocacy Program (FAP), military law enforcement/security and the Defense Central Index of Investigation (DCII) will certify that these checks have been completed and no information exists that precludes the individual from working with children. The human resource or security office will review the certification and, if no derogatory information is disclosed, maintains the data securely in the Service Component's system of record or employee's personnel file. If derogatory information is disclosed, the submitting program manager will consult with the installation human resource officer or security monitor. The form does not expire and may be utilized to conduct periodic reverification or annual checks.

### 3. Use of Information Technology

At this time most of the responses will be collected electronically. Offices responsible for utilizing the form will be allowed to electronically submit and/or hard copy submit. Access to a computer will be provided.

### 4. Non-duplication

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

### 5. Burden on Small Businesses

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

### 6. Less Frequent Collection

The frequency of collection is required by DoD policy and is intended to mitigate the risk of individuals with specific criminal backgrounds (child abuse or sex offenders, for example) having access to children.

### 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 Friday, May 29, 2020. The 60-Day FRN citation is 85 FR 32371 FRN 32371.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, September 1, 2020. The 30-Day FRN citation is 85 FR 54360 FRN 54360-54361.

#### Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Notice 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

The Privacy Act Statement is located on the top third of the form in the section labeled PRIVACY ACT STATEMENT and clearly visible to the respondent when completing the form. The information collection requires a System of Record Notice (SORN). Each military Department has a SORN and maintains a Records Retention and Disposition Schedule as stated.

**DoD:** Defense Central Index of Investigations (DCII), DMDC 13 DoD

(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570716/dmdc-13-dod/>), DITPR #6697

**Army:** A0215-3 SAMR, NAF Personnel Records

(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570010/a0215-3-samr/>), DITPR #593 and, A0690-200 DAPE, Department of the Army Civilian Personnel System (<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-view/Article/570099/a0690-200-dape/>), DITPR #6080

**RETENTION AND DISPOSAL:** Data is encrypted and password protected. The system is only accessible to registered users by access through login and password that is activated upon registration. Registrants must click the activation email in order to activate their login.

**Navy and Marine Corps:** NM01754-3, DON Child and Youth

Program (<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570428/nm01754-3/>), DITPR #NM01754-3

**RETENTION AND DISPOSAL:** Records are kept for two years after individual is no longer in the Child Care Services Programs and then destroyed by burning, shredding, macerating, pulping, degaussing, erasing, or other appropriate means.

**Air Force:** F034 AF SVA C, Child Development/Youth Programs

Records (<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569755/f034-af-sva-c/>), DITPR #11299.

RETENTION AND DISPOSAL: Retained in personnel files for one year after the individual/provider leaves the program or until they request transfer of records to another installation. In the event the records are not transferred, they will be destroyed by tearing into pieces, shredding, pulping, macerating, or burning. Computer records are destroyed by erasing, deleting or overwriting.

#### 11. Sensitive Questions

The information collection is required under authority of 34 United States Code § 20351 and DoDI 1402.05 Criminal History Background Checks on Individuals in Child Care Services Programs and is used to determine an individual's suitability or fitness for working with children.

#### 12. Respondent Burden and its Labor Costs

##### a. Estimation of Respondent Burden

1. Installation Records Check (IRC) form (Department of Defense Child Care Services Programs)

- a. Number of Respondents: 14,000
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 14,000
- d. Response Time: 10 min.
- e. Respondent Burden Hours: 2,333 hours

2. Total Submission Burden

- a. Total Number of Respondents: 14,000
- b. Total Number of Annual Responses: 14,000
- c. Total Respondent Burden Hours: 2,333 hours

##### b. Labor Cost of Respondent Burden

1. Installation Records Check (IRC) (Department of Defense Child Care Services Programs)

- a. Number of Total Annual Responses: 14,000
- b. Response Time: 10 minutes
- c. Respondent Hourly Wage: \$7.25 (current federal minimum wage)
- d. Labor Burden per Response: \$1.20
- e. Total Labor Burden: \$16,900

2. Overall Labor Burden

- a. Total Number of Annual Responses: 14,000
- b. Total Labor Burden: \$16,900

The Respondent hourly wage was determined by using the 2019 federal minimum wage of \$7.25 per hour, as average.

### 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

##### 1. Installation Records Check (IRC) (Department of Defense Child Care Services Programs)

- a. Number of Total Annual Responses: 14,000
- b. Processing Time per Response: 10 min
- c. Hourly Wage of Worker(s) Processing Responses: \$23.82 (GS-9.5)
- d. Cost to Process Each Response: \$3.97
- e. Total Cost to Process Responses: \$55,580

##### 2. **Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 14,000
- b. Total Labor Burden: \$55,580

#### b. Operational and Maintenance Costs

The hourly wage was determined by using the OPM Website: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>

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

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

### 15. Reasons for Change in Burden

There are no increases in the responses or burden hours.

### 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.