

SUPPORTING STATEMENT - PART A

Needs Assessment of Child and Youth Non-Medical Counseling – 0704-XXXX

1. Need for the Information Collection (1-3 paragraphs)

Military Community & Family Policy (MC&FP) of the Department of Defense (DoD) is requesting Office of Management and Budget (OMB) clearance for the Needs Assessment of Child and Youth Behavioral Military Family Life Counseling program (CYB-MFLC). In referencing “CYB-MFLC programs” throughout this document, all public school programs are included. MC&FP has contracted with the RAND Corporation to conduct a needs assessment of child and youth non-medical counseling services. There has not been a comprehensive assessment of non-medical counseling of the CYB-MFLC program.

The CYB-MFLC program provides private and confidential non-medical, short-term, solution-focused counseling services to children and youth. In order for the DoD to best and most efficiently serve the needs of military children, it is important to know how the CYB-MFLC program fits within the landscape of family and child support systems to meet the needs and expectations of stakeholders. It is also important to identify where gaps in services remain and to identify the emerging needs of military children and youth that could be potentially filled or addressed by the CYB-MFLC program. Assessing how prevalent those needs and gaps are, and whether there is variation in these needs across locations, will inform modifications to the program to strengthen alignment of the scope of its services with other sources of support, resulting in improved coordinated care for military children in the school environment.

Increased reports of behavioral, emotional, social, and academic issues among school-aged children has increased the urgency for MC&FP to ensure the CYB-MFLC program is effectively and efficiently serving the needs of the over 900K military children. This study aligns to the lethality line of effort in the National Defense Strategy because supporting family well-being preserves workforce talent and focuses the Force on warfighting success. This study also aligns with MC&FP’s internal priority for 2020 to facilitate help-seeking and connect the military community with resources to promote positive well-being. The statutory basis for the Needs Assessment of Child and Youth Non-Medical Counseling comes from direction from the Office of the Secretary of Defense, Cost Assessment and Program Evaluation (OSD-CAPE) to evaluate family programs, to include the nonmedical counseling programs.

2. Use of the Information

The Needs Assessment of Child and Youth Non-Medical Counseling will collect information from school principals at civilian schools involved with the CYB-MFLC program.

Respondents will provide information, currently not available in any other source, about the breadth and depth of the unique non-medical counseling needs of military children and the ways in which the CYB-MFLC program is or is not meeting those needs. Systematically collecting a common core set of information across all schools is critical given that nonmedical counseling needs and services are expected to be extremely varied (e.g., due to

proximity to military Exceptional Family Member programs, parental deployment patterns across installations, developmental stage of child birth to age 18).

An email from MC&FP will be emailed to principals to 1) inform them of the purpose of the study and the value to MC&FP and 2) tell principals that they should expect an invitation to arrive within the next 24-48 hours. This letter of introduction may help increase response rate by letting principals know that this study is approved by MC&FP. School principals will then receive an email invitation that describes the study, with a unique hyperlink to the consent form and online survey from the selected survey vendor. Principals will read and provide consent to participation in the study by clicking through to the survey itself. The structure and content of the survey instrument is guided by the study objectives, comprising a mix of closed and open-ended questions (included in package). We expect the survey to take less than 15 minutes to complete. Principals who have not completed the survey will be sent a reminder via email at 3 days and 14 days after original invitation. The survey will be open for one month.

RAND will work with their survey vendor to obtain complete data files upon completion of the data collection period for descriptive analysis. Data files will be stripped of identifying information and all files will be electronically transferred in accordance with RAND's high data use and data transfer standards.

3. Use of Information Technology

100 percent of the surveys will be collected electronically.

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 is a one-time data collection to identify the emerging needs of military children and youth.

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 Tuesday, January 19, 2021. The 60-Day FRN citation is 86 FR 5152 FRN 5152-5153.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, April 21, 2021. The 30-Day FRN citation is 86 FR 20671 FRN 20671-20672.

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 not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

All data will be destroyed within 36 months of the project end date.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Principal Survey

- a) Number of Respondents:180
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 180
- d) Response Time: 0.25 hour
- e) Respondent Burden Hours: 45 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 180
 - b) Total Number of Annual Responses: 180
 - c) Total Respondent Burden Hours: 45 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
Principal Survey
 - a) Number of Total Annual Responses: 180
 - b) Response Time: 0.25 hour
 - c) Respondent Hourly Wage: \$46.22
 - d) Labor Burden per Response: \$11.56
 - e) Total Labor Burden: \$2,079.90

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 200
 - b) Total Labor Burden: \$2,079.90

The total burden hours were multiplied by the average hourly wage for each participant according to wage data compiled by the Bureau of Labor Statistics. For school principals, we used data for 2019 on the median hourly wage for “education and childcare administrators” (\$46.22 per hour).¹

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

- 1) Collection Instrument(s)
Principal Survey
 - a) Number of Total Annual Responses: 180
 - b) Processing Time per Response: .25 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$58.13
 - d) Cost to Process Each Response: \$14.53
 - e) Total Cost to Process Responses: \$2,615.85

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 180
 - b) Total Labor Burden: \$2,615.85

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: \$35,000.00

2) Total Operational and Maintenance Cost: \$35,000.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$2,615.85

2) Total Operational and Maintenance Costs: \$35,000.00

3) Total Cost to the Federal Government: \$37,615.85

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The results specific to the MFLC program are not scheduled for publication. However, MC&FP may consider publication in some form if broader knowledge relevant to serving child systems emerge.

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.