

## SUPPORTING STATEMENT - PART A

### Family Advocacy Program (FAP) Child Abuse and Domestic Abuse Incident Reporting System – OMB 0704-0536

#### Summary of Changes from Previously Approved Collection

- The burden has increased since the previous approval due to updated estimates for the hourly wage for respondents.

#### 1. Need for the Information Collection

For 40 years, the Office of the Secretary of Defense (OSD) Family Advocacy Program (FAP) has worked to prevent and respond to child abuse and neglect and domestic abuse in military families. This information collection provides the child abuse and domestic abuse incident data from the FAP Central Registry, as required by section 574 of the National Defense Authorization Act (NDAA) for FY 2017 (P.L. 114-328). In addition to meeting the Congressional requirement, this report provides critical aggregate information on the circumstances of child abuse/neglect and domestic abuse incidents, which further informs ongoing prevention and response efforts. The aggregate FAP Central Registry data derived from this information collection and submitted from each Military Service (Army, Navy, Marine Corps, and Air Force) offers a DoD-wide description of the child abuse and neglect and domestic abuse incidents that are reported to FAP.

Although the requirement for an annual report on the child abuse and domestic abuse incident data, as outlined in section 574 of the FY 2017 NDAA, expired on April 30, 2021, the Department of Defense will continue to provide the report annually to the Senate and House Armed Services Committees. The Government Accountability Office (GAO) made a specific recommendation to expand future reporting of these aggregate data to Congress in its Domestic Abuse: Actions Needed to Enhance DOD's Prevention, Response, and Oversight report (GAO-21-289) issued May 6, 2021 (see Recommendation 3). Moreover, section 538 of the FY 2018 NDAA (P.L. 115-91) requires information regarding child sexual abuse and domestic abuse-related sexual assault be included as an annex to the Annual Report on Sexual Assault in the Military.

#### 2. Use of the Information

Respondents to the collection are military members and associated family members who have been referred to the installation FAP after a reported incident of family maltreatment, either domestic abuse or child maltreatment. The purpose of the collection is to determine eligibility for FAP services and to initiate a clinical record. The information is collected during a clinical interview with the respondents and is entered into the Military Service's clinical case record system by either the clinician or the data specialist, depending on the staffing of the installation FAP.

Each quarter, the data specialist or analyst at the Military Service's FAP Headquarters extracts the specific fields required for this information collection from the Military Service's case management system and sends a batch file to the Defense Manpower Data Center (DMDC), which houses the DoD FAP Central Registry. At the end of the calendar year, the Military Service's FAP Headquarters extracts the previous FY data and sends a FY batch file to DMDC. The DMDC analyst prepares and sends to OSD FAP an annual workbook containing de-identified aggregate data. The OSD FAP analyst prepares an annual report using these de-identified aggregate data, as required by section 574 of the FY 2017 NDAA.

3. Use of Information Technology

Information is collected 100 percent electronically. The annual aggregated data and information transmitted by the Military Services to DMDC, and then by DMDC to OSD FAP is processed entirely by using information technology and systems. Data collection relies on technological collection techniques, with data entries made by data specialists and clinicians, depending on requirements.

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

The Office of the Secretary of Defense Family Advocacy Program together with DMDC conducts an annual collection and reporting of aggregate domestic abuse and child abuse and neglect data from all of the Military Departments to meet the requirements of section 574 of the FY 2017 NDAA. Aggregate child sexual abuse and domestic abuse-related sexual assault data are used to meet the requirements of section 538 of the FY 2018 NDAA. Less frequent collection will result in no ability to provide these annual reports to Congress.

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, July 14, 2021. The 60-Day FRN citation is 86 FRN 37139 FRN 37139.

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

A 30-Day Federal Register Notice for the collection published on Friday, September 17, 2021. The 30-Day FRN citation is- 86 FR 51876 FRN 58176.

## 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

When respondents provide information for benefit determination and for clinical services, they receive copies of the Health Information Portability and Protection Act (HIPPA), as applicable, and the Privacy Information Act from the installation FAP provider. All personally identifiable information is protected by the Privacy Act of 1974 and is protected according to the regulations therein and by related DoD directives and instructions. No PII is transferred or transmitted from or by DMDC to the OSD Family Advocacy Program.

The Central Registry falls under the Defense Manpower Data Center Data Base (April 16, 2019, 84 FR 15605) Privacy Act System of Records Notice (SORN) DMDC 01 which can be found at <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/OSDJS/DMDC-01.pdf?ver=2019-04-18-091612-550>). The SORN is currently under revision. A copy of the PIA, Defense Manpower Data Center Data Base, and the draft revised SORN have been provided with this package for OMB's review.

Input/source records are deleted or destroyed after data have been entered into the master file or when no longer needed for operational purposes, whichever is later. Exception: Apply NARA-approved disposition instructions to the data files residing in other DMDC data bases.

The Master File is retained permanently. At the end of the fiscal year, a snapshot is taken and transferred to the National Archives in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

Outputs records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.

System documentation (codebooks, record layouts, and other system documentation) are retained permanently and transferred to the National Archives along with the master file in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

#### 11. Sensitive Questions

Social security numbers are collected in this process. The Social Security Number Justification Memo is attached. The aggregate data provided to OSD FAP by DMDC from the Central Registry does not contain any PII or answers to sensitive questions.

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

##### Part A: ESTIMATION OF RESPONDENT BURDEN

The burden estimate was determined by calculating the average number of child abuse and domestic abuse reports made to the FAP over the past ten years. Members of the public; civilian spouses, intimate partners, and parents provide a response in 70% of the reports. The total, 22,288, represents 70% of the average number of reports received in a year. Each response takes approximately 45 minutes to complete which translates into a total of 16,716 hours of respondent burden.

- 1) Central Registry: Child Abuse and Domestic Abuse Incident Reporting System
  - a) Number of Respondents: 22,288
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 22,288
  - d) Response Time: 45 minutes
  - e) Respondent Burden Hours: 16,716 hours
  
- 2) Total Submission Burden
  - a) Total Number of Respondents: 22,288
  - b) Total Number of Annual Responses: 22,288
  - c) Total Respondent Burden Hours: 16,716 hours

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

- 1) Central Registry: Child Abuse and Domestic Abuse Incident Reporting System
  - a) Number of Total Annual Responses: 22,288
  - b) Response Time: 45 minutes
  - c) Respondent Hourly Wage: \$25.75
  - d) Labor Burden per Response: \$19.31

- e) Total Labor Burden: \$430,437.00
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 22,288
  - b) Total Labor Burden: \$430,437.00

The Respondent hourly wage was determined using the median usual weekly earnings for full-time workers age 25-54 years, which can be accessed at the U.S. Bureau of Labor Statistics website: <https://www.bls.gov/news.release/wkyeng.t03.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. Cost to the Federal Government

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

The following breakdown accounts for the four quarterly updates to the DoD FAP Central Registry from the automated central registries owned by the Military Services and the annual report on the data from the previous fiscal year.

- 1) Central Registry: Child Abuse and Domestic Abuse Incident Reporting System – Quarterly Batch Files
  - a) Number of Total Annual Responses: 4
  - b) Processing Time per Response: 10 hours
  - c) Hourly Wage of Worker(s) Processing Responses: \$50.04
  - d) Cost to Process Each Response: \$500.40
  - e) Total Cost to Process Responses: \$2,001.60
- 2) Central Registry: Child Abuse and Domestic Abuse Incident Reporting System – Annual Report
  - a) Number of Total Annual Responses: 1
  - b) Processing Time per Response: 314 hours
  - c) Hourly Wage of Worker(s) Processing Responses: \$59.39
  - d) Cost to Process Each Response: \$18,648.46
  - e) Total Cost to Process Responses: \$18,648.46
- 3) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 5
  - b) Total Labor Burden: \$20,650.06

#### 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: \$0

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$20,650.06

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$20,650.06

15. Reasons for Change in Burden

The burden has increased since the previous approval due to updated estimates for the hourly wage for respondents. As opposed to relying on a single job sector or industry, the revised estimate uses median weekly earnings for full-time workers in the age range that corresponds to the typical respondent. Similarly, the labor burden to the government was revised to more accurately reflect the time and effort involved in the increased quality assurance associated with the data collection, as well as expertise of the statistician hire on the OSD FAP team who collaborates with DMDC to produce the annual reporting to Congress.

16. Publication of Results

Aggregate results from this data collection are published in the Department of Defense Report on Child Abuse and Neglect and Domestic Abuse in the Military on April 30<sup>th</sup> of each year. The most recent report can be accessed here:

<https://www.militaryonesource.mil/data-research-and-statistics/reports/family-advocacy-program/>. Data pertaining to child sexual abuse and domestic abuse-related sexual assault are also published as appendices to the Annual Report on Sexual Assault in the Military and can be accessed here: <https://www.sapr.mil/reports>. These publications meet the requirements set forth in section 574 of FY 2017 NDAA and section 538 of FY 2018 NDAA, respectively. Although the requirement for the annual report on child and domestic abuse incident data expired on April 30, 2021, the Department anticipates that this requirement will be renewed and will continue to provide this annual report to the Senate and House Armed Services Committees.

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.