SUPPORTING STATEMENT - PART A

Exceptional Family Member Program (EFMP) Family Needs Assessment - 0704-0580

Summary of Changes from Previously Approved Collection

- Increase in burden to the Federal Government due to an increase in annual labor costs.
- Decrease in respondent burden due to a decrease of the labor wage per response.
- Change the instructions to Addendum 2.
- Added a new block (now block 17) for a selection of the following: Same-Service, Sister-Service, and Declined with check boxes.
- Change reference of Addendum 2 within the Privacy Act Statement.

1. <u>Need for the Information Collection</u>

Section 1781c of Title 10, U.S.C. requires the Office of Community Support for Military Families with Special Needs (OSN) to enhance and improve support for military families with special needs. In this effort, OSN and the four Services developed the DD Form 3054 Exceptional Family Member Program (EFMP) Family Needs Assessment (FNA) as standard documentation to guide assessment of needs, service planning and case transfer processes for the Family Support component of the EFMP. The EFMP FNA assists EFMP Family Support staff in identifying the needs of families and developing plans of action. The Family Services Plan Addendum allows EFMP Family Support staff and families to track identified steps in addressing their needs and goals. The PCS Warm Hand-Off Summary Addendum facilitates the transfer of cases between Same-Service or Sister-Service Family Support Offices when a family requests a warm hand-off to a gaining installation.

The EFMP FNA addresses current differences in assessment processes and inconsistent transfer of cases across the Services. With this standardized form, installation-level EFMP Family Support Offices can provide a family support experience that is consistent across the Services and maintains continuity of services when military families with special needs have Permanent Change of Station (PCS) orders to a Same-Service or Sister-Service location.

2. <u>Use of the Information</u>

DD form 3054 "Exceptional Family Member Program (EFMP) Family Needs Assessment" is used by EFMP Family Support staff in collaboration with families who request assistance in navigating resources and systems of support. The Form documents a family's needs and provides a plan for them to gain access to support and resources in the community which meets those needs. The Family Services Plan Addendum provides a plan of action and a way to track the progress towards goals set by the family with the assistance of the EFMP Family Support staff. The PCS Warm Hand-Off Summary Addendum summarizes case management activities at the current installation and helps with a warm hand-off prior to a family transferring to a gaining Same-Service or Sister-Service installation. The DD Form 3054 is standardized across the four Services with the goal of facilitating a consistent Family Support experience for all military families.

Respondents include EFMP Family Support staff who complete the form in conjunction with families who are requesting support services. The DD Form 3054 is completed using information gathered during an in-person or telephonic interview conducted with service members and/or their dependents. The EFMP Family Support staff documents the information obtained during the discussion to complete the DD Form 3054. Afterwards, the FNA is uploaded, stored, and maintained internally in their web-based secured database in accordance with their Service specific guidance.

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

0% of responses are collected electronically. DD Form 3054 may be completed electronically as a PDF-fillable form or printed and completed by hand by the EFMP Family Support staff. The PDF-fillable version of the form is intended to reduce the burden on respondents when the form is transferred to additional offices.

4. <u>Non-duplication</u>

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

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

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

6. <u>Less Frequent Collection</u>

DD form 3054 is intended to be completed on a voluntary basis once per PCS cycle, per family, as appropriate. Less frequent collections would render the Department unable to fulfill reporting requirements.

7. <u>Paperwork Reduction Act Guidelines</u>

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. <u>Consultation and Public Comments</u>

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, August 30, 2022. The 60-Day FRN citation is 86 FR 48405 FRN 48405-48406.

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

A 30-Day Federal Register Notice for the collection published on Monday, January 24, 2022. The 30-Day FRN citation is 87 FR 3515 FRN 3515.

Part B: CONSULTATION

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

9. <u>Gifts or Payment</u>

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

10. <u>Confidentiality</u>

All data are protected by the Privacy Act of 1974 and are protected according to the regulations therein, and by related DoD directives and instructions. A Privacy Act Statement is located on the form.

SORNS are published on DPCLTD's website.

Department of the Navy (Navy and Marine Corps), M01754-6, Exceptional Family Member Program Records: <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570631/m01754-6/</u>

Department of the Army, A0608b CFSC, Personal Affairs; Army Community Service Assistance Files: <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570054/a0600-8-104-ahrc/</u>

Department of the Air Force, F036 AFPC Z, Air Force Family Integrated Results and Statistical Tracking (AFFIRST): <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569813/f036-afpc-z/</u>

Department of the Navy (Navy and Marine Corps), N01754-4, Navy Family Accountability and Assessment System (NFAAS): <u>https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570335/n01754-4/</u>

A PIA is not required as P&R only collects de-identified metrics and reporting data across the EFMP program.

Retention schedule is available through the links provided for SORNs.

11. <u>Sensitive Questions</u>

No questions considered sensitive are being asked in this collection.

12. <u>Respondent Burden and its Labor Costs</u>

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
 - [DD3054]
 - a) Number of Respondents: 20,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 20,000
 - d) Response Time: 30 minutes
 - e) Respondent Burden Hours: 10,000 hours
- 2) Total Submission Burden
 - a) Total Number of Respondents: 20,000
 - b) Total Number of Annual Responses: 20,000
 - c) Total Respondent Burden Hours: 10,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
 - [DD3054]
 - a) Number of Total Annual Responses: 20,000
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$27.07
 - d) Labor Burden per Response: \$13.54
 - e) Total Labor Burden: \$270,800
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 20,000
 - b) Total Labor Burden: \$270,800

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] ([https://www.bls.gov/oes/current/oessrcst.htm]), May 2020 National Occupational Employment and Wage Estimates Unites States.

13. <u>Respondent Costs Other Than Burden Hour Costs</u>

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

- 1) Collection Instrument(s) [DD3054]
 - a) Number of Total Annual Responses: 20,000
 - b) Processing Time per Response: 10 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$27.56
 - d) Cost to Process Each Response: \$4.59
 - e) Total Cost to Process Responses: \$91,800.00
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 20,000
 - b) Total Labor Burden: \$91,800.00

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$
 - b) Printing: \$4,000
 - c) Postage: \$
 - d) Software Purchases: \$
 - e) Licensing Costs: \$
 - f) Other: \$
- 2) Total Operational and Maintenance Cost: \$4,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$91,800.00
- 2) Total Operational and Maintenance Costs: \$4,000
- 3) Total Cost to the Federal Government: \$95,800.00.

15. <u>Reasons for Change in Burden</u>

Increase in burden to the Federal Government due to an increase in annual labor costs based on 2021 GS salary table from OPM

(https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS h.pdf).

Decrease in respondent burden due to a decrease of the labor wage per response based on the use of the May 2020 National Occupational Employment and Wage Estimates, Unites States, via <u>https://www.bls.gov/oes/current/oessrcst.htm</u>.

16. <u>Publication of Results</u>

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.