



DEPARTMENT OF THE AIR FORCE
INTEGRATED RESILIENCE
HEADQUARTERS AIR FORCE
PENTAGON



March 16, 2022

Brigadier General Debra A. Lovette
Director
Integrated Resilience Office
Headquarters Air Force
1040 Air Force Pentagon, 5B349
Washington, DC 20330-1040

Mr. Dominic Mancini
Deputy Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Dear Mr. Mancini:

Pursuant to Office of Management and Budget (OMB) procedures established at 5 C.F.R. Part 1320, Controlling Paperwork Burdens on the Public, I request that the proposed Department of Defense (DoD) information collection, "Formative Research for Sexual Assault Leadership Training at the U.S. Air Force Academy," or "The SALT Study" (enclosed) be processed as an emergency clearance request in accordance with 5 C.F.R. § 1320.13, Emergency Processing.

I have determined that this information must be collected prior to the time periods established under Part 1320 of the regulations and that this information collection is essential to inform the development and enhancement of the sexual assault prevention and response leadership training curriculum implemented at the United States Air Force Academy (USAFA.) This study responds to the extensive problem of sexual harassment/assault in the military. The most recent available DoD data on sexual assault (2018) indicated that sexual assault victimization prevalence increased by 44 percent among women (the prevalence of sexual assault victimization reported by men stayed the same) from the previous year.¹ More than 20,000 Service members were the victims of sexual assault in 2018 (13,000 women and 7,500 men) but fewer than 8,000 per year reported that assault.²

¹ Breslin, R., Davis, E., Hylton, K., Hill, A., Klauberg, W., Petusky, M., Klahr, A. (2019). *2018 Workplace and Gender Relations Survey of Active Duty Members: Overview Report*. Report No. 2019-027. Alexandria, VA: Office of People Analytics, 26. <https://apps.dtic.mil/sti/citations/AD1072334>.

² DoD SAPRO. (2021). Appendix B: Statistical Data on Sexual Assault. *Fiscal Year 2020 Annual Report on Sexual Assault in the Military*, 11. https://www.sapr.mil/sites/default/files/Appendix_B_Statistical_Data_On_Sexual_Assault_FY2020.pdf.



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This emergency clearance request is necessary due to the timing of this study in relation to the revised policies on the OMB Paperwork Reduction Act, extending OMB's oversight to DoD information collections for specific sensitive topics such as sexual assault. When this study was planned, contracted, and implemented in 2020, the new guidance requiring OMB approval for surveys with military personnel was not issued. This new OMB approval requirement represents an unexpected review element that has contract and study implications that could put the government's substantial investment at risk if not expedited. If granted, this emergency clearance request will avoid a work stoppage and major setbacks for the evaluation.

The current study is also consistent with a call from the 2021 Independent Review Commission (IRC) on Sexual Assault in the Military report (see *Hard Truths and the Duty to Change*) and the Secretary of Defense's reply to the report. The IRC made recommendations related to: Accountability; prevention; climate and culture; and victim care and support. In particular, the IRC noted the military prevention activities are hampered by a lack of high-quality data and evidence-based programs addressing sexual harassment and sexual assault. The current study will help address this problem by collecting formative data (through anonymous interview and focus group protocols approved by the project IRB) from recent USAFA graduates on the training needed to better support their roles and responsibilities as new leaders in the Air and Space Force. Conducting this research aligns with the IRC's call for greater accountability in the military services in the area of sexual assault prevention and response.

The Department is requesting an expedited approval for this critical evaluation to proceed. This collaborative research effort, led by the University of Florida, has been contracted by the Congressionally Directed/Military Operational Medical Research Programs to conduct formative research to identify unmet leadership training needs under the DoD Psychological Health and Traumatic Brain Injury Research Program: Prevention Research to Reduce Sexual Assault (W81XWH2020014 Project Number 190035). As part of this work, the University of Florida, in collaboration with RTI International and the Department of the Air Force (DAF), is conducting the interviews with USAFA graduates, currently Captains enrolled in Squadron Officer School at Maxwell Air Force Base. The results will be used by the DAF to evaluate rigorously the current USAFA leadership training and make evidence-based recommendations for modifications that might enhance future leadership preparedness in preventing and responding to sexual assault.

Because of the nature of the public health emergency related to sexual harassment and sexual assault, the urgent need for the Department to identify successful prevention programming, and the need to preserve the government's investment in this formative research, it is impractical for DoD to consult in advance with interested agencies and members of the public in order to minimize the burden of the collection of information pursuant to 5 C.F.R. § 1320.13(c). Therefore, DoD requests a 180-day emergency clearance to obtain the information required for "The SALT Study." During the 180-day emergency clearance period, DoD will work to establish a regular clearance submission. As this request for approval concerns an urgent safety need, DoD

is also seeking OMB's approval to waive the need, or reduce the required time, for the Federal Register Notices otherwise required by 5 C.F.R. 1320.5(a)(1)(iv) and 1320.8(d)(1) prior to publication and implementation of this disclosure.

We would appreciate if you could please provide an approval/disapproval determination of this request to collect information under an emergency clearance by close of business on April 1, 2022.

Sincerely,

DEBRA A. LOVETTE, Brig Gen, USAF
Director, DAF Integrated Resilience