# <u>SUPPORTING STATEMENT - PART A</u>

USMC Child and Youth Program - 0703-0068

# Summary of Changes from Previously Approved Collection

- NAVMC Forms 1750/7, 1750/10, and 1750/11 have been added to this information collection request.
- Title of information collection changed to reflect the entire program.
- Respondent time burden has decreased because NAVMC 11720 was incorrectly estimated to have 112,000 respondents.
- Despite the decrease in time burden, the Labor Cost of Respondent Burden has increased due to revised average hourly wage estimates which were previously too low.

# 1. Need for the Information Collection

The mission of the United States Marine Corps Child and Youth Program (USMC CYP) is to provide high-quality, affordable childcare programs and services to support the overall operational readiness and retention of eligible Marine Corps military families. The USMC CYP information collections are necessary to enroll and register eligible CYP participants, identify if any participant accommodations are required, and obtain authorization for CYP personnel to administer approved medications or non-medicated topical products that the participants require.

#### Authorities to collect the information:

- 10 U.S.C. Ch. 88, Subchapter II outlines the responsibilities of eligible patrons of the CYP and CYP professionals.
- 10 U.S.C. 5013, Secretary of the Navy is responsible for the functioning and efficiency of the Department of the Navy and the formulation of policies and programs that are fully consistent with the national security objectives and policies established by the President or the Secretary of Defense.
- 10 U.S.C. 5041, Headquarters, Marine Corps is to assist the Secretary of the Navy in carrying out his responsibilities.
- DoD Instruction 6060.02, Child Development Programs' policy support the mission readiness, family readiness, retention, and morale of the total force during peacetime, overseas contingency operations, periods of force structure change, relocation of military units, base realignment and closure, and other emergency situations (e.g., natural disasters and epidemics).
- DoD Instruction 6060.04, Youth Services' policy ensures that Youth Services contributes to the readiness, retention, and lethality of the Total Force by helping families balance the competing demands of work and family life.

 MCO 1710.30, Marine Corps Child and Youth Programs establishes policy and procedural guidance for the effective execution of the CYP and standardizes child care and youth programs across the Marine Corps and authority for the use of collection instruments.

# 2. Use of the Information

The information collected on these forms is used to support the USMC Child and Youth Programs (CYP). Respondents are the parents/guardians of USMC CYP participants. Parents/guardians complete NAVMC Forms 1750/4 (USMC Child and Youth Programs Health Assessment) & 1750/5 (USMC Child and Youth Programs Registration Form) during the registration process. A CYP parent handbook (included with this package) is provided to assist respondents with navigating the registration process and programs. NAVMC 1750/4 is used to ensure participants have completed the required immunizations and to inform CYP staff of any conditions which may require accommodations for the child to safely participate in the program. NAVMC 1750/5 is utilized to provide the basic enrollment information required for the staff to enroll the child in USMC CYP. If additional supporting information from a health care provider is required due to a special need identified on NAVMC Form 1750/4, a CYP Nurse or Exceptional Family Member Program (EFMP) case worker will request respondents also complete NAVMC Form 11720 (USMC Family Care Programs Consent to Release Information) as needed. The completed NAVMC Form 11720 is used by the CYP Nurse or EFMP case worker to contact the respondentdesignated medical providers and obtain relevant supporting health information to approve authorized services and accommodations for the program participants (e.g., continuation on location, respite care determination, and plan of care).

The NAVMC Forms 1750/7 (USMC Child and Youth Programs Non-Medicated Topical Products Authorization), 1750/10 (USMC Child and Youth Programs Medication Authorization and Administration Record), and 1750/11 (USMC Child and Youth Programs Controlled Medication Authorization, Administration Record and Daily Log) are required if their child requires regularly administered non-medicated topical products, medication, or controlled medication, respectively. The information is used by USMC CYP personnel as authorization to administer these products to CYP participants. For medication and controlled medication, the NAVMC Forms 1750/10 and 1750/11 are also used to log administration of the medication. All information is stored in a designated secure area marked as confidential for appropriate staff to administer.

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

10% of respondents fill out the forms electronically and send via encrypted email. Currently the forms are predominantly returned in hard copy and maintained in the participant's file to safeguard the participant's protected health information and facilitate daily logging of topical and medication administration.

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

The NAVMC 1750/4 health assessment may be updated on occasion, based on health status updates. However, NAVMC Forms 1750/5 and 11720 are completed only once per registration.

Frequency of parent or guardian authorization and guidance is on occasion, at the discretion and desire of the parent or guardian of the participant, not the Child and Youth Program. The frequency is dependent on the required updates to the collection instruments:

NAVMC 1750/7 expires on the date listed on the collection instrument, the date Non-Medicated Topical Products Authorization expires, or one year from the CYP acceptance date, whichever occurs first.

NAVMC Forms 1750/10 and 1750/11 are updated as requested by the parent/guardian and on month twelve, as required.

# 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, January 26, 2022. The 60-Day FRN citation is 87 FR 4006.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, August 23, 2022. The 30-Day FRN citation is 87 FR 51654.

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>

A Privacy Act Statement is located at the top of each of the collection instruments.

A copy of the SORN (NM01754-3, DON Child and Youth Program) is published at: <a href="https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570428/nm01754-3/">https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570428/nm01754-3/</a>.

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

Records are kept for two years after the individual is no longer in the USMC Child and Youth Program and then destroyed by burning, shredding, macerating, pulping, degaussing, erasing, or other appropriate means.

#### 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 Instruments

NAVMC 1750/4 – USMC Child and Youth Programs Health Assessment

- a) Number of Respondents: 112,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 112,000
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 56,000 hours

NAVMC 1750/5 – USMC Child and Youth Programs Registration Form

- a) Number of Respondents: 112,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 112,000
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 56,000 hours

# NAVMC 11720 – USMC Family Care Programs Consent to Release Information

- a) Number of Respondents: 7,500
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 7,500
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 1,250 hours

# NAVMC 1750/7 – USMC Child and Youth Programs Non-Medicated Topical Products Authorization

- a) Number of Respondents: 12,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 12,000
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 2,000 hours

# NAVMC 1750/10 – USMC Child and Youth Programs Medication Authorization and Administration Record

- a) Number of Respondents: 2,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 2,000
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 333.3 hours

# NAVMC 1750/11 – USMC Child and Youth Programs Controlled Medication and Authorization, Administration and Daily Log

- a) Number of Respondents: 2,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 2,000
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 333.3 hours

# 2) Total Submission Burden

- a) Total Number of Respondents: 112,000
- b) Total Number of Annual Responses: 247,500
- c) Total Respondent Burden Hours: 115,916.67 hours

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

#### 1) Collection Instrument(s)

# NAVMC 1750/4

- a) Number of Total Annual Responses: 112,000
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$17.38
- e) Total Labor Burden: \$1,946,000.00

#### NAVMC 1750/5

- a) Number of Total Annual Responses: 112,000
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$17.38
- e) Total Labor Burden: \$1,946,000.00

#### **NAVMC 11720**

- a) Number of Total Annual Responses: 7,500
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$5.79
- e) Total Labor Burden: \$43,437.50

#### NAVMC 1750/7

- a) Number of Total Annual Responses: 12,000
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$5.79
- e) Total Labor Burden: \$69,500

# NAVMC 1750/10

- a) Number of Total Annual Responses: 2,000
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$5.79
- e) Total Labor Burden: \$11,583.33

### NAVMC 1750/11

- a) Number of Total Annual Responses: 2,000
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$34.75
- d) Labor Burden per Response: \$5.79
- e) Total Labor Burden: \$11,583.33

### 2) Overall Labor Burden

- a) Total Number of Annual Responses: 247,500
- b) Total Labor Burden: \$4,028,104

Hourly wage was based on Department of Labor, Bureau of Labor Statistics for "Management, Professional, and Related Occupations," accessed at <a href="https://www.bls.gov/cps/cpsaat39.htm">https://www.bls.gov/cps/cpsaat39.htm</a>, retrieved 04.19.2022.

#### 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. <u>Cost to the Federal Government</u>

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

#### 1) Collection Instrument(s)

#### NAVMC 1750/4

- a) Number of Total Annual Responses: 112,000
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$263,760

#### NAVMC 1750/5

- a) Number of Total Annual Responses: 112,000
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$263,760

#### NAVMC 11720

- a) Number of Total Annual Responses: 7,500
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$17,662.50

#### NAVMC 1750/7

- a) Number of Total Annual Responses: 12,000
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$28,260

#### NAVMC 1750/10

- a) Number of Total Annual Responses: 2,000
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$4,710

#### NAVMC 1750/11

- a) Number of Total Annual Responses: 2,000
- b) Processing Time per Response: 10 minutes

- c) Hourly Wage of Worker(s) Processing Responses: \$14.13
- d) Cost to Process Each Response: \$2.36
- e) Total Cost to Process Responses: \$4,710
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 247,500
  - b) Total Labor Burden: \$582,862.50

#### 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: \$582,862.50
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$582,863

Labor costs for NF Level 3 employees is \$14.13 per hour; pay schedules can be accessed at: <a href="http://www.mccs-sc.com/res-inf/hr/docs/forms/wagescalenafpayranges.pdf">http://www.mccs-sc.com/res-inf/hr/docs/forms/wagescalenafpayranges.pdf</a>

# 15. Reasons for Change in Burden

Respondent time burden has decreased since the last submission despite the addition of three forms. This is because NAVMC 11720 was incorrectly identified as having 112,000 respondents when, in practice, only a small percentage of parents/guardians complete the form. Despite the decrease in time burden, the Labor Cost of Respondent Burden has increased due to revised average hourly wage estimates which were previously too low.

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

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