SUPPORTING STATEMENT - PART A

Exceptional Family Member Program Survey – 0704-EFMS

1. Need for the Information Collection

The purpose of the Exceptional Family Member Program (EFMP) Survey is to assess the opinions and experiences of active duty members and to provide key metrics to the Office of Special Needs (OSN) and the military Services. Results of this survey will provide direct feedback on members’ use of and satisfaction with EFMP, including their receipt of care and support from EFMP staff. Legislation authorizing the Under Secretary of Defense (Personnel & Readiness) to gather information is provided in the:

FY2021 National Defense Authorization Act (NDAA), Subtitle I, Subpart 582, which mandates that the DoD evaluate the EFMP, specifically focusing on: “(C) the level of satisfaction of military families with special needs with the family and medical support they are provided.”

Although the requirement does not mention the EFMP survey specifically, there is a requirement to gather information and the EFMP survey is how the policy office is obtaining that information. The survey will be available to members who were part of the sample provided to OPA by the Services. Additionally, members who were not part of the sample, but have a dependent who is enrolled in EFMP will be allowed to take the survey via the OPA survey website. Data from this survey will be presented to OSN. Analysis will include Office of People Analytics’ (OPA) standard products: a tabulation volume (a set of relative frequency distributions of each question, and cross-tabulations of survey questions by key stratifying variables), briefing slides and reports highlighting key findings, and a statistical methodology report. Ad hoc analyses of this survey may be requested by the policy office and other approved organizations, which will be conducted as needed and based on available staff. These projects take approximately one year to complete, including assessment design and development, fielding and administration, and data analysis and reporting.

2. Use of the Information

The overall objectives of this project are to establish how the program is addressing the intended mission of the EFMP to support military families, and to gain insight into the experience, importantly the challenges, of military families enrolled in the EFMP to proactively enhance the program through policy, process improvements, and outreach activities.

Based on the results of this work, OSN will:

1. Brief Senior Leadership on the results of the study including the methodology, findings, and implications.
2. Utilize the technical report and results to assist in the identification and reporting of trends and gaps across the Department pursuant to Section 1781c of Title 10 U.S.C.
3. Utilize the survey results as a component of Office of the Secretary of Defense’s evaluation and monitoring of the EFMP.
4. Utilize the data to drive future program improvements, EFMP standardization, and policy enhancements with a key focus on the reported experience of families.
5. Include a summary of the results and implications within the OSN annual report to Congress.

OPA will administer the EFMP Survey as a web-based survey. Respondents will be able to access the survey via the web on a device they select. The web survey will be administered on proprietary software developed by OPA’s survey operations contractor, Data Recognition Corporation (DRC). Digitally signed e-mails, electronic files, and web-based technology will be used for respondent communications and for data collection. To reduce respondent burden, web-based surveys use “smart skip” technology to ensure respondents only answer questions that are applicable to them. Respondents will be able to quickly access the web survey via QR codes. Selected sample members will receive a total of 12 emails.

The control system will be updated to determine non-respondents. Everyone who indicates by phone, fax, postal mail, or e-mail they did not want to participate in the survey will be coded as actively refusing to participate. Information on the survey website will inform sample members (Privacy Advisory and Informed Consent Statement and Frequently Asked Questions (FAQs), “Once you start answering the survey, if you desire to withdraw your answers, please send an e-mail requesting this to Survey@mail.mil or leave a message any time, toll-free, at 1-800-881-5307.” Upon such notification, OPA’s survey operations contractor will delete the person’s survey responses and code the person as an actively refusing to participate.

3. Use of Information Technology

OPA will administer the survey via the web. All responses (100%) are collected electronically. We use proprietary software developed by OPA’s survey operations contractor to administer the survey on the web. Digitally signed e-mails, electronic files, and web-based technology will be used for respondent communications and data collection. To reduce respondent burden, web-based surveys use “smart skip” technology to ensure respondents only answer questions that are applicable to them.

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

In order to meet Congressional requirements to gather information on EFMP, the survey must be administered.

*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 25, 2022. The 60-Day FRN citation is 87 FR 3784 FRN 3784.

7 comments were received during the 60-Day Comment Period. They are included below in the order they were received, as well as our Agency’s response to the comment.

1. How will the survey be distributed, and what will the mechanism be for service members that do not have access to an official military email address, such as those below the rank of NCO in the US Army?
	1. RESPONSE: We will be using the latest contact information provided to us by OSN and the Service EFMP offices.
2. Is it realistic to expect service members to complete the survey within 15 minutes? Will 15 minutes be sufficient to collect enough data to represent the entirety of the force properly?
	1. RESPONSE: Yes, we think it will take an average of 15 minutes to complete the survey. Members can take more or less time to complete it. We have balanced length and comprehensiveness and worked closely with the Service EFMP representatives to ensure that we collect data across all relevant topics.
3. Will the survey results be publicly available, and if they are, where will they be accessed?
	1. RESPONSE: The results will be shared with relevant DoD and Service policy makers and leaders at which time they will decide on public release as is done with other DoD surveys.
4. What will the results from the survey be used to accomplish?
	1. RESPONSE: They will be shared with EFMP policy and program offices who will use the results to guide their efforts to evaluate and improve the program.
5. You have stated, “the survey will assess topics such as perceptions of the EFMP enrollment process, family support, and referrals.” These topics cross between the medical side and the family service side of EFMP. Will it be made clear to respondents that each office has different functions as they complete the survey?
	1. RESPONSE: Yes, the survey contains subject headers letting the respondent know the topic for each question.
6. Provide a mechanism for survey distribution to service members without access to official military email address
	1. RESPONSE: We are working with OSN and the Service EFMP to get the most accurate contact information.
7. Do not require the service member to utilize a CAC to access the survey or submit their responses.
	1. RESPONSE: The survey does not require the service member to utilize a CAC to access the survey or submit their responses.

A 30-Day Federal Register Notice for the collection published on Monday, Month 23, 2022. The 30-Day FRN citation is 87 FR 31220 FRN 31220-31221.

Part B: CONSULTATION

OPA consulted with OSN to develop survey items. Additionally, we solicited public comments through the Federal Register.

9. Gifts or Payment

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

10. Confidentiality

The survey website includes a Privacy Advisory at the beginning of the survey.

The System of Record Notice (SORN) for this collection is DHRA 03 (Survey Data and Assessment [July 28, 2021, 86 FR 40498]). The SORN is located at:

https://www.federalregister.gov/documents/2021/07/28/2021-16054/privacy-act-of-1974-system-of-records

The data collection are covered by a PIA (Survey Database, [December 18, 2020], DHRA/OPA). PIA is published at:

https://www.dhra.mil/Portals/52/Documents/Privacy/PIA/OPA%20-%20Survey%20Database.pdf

The current disposition authority for survey data is N1-330-03-001, item 8. FILE NUMBER: 1805-09 FILE TITLE: Survey and Census Database FILE DESCRIPTION: Records of census forms completed by military members, civilians, and all persons eligible for DoD benefits. Information in this database are used for policy planning purposes, manpower and benefits research, and other manpower research activities, included are: Survey and Census database master file, codebooks, record layouts, and other technical information required to use the database. OSD Records Disposition Schedules SERIES 1800 342 DISPOSITION: Permanent. Cutoff on completion of the report for the DoD office requiring the creation of the report. Transfer master file and system documentation to NARA at cutoff in accordance with the standards of 36 CFR 1228.270 and 36 CFR 1234. AUTHORITY: N1-330-03-00

Reports would fall under FILE NUMBER: 103-01.2 FILE TITLE: Policy Files – Evaluation FILE DESCRIPTION: Analyses, studies, and substantive correspondence and memos that evaluate or assist in the evaluation of a process, procedure, or function. These files accumulate in the offices of the Secretary and Deputy Secretary of Defense, immediate offices of the Under and Assistant Secretaries of Defense, or any element of any OSD Component involved in making, promulgating, or analyzing policy relating to a Component's mission. They are not to be confused with Policy and Precedent (102-05.1), Publications (102-06.1), or Instruction (103-02.1) files. NOTE: Use 101-14 for background papers associated with policy case files. DISPOSITION: Permanent. Retire to the WNRC when superseded or obsolete. Transfer to NARA 25 years after cutoff. AUTHORITY: N1-330-93-001, item 2 PRIVACY ACT: Not applicable

OPA currently has an SF-115 request for disposition authority for all survey records, to include the reports, labeled DAA-0330-2021-0008.  That has a temporary retention of 30 years for confidential data, permanent retention of 30 years for public use data, and permanent retention of 30 years for reports.

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)

Exceptional Family Member Program Survey

1. Number of Respondents: Approximately 16,500
2. Number of Responses Per Respondent: 1
3. Number of Total Annual Responses: 16,500
4. Response Time: 0.25 hours
5. Respondent Burden Hours: 4,125 hours
6. Total Submission Burden
	1. Total Number of Respondents: 16,500
	2. Total Number of Annual Responses: 16,500
	3. Total Respondent Burden Hours: 4,125 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1. Collection Instrument(s)

Exceptional Family Member Program Survey

1. Number of Total Annual Responses: 16,500
2. Response Time: 0.25 hours
3. Respondent Hourly Wage: $40
4. Labor Burden per Response: $10
5. Total Labor Burden: $165,000
6. Overall Labor Burden
	1. Total Number of Annual Responses: 16,500
	2. Total Labor Burden: $165,000

*Source for average national wage:* <http://www.dol.gov/dol/topic/wages/index.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

1. Collection Instrument(s) 2022 EFMP Survey: Contractor
2. Number of Total Annual Responses: 16,500
3. Processing Time per Response: .25 hours
4. Hourly Wage of Worker(s) Processing Responses: $75.50
5. Cost to Process Each Response: $18.88
6. Total Cost to Process Responses: $311,520
7. Collection Instrument(s) 2022 EFMP Survey: Government
8. Number of Total Annual Responses: 16,500
9. Processing Time per Response: .112 hours
10. Hourly Wage of Worker(s) Processing Responses: $69.16
11. Cost to Process Each Response: $7.75
12. Total Cost to Process Responses: $127,875
13. Overall Labor Burden to the Federal Government
	1. Total Number of Annual Responses: 16,500
	2. Total Labor Burden*:* $439,395

Part B: OPERATIONAL AND MAINTENANCE COSTS

1. Cost Categories
	1. Equipment: $0
	2. Printing: $0
	3. Postage: $0
	4. Software Purchases: $0
	5. Licensing Costs: $0
	6. 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: $439,395
2. Total Operational and Maintenance Costs: $0
3. Total Cost to the Federal Government: $439,395

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The 2022 Exceptional Family Member Program Survey was approved to field in mid-November 2022 through mid-January 2023. The response rates for the Services have been lower than expected, particularly for the Air Force. All of the Services were requested to provide updated email addresses. Request approval to send two additional emails (for a total of 12) and extend the field period through mid March. Data analysis and reporting will occur from the time the survey is closed through a year later. After the survey quality assurance review is completed, tabulation volumes, briefings, and reports are created.

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.