

SUPPORTING STATEMENT - PART A

Department of Defense Consent to Conduct Installation Records Check (IRC)
0704-0586

1. Need for the Information Collection

The information collection requirement is necessary to obtain information pertinent to the criminal history background investigation and suitability determination of individuals working with children in DoD child care programs. The form facilitates vetting of an individual's criminal history records used for suitability and/or fitness determination to work with children.

Authority is granted by DoD Instruction 1402.05, *Background Checks on Individual in DoD Child Care Services Programs* which states all individuals who have regular contact with children under 18 years of age in DoD-sanctioned child care services programs and who also have a current or prior DoD affiliation must also undergo an installation records check (IRC).

2. Use of the Information

Individuals who are interested in working for DoD or for a program operated by or through a contract with the DoD must complete the DD Form 3058 "DoD Installation Records Check" before working with children under the age of 18 years. DoD programs and services that use this form include but are not limited to: Child Protective Services (CPS) (including the investigation of child abuse and neglect reports), faith-based (religious) programs, Social Services Programs, Health and Mental Health Care Programs, to include Physicians, Dentists, Nurse Practitioners, Technicians; Childcare, Education Programs (whether or not directly involved in teaching), Foster Care, Residential care, Recreational or Rehabilitative programs, and Detention, Correctional, and Treatment services. The types of individuals screened include civilian applicants and employees, military members, contractors, family child care/home day care providers and their family members, and volunteers

Disclosure is voluntary; however, failure to furnish all the requested information may impact the individual's ability to work with and around children. Respondents are provided the collection instrument during the application or on boarding phase. The collection instrument requires each respondent complete the form using pen or pencil or electronically (using a computer). The respondent may receive assistance in filling out the form, such as having the form read to them by the human resource officer or security manager. The individual must sign. The form is completed in the human resource or security offices and securely maintained by the human resource officer or security

manager. There are no other communications sent to the respondent associated with the information collection.

The IRC is a critical piece of a criminal history background investigation and suitability determination of any individual providing care and services to children in DoD programs. The form allows vetting of an individual's criminal history records and making a suitability and/or fitness determination to work with children using military law enforcement records, the Defense Central Index of Investigations (DCII), and information in the Family Advocacy Records (FAP) Central Registry. The human resource office or security manager sends the form to installation law enforcement, family advocacy and DCII. Human resource officer or security manager initiate reinvestigation of installation records checks every five years.

These critical checks help ensure all individuals working with children have been thoroughly vetted and that all background check findings have been properly adjudicated before the individual is authorized access to children.

3. Use of Information Technology

The form is formatted to collect responses via printed copy and electronically. 10% are collected electronically. Offices responsible for utilizing the form are encouraged to utilize the electronic submission and to provide the respondent access to a computer.

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 an economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Collected during application/onboard and every five years during reinvestigation. The frequency of collection is required by DoD policy and is intended to mitigate the risk of individuals with specific criminal backgrounds (e.g., child abuse or sex offenders) with access to children.

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 for the collection published on Wednesday, June 21, 2023. The 60-Day FRN citation is 88 FRN 40227

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

A 30-Day Federal Register Notice for the collection published on Friday, September 22, 2023. The 30-Day FRN citation is 88 FRN 65373.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Notice 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

The Privacy Act Statement is located on the top of the form in the section labeled PRIVACY ACT STATEMENT and clearly visible to the respondent when completing the form.

The System of Record Notice (SORN) is located in DUSDI-02 DoD, Personnel Vetting Records System,
<https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/OSDJS/DUSDI-02-DoD.pdf>

A draft copy of the PIA, Electronic Application (eApp), has been provided with this package for OMB's review.

Draft Records Retention/Disposition Schedule is currently in development, pending submission to and approval from the Archivist of the United States, National Archives and Records Administration (NARA). Unscheduled NBIS records will be treated as permanent until receipt of retention/disposition instruction approval from the Archivist of the United States, NARA.

11. Sensitive Questions

The information collection is required under authority of DoDI 1402.05 Criminal History Background Checks on Individuals in Child Care Services Programs and is used to determine an individual's suitability or fitness for working with children.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1. Collection Instrument(s)
[DD 3058 – Department of Defense Consent to Conduct Installation Records Check (IRC)]
 - a. Number of Total Annual Responses: 14,000
 - b. Number of Responses per Respondent: 1
 - c. Number of Total Annual Responses: 14,000
 - d. Response Time: 10 min.
 - e. Respondent Burden Hours: 2,333 hours
2. Total Submission Burden
 - a. Total Number of Respondents: 14,000
 - b. Total Number of Annual Responses: 14,000
 - c. Total Respondent Burden Hours: 2,333 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1. Collection Instrument(s): DD 3058 – Department of Defense Consent to Conduct Installation Records Check (IRC)
 - a. Number of Total Annual Responses: 14,000
 - b. Response Time: 10 minutes (0.167)
 - c. Respondent Hourly Wage: \$15.00 (federal employee minimum wage)
 - d. Labor Burden per Response: \$2.51
 - e. Total Labor Burden: \$35,140
2. Overall Labor Burden
 - a. Total Number of Annual Responses: 14,000
 - b. Total Labor Burden: \$35,000

The Respondent hourly wage was determined using the U.S. Federal Civilian Employees minimum wage of \$15.00/hour.

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)
[DD 3058 – Department of Defense Consent to Conduct Installation Records Check (IRC)]
 - a. Number of Total Annual Responses: 14,000
 - b. Processing Time per Response: .25 hours
 - c. Hourly Wage of Worker(s) Processing Responses: \$26.62
 - d. Cost to Process Each Response: \$6.66
 - e. Total Cost to Process Responses: \$93,240

2. Overall Labor Burden to Federal Government
 - a. Total Number of Annual Responses: 14,000
 - b. Total Labor Burden: \$93,240

The hourly wage was determined by using the OPM Website:
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$
 - b) Printing: \$550
 - c) Postage: \$
 - d) Software Purchases: \$
 - e) Licensing Costs: \$
 - f) Other: \$

- 2) Total Operational and Maintenance Cost: \$550

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$93,240

- 2) Total Operational and Maintenance Costs: \$550

- 3) Total Cost to the Federal Government (P: Add 1 and 2 in this section): \$93,790

15. Reasons for Change in Burden

There has been no change in burden since the last approval

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. Exceptions to “Certification for Paperwork Reduction Submissions”

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