

SUPPORTING STATEMENT - PART A

Problematic Sexual Behavior in Children and Youth Information System – 0704-0620

Summary of Changes from Previously Approved Collection

- The burden has increased following full implementation of the information system. The original estimate was calculated prior to the information system rolling out in October 2021. FY 2023 was the first year of full implementation of the information system across the Department. As a result, estimates provided in this statement more accurately reflect the burden. This increase also reflects the inclusion of the annual report on serious harmful behaviors between children and youth, as required by the NDAA for FY 2021 (Public Law 116-283).

1. Need for the Information Collection

This information collection provides incident and case management data on problematic sexual behavior between children and youth as required by the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232), Section 1089, Policy on Response to Juvenile-on-Juvenile Problematic Sexual Behavior Committed on Military Installations. This statute requires policy development, data collection, and Family Advocacy Program (FAP) involvement through a multi-disciplinary response to problematic sexual behavior in children and youth (PSB-CY) occurring on military installations. More specifically, the legislation requires the data collection to include a description of the incident, whether a multidisciplinary review by the FAP was completed, whether the incident also involved an investigation by law enforcement or other entity, and whether action was taken to support and assist children, youth, and families in response to the incident and a description of any action taken.

2. Use of the Information

Respondents are military members and associated family members who have been referred to the installation FAP after a reported incident of PSB-CY has been received. The purpose of the collection is to determine eligibility for FAP services and to initiate a case record that will inform and support the development and implementation of well-coordinated safety plans, evidence informed support and intervention services, and referrals to specialized care when needed that meet the complex needs of children, youth, and their families involved in incidents of PSB-CY. The referral information may be initially collected from military commanders, military law enforcement, a military child development center, military treatment facility or Department of Defense school operating on the installation who are required by statute to refer incidents involving PSB-CY to the FAP for a multidisciplinary review and intervention planning.

Upon receipt of the referral, a designated FAP professional contacts the military member and associated family members to gather initial information related to the incident and schedule an incident intake interview. A FAP professional may reach out to the military member or their family members via phone or in-person communication, based on the family's preference. During this initial contact, the FAP professional will employ the PSB-CY Non-Clinical Referral Tool (DD Form 3179) to gather preliminary information regarding the incident. Information gathered during these encounters is entered into the system. Access to the system is role-based and information can only be entered or viewed by those who have been given information entry and viewing privileges by the system administrator.

The system includes real-time aggregate and de-identified information in dashboards and reports that are viewable by users with the proper privileges to access. These reports and dashboards inform installation, region, Service headquarters personnel on current trends and opportunities for process improvement in the delivery of support services to children, youth, and families.

3. Use of Information Technology

Information is collected 100% electronically by FAP staff who have been given role based data entry and viewing privileges by the system administrator.

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

This is an incident based collection to meet the legislative requirement in Section 1089 of the FY19 NDAA and to guide and document timely multidisciplinary support to children and families involved in PSB-CY incidents.

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 September 30, 2024. The 60-Day FRN citation is 89 FR 79570

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

A 30-Day Federal Register Notice for the collection published on Friday, January 10, 2025. The 30-Day FRN citation is 90 FRN1985.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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

When respondents provide information for benefit determination and for FAP services, they receive copies of the applicable Privacy Act Statement from the installation FAP provider. All personally identifiable information is protected by the Privacy Act of 1974 and is protected according to the regulations therein and by related DoD directives and instructions.

The system includes comprehensive, multi-modal cybersecurity and privacy measures designed to protect its sensitive information and limit access without impacting operational objectives. External controls are partially inherited through the Amazon Web Services (AWS) GovCloud region via the hosting of the PSB-CY Information System in the GovCloud Impact Level 5 (IL5) infrastructure. Additionally, a full ATO and CAC-only access allow only approved .MIL Non-classified Internet Protocol (IP) Router Network (NIPRNet) users into the application. Each user is assigned to and approved for one of 21 distinct roles in the application. These roles are defined at the installation, region, military department, and Department levels. Roles provide for minimal ('read only') to full-access ('system administrator') privileges. Based on the user's specific role and the viewing, editing and/or managing privileges associated with that role, the user will only see information pertinent to them and their viewing rights.

A copy of the SORN, DPR-50¹, titled "Problematic Sexual Behavior in Children and Youth (PSB-CY) Information System," has been provided with this package for OMB's review.

A copy of the PIA for Problematic Sexual Behavior in Children and Youth (PSB-CY) has been provided with this package for OMB's review.

¹ <https://www.federalregister.gov/documents/2021/08/23/2021-18025/privacy-act-of-1974-system-of-records>

Records are cut off and destroyed 5 years after the end of the calendar year the case is closed or when a minor child reaches 23 years old.

11. Sensitive Questions

Social Security numbers are collected in this process. A Social Security Number Justification Memorandum, as submitted to the Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties, and Transparency on December 11, 2024, is attached. The information collected also includes sensitive questions related to the sexual behavior of children and youth to determine if these behaviors are problematic as defined in DoDI 6400.01, Family Advocacy Program, and warrant a multidisciplinary response due to the harm or potential harm the behavior may present to other children and youth.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

Internal Note: The burden estimate was determined using the number of children involved in reports or allegations of PSB-CY made to the FAP in FY23 (the first year data were reported; 2,346 children involved in the 1,227 reports or allegations of PSB-CY). Information is obtained from members of the public (i.e., civilian parents, family members). Using FY23 data (2,346 children) as a starting point and allowing for some flexibility, an estimated 2,500 reports or allegations are anticipated annually. Each response takes approximately 1 hour to complete which translates into a total of 2,500 hours of respondent burden.

1) Problematic Sexual Behavior in Children and Youth Information System

- a) Number of Respondents: 2,500
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 2,500
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 2,500 hours

2) Total Submission Burden

- a) Total Number of Respondents: 2,500
- b) Total Number of Annual Responses: 2,500
- c) Total Respondent Burden Hours: 2,500 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Problematic Sexual Behavior in Children and Youth Information System

- a) Number of Total Annual Responses: 2,500
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$30.12
- d) Labor Burden per Response: \$30.12

- e) Total Labor Burden: \$75,300.0
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 2,500
 - b) Total Labor Burden: \$75,300.00

The Respondent hourly wage was determined using the median usual weekly earnings for full-time workers age 25-54 years, which can be accessed at the U.S. Bureau of Labor Statistics website: <https://www.bls.gov/news.release/wkyeng.t03.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) Problematic Sexual Behavior in Children and Youth Information System – Collection and Entry
 - a) Number of Total Annual Responses: 2,500
 - b) Processing Time per Response: 2 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$53.87
 - d) Cost to Process Each Response: \$107.74
 - e) Total Cost to Process Responses: \$269,350.00
- 2) Problematic Sexual Behavior in Children and Youth Information System – Annual Report
 - a) Number of Total Annual Responses: 1
 - b) Processing Time per Response: 535 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$64.06 – \$89.04
 - d) Cost to Process Each Response: \$42,237
 - e) Total Cost to Process Responses: \$42,237
- 3) Quality Assurance (IT/Cyber Team)
 - a) Number of Total Annual Responses: 68
 - b) Processing Time per Response: 0.75 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$67.00
 - d) Cost to Process Each Response: \$50.25
 - e) Total Cost to Process Responses: \$3,417.00
- 4) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 2,500
- b) Total Labor Burden: \$315,004.00

The federal government worker hourly wage was determined using the Office of Personnel Management 2024 General Schedule (GS) Pay Tables with locality pay for the National Capital Region. The paygrade of GS 12 Step 5 was used for collection and entry. The paygrades of GS 13 Step 5, GS 14 Step 5, and GS 15 Step 5 were used for the annual report. Source: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/>

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$2,359.00
 - e) Licensing Costs: \$3,942.00
 - f) Other: \$23,403.27 (Amazon Web Services GovCloud IL5 Region Hosting)
- 2) Total Operational and Maintenance Cost: \$29,704.27

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$315,004.00
- 2) Total Operational and Maintenance Costs: \$29,704.27
- 3) Total Cost to the Federal Government: \$344,708.27

15. Reasons for Change in Burden

The burden has increased by \$88,808 following full implementation of the information system. The original estimate was calculated prior to the information system rolling out in October 2021. FY 2023 was the first year of full implementation of the information system across the Department. As a result, estimates provided in this statement more accurately reflect the burden. This increase also reflects the inclusion of the annual report on serious harmful behaviors between children and youth, as required by the NDAA for FY 2021 (Public Law 116-283).

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.