

SUPPORTING STATEMENT - PART A

“DoD-wide Data Collection and Analysis for the Department of Defense Qualitative and Quantitative Data Collection in Support of the Independent Review Commission on Sexual Assault Recommendations” – 0704-0644
Department of Defense

1. Need for the Information Collection

The Office of the Under Secretary of Defense for Personnel and Readiness; (OUSD(P&R)) within the Department of Defense (DoD) is requesting Office of Management and Budget (OMB) clearance for DoD-wide quantitative and qualitative data collection in support of the implementation and evaluation of the Secretary of Defense-approved Independent Review Commission on Sexual Assault in the Military’s (IRC) 82 recommendations. These recommendations are detailed in the Secretary of Defense Memo “Commencing DoD Actions and Implementation to Address Sexual Assault and Sexual Harassment in the Military” dated 22 September 2021 (including under the supporting documents).

These information collections will be conducted by the Office of the Secretary of Defense (OSD) components, Military Departments, Military Services, and/or National Guard Bureau (NGB) (hereafter referred to as DoD). DoD will collect quantitative and qualitative data through in-person and computer/web-based surveys and assessments, focus groups, interviews, site visits, panel discussions, user-experience testing, and message development and testing.

Information collection efforts will align to the four IRC Lines of Effort (LOE) that guided the development of the IRC’s recommendations: LOE 1 – Accountability; LOE 2 – Prevention; LOE 3 – Climate and Culture; and LOE 4 – Victim Care and Support.

Although research studies may also address risk factors outside of sexual assault, DoD will primarily use this research to inform improvements to or the development of sexual assault prevention and response programs, methods, and policies. For example, in support of LOE 1, the Joint Service Committee on Military Justice completed a review of the Manual for Courts-Martial, and recommended revisions were published in the Federal Register on October 19, 2022. Over the coming months, the Department will continue to implement the remaining NDAA and IRC accountability recommendations. DoD also made progress establishing guidance and infrastructure for a dedicated, integrated prevention workforce, and will soon initiate multiple pilot projects for targeted and community-level prevention. Finally, the Military Services and NGB are evaluating their response workforce structures, which will inform DoD’s guidance for a staffed, resourced, and professional response workforce.

In order to work continuously and ensure the needs of the DoD community are met, OUSD(P&R) seeks to obtain OMB approval of a generic clearance to conduct quantitative, qualitative, and/or mixed-methods research. The methods of data collection may include

standardized assessments or surveys that yield quantitative results that may be generalizable, and qualitative approaches such as focus groups or interviews to obtain feedback and information that provides more in-depth insights on perceptions and opinions.

2. Use of the Information

DoD will collect, analyze, and interpret information gathered through this generic clearance to support implementation of the IRC's recommendations approved by the Secretary of Defense (by providing additional information or context where needed) and to allow the DoD to determine and report on the effectiveness of its efforts using process, outcome, and/or impact evaluations.

DoD will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used internally and may be made publicly available outside of DoD;
- Information gathered may be used for the purpose of informing or evaluating specific policy and programmatic decisions related to the IRC's recommendations;
- Information gathered will yield qualitative and/or quantitative information related to the IRC's four LOEs;
- Participation in the information collection by members of the DoD is voluntary or part of broader data collection efforts;
- Personally identifiable information (PII) may be collected if there is a specific and clearly stated purpose, however, all information is reported in aggregate.

If these conditions are not met, DoD will submit an information collection request to OMB for approval through the normal Paperwork Reduction Act (PRA) process (including the 60- and 30-Day PRA notices).

To obtain approval for a collection that meets the conditions of this generic clearance, standardized data collection instruments will be submitted to OMB along with supporting documentation.

Within LOE 1, DoD anticipates reviewing policy of judge-ordered Military Protective Orders for victims of sexual assault and related offenses and studying caseloads to attain the optimum timeline for the military justice process. In support of LOE 2 initiatives, DoD plans to conduct several needs assessments and gap analyses, and pilot studies to link Service members with resources and support. For LOE 3, DoD anticipates several needs assessments and gap analyses, and a pilot study to develop a standardized "pulse survey" tool enabling unit-level commanders to collect real-time climate data on sexual harassment and sexual assault from Service members in their units. Within LOE 4, DoD plans to conduct a pilot study, needs assessments and gap analyses, and program evaluation to improve the coordination of sexual assault response providers, and the quality and availability of victim support resources. Finally, in support of the cross cutting recommendations, DoD plans to conduct needs assessments and gap analyses to evaluate

ways to better conduct data on the role of demographic factors on the experience of sexual harassment and racial/ethnic harassment and discrimination in the military.

More specifically, the types of collections that this generic clearance covers include, but are not limited to the following:

- Structured (i.e., standardized set of questions) or unstructured (i.e., flexible) in-person or virtual interviews, as well as individual assessments;
- Cognitive interviews and methodological pre-testing;
- User experience testing;
- Message development and testing;
- Site visits;
- Focus Groups; and,
- Web-based or on-site surveys

DoD established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

3. Use of Information Technology

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

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

Without this type of continuous information collection, DoD will not have timely information to effectively implement the 82 IRC recommendations approved by the Secretary of Defense.

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

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, September 10, 2025. The 60-Day FRN citation is 90 FRN 43589.

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

A 30-Day Federal Register Notice for the collection published on Monday, December 29, 2025. The 30-Day FRN citation is 90 FRN 60690.

9. Gifts or Payment

Payments or gifts may be offered to respondents as an incentive to participate in the collection to maximize the response rate and when approved by the DoD Office of General Counsel (OGC).

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, DoD will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If DoD includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge. All data collections under this generic license will adhere to the organization's records management, privacy impact assessment, and System Records Notice as applicable.

11. Sensitive Questions

As a part of the information collection, DoD may ask respondents to answer questions on sensitive topics, as they relate to the IRC's four LOEs (i.e., accountability, prevention, climate and culture, and victim care and support). In this generic approval, sensitive topics may include the full spectrum of prohibited behaviors in the Uniform Code of Military Justice, including safe storage of lethal means (e.g., firearms, medications, household poisons), risk and protective factors for self-directed harm and prohibited abuse or harm, and disclosure of incidents of self-directed harm and prohibited abusive or harmful acts.

12. Respondent Burden and its Labor Costs

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (45,000) are based on the number of collections we expect to conduct across the DoD and over the requested period for this clearance.

Part A: ESTIMATION OF RESPONDENT BURDEN: Table 1

| | Number of Occurrence | Number of | Proposed Responses | Estimated Completion | Burden Hours |
|--|----------------------|-----------|--------------------|----------------------|--------------|
|--|----------------------|-----------|--------------------|----------------------|--------------|

| | s (Annual) | Responses (Average) | (Annual) | Time (Average) | (Annual) |
|--|------------|---------------------|----------|----------------|----------|
| Interviews | 56 | 100 | 5,625 | 1 hour | 5,625 |
| Cognitive & Personality testing / Methodological Pre-testing | 45 | 100 | 4,500 | 1 hour | 4,500 |
| User experience testing | 45 | 100 | 4,500 | 1 hour | 4,500 |
| Message development and testing | 56 | 100 | 5,625 | 1 hour | 5,625 |
| Site Visits | 56 | 100 | 5,625 | 1 hour | 5,625 |
| Focus Groups | 37 | 100 | 5,625 | 1.5 hours | 5,625 |
| Surveys | 500 | 81 | 40,500 | .33 hours | 13,500 |
| Total | 795 | 681 | 72,000 | 6.83 hours | 45,000 |

With the estimated annual burden of 45,000 hours, the overall annual labor cost for respondents is estimated to be approximately. An hourly wage of \$28.01 is used for all respondents using the Department of Labor's January 2024 Occupational Employment Statistics data for "All Occupations."

(http://www.bls.gov/oes/current/oes_nat.htm#00-0000)

Part B: LABOR COST OF RESPONDENT BURDEN: Table 2

| Type of Respondent | Total Burden Hours (Annual) | Average Hourly Wage (DOL) ("All Occupations") | Total Respondent Costs (Annual) |
|--------------------|-----------------------------|---|---------------------------------|
| Target Population | 45,000 | \$28.01 | \$1,260,450 |

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<https://www.dol.gov/general/topic/wages>)

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

While on-site and off-site federal contractor staff may be assigned to work on some of the individual fast track information collections (IC), the 2024 OPM General Schedule hourly labor rates for the Washington DC area were used to estimate all labor costs. Only minimal costs per IC are anticipated given that the majority of the generic information collections will be electronic or web-based with little or no printing or mailing costs. Any O&M costs per IC that are related to storage or system maintenance would be prorated across all projects being housed or maintained on the system. It is estimated that the average cost per fast-track information collection will be approximately \$1586. With 795 fast track information collections projected annually, the total annual cost to the Federal Government would be approximately \$1,260,450.

Part A & B : LABOR COST TO THE FEDERAL GOVERNMENT and OPERATIONAL AND MAINTENANCE COSTS: Table 3

| Type of Cost | Average Hours per IC | Average Hourly Rate | Average Costs per IC |
|---|----------------------|---------------------|----------------------|
| Instrument development, programming, and administration preparation | 672 hours (4 months) | | |
| Data cleaning, analysis, and report writing | 672 hours (4 months) | | |
| Operational and Maintenance Costs | | | |
| Total | | | |

PARTC C: TOTAL COST TO THE FEDERAL GOVERNMENT: Table 4

| | Annual # of Occurrences | Average Cost per Occurrence | Annual Cost |
|--|-------------------------|-----------------------------|-------------|
| Interviews | 56 | \$2,814 | 157,556 |
| Cognitive and personality testing / Methodological Pre-testing | 45 | \$2,801 | 126,045 |
| User experience testing | 45 | \$2,801 | 126,045 |
| Message development and testing | 56 | \$2,814 | 157,556 |
| Site Visits | 56 | \$2,814 | 157,556 |
| Focus Groups | 37 | \$4,258 | 157,556 |
| Surveys | 500 | \$756.27 | 378,135 |

15. Reason for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

Publication of results may be required by external entities such as Congress and will be considered on a case-by-case basis, depending on the nature of the study, sensitivity of information collection, and aggregation of results.

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 Act Submissions”

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