

SUPPORTING STATEMENT - PART A

Pure Power – 0704-MFPP

1. Need for the Information Collection

The Department of War (DoW) provides non-medical counseling to service members and their families through the Military and Family Life Counseling (MFLC) program, as established by DoD Instruction 6490.06. This program addresses everyday life challenges such as parenting, relationships, and post-deployment adjustment. The MFLC program utilizes master's and doctoral-level licensed contracted counselors, who have at least two years of specialized experience with children and families, to provide evidence-based counseling (a process of navigating emotional distress and developing actionable coping skills) support in locations like Child Development Centers and Department of War Education Activity (DoWEA) schools.

To better address the unique needs of military-connected youth, the DoW is seeking an evidence-based, manualized set of counseling techniques to enhance coping. The [Pure Power](#) set of techniques, while proven effective with civilian youth, requires evaluation to determine its efficacy for military children and adolescents who face distinct stressors like frequent moves (PCS), parental separations, and family stress related to military life.

An initial implementation feasibility study resulted in positive feedback, with students attending eagerly and teachers, guidance counselors, and school administrators observing positive effects. The next outcome evaluation pilot will involve MFLCs facilitating the curriculum with military-affiliated youth and collecting quantitative data to assess its success.

Consequently, Military Community and Family Policy (MC&FP) will pilot Pure Power within the MFLC program. The outcomes of this pilot are crucial. They will determine if Pure Power is suitable for expansion across the entire MFLC footprint and will inform best practices for implementing the curricula in military-specific environments. If the program proves effective, the same data collection instruments will be used for a broader rollout to all child and youth MFLCs. This could have a significant, program-wide impact on the support provided to military children and their families.

2. Use of the Information

At the beginning of each school year, parents provide consent for their children to access Military and Family Life Counselor (MFLC) services. Children with parental consent may self-refer or be referred by a parent or school staff member to participate in Pure Power group counseling sessions. These sessions are strictly therapeutic and do not serve as research focus groups. To help participants navigate distress and build actionable coping skills, MFLCs utilize evidence-based techniques. Following each session, counselors document activities in administrative reports accessed via their employer portals. To maintain strict confidentiality,

these activity reports collect no Personally Identifiable Information (PII) or Protected Health Information (PHI), though Military Community Support Programs may access the aggregated data for trend analysis.

The 'Pure Power' curriculum will be implemented with youth across three military installations. The program consists of a minimum of 16 lessons delivered during weekly, 30-to-45-minute small group sessions spanning at least 20 weeks, with each lesson completed within a single week. The anticipated MFLC contractors sample size is approximately 16 counselors. MFLCs trained in Pure Power will be assigned to schools by grade levels: K-2 (five elementary schools), 3-5 (eight elementary schools), and 6-12 (one high school and three middle schools) at Kadena Air Base, Fort Campbell, Fort Bragg, Fort Knox, Commander Fleet Activities Yokosuka Japan, Naval Base Guam.

To evaluate program impact, MFLCs will conduct post-session observational assessments of the youth participants. At the end of each group counseling session, MFLCs will log into their established online reporting portal to complete the activity report, which will include the nine evaluation questions listed in part B. For each session, the MFLC will evaluate each of the eight participants individually against the nine observational metrics. The nine items will address problem solving, stress management, communication, and three of the items will measure change over time in related skills (e.g., Since the initial delivery of the Pure Power curriculum lessons, how has the youth's ability to problem solve changed?). MFLCs will complete all ratings based upon their direct observations of participants during the group sessions.

Pure Power participants will not complete any assessment forms or provide any written data. Permission for participation will be provided by parents.

The MCSP project lead will examine the data reported by the MFLCs every four weeks throughout the curricula delivery. At the end of the 20-week curricula delivery, the MCSP project lead will work with the Clearinghouse for Military Family Readiness at Penn State (Clearinghouse) using an aggregated, de-identified dataset to conduct the final program analyses.

The goal of this data collection is to provide MCSP with data that demonstrates youth skill acquisition in stress management, problem solving, and communication, as each has been shown in research to contribute to improved youth and family well-being. These outcomes will be as measured through changes in the nine items adapted from the Devereaux Student Strengths Assessment (DESSA) and the DESSA-MINI - nationally normed, strength-based behavior rating scale for students from kindergarten through 12th grade - over time.

3. Use of Information Technology

100% of responses are collected and catalogued online through the existing MFLC reporting system.

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

To ensure the program is effective, MFLCs must track how each child responds to every individual 'Pure Power' lesson. Gathering this data after each session is necessary because the counselor must assess a child's clinical progress week-to-week to determine if they require continued targeted support.

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, February 25, 2026. The 60-Day FRN citation is 91 FRN 9243.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, October 20, 2026. The 30-Day FRN citation is 91 FRN 66319.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register Notice was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to youth Pure Power participants or MFLC respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because data will be shared with the Clearinghouse for analysis as an aggregate without identifiers, therefore, records are not retrievable by PII.

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

Records are kept according to the retention schedule laid out in the DPR 45 DoD SORN. Master database files: Close after 3 years of continuous inactivity or notification of discharge, retirement or separation of the service member, then records are destroyed 10 years after closed.

11. Sensitive Questions

MFLCs are not going to report any sensitive information about the participants. No PII will be collected.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument

Military and Family Life Counseling Feedback Form

- a) Number of Respondents: 17
- b) Number of Responses Per Respondent: 128
- c) Number of Total Annual Responses: 2176
- d) Response Time: 2 minutes
- e) Respondent Burden Hours: 73 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 17
- b) Total Number of Annual Responses: 2176
- c) Total Respondent Burden Hours: 73 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument

[Military and Family Life Counseling Feedback Form]

- a) Number of Total Annual Responses: 2,176
- b) Response Time: 2 minutes
- c) Respondent Hourly Wage: \$7.25

- d) Labor Burden per Response: \$0.22
 - e) Total Labor Burden: \$ 473.28
- 2) Overall Labor Burden
- a) Total Number of Annual Responses: 2,176
 - b) Total Labor Burden: \$ 473.28

The Respondent hourly wage was determined by using the Federal Minimum Wage of \$7.25/hr. (<https://www.dol.gov/whd/minimumwage.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
[MFLC Activity Report]
- a) Number of Total Annual Responses: 2,176
 - b) Processing Time per Response: 4 minutes = 0.07 hours
 - c) Hourly Wage of Worker(s) Processing Responses: 50.12
 - d) Cost to Process Each Response: \$ 3.34
 - e) Total Cost to Process Responses: \$7,270.74
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 2,176
 - b) Total Labor Burden: \$7,270.74

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: \$187,000 (PSU/MFLC Vendor)
- 2) Total Operational and Maintenance Cost: \$187,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$7,270.74

2) Total Operational and Maintenance Costs: \$187,000

3) Total Cost to the Federal Government: \$194,271

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The results of this information collection will be published on Clearinghouse for Military Family Readiness - <https://militaryfamilies.psu.edu/>.

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.