SUPPORTING STATEMENT - PART A

Defense Sexual Assault Incident Reporting – 0704-0482

Summary of Changes from Previously Approved Collection

- Burden increased due to the addition of four screening tools.
- Addition of four Screening Tools: Non-Clinical Victim Needs Assessment Tool (NCVNAT), Extended- Hurt, Insulted, Threaten, Scream (E-HITS) Assessment, Revictimization Risk Assessment, Columbia-Suicide Severity Rating Scale (C-SSRS) and DD2965 (DSAID Data Form)
- Removed DD2910-1and DD2910-3 since they are below the 10-respondent threshold.

1. Need for the Information Collection

Section 563 of Public Law (PL) 110-417, the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2009, directs the Secretary of Defense to implement a centralized case-level database for the collection and maintenance of information regarding sexual assaults involving members of the Armed Forces. This includes information, if available, about the nature of the assault, victim, alleged offender, investigative information, case outcomes in connection with the assault, and other information necessary to fulfill reporting requirements. Section 543 of PL 114-328, the NDAA for FY2017, further directed the Secretary of Defense to include information on each claim of retaliation in connection with a report of sexual assault in the Armed Force made by or against a member of such Armed Force in the Annual Report on Sexual Assault in the Military. This includes the narrative description and nature of each complaint, information on the complainant and alleged retaliator, and summary and determination of the investigation. Section 536 of Public Law 116-92 of the National Defense Authorization Act for Fiscal Year 2020 directs the Secretary to prescribe procedures under which a victim who files a restricted report on an incident of sexual assault may request, at any time, the return of any personal property of the victim obtained as part of the sexual assault forensic examination. Section 543 of Public Law 113-291, DoDI 5505.18, "Investigation of Adult Sexual in the Department of Defense," and Under Secretary of Defense for Personnel and Readiness memorandum, "Procedures to implement the "Catch a Serial Offender Program," issued June 10, 2019.

Additional authorities include:

10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 8013, Secretary of the Air Force; 32 U.S.C. 102, National Guard; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR) Program; DoD Instruction 6495.02, SAPR Program Procedures; Army Regulation 600-20, Chapter 8, Army Command Policy (Sexual Assault Prevention and Response Program); Office of the Chief of Naval Operations (OPNAV) Instruction 1752.1C, Sexual Assault Prevention and

Response Program; Marine Corps Order 1752.5B, SAPR Program; Air Force Instruction 90-6001, SAPR Program; and E.O. 9397 (SSN), as amended.

2. Use of the Information

Individuals who may be victims and/or alleged perpetrators; bystanders/witnesses; or first responders in a sexual assault involving a member of the Armed Forces, includes:

- Active-duty Army, Marine Corps, Navy, and Air Force members.
- Active-duty Reserve members and National Guard members covered by title 10 or title 32.
- Service members who were victims of a sexual assault prior to enlistment or commissioning.
- Military dependents age 18 and older.
- Department of Defense (DoD) civilians.
- DoD contractors*.
- Other Federal government employees*.
- U.S. civilians*; and
- Foreign military members who may be lawfully admitted into the U.S. or who are not covered under the Privacy Act*.

**Note: This information is not currently collected from bystanders, witnesses, or first responders. Collection of information is pending approval of this package.*

Service members and military dependents 18 years and older who have been sexually assaulted have two reporting options: Unrestricted or Restricted. If the individual elects Restricted Reporting, no Personally Identifiable Information (PII) will be collected. If an individual elects Unrestricted Reporting, PII will be collected, and investigation is triggered. Non-military or federal employee victims of sexual assaults involving members of the Armed Forces may only file an Unrestricted Report. The only exceptions are Air Force and Army civilians, and military dependents who are adult sexual assault victims.

A collection is initiated when an individual elects to make either an Unrestricted or Restricted report by completing and signing a DD Form 2910, "Victim Reporting Preference Statement." The Sexual Assault Response Coordinator (SARC) or SAPR Victim Advocate (VA) will then begin filling in the DD Form 2965, "Defense Sexual Assault Incident Database (DSAID) Data Form," with the information received from the individual. For Unrestricted reports, the information from the DD Form 2910 and DD Form 2965 is entered into the DSAID. A copy of the DD Form 2910 is provided to the victim; the DD Form 2965 is destroyed. For restricted reports, the DD Form 2910s are maintained in hard copy by the SARC. If a sexual assault involving a non-military or federal employee victim is first reported to civilian law enforcement, information on these members of the public may also be collected as part of an Unrestricted or Restricted Report.

Information on reported instances of retaliation in connection with a report of sexual assault is collected on the DD Form 2910-2, "Retaliation Victim Reporting Preference Statement." Reports of retaliation may only be made in connection with an Unrestricted Report of sexual assault made by or against a member of the Armed Forces.

When a report of retaliation is received from another source through the course of an investigation, a new retaliation case is opened in DSAID by a Program Manager (PM) at one of the Service headquarters. In some exceedingly rare cases, a victim may ask to file or update a replacement report using the DD Form 2910-1, "Replacement of Lost DD Form 2910, Victim Reporting Preference Statement."

This information is collected to provide case management support and fulfill Congressional reporting requirements. Records may also be used as a management tool for statistical analysis, tracking, reporting, evaluating program effectiveness, conducting research, and case and business management. De-identified data is used to respond to mandated reporting requirements.

Information is collected in those instances a victim of sexual assault who opted for a Restricted Report and chose to undergo a Sexual Assault Forensic Examination (SAFE) at a military treatment facility contacted a Sexual Assault Response Coordinator (SARC) to request return of their personal property through DD Form 2910-3 "Return of Victim's Personal Property in Restricted Reporting Sexual Assault Cases Collected During a Sexual Assault Forensic Examination (SAFE)".

Information collected on DD Form 2910-4 will be used to document requests for username and passwords for the Catch a Serial Offender (CATCH) Program and to collect victim contact information in the event the victim's entry matches against another sexual assault victim. The SAPR Program personnel use information to ensure that victims are aware of available services. At the DoD level, only de-identified data is used to respond to mandated congressional reporting requirements.

Beginning in October 2026, DoW SAPRO will introduce the use of the following screening tools to enhance its ability to support victims of sexual assault. These tools provide a structured framework to help determine a victim's immediate needs and risks, ensuring they receive the most effective support possible. The information gathered is for case management and will not be stored in the DSAID.

- Non-Clinical Victim Needs Assessment Tool. The NCVNAT is a single page (front and back) tool with individual sections on the five identified categories of common victim needs and a box for prioritization of these needs. The Needs Assessment provides a framework for collecting information about victim-identified needs. Screening questions are embedded within the five categories which further assess for SAFE needs, intimate partner violence, revictimization risk, and suicide risk.

- Extended – Hurt, Insult, Threaten, Scream (E-HITS) Assessment. The E-HITS assessment is a 5-item, self-administered screening tool used in healthcare settings to identify intimate partner violence (IPV) in the past year. It measures physical, psychological, and sexual abuse. This assessment takes less than 5 minutes to complete.

- Revictimization Risk Assessment. The Revictimization Risk Assessment is a six-question assessment that helps assess the risk for revictimization after reporting a sexual assault. Based on the risk level, an intervention recommendation can be made.

- Columbia-Suicide Severity Rating Scale (C-SSRS). This protocol supports suicide risk screening through a series of simple, plain-language questions that anyone can ask. The answers help users identify whether someone is at risk of suicide, determine the severity and immediacy of that risk, and gauge the level of support that the person needs.

DSAID will be used to document that a victim's needs assessment was completed. The specific details gathered using the screening tools will not be stored in the database, as they are for immediate victim support purposes only.

3. Use of Information Technology

Information is collected from the individual and input into DSAID by the SARC for the purpose of case/ business management. Authorized Legal Officers (LOs) are also able to update investigative information entered by SARCs for the purpose of capturing case outcome. Case information maintained in DSAID is also received via a direct interface with MCIO systems, when appropriate. Information collected by the SARC, SAPR VA, or LOs is input into DSAID manually. Information from the Military Criminal Investigative Organization (MCIO) systems is transferred electronically via Secure File Transfer. In total, an estimated 25% of data submissions are transmitted into DSAID electronically via the interface with the MCIO systems.

DoD SAPRO has built an interface with the Defense Manpower Data Center (DMDC) Real-Time Broker Service (RBS), also known as DEERs. The purpose of this interface is to allow DSAID to receive authoritative demographic data to improve the efficiency and reliability of sexual assault victim support information stored within the system.

DEERS provides demographic data for the following categories of individuals:

- Any person who has been identified as a victim of a sexual assault allegedly against or committed by a uniformed member of the military, a DoD Civilian or DoD Contractor, or a retaliation reporter.

4. Non-duplication

Each Military Service maintains a number of systems that support the various communities involved in providing support to victims of sexual assault and other response elements to include criminal investigative and legal communities. Other than DSAID, however, a system to consolidate and centralize this data, per the requirements of Section 563 of PL 110-417, does not exist. The lack of such a system would make cradle-to-grave case management, reporting, accurate trend analysis on the efficiency of training programs, and victim care difficult and labor intensive. The current service systems and status are as follows:

a. The Department of the Army's Army Law Enforcement Reporting and Tracking System is currently deployed and captures investigative and legal information.

b. The Department of the Navy's Consolidated Law Enforcement Operations Center is currently deployed and captures investigative and legal information.

c. The Department of the Air Force's Investigative Information Management System is currently deployed and captures case investigative information.

These sources of data were examined at the time of DSAID's creation and were found not to meet the mandate of PL 110-417 as they are Military Service specific and not DoD-wide systems. Additionally, these Service-level systems lack the capability to run reports to meet current congressional and Departmental reporting requirements pertaining to Restricted and Unrestricted reports of sexual assault.

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

At this time, it is estimated that DSAID is required to generate roughly 20 standard Military Service and Military Service Academy reports a year. These reports are generated by DSAID either quarterly or annually. Eight of these standard reports are congressionally mandated. The system also produces weekly ad hoc queries and reports and is used to support Congressional and Government Accountability Office inquiries as needed. Less frequent collections would render the Department unable to fulfill these reporting requirements.

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). DoD SAPRO intends to utilize OMB's Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD-15), Figure 2 (Race and Ethnicity Question with Minimum Categories Only) for collecting and reporting race/ethnicity data in DSAID and the DD Form 2965 (DSAID Data Form). DoD SAPRO is very sensitive to collecting extraneous personally identifiable information (PII) from any victim of sexual assault, especially from those who desire to utilize the Restricted reporting option. Restricted reporters are often concerned that any PII they provide can lead to their identification by command, law enforcement, and/or their fellow Service members. Requiring SAPR personnel to gather data at the level required in Figure 1, with multiple detailed race/ethnicity checkboxes and categories, will likely have a negative impact on the SAPR program, especially when gathering personal information from victims who are often traumatized because of their incident. Finally, when providing information to senior leaders and Congress, DoD SAPRO would never provide race/ethnicity data in reports and briefings to the level of detail required in Figure 1. Therefore, it is overly burdensome on SAPR personnel to collect, track, and maintain race/ethnicity data at that level. DoD SAPRO is working to align race/ethnicity data in DSAID with Figure 2 by the end of 2026, well before OMB's required date of March 28, 2029. The updated DD Form 2965, currently with Forms Management for re-publication, had been updated to collect race/ethnicity data in the Figure 2 format.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, June 24, 2026. The 60-Day FRN citation is 91 FRN 37960.

One comment was received during the 60-Day Comment period.

"As military databases integrate with civilian law enforcement reporting and federal criminal databases, tracking forms like the DD 2910 series risk data exposure if cybersecurity protocols or access-control frameworks tied to these information collections are loosely defined. If data-sharing protocols and system-to-system application programming interfaces (APIs) are loosely defined, sensitive PII or indicators of restricted reports risk cascading into general personnel files or security clearance adjudications, actively deterring service members from utilizing reporting channels due to fear of career reprisal or privacy loss.

Protecting the privacy and confidentiality of sexual assault survivors is a mandatory prerequisite for maintaining the integrity of the military justice and support infrastructure. Approval under the Paperwork Reduction Act must be conditioned upon the Department of Defense demonstrating uncompromised data-security architectures and airtight interoperability firewalls that strictly prevent unauthorized cross-system data leakage."

Response:

"The Department of War recognizes that protection of personally identifiable information (PII) and the confidentiality of Restricted Reports are essential to survivor trust and to the effectiveness of the Sexual Assault Prevention and Response (SAPR) program. DD Forms 2910 and related forms are designated **CUI when filled** and include Privacy Act statements. The forms document a victim's reporting preference and access to services; they do not independently establish authority for broader personnel, law-enforcement, or security-adjudication use.

DSAID includes security measures intended to protect sensitive information, including a File Locker capability for protected storage of certain victim documents. The Department will continue to assess and apply appropriate technical and administrative safeguards—including role-based access, least-privilege access, audit logging, and interface governance—to protect PII and prevent unauthorized disclosure. The Department remains responsible for ensuring that implementation of the collection complies with applicable privacy, security, SAPR confidentiality, and records requirements."

A 30-Day Federal Register Notice for the collection published on Friday, November 13, 2026. The 30-Day FRN citation is 91 FRN 72858.

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. However, victims and alleged perpetrators may be entitled for benefits allowed by the law.

10. Confidentiality

A Privacy Act Statement (PAS) is provided on the DD Form 2910, DD Form 2901-1, 2910-2, 2910-3, DD2910-4 and the DD Form 2965. If the DD Form 2965 is not used to collect information from a respondent, the PAS is provided separately by the SARC or SAPR VA.

DSAID's current System of Record Notice can be found here: https://www.federalregister.gov/documents/2024/12/20/2024-29917/privacy-act-of-1974-system-of-records

DSAID's Privacy Impact Assessment is provided for OMB review.

Temporary; Cutoff cases at the end of the fiscal year. Destroy 50 years after cutoff. Records are maintained in the system until destroyed.

11. Sensitive Questions

As stated, victims of sexual assault have two options when reporting information regarding an incident. Victims may consent to a full collection of information, which will initiate an investigation through the selection of the Unrestricted Reporting option. Alternatively, victims may report in a way that enables them to receive assistance without initiating an investigation through the election of a Restricted Report. If a victim elects the Restricted Reporting option, no PII will be collected, but full or limited SAPR services may be available. Non-military or federal employee victims of sexual assaults involving members of the Armed Forces may only file an Unrestricted Report, with the exception of adult military dependents. In this way, no collected information violates the Privacy Act, as implemented by DoD 5400.11-R.

If an individual elects the Unrestricted Reporting option, PII elements collected include Social Security Numbers, race, and ethnicity. A Social Security Justification Memorandum was initially signed and approved authorizing the collection of SSN in April 2014. An updated draft justification was submitted to PCLD for renewal. A copy is attached.

By the very nature of the system, information regarding sexual activity is collected. All information on sexual activity, however, is collected per Congressional requirements. Additionally, race and ethnicity categories are in compliance with those outlined in DoD

Manual 7730.47-M, Volume 1, "Defense Incident-Based Reporting System (DIBRS): Data Segments and Elements," a copy of which is included with this package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Defense Sexual Assault Incident Unrestricted Reporting (DD2910 and DD2965)
a) Number of Respondents: 5,640
b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 5,640
d) Response Time: 2.5 Hours
e) Respondent Burden Hours: 14,100

Defense Sexual Assault Incident Restricted Reporting (DD2910 and DD2965)
a) Number of Respondents: 2,176
b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 2,176
d) Response Time: 1 hour
e) Respondent Burden Hours: 2,176

[DD2910-2, Retaliation Reports]
a) Number of Respondents: 53
b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 53
d) Response Time: 2.5 hours
e) Respondent Burden Hours: 133 hours

[DD2910-4, CATCH]
a) Number of Respondents: 376
b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 376
d) Response Time: 2.5 hours
e) Respondent Burden Hours: 940

[[C-SSRS], [E-Hits], [Revictimization Risk Assessment], [NCVNAT]
a) Number of Respondents: 7,816
b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 7,816
d) Response Time: 5 minutes
e) Respondent Burden Hours: 651

2) Total Submission Burden
a) Total Number of Respondents: 16,061

b) Total Number of Annual Responses: 16,061
c) Total Respondent Burden Hours: 18,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)
[DD2910, Unrestricted Reports]
   a) Number of Total Annual Responses: 5640
   b) Response Time: 2.5 hours
   c) Respondent Hourly Wage: $26.31
   d) Labor Burden per Response: $65.78
   e) Total Labor Burden: $370,971

[DD2910, Restricted Reports]
   a) Number of Total Annual Responses: 2176
   b) Response Time: 1 hour
   c) Respondent Hourly Wage: $26.31
   d) Labor Burden per Response: $26.31
   e) Total Labor Burden: $57,251

[DD2910-2, Retaliation Reports]
   a) Number of Total Annual Responses: 53
   b) Response Time: 2.5 hours
   c) Respondent Hourly Wage: $26.31
   d) Labor Burden per Response: $65.78
   e) Total Labor Burden: $3,486

[DD 2910-4, CATCH]
   a) Number of Total Annual Responses: 376
   b) Response Time:2.5 hours
   c) Respondent Hourly Wage: $26.31
   d) Labor Burden per Response: $65.78
   e) Total Labor Burden: $24,731

2) Collection Instrument(s)
[[C-SSRS], [E-Hits], [Revictimization Risk Assessment], [NCVNAT]
   a) Number of Total Annual Responses: 7816
   b) Response Time: 5 minutes
   c) Respondent Hourly Wage: $26.31
   d) Labor Burden per Response: $2.19
   e) Total Labor Burden: 17,137

3) Overall Labor Burden
   a) Total Number of Annual Responses: 47,325
   b) Total Labor Burden: $473,576

The Respondent hourly wage was determined by using the Office of Personnel Management 2026 General Schedule Pay Tables (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/GS_h.pdf)

Note; The Screening Tools are not yet operational. The number of total annual responses equals the total number of restricted and unrestricted reports. The total annual responses number is a maximum value, as not every screening tool may necessarily be used. Once operational, the next submission will reflect actual response data.

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)
[DD2965, DSAID Data Form]
   a) Number of Total Annual Responses: 7,816
   b) Processing Time per Response: 1.5 hours
   c) Hourly Wage of Worker(s) Processing Responses: $41.73
   d) Cost to Process Each Response: $62.6
   e) Total Cost to Process Responses: $489,243

[DD2910 Unrestricted]
   a) Number of Total Annual Responses: 5,640
   b) Processing Time per Response: 1.5 hours
   c) Hourly Wage of Worker(s) Processing Responses: $41.73
   d) Cost to Process Each Response: $62.6
   e) Total Cost to Process Responses: $353,035.00

[DD21910 Restricted Report]
   a) Number of Total Annual Responses: 2,176
   b) Processing Time per Response: 1.5 hours
   c) Hourly Wage of Worker(s) Processing Responses: $41.73
   d) Cost to Process Each Response: $62.6
   e) Total Cost to Process Responses: $136,207

[DD2910-2, Retaliation Reports]
   a) Number of Total Annual Responses: 53
   b) Processing Time per Response: 1 hour
   c) Hourly Wage of Worker(s) Processing Responses: $41.73
   d) Cost to Process Each Response: $41.73

e) Total Cost to Process Responses: $2,211.69

[DD2910-4, CATCH]
a) Number of Total Annual Responses: 376
b) Processing Time per Response: 1 hour
c) Hourly Wage of Worker(s) Processing Responses: $41.73
d) Cost to Process Each Response: $41.73
e) Total Cost to Process Responses: $15,690.48

[C-SSRS]
a) Number of Total Annual Responses: 7816
b) Processing Time per Response: 0.166 hours
c) Hourly Wage of Worker(s) Processing Responses: $41.73
d) Cost to Process Each Response: $6.93
e) Total Cost to Process Responses: $54,360

[NCVNAT]
a) Number of Total Annual Responses: 7816
b) Processing Time per Response: 0.166 hours
c) Hourly Wage of Worker(s) Processing Responses: $41.73
d) Cost to Process Each Response: $6.93
e) Total Cost to Process Responses: $54,164.88

[E-HITS]
a) Number of Total Annual Responses: 7816
b) Processing Time per Response: 0.166 hours
c) Hourly Wage of Worker(s) Processing Responses: $41.73
d) Cost to Process Each Response: $6.93
e) Total Cost to Process Responses: $54,164.88

[Revictimization Risk Assessment]
a) Number of Total Annual Responses: 7816
b) Processing Time per Response: 0.166 hours
c) Hourly Wage of Worker(s) Processing Responses: $41.73
d) Cost to Process Each Response: $6.93
e) Total Cost to Process Responses: $54,164.88

2) Overall Labor Burden to the Federal Government
a) Total Number of Annual Responses: 47,325
b) Total Labor Burden*:* $1,213,124.89

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories
a) Equipment: $0

b) Printing: $10,000
c) Postage: $0
d) Software Purchases: $0
e) Licensing Costs: $0
f) Other: $0

2) Total Operational and Maintenance Cost: $10,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: $1,213,124.89

2) Total Operational and Maintenance Costs: $10,000.00

3) Total Cost to the Federal Government: $1,223,124.89

15. Reasons for Change in Burden

There has been an increase in burden since the previous approval due to the addition of four assessment screening tools.

16. Publication of Results

Aggregate data collected in DSAID will be published in accordance with Section 577(f) of PL 108-375, the NDAA for FY2005. Section 596 of PL109-163 (FY2006 NDAA), Sections 532 and 583 of PL 109-364 (FY2007 NDAA), Section 567 of PL 111-84 (FY2010 NDAA), Section 1631 of PLXXX (FY2011 NDAA), Sections 575 and 579 of PL 111-383 (FY2013 NDAA), Section 542 of PL 113-291 (FY2015 NDAA), Section 543 of PL 114-328 (FY2017 NDAA), and Section 537 PL 115-XXX (FY2018 NDAA) impose additional requirements for the report. These mandates require the collection of sexual assault information involving members of the Armed Forces annually and that the publication of this data be submitted to Congress.

SAPRO publishes the DoD Annual Report and the Military Service Academy Reports each year. Those reports are provided to Congress and are published on www.sapr.mil, a public facing website. The reports include non-PII DSAID sexual assault reporting data for DoD and the Military Service Academies. To protect individual privacy, only de-identified data is 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.