

SUPPORTING STATEMENT

Department of Defense Child Development Program DD X656

A. JUSTIFICATION

1. Need for Information Collection

The collection activity is under review as DoD Instruction 6060.02, "Child Development Programs" (CDPs), is being reissued per DoDI 5025.01, "DoD Issuance Process." The DoD requires the information in the proposed collection for program planning and management purposes. DD Form X656 "Basic Criminal History and Statement of Admission". DoD is seeking clearance of DD Form X656 with this submission:

- a. The completion of DD Form X656, "Basic Criminal History and Statement of Admission" to be completed by all persons applying for employment within DoD CDPs. The DD Form X656 is a new form that collects basic information about the applicant and asks basic information in regards to whether they have been arrested, charged, or convicted of or for a crime. Additionally, the form is to be reaffirmed annually if the applicant becomes an employee. The form does not serve as a criminal background check which is conducted through other means. The SF-85 process is initiated after this form is completed.

All forms have been revised or created to remove or omit any reference to social security numbers of individuals.

The information collected through DD Form 2606, DD Form 2652 and DD Form X656 is collected under the authority of PL 101-89 and EO 9397.

Respondents for the information collection through DD Form X656 are individuals seeking employment in DoD CDPs.

2. Use of Information

The DoD CDP requires the information in the proposed collections for program planning and management purposes.

The DD Form X656 is used to annotate employees understanding of the background check requirements and obtain information in regards to any criminal history that might prevent an individual from being employed in a CDP.

Information collected on the form may be shared on a need to know basis within the DoD, and otherwise as provided by the Privacy Act, 5 U.S.C. 552a. In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, these

records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a (b)(3) as identified on the Army SORN A0608-10 CFSC, Air Force SORN F034 AF SVA, and Navy SORN NM01754-3, (atch 4) and the DoD Routine Blanket Uses published at http://dpclo.defense.gov/privacy/SORNs/blanket_routine_uses.html.

3. Improved Information Technology

While these forms can be downloaded as fillable .pdf's, there is not an electronic collection system in place for these forms. As electronic collection systems are developed, a Privacy Impact Assessment will be conducted for all forms by the respective Military service. Army Privacy Impact Assessment for RecTrac system is provided in Supporting Documentation.

4. Efforts to Identify Duplication

In regards to DD Form 2602 and DD Form 2652, the enrollment or application information for this collection is unique to each individual and there is not information already available which can be used, or modified for use, for the purposes of this collection. Efforts have been made to limit the amount of duplicate information as well as eliminate unneeded information.

In the case of the DD Form X656, there is no collection already in existence that requires this information.

5. Methods Used to Minimize Burden on Small Entities

The collection of information does not have any burden on small businesses or other entities.

6. Consequences of Not Collecting the Information

Completion of DD Form X656 is voluntary; however, failure to furnish requested information may result in the individual being deemed unfit for employment.

7. Special Circumstances

There are no special circumstances that require the collection to be collected in a manner inconsistent with the guidance delineated in 5 CDR 1302.5(d)(2)

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

- a. This proposed collection was published in the Federal Register for public comment on September 5, 2013 (78 FR 54632). No Comments were received. The 30-Day Federal Register Notice was published on January 30, 2014 (79 FR 4888). The comment period is currently open for notice.

- b. Efforts have not been made to consult with respondents. Information collected on the DD Forms 2606, 2652 only asks basic questions to be able to place applicants on waiting lists for CDP services, determine what DoD fee category the family will be placed in. In the case of the DD Form X656, basic criminal history is asked for as well as a statement regarding the understanding of the background check process necessary for employment.

9. Payments to Respondents

N/A

10. Assurance of Confidentiality

This information collection does not ask the respondent to submit proprietary, trade secret or confidential information to the Department of Defense.

Each form contains a Privacy Act Statement outlining the applicable Authorities, Purposes, Uses and Disclosure of the provided information.

All information is collected, maintained and used in accordance with Federal Law and regulations and information is secured to protect information. All records are maintained as a hard copy and stored in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or similar system. Access to personal information is limited to those individuals who require the records to perform official assigned duties.

As electronic collection systems are developed, a Privacy Impact Assessment will be conducted for all forms by the respective Military service. Army Privacy Impact Assessment for RecTrac system is provided in Supporting Documentation.

Each Military Service has an applicable SORN as stated below:

ARMY

SORN ID Number: A0608-10 CFSC

SORN Title: Child Development Services (CDS) (CDS) (February 22, 1993, 58 FR 10002).

SORN Website address:

http://dpclo.defense.gov/privacy/SORNS/component/army/A0608-10_CFSC.html

AIR FORCE

SORN ID Number: F034 AF SVA C

SORN Title: Child Development/Youth Programs Records (March 13, 1998, 63 FR 12457)

SORN Website address:

http://dpclo.defense.gov/privacy/SORNS/component/airforce/F034_AF_SVA_C.html

NAVY

SORN ID Number: NM01754-3

SORN Title: DON Child and Youth Program (May 27, 2010, 75 FR 29728)

SORN Website address:

<http://dpclo.defense.gov/privacy/SORNS/component/navy/NM01754-3.html>

11. Personal Identifying Information, Sensitive Questions and Protection of the Information

Personal Identifying Information (PII): Each form contains a Privacy Act Statement outlining the applicable Authorities, Purposes, Uses and Disclosure of the provided information.

Respondents are advised that their data is collected under the protection of the Privacy Act, 5 USC 552a. The data is collected, maintained, and used in strict confidence in accordance with Federal Law and regulations to protect the confidentiality of PII. The paper forms are secured to protect PII. DoD Instruction 5400.16 provides DoD Privacy Impact Assessment guidance.

Protection of the Information: Paper records are maintained in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or similar system. Access to personal information is limited to those individuals who require the records to perform official assigned duties.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information.

a. Estimation of Respondent Burden

Table: Burden Hours for Collection – DD Form X656

Total annual respondents	5,000
Frequency of response	1
Total annual responses	5,000
Burden per response	10 minutes
Total burden hours	832

b. Explanation of how burden was estimated

The estimated 10 minutes of burden per respondent was determined by the fact that all information should be readily available to the respondent.

TOTAL BURDEN HOURS: 832 hours

c. Labor Cost of Respondent Burden

The respondents will complete all forms on their own time.

Using a per respondent basis of 10 minutes per response and a minimum wage (source: Department of Labor (<http://www.dol.gov/dol/topic/wages/minimumwage.htm>)) of \$7.25, it is estimated that the cost per response will be \$1.21 (10 minutes). Therefore, the total labor cost will be \$6,050.

13. Estimates of Other Cost Burden for the Respondent for Collection of Information

a. Total Capital and Start Up Cost

NA

b. Operation and Maintenance Cost.

NA

14. Estimated Cost to the Federal Government

Initial review and processing:

Child Development Program Admin

Hourly cost GS-5, \$13.14 per hour x 5 minutes per form = \$1.10 per respondent

5,000 respondents x \$1.10 = \$5,500.

15. Changes in Burden

DD Form X656 is a new collection; there are no changes in burden.

16. Publication Plans/Time Schedule

The results of the information collection will not be published for statistical use.

17. Approval Not to Display Expiration Date

N/A

18. Exceptions to Certification Statement

N/A.