

SUPPORTING STATEMENT – PART A

EXCEPTIONAL FAMILY MEMBER PROGRAM

A. JUSTIFICATION

1. Need for the Information Collection. The Individual with Disabilities Education Act, (Sections 1400 et seq. of title 20, United States Code) and the Defense Dependents Education Act, (Sections 921 et seq. of title 20, United States Code) require the Department of Defense to provide early intervention services to developmentally delayed infants and toddlers (birth through 2) and special education and medically related services to children with disabilities from 3 through 21 years of age who are eligible to attend a DoD school. In order to ensure the availability of necessary medical and educational services for family members, the Department must identify those who have special health or educational needs. The needs are considered when approving family travel to an overseas location where DoD must provide the services.

The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (Public Law 94-191) requires specific language to advise the individuals that personally identifiable health information shall not be used or disclosed except for specifically permitted purposes, unless informed consent is provided by the individual. The Department is standardizing the information collection to ensure that appropriate information is collected and that it meets the data collection HIPAA requirements.

The National Defense Authorization Act (NDAA) for Fiscal Year 2010 (Public Law 111-84) requires procedures to identify members of the Uniformed Services who are members of military families with special needs, mechanisms to ensure their timely and accurate evaluations and enrollment.

2. Use of the Information. The purpose of this information collection is to identify medical and educational requirements of family members when family member travel to an overseas assignment is being considered. Respondents are Military members and DoD civilian employees, private physicians and school personnel. This information collection is primarily used by the Uniformed Services to identify those individuals requiring special consideration when authorizing family travel to an overseas location at government expense. The DD Form 2792, “Family Member Medical Summary,” and DD Form 2792-1, “Special Education/Early Intervention Summary,” are the forms associated with this information collection. The information is provided to both medical and educational screening committees in overseas locations for their determination of the availability of medical and education resources necessary to meet the family member’s needs. The medical and/or educational recommendation is supplied to the appropriate Military Department’s personnel department in determining the future assignment for the service member. This information collection may also be used to identify available medical and educational resources to DoD civilian employees who are considering a job overseas to assist them in deciding whether to relocate overseas with a family member who

has special medical or educational needs. The information is not supplied to agencies outside of the Department of Defense. Respondents are required to update the forms every 3 years.

3. Use of Information Technology. The DD Form 2792 and DD Form 2792-1 are available to the public electronically online from the Department of Defense forms website (<http://www.dtic.mil/whs/directives/infomgt/forms/dd/ddforms2500-2999.htm>). For respondents who have access to computerized information technology, the forms can be completed online and electronically signed using a Common Access Card (CAC). There are no current plans to submit the completed forms electronically due to the number of individuals who must sign the form (sponsor or family member, civilian physician and/or public school officials). Although the Department has electronically generated the form, the form includes confidential medical information that must be entered by a physician. At this time, it is not practical to require that this information be entered electronically.

4. Non-duplication. Investigation resulted in no findings of duplicate records. The information collection is not available in any centralized location and requires the assistance of military personnel and DoD civilian employees in providing information. Each form contains unique and original information that pertains only to the medical and educational needs of an individual family member.

5. Burden on Small Business. The use of this form will not impact small business or other small entities.

6. Less Frequent Collection. If this information is not collected it will be impossible for the Military Departments to consider the special medical and/or educational needs of family members when approving overseas travel, nor would it be possible to inform civilian employees of the availability of services overseas. If the information is collected less often, it may be inaccurate. This could result in an incorrect decision about assignment and thus a lack of adequate resources to meet the family member's medical and/or educational needs. The Department would incur significant costs if family members are returned to the United States from an overseas location due to non-existent or insufficient medical support being available.

7. Paperwork Reduction Act Guidelines. There are no special circumstances. This collection will be conducted in a manner consistent with the guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments.

a. An agency 60-Day Federal Notice was published in VOL 79, No. 114, Wednesday, January 2, 2014 Federal Register, pages 114-115, as required by 5 CFR 1320.8(d). No public comments were received in response to the notice.

An agency 30-Day Federal Notice was published in VOL 79, No. 120, Monday, June 23, 2014 Federal Register, page 35535.

b. In preparation for the current submission, the program analyst responsible for EFMP policy from the Office of the Secretary of Defense convened a working group of the EFMP Managers from each Services to review both the DD 2792 and the DD 2792-1. The group concurred that the requirement should remain for the collection of information at least every 3 years. The group agreed to:

- Adding authorization to fax or e-mail summary information using secure media transfer. Limiting the form for the use of family travel and registration in the EFMP.
- Adding the Coast Guard and place for members for members in the Reserves to report their duty status.
- Including the DoD Benefits Number.
- Moving the information on case management from the Administrative Use Only section to the Demographics/Certification section.
- Revising the diagnosis(es) and medication history so that the primary and secondary diagnosis(es) are separated. Removing the approximate date medications were last used.
- Administrative Use Only section – Removing several special assignment considerations that are not conducive when making assignment decisions.
- Including additional required specialty providers.
- Provider Information - Removing the need for provider addresses and including an area for providers to report their specialty area.
- Autism Spectrum Disorders and Significant Developmental Delay Addendum – Indicating that information on current intervention/therapies for children could be documented by the medical professional in consultation with the family. And, adding the frequency of required medical services.

Other additions to the DD 2792-1 include the clarification that the form must also be completed for children ages 3 through 5. Developmental Delay has also been added as an eligibility category.

Consultations were conducted with the following individuals:

Name	Organization	Phone Number
Dr. Carl Grube	US Army	703-681-8346
LCDR Noah Sperner	US Navy	703-681-9214
Maj Kelly Czeiszperger	US Air Force	210-395-9247
Jennifer Stewart	US Marine Corps	703-432-9116

9. Gifts or Payment. No payment or gift will be made to respondents.

10. Confidentiality. All data are protected by the Privacy Act of 1974 and are protected according to the regulations therein, and by related DoD directives and instructions. The Privacy Impact Assessment (PIA) is not applicable. The following System of Records Notices (SORNs) oversee the collection of the SSN. Completed forms are covered by official military personnel and special needs records. SORNs are maintained by each of the Services. The DoD Blanket Routine Uses found at <http://dpclo.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>, apply to this collection

Applicable SORNs:

Army

A0600-8-104b AHRC - Official Military Personnel Record

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6128/a0600-8-104b-ahrc.aspx>)

A0608b CFSC, Personnel Affairs: Army Community Service Assistance Files

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6163/a0608b-cfsc.aspx>)

Marine Corps

M01070-6, Marine Corps Official Military Personnel Files

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6775/m01070-6.aspx>)

MO1754-6 - Exceptional Family Member Program Records

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6780/m01754-6.aspx>)

Navy

N01070-3 - Navy Military Personnel Records System

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6405/n01070-3.aspx>)

N01301-2, On-Line Distribution Information System (ODIS)

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6415/n01301-2.aspx>)

Air Force

F036 AF PC C, Military Personnel Records System

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/5876/f036-af-pc-c.aspx>)

F044 AF SG U - Special Needs and Educational and Developmental Intervention

Services (<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/5942/f044-af-sg-u.aspx>)

DoD

DPR 34, Defense Civilian Personnel Data System

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6721/dpr-34-dod.aspx>)

DHA 16 DoD, Special Needs Program Management Information System (SNPMIS)

Records (<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6829/edha-16-dod.aspx>)

Department of Defense Education Activity

DoDEA 26- Department of Defense Education Activity Dependent Children's School Program Files

(<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6707/dodea-26.aspx>)

11. Sensitive Questions. All of the information on DD Form 2792 and DD Form 2792-1 is considered sensitive. The forms collect information about family members and their medical or educational disabilities. The purpose of the form, however, requires that such information be collected so that the medical and educational needs can be met overseas.

Social Security Numbers (SSN) are required on the DD Form 2792 and DD Form 2792-1 because the SSN is still used in the military personnel systems and the military health systems (MHS). The SSN on the EFM medical summary identifies the service member's dependent who has chronic medical needs. Coordination with both MHS and the personnel system assures that the medical needs of the service member's family member can be met at the next assignment. The SSN cannot be truncated without the risk of misidentifying the service member. If the DoD did not collect the SSN from the member, there is an unacceptable risk that the medical information may be incorrectly annotated in the wrong service member's file. A service member might then be assigned to a location where the exceptional family member's medical need could not be met, resulting in lack of necessary medical services, and possible a return of the family to a location with adequate services. It is simply not possible to develop a migration or transition plan for the elimination of the SSN on the DD Form 2792 unless a single identifier can be established that will satisfy the requirements of both personnel system and MHS and allow for service member identification.

Collection of the SSN on the DD Form 2792 and DD Form 2792-1 is necessary to link the document to the service member's personnel records. There are no other unique identifiers for this purpose.

The DD Forms 2792 and 2792-1 are used to help match the needs of family members with the locations where their special needs can be met. Complete information increases the likelihood that the recommendation will accurately reflect the needs.

In considering the health and safety of these family members, decisions are made on an individual basis, not solely on a diagnosis. Gender provides additional information that is relevant to medical care. There is increased prevalence and severity of certain conditions that have a gender basis. There are chromosomal conditions that have gender differences regarding prognosis and types of care. There are gender differences in medication management.

In the special needs population, there are developmental issues that present differently depending on gender, especially in early intervention and preschool-aged populations.

Gender provides necessary information that helps to clarify the interventions and supports necessary to manage certain conditions and diseases.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

(1) DD Form 2792, "Family Member Medical Summary" (Those completed by civilian physicians)

Total annual respondents: 18,076
Frequency of response: 1
Total annual responses: 18,076
Burden per response: 30 minutes
Total Burden Hours: 9,038 Hours

(2) DD Form 2792-1, "Special Education/Early Intervention Summary"

Total annual respondents: 26,479
Frequency of response: 1
Total annual responses: 26,479
Burden per response: 25 minutes
Total Burden Hours: 11,034 Hours

(3) Total Average Annual Burden

Respondents: 44,555
Responses per respondent: 1
Total annual responses: 44,555

Average hours per response: .45 (Total hours (20,072) divided by total Responses (44,555))
 Total annual burden: 20,072 (Total responses (44,555) x Average hrs per response (.45049))

b. Explanation of How Burden was Estimated.

The DD Form 2792 was pilot tested in 2000. The Military Services reported no change in the amount of time it takes to complete the form since that time. The Services report that the number of forms being completed by civilian physicians has increased in the last 3 years as well as the number of family members completing the forms.

The estimates below were based on numbers provided by the Services EFMP program managers and the calculations validated with them.

b. Labor Cost of Respondent Burden

(1) DD Form 2792, “Family Member Medical Summary”

Hourly pay for a physician \$82.90/hr @ \$172,432 per year
 Completing 18,076 Forms X \$82.90 X .25(15 mins) per form = \$374,625

Hourly pay for a clerk \$15.27/hr @ \$31,762 per year
 Completing 18,076 Forms X \$15.27 X .25(15 mins) per form = \$69,005

(2) DD Form 2792-1, “Special Education/Early Intervention Summary”

Hourly pay for a special education teacher \$25.50/hr @ \$51,000 per year
 Completing 26,479 Forms X \$25.50 X .08(5 mins) = \$54,017

Hourly pay for a clerk \$17.31/hr @ \$36,000 per year
 Completing 26,479 Forms X \$17.31 X .33 (20 mins) = \$151,255

(3) Total Costs = \$648,902

13. Respondent Costs Other Than Burden Hour Costs

a. Total Capital and Start-up Cost. There are no capital and start-up costs associated with this information collection. Respondents maintain the information for reasons other than to provide or keep records for the government.

b. Total Operation and Maintenance Cost.

DD 2792-1 “Special Education/Early Intervention Summary” – Supporting documentation

5 pages at \$.10 per page = \$.50 X 26,479 = \$13,239.50

14. Cost to the Federal Government

Cost to assemble packages (DD 2792 and DD 2792-1)

GS-5/Step 4, Personnel Admin, hourly rate is \$18.20¹

\$37,859/2080 = \$18.20

\$.26 X 30 mins = \$7.80

Cost for 44,555 forms X \$7.80 = \$347,529.00

Cost to forward packages (DD 2792 and DD 2792-1)

GS-5/Step 4, Personnel Admin, hourly rate is \$18.20

\$.26 X 10 mins = \$2.60

Cost for 44,555 forms X \$2.60 = \$115,843.00

Cost to Print DD 2792

18,076 forms X \$.13 per page X 13 pages = \$30,548.44

Cost to Print DD 2792-1

26,479 forms X \$.13 per page X 3 pages = \$10,326.81

Total cost for printing = \$40,875.25

Total cost to Government = \$504,247.25

15. Reasons for Change in Burden

The numbers of family members identified with special needs has risen and is expected to rise minimally over the next 3 years. The total dollar amount reflects the increased use of non-military physicians and non-governmental school personnel to complete the forms.

16. Publication of Results

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

17. Non-Display of OMB Expiration Date

Approval not to display the expiration date is not being sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the certification statement are being sought.

¹ Used the GS Step 4 for the clerk (D.C. locality pay). \$37,859/2080 = \$18.20

