

## SUPPORTING STATEMENT - PART A

DoD Consent to Conduct Installation Records Check (IRC) – DD Form 3058

OMB Control Number 0704-XXXX

### 1. Need for the Information Collection

The information collection requirement is necessary to obtain consent from impacted individuals to conduct an installation records check (IRC) of the Family Advocacy Program (FAP) Central Registry and military law enforcement records and the Defense Central Index of Investigations (DCII) to determine suitability to work with children under 18 years of age in DoD Child Care Services Program. Impacted individuals include: employees, applicants for employment, contractors, volunteers, Family Child Care (FCC) providers, and adult family members of FCC providers residing in the home.

Authority is granted by 34 United States Code § 20351, DoDI 1402.05 and DoDI 1400.25 (731) of individuals who work or support DoD Child Care Services programs on a military installation to ensure appropriate background investigation are conducted to determine suitability or fitness of the individual engaged with children under 18 years of age with regular and recurring contact. The data collected will provide military installation criminal history background information used to screen and analyze an individual's suitability or fitness to work with children under 18 in DoD Child Care Services Programs.

### 2. Use of the Information

The form gives consent to obtain an IRC of Individuals who provide child care services on a military installation. The information will be used to obtain a favorable suitability or fitness determination prior to working with children under 18 years of age. Respondents include DoD applicants, current employees, contractors, family child care providers, adult family members residing in the home, and volunteers. Disclosure is voluntary; however, failure to furnish requested information may impact the individual's ability to work with and around children.

The collection instrument is electronic and/or optional hard copy. Respondents are provided the collection instrument during the initial hiring, annually for FCC in-home providers and upon the 5 year reverification for employees and volunteers. The collection instrument requires each respondent to complete the form using a computer. The respondent may receive assistance in filling out the form, such as having the form read to them by the human resource officer or security manager. The individual must sign the form.

The form is completed at the program site and electronically filed in the program's system of record or employees' personnel file. There are no other communications sent to the respondent associated with the information collection.

Installation Family Advocacy Program (FAP), military law enforcement/security and the Defense Central Index of Investigation (DCII) will certify that these checks have been completed and no information exists that precludes the individual from working with children.

The human resource or security office will review the certification and, if no derogatory information is disclosed, maintains the data securely in the Service Component's system of record or employee's personnel file. If derogatory information is disclosed, the submitting program manager will consult with the installation human resource officer or security monitor. The consent does not expire and may be utilized to conduct periodic reverification annual checks.

3. Use of Information Technology

100% of responses will be collected electronically. Access to a computer will be provided. Offices responsible for utilizing the form may submit in hard copy if necessary.

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

The frequency of collection is required by DoD policy and is intended to mitigate the risk of individuals with specific criminal backgrounds (child abuse or sex offenders, for example) having access to children.

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 Thursday, March 7, 2019. The 60-Day FRN citation is 84 FRN 8320.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, June 26, 2019. The 30-Day FRN citation is 84 FRN 30099.

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.

10. Confidentiality

A Privacy Act Statement is located at the top of the form, where it is clearly visible to all respondents.

The information collection requires a System of Record Notice (SORN). Each military Department has a SORN and maintains a Records Retention and Disposition Schedule as stated.

DoD: Defense Central Index of Investigations (DCII), DMDC 13 DoD  
(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570716/dmdc-13-dod/>), DITPR #6697

Army: A0215-3 SAMR, NAF Personnel Records  
(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570010/a0215-3-samr/>) and,  
A0690-200 DAPE, Department of the Army Civilian Personnel System  
(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-view/Article/570099/a0690-200-dape/>)

RETENTION AND DISPOSAL: Data is encrypted and password protected. The system is only accessible to registered users by access through login and password that is activated upon registration. Registrants must click the activation email in order to activate their login.

Navy and Marine Corps: NM01754-3, DON Child and Youth Program  
(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570428/nm01754-3/>)

RETENTION AND DISPOSAL: Records are kept for two years after individual is no longer in the Child Care Services Programs and then destroyed by burning, shredding, macerating, pulping, degaussing, erasing, or other appropriate means.

Air Force: F034 AF SVA C, Child Development/Youth Programs Records  
(<https://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569755/f034-af-sva-c/>)

RETENTION AND DISPOSAL: Retained in personnel files for one year after the individual/provider leaves the program or until they request transfer of records to another base, whichever comes first. In the event the records are not transferred, they will be destroyed

by tearing into pieces, shredding, pulping, macerating, or burning. Computer records are destroyed by erasing, deleting or overwriting.

Defense Logistics Agency: S400.20, Day Care Facility Registrant, Applicant, and Enrollee Records (<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570257/s40020/>)

RETENTION AND DISPOSAL: Enrollee records (involving no serious accident or injury requiring emergency medical records) are sent to the Child Development and Youth Program Coordinator upon termination from the program and are destroyed 1 year later.

Enrollee records (involving a serious accident or injury requiring emergency medical records) are sent to the Child Development Services Coordinator upon termination from the program and are destroyed 3 years after the incident or 1 year after the enrollee withdraws from the program, whichever is later. Employee and Volunteer Records are maintained at the Child Development Center and are destroyed 3 years after termination of employment or volunteer services.

National Security Agency: GNSA 19, National Security Agency/Central Security Service (<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570520/gnsa-19/>)

RETENTION AND DISPOSAL: Disposition pending (until NARA has approved a retention and disposal schedule for these records, the records will be treated as permanent).

A draft copy of the PIA, DoD Consent to Conduct Installation Record Checks, has been provided with this package for OMB's review.

#### 11. Sensitive Questions

Sensitive information being collected is authorized by 34 USC 20351, the Crime Control Act of 1990, and DoDI 1402.05, Criminal History Background Checks on Individuals in Child Care Service Programs. It is used to determine an individual's suitability or fitness for working with children.

A Social Security Number Justification Memo has been provided as part of this collection package.

#### 12. Respondent Burden and its Labor Costs

##### Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) [DD Form 3058]
  - a) Number of Respondents: 14,000
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 14,000

- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 2,333 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) [DD Form 3058]
  - a) Number of Total Annual Responses: 14,000
  - b) Response Time: 10 minutes
  - c) Respondent Hourly Wage: \$7.25
  - d) Labor Burden per Response: \$1.20
  - e) Total Labor Burden: \$16,800

The Respondent hourly wage was determined by using the Federal minimum wage of \$7.25/hr.

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) [DD Form 3058]
  - a) Number of Total Annual Responses: 14,000
  - b) Processing Time per Response: 10 minutes
  - c) Hourly Wage of Worker(s) Processing Responses : \$23.82
  - d) Cost to Process Each Response: \$3.97
  - e) Total Cost to Process Responses: \$55,580

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: \$0
  
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$55,580

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$55,580

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 not be 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.