DoD Internal Information Collections Process and Procedures Training

DoD Internal Information Collections Team
Washington Headquarters Service,
Executive Services Directorate, Directives Division

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Introduction to DoD information collections

Types of DoD information collections

- ➢ <u>Congressional information collections</u>: Information collections submitted by DoD to Congress. Follow procedures in DoD Instruction 5545.02 and coordinate with the Office of the Assistant Secretary of Defense for Legislative Affairs. Information collections that are required by Congress but not submitted back to Congress are processed as DoD internal information collections.

- ➢ <u>DoD public information collections</u>: Information is collected by DoD from the public. Follow procedures for public information collections in Chapter 3 of DoD 8910.1-M. Visit the DoD Public Information Collections Website (http://www.dtic.mil/whs/directives/infomgt/collections/index.htm) for more information on DoD public information collections.

- ➢ <u>DoD Component-internal information collections</u>: Information is collected from one DoD Component. Follow procedures for Component-internal information collections as required by that Component. Contact the Component Information Management Control (IMCO) Officer for more information.
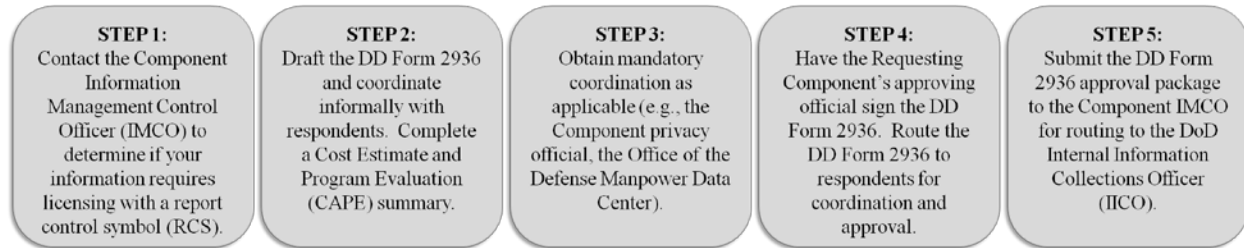
- ➢ <u>DoD internal information collections</u>: Information is collected from more than one DoD Component or from another Federal agency. Follow procedures for internal information collections in Directive-Type Memorandum 12-004, DoD 8910.1-M, and on the DoD Internal Information Collections Website, (http://www.dtic.mil/whs/directives/corres/intinfocollections/iic_home.html).

Types of DoD Information Collections

Type	Congressional Information Collections	DoD Public Information Collections	Component Internal Information Collections	DoD Internal Information Collections
Description	DoD submits information directly to **Congress**	DoD collects information from the **public**	A DoD Component collects information from within that **DoD Component**	DoD collects information across or from **more than one DoD Component**
Process Owner	Office of the Assistance Secretary of Defense for Legislative Affairs	Office of Management and Budget through Washington Headquarters Services, Information Management Division	That DoD Component's Information Collections Management Program	Washington Headquarters Services, Directives Division
Authority Documents and References	DoD Instruction 5545.02	DoD Instruction 8910.01 and DoD 8910.1-M	Respective Component's Guidance Documents	DoD Instruction 8910.01, Directive-Type Memorandum 12-004, and DoD 8910.1-M
Forms Used for Approval	Not Applicable	Office of Management and Budget Form 83-I	Varies by Component	DD Form 2936
Websites and Search Engines	Congressional Hearings and Reporting Requirements Tracking System (CHARRTS)	DoD Public Information Collections Website	Varies by Component	The DoD Internal Information Collections System

The DoD Internal Information Collections (IIC) approval process
(obtaining a report control symbol)

STEP 1: Contact the Component Information Management Control Officer (IMCO) to determine if your information requires licensing with a report control symbol (RCS).

STEP 2: Draft the DD Form 2936 and coordinate informally with respondents. Complete a Cost Estimate and Program Evaluation (CAPE) summary.

STEP 3: Obtain mandatory coordination as applicable (e.g., the Component privacy official, the Office of the Defense Manpower Data Center).

STEP 4: Have the Requesting Component's approving official sign the DD Form 2936. Route the DD Form 2936 to respondents for coordination and approval.

STEP 5: Submit the DD Form 2936 approval package to the Component IMCO for routing to the DoD Internal Information Collections Officer (IICO).

Step 1: Contact your Information Management Control Officer (IMCO)

➢ IMCO contact information can be found on the DoD Internal Information Collections (IIC) Website at
http://www.dtic.mil/whs/directives/corres/intinfocollections/iic_home.html

➢ Exemptions to licensing with a report control symbol:
- See DoD 8910.1-M for a list of DoD internal information collections that may be exempt from licensing with a report control symbol.
- The DoD Internal Information Collections Officer must approve all exemptions.
- Examples of exempt information collections:
  - Intelligence reporting
  - Operating documents, comments or concurrence that are part of proposed actions, processes, or publications
  - Reports of audit or internal review

Step 2: Draft the DD Form 2936 and complete a Cost Assessment and Program Evaluation (CAPE) summary

➢ Action Officer completes the DD Form 2936 except the following sections:
- 8. Coordination
- 9.g. POC/Respondent's signature
- 13.c. Requesting Component Approving Official Signature
- 14. DoD Information Management Control Officer
- 15. For Use by DoD Internal Information Collections Officer Only

➢ Composing a justification statement (section 7):
- If the information collection is a survey, attach the package sent to the Defense Manpower and Data Center (DMDC) to include the justification statement.
- If the information collection is a collection of information from the public, attach the justification statement submitted with the Office of Management and Budget (OMB) Form 83-I.

Step 2: Draft the DD Form 2936 and complete a CAPE summary, continued

➢ Composing a justification statement (section 7), continued:
  • The justification statement should include:
    ▪ A detailed description of how the information will be used, by whom and the purpose. Does the information collection involve the use of technological collection techniques? Describe efforts made to reduce the burden and cost on the respondents.
    ▪ A list of risks or penalties associated with not having the information collection request approved.

➢ Cost Assessment and Program Evaluation (CAPE) summary:
  • Complete a cost summary on the CAPE website: https://www.cape.osd.mil/CostGuidance/.
  • Instructions for completing the CAPE cost summary are located to the right of the tool. The CAPE summary should include costs to the owner of the information collection as well as costs to the respondents. The CAPE summary should reflect estimated costs for one year of the information collection (e.g., if the information collection will be conducted once, then the CAPE summary will reflect a onetime cost; if the information collection will be conducted monthly, then the CAPE summary will reflect each collection over a twelve month period).
  • The cost reflected on the DD Form 2936 must match the cost on the CAPE summary.
  • The owner of the information collection may complete one CAPE summary but respondents have the opportunity to create their own CAPE summaries during coordination of the DD Form 2936.
  • All CAPE cost summaries must be completed before routing the DD Form 2936 package to the responding Components for coordination.

Step 2: Example Cost Assessment and Program Evaluation summary (CAPE)

➢ Information required to complete a CAPE summary:
  • How many respondents will you have?
    Example: 5 Components with 10 respondents each
  • How often and how long will the information be collected?
    Example: Quarterly (four times during fiscal year 2012)
  • What is the average GS level (or equivalent) of your respondents?
    Example:
    Army, Navy, Air Force: O-4
    Under Secretary of Defense for Personnel and Readiness (USD(P&R)), USD for Acquisition, Technology, and Logistics (USD(AT&L)): GS-12
  • What are the costs to your organization/Component for owning or sponsoring the collection?
    Example: $1000 onetime contract cost and $100 for distribution each time the survey is administered

Step 2: CAPE Methodology Statement Example

➢ This survey will cost the Department of Defense $7,690.00 per year. The survey will be administered to Army, Navy, Air Force, the OUSD(P&R), and the OUSD(AT&L) four times each year. We will survey 10 individuals in each DoD Component and it will take each respondent approximately 30 minutes to complete the survey. The cost to the owning Component to develop and administer this survey is $100 each time the survey is administered. The initial contract cost to develop the survey is a onetime cost of $1000.

Step 3: Obtain mandatory coordination

➢ Component or OSD Privacy Official: All information collection requests shall be coordinated with the owner's Component Privacy Official to ensure compliance with privacy policy. Coordination with the OSD Privacy Official is mandatory if the information collection is a survey. If coordination with the OSD Privacy Official is required, the survey will be forwarded automatically to the OSD Privacy Official for coordination after coordination with the Defense Manpower Data Center is complete.

➢ Director, Defense Manpower and Data Center (DMDC): All surveys must be submitted to the Director, DMDC for review. Seeking DMDC review is the first step for any survey. DMDC reviews surveys through the online Data Request System (DRS) (https://www.dmdc.osd.mil/drs/owa/drs.login.show_login?v_job_id=0)

➢ Human Research Protection Program (HRPP) Manager: Information collections involving the gathering of information on human subjects must be coordinated with the HRPP Manager and must comply with HRPP policy.

➢ Component Records Manager: All information collection requests must be coordinated with the owning Component's Records Management Official as required to ensure that the appropriate records disposition schedule has been identified in accordance with the respective Component's records disposition schedules. Click here for a list of Component Records Managers.

➢ Component Chief Information Officer (CIO): All requests for collection of information via computer systems or in electronic format must be coordinated with the owner's Component CIO to ensure that the information will be appropriately safeguarded.

➢ Component Forms Manager: Information collections involving the use of a form must be coordinated with the owner's Component Forms Manager to determine if the form should be controlled in accordance with DoD

7750.07-M. [Click here](#) for a list of Component Forms Management Officials.

- ➢ Component Office of General Counsel: DoD Components must consult with their Office of General Counsel if planning to provide gifts or payments to Federal employees for participation in an information collection.

Step 4: Route the DD Form 2936 to respondents for coordination

- ➢ Adjudicate concerns from the coordination obtained during step 3.
- ➢ **Have your Component's approving official sign the DD Form 2936 (section 13 of the DD Form 2936).** Section 13 of the DD Form 2936 must be signed at the Senior Executive Service (SES) level at a minimum.
- ➢ Then route the DD Form 2936, the CAPE summary, and the CAPE summary methodology statement to respondents for approval and signature in one of two ways:

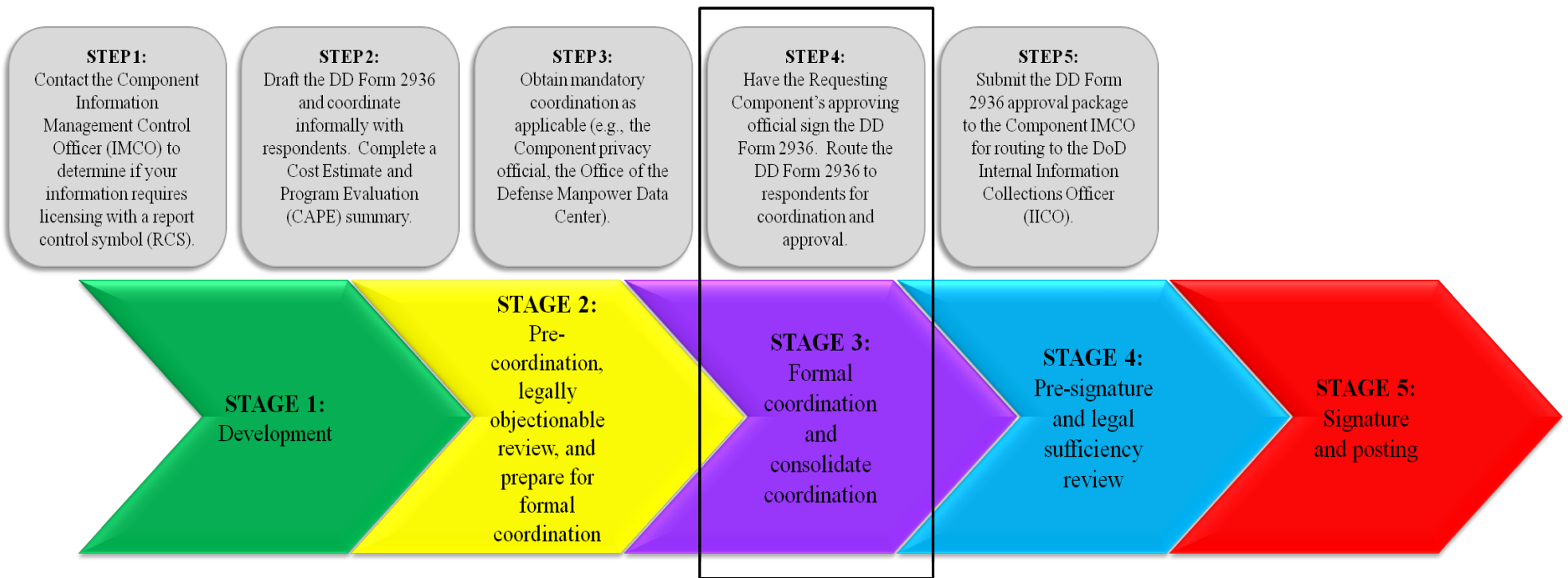(1) Routing the DD Form 2936 without a prescribing DoD issuance:
  - ➢ A draft DD Form 2936 with estimated costs for all responding Components and the owner of the information collection must be submitted to each responding Component for coordination. Each responding Component must sign the DD Form 2936 and return the form to the owner of the information collection.
  - ➢ Respondents' signatures on the DD Form 2936 must be at the Senior Executive Service (SES) level at a minimum.
  - ➢ The coordination requirements outlined in step 3 must be completed before the DD Form 2936 is submitted to responding Components.
  - ➢ Information collections prescribed by statute, law, Federal regulation, or Executive Order are not optional and may be approved without the concurrence of all respondents as long as the respondents are given the opportunity to coordinate.

(2) Routing the DD Form 2936 with its prescribing issuance:
  - ➢ All information collections prescribed in a DoD issuance (to include those also prescribed by statute, law, Federal regulation, or Executive Order) must be coordinated with the issuance as one action in accordance with DoD Instruction 5025.01.
  - ➢ A draft DD Form 2936 with estimated costs for all respondents and owner of the information collection must be posted to the DoD Directives Portal when the DoD issuance is posted to the Portal for coordination. The coordination requirements described in step 3 must be completed before the DD Form 2936 is posted to the DoD Directives Portal. **The respondents' signatures and your Component's approving official's signatures (sections 9 and 13) are not required on the DD Form 2936 if the DD Form 2936 is routed on the Directives Division Portal with its prescribing issuance.**

The DoD Internal Information Collections Process and the DoD Issuances Process

DoD Internal Information Collection Approval Process

STEP 1:	STEP 2:	STEP 3:	STEP 4:	STEP 5:
Contact the Component Information Management Control Officer (IMCO) to determine if your information requires licensing with a report control symbol (RCS).	Draft the DD Form 2936 and coordinate informally with respondents. Complete a Cost Estimate and Program Evaluation (CAPE) summary.	Obtain mandatory coordination as applicable (e.g., the Component privacy official, the Office of the Defense Manpower Data Center).	Have the Requesting Component's approving official sign the DD Form 2936. Route the DD Form 2936 to respondents for coordination and approval.	Submit the DD Form 2936 approval package to the Component IMCO for routing to the DoD Internal Information Collections Officer (IICO).

STAGE 1: Development

STAGE 2: Pre-coordination, legally objectionable review, and prepare for formal coordination

STAGE 3: Formal coordination and consolidate coordination

STAGE 4: Pre-signature and legal sufficiency review

STAGE 5: Signature and posting

DoD Issuance Publication Process

Step 5: Submit the DD Form 2936 approval package to the Component Information Management Control Officer (IMCO)

➢ Submit the DD Form 2936 approval package to your IMCO for approval and routing to the DoD Internal Information Collections Officer.
➢ The DD Form 2936 approval package must include:
  o The DD Form 2936. The DD Form 2936 must be signed at the SES level by the owning Component and each responding Component (unless routed with the prescribing issuance).
  o All CAPE summaries associated with the information collection and the methodology statement.
  o Copies of coordination with the Component or OSD Privacy Official, the Component Records Management Official, the Component CIO, the Director, DMDC, the HRPP Manager, and the Component Forms Manager as applicable.
  o A copy of or a detailed description of the proposed collection instrument.
  o A copy of the prescribing document.
  o The justification statement.

Reinstatement, revision, and extension of DoD internal information collections (IICs)

➢ Reinstatement: The information collection was approved previously but the report control symbol (RCS) has expired. Submit a new DD Form 2936 approval package.
➢ Revision: The RCS has not expired and the owning Component wishes to make changes to the information collection. For minor changes, contact your IMCO. Sections 1, 2, 3, 4, 5, 7, 11, 12, 13 and 14 of the DD Form 2936 are mandatory for revision requests. Complete the remaining sections as applicable.
  o Justification statement for revision requests: Select "Explanation of Revisions to Information Collection" in section 7. Include a detailed description of the instead of composing a new justification statement.
➢ Extension: There are no revisions and there is no change in the cost of the information collection. Extensions are granted for a maximum of two years. Do not complete sections 5.d., 5.e., 5.f., 5.g., 8, 9, and 10 of the DD Form 2936. Complete all other sections.
  o Justification statement for extension requests: Select "Explanation of Request for Extension" in section 7. Explain why an extension to the information collection is necessary instead of composing a new justification statement.

Emergency approval procedures

➢ DoD internal information collections may be granted a temporary RCS by the DoD Internal Information Collections Officer (IICO) without prior completion of the CAPE summaries and coordination.
➢ **Insufficient planning or administrative oversight does not warrant emergency approval.**
➢ The DoD IICO will determine if an information collection warrants emergency approval.

- An expiration date of no more than 180 days from the approval date will be assigned to a DoD internal information collection approved under emergency procedures. All remaining documentation not required by the DoD Internal Information Collections Officer when emergency approval is granted must be completed and submitted to the DoD Internal Information Collections Officer prior to the expiration date of the temporary report control symbol.
- Requests for emergency approval must be submitted to the DoD IICO through the DoD Component's IMCO and the DD Form 2936 must be signed by the OSD or DoD Component Head.
- Emergency approval requests must meet one of the following criteria:
  o The normal approval process will cause harm to the DoD, another Federal agency, or the public.
  o An unanticipated event has occurred (such as a natural disaster) that requires the urgent processing and approval of a DoD internal information collection.
  o The normal approval process is likely to cause a statutory or court-ordered deadline to be missed.

AO – action officer

ARMS – Account Registration Management System
Used to create accounts for users outside of the OSD/WHS network to access the DoD Internal Information Collections (IIC) Database. See page 17 for more information.

CAPE – Cost Assessment and Program Evaluation
CAPE summaries are required as part of the DD Form 2936 action package. See page 6 for more information.

CIO – Chief Information Officer
Component CIOs are required to coordinate on DoD internal information collections that are collected via computer systems or in electronic format. See page 12 for more information.

Component-internal information collection
Information is collected from one DoD Component. See page 3 for more information.

Congressional information collection
Information collections submitted by DoD to Congress. See page 3 for more information.

DA&M – Director of Administration and Management

DMDC – Defense Manpower and Data Center
DMDC coordination is required for all surveys. See page 12 for more information.

DoD IIC – DoD internal information collection
Information is collected from more than one DoD Component or from another Federal agency.

DoD IICO – DoD Internal Information Collections Officer
Contact the DoD IICO by sending an email to DoD.Internal.Collect@WHS.mil.

DoD public information collection
Information is collected by DoD from the public. See page 3 for more information.

IMCO –Information Management Control Officer
The Component advisor on information collections. Visit the DoD Internal Information Collections (IIC) Website at http://www.dtic.mil/whs/directives/corres/intinfocollections/iic_home.html for a list of Component IMCOs.

Information collection owner
The DoD Component requesting the information. "Owner" and "requester" are used interchangeably.

Information collection requester
The DoD Component requesting the information. "Owner" and "requester" are used interchangeably.

Information collection sponsor
The DoD Component serving as the "owner" or "requester" of an information collection on behalf of a private/public organization, a state or local government, or another Federal agency.

Information collection respondent
Those DoD Components responding to the information collection. See page 13 for more information on required coordination with respondents to information collections.

OSD – Office of the Secretary of Defense

OUSD(AT&L) – Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics

OUSD(P&R) – Office of the Under Secretary of Defense for Personnel and Readiness

RCS – report control symbol

SES – Senior Executive Service

WHS – Washington Headquarters Services