



# Office of Information Management Newsletter

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## Special points of interest:

- THE IC SYSTEM IS NOW REQUIRED!
- OMB MEMO— FLEXIBILITIES UNDER THE PRA
- EXPIRED COLLECTIONS PROJECT UPDATE

## Inside this issue:

UPCOMING TRAINING DATES	2
OMB MEMO— FLEXIBILITIES UNDER THE PRA	2
JULY APPROVALS: DOD INTERNAL & PUBLIC	3
EXPIRED COLLECTIONS PROJECT UPDATE	3
INCLUDING RECORD NUMBERS IN EMAILS	3
A WORD FROM THE CLEARANCE OFFICER	4

## The Information Collections System is Now Required!

After many months of development, OIM is proud to announce the official rollout of the newly-enhanced Information Collections (IC) System!

As of August 1, 2016, all new information collections must be submitted to our office through the IC System Workflow Portal. This means that if you have a public collection for which a 60-Day Federal Register Notice has not yet been published, or a DoD internal collection that has not yet gone out for mandatory coordination, you will be required to complete a Workflow through the System.

Alternatively, if you have a collection package that has already completed these steps, i.e., a public collection that already has a published 60-day for the current package iteration or an internal collection that has

submitted elements for mandatory coordination, you have until September 30, 2016 to complete these packages and obtain a clearance. If the package has not been cleared after September 30, you will be required to initiate a workflow in the IC System in order to complete the licensing process. To prevent duplication of effort, we highly encourage you to move currently-pending packages forward as soon as possible in order to avoid having to re-enter the collection data in a workflow.

Please note that the September 30 cut-off date also applies to all collections listed as violations of the PRA in the Expired Collections Project.

Non-standard information collections, including requests for emergency clearance, gener-

ic collections, and collections related to rules, are not currently required to use the System; we will continue to process them through the Information Collections org box.

Our office remains very enthusiastic about the System's new enhancements. While we anticipate future updates improving the System's functionality even more, we are already seeing increased processing and tracking efficiencies. If you have any suggestions for future improvements, please let us know as soon as possible.

Finally, if you have any questions or experience any problems with the IC System, please contact OIM Analyst Karl Pabst for assistance. Thank you in advance for your patience during this initial rollout phase!

## Forms Management Team Personnel Highlights

One of our office's goals with this monthly newsletter is to increase the visibility of our Forms Management Team, which became part of the Office of Information Management along with the Information Collections Branch when these two branches merged in April 2016. As a sign of our renewed commitment to this goal, please join us in extending a warm—and belated—welcome to Lee Bennett, III and Carleen Robinson.

### LEE BENNETT, III

Lee has been with Washington Headquarters Services (WHS) since November 2010, all of which has been spent with the DoD Forms Management Program. Lee functions as the Electronic Forms Specialist for the program, where he does everything from advanced forms design to database upkeep.

### CARLEEN ROBINSON

Carleen has been with

Washington Headquarters Services (WHS) since May 1985 and has spent the past 31 years working with the Directives Division. Carleen also has experience working with the Department of the Army, Department of Treasury, and the Defense Investigative Services.

Carleen now works as a Forms Designer for the Department.



**“If you don’t  
learn from your  
mistakes, then  
they become  
regrets.”**

**- John Felix Anthony  
Cena**

## Upcoming OIM Training Dates

### INFORMATION COLLECTIONS TRAINING:

#### **September 19: Action Officer Training**

- 0830 - 1200 Internal and Public Collections
- 1300 - 1700 NEW IC System Training

#### **September 22: IMCO Meeting**

- 1300 - 1500 Details coming soon!

**\*REGISTRATION IS REQUIRED  
FOR ALL SESSIONS\***

To register, please email the DoD  
Information Collections Org Box

## OMB Memo—Flexibilities Under the PRA

Last month, OMB’s Office of Information and Regulatory Affairs (OIRA) released a memo discussing a few of the less well-known possibilities that are available under the Paperwork Reduction Act. Although the PRA is often construed as inflexible, in certain circumstances Federal departments and agencies can take advantage of streamlined requirements and other flexibilities in order to clear information collections more efficiently. According to OIRA, many Federal agencies—including the Department of Defense—may not be taking full advantage of the opportunities that are available to us.

Based on the information collections OIM has reviewed recently, the following topics may be of particular interest to DoD:

### **Generic Clearances and the Fast-Track Process**

A generic clearance is useful when conducting multiple collections with very similar purposes and methods, but when determining the collection details (specific data, number of respondents, etc.) is impossible until a later date. We have discussed generic clearances and fast-track approvals at length in previous issues of this newsletter, but please reach out via the Information Collections Org Box if you would like more information on these processes.

### **De Minimis Changes**

*De minimis* changes, or alterations of a purely cosmetic nature to approved information

collections, do not require further approval under the PRA. These kinds of changes might alter the look or feel of a collection, but the nature and type of information collected must remain the same.

### **Social Media and the PRA**

Many of the ways in which social media is used by Federal agencies do not require PRA approval, including general solicitations of views, interactive meeting tools, and ratings/rankings of website material.

### **Common Forms**

A Common Form is an information collection that can be used by multiple government agencies for the same purpose. Once the sponsoring agency obtains OMB approval through the normal process, other agencies can obtain approval to use the same information collection simply by providing OMB with the information specific to their use of the Common Form, such as the number of respondents, burden estimates, etc. OMB can then grant approval without the public comment periods normally required by the PRA.

For your convenience, a copy of this memo is attached to this Newsletter’s distribution email. Please feel free peruse these topics at your leisure. As always, please contact us through the Information Collections Org Box if you would like more information about any of these topics.

## July Approvals from DoD & OMB

### **DoD APPROVALS:**

- DD-P&R(A)1969 “Commissary Customer Service Survey”
- DD-P&R(A)2617 “Annual Officers Bonus Program Update”
- DD-P&R(OT)2618 “Phone Interviews for Formative Research to Identify Military Family Needs”
- DD-POL(AR)2619 “Deconfliction (DECON) Database”
- 0704-0478 “Safeguarding Covered Defense Information, Cyber Incident Reporting, and Cloud Computing”
- 0704-0500 “Vietnam War Commemoration Commemorative Planned Events”
- 0704-0541 “DFARS: Detection and Avoidance of Counterfeit Parts—Further Implementation”
- 0704-0545 “Collection of Required Data Elements to Verify Eligibility”

### **OMB APPROVALS:**

- 0703-0065 “Risk Management Information (RMI) System”
- 0704-0392 “Technical Assistance for Public Participation (TAPP) Application”
- 0704-0466 “Science, Mathematics and Research for Transformation (SMART) Scholarship Program”
- 0704-0549 “DFARS part 225, Foreign Acquisition, and Defense Contractors Performing Private Security Functions Outside the United States”
- 0704-0553 Fast Track Generic Clearance “Army Corps of Engineers, Three Rivers Shippers Survey”



**Recent Approvals from DoD & OMB**

## Expired Collections Project Update

Thank you to all our IMCOs for all their hard work on this project thus far! Since we began this effort, we have had nine packages reinstated, and we currently have five more under review at OMB.

We would like to take this opportunity to encourage our IMCOs to continue prioritizing their expired collections. The 60 Day Federal Register Notices for most of the collections identified in September 2015 will be expiring in September and October. In order to avoid republishing 60 Day Federal Register Notices, all affected Components should do their best to have their collec-

tions submitted to OMB by the end of September.

The special processes instituted for these collections will also be ending at that time. As of October 1, 2016, all collections will have to go through OIM’s new IC System. While some of you will continue to work with Caitlyn Borghi on your expired collections, she will no longer be the sole analyst on this project. We will provide further updates on the Expired Collections Project and the planned changes as we approach October 1.

## Reminder to Include Record Numbers in Email Submissions

As a quick reminder, please be sure to include your information collection reference number (Report Control Symbol for internal collections and OMB Control Number for public collections) in the subject line of your emails to the Information Collections and Directives Division Org Boxes. This includes the temporary record numbers we generate before you obtain an official RCS or Control Number.

We identify, manage, and assign your submissions much more efficiently when we do not have to search through your documents to identify the collection, and we would greatly appreciate your understanding and assistance with this matter.

If you have any questions or are unsure how to determine your record number, please contact the Information Collections Org Box.

**“Quality is never an accident. It is always the result of intelligent effort”**

**- John Ruskin**

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**VISIT US ONLINE:**

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directives/  
collections/index.html](http://dtic.mil/whs/directives/collections/index.html)**

## **A Word from the DoD Clearance Officer**

Last month's newsletter briefly mentioned a new effort being undertaken by OIM to identify all the DD and SD forms that are collecting SSNs but do not yet have signed and approved SSN Justification Memos on record. We are beginning that effort now by reaching out to Forms Managers for the SSN justification memos, and we will then forward the memos to DPCLTD for their approval. This will complete the approval process and bring all the SSN-related compliance documentation up-to-date.

To give you some background into this project, at the request of Congress, the US Government Accountability Office (GAO) reached out across the Federal government to initiate an inquiry into what GAO refers to as "Federal Government Efforts to Reduce the Use of Social Security Numbers." GAO posed three main questions: 1) To what extent have federal agencies developed and executed plans to eliminate the use and display of SSNs; 2) What government-wide initiatives have been undertaken to assist agencies in eliminating unnecessary use of SSNs and what have been their results; and 3) What remaining challenges to reducing the continued use of SSNs as personal identifiers have agencies identified?

After a conference call with GAO, representatives of several DoD offices, including P&R, CIO, Privacy, and WHS/OIM, met to determine a way forward. Some interesting ideas were floated, and while it may take a bit of planning and wherewithal to resolve this at the Department level, OIM's way is clear—to be fully responsive to GAO's tasking, we will first work with the components to ensure that any collection of SSNs is fully documented and approved and then brainstorm what our office can do to reduce the collection of SSNs. In addition, we plan on broadening the scope of our effort to include not just forms but all DoD internal and public information collections that collect SSNs in some manner. OIM welcomes this effort because, in addition to re-emphasizing the need to reduce the use of SSNs across the Department, it has also served as the impetus for cross-agency / cross-component problem solving.

On a different topic, in addition to the trainings scheduled for September, we have also scheduled a separate meeting for IMCOs only. While not a training per se, OIM has a number of high-priority items to discuss and some new information to provide. This is a good opportunity to stay up-to-date on the latest process improvements, so I encourage IMCOs to attend. We are going to test the options of teleconferencing and VTC this time for those of you unable to travel to the Mark Center to attend in person.

Regards,

Fred Licari,  
OIM Team Lead