

Defense Health Agency ADMINISTRATIVE INSTRUCTION

NUMBER 8900.01 July 4, 2020

DAD-SP&FI

SUBJECT: Guidance for Conducting Surveys and Other Information Collections (SOICs)

References: See Enclosure 1.

1. <u>PURPOSE</u>. This Defense Health Agency-Administrative Instruction (DHA-AI) based on the authority of References (a), (b), and (c), and in accordance with the guidance of References (d) through (m), establishes the Defense Health Agency's (DHA) procedures to:

a. Establish a DHA Component Information Collection Program, policy, and procedures necessary to license SOIC, that require responses from DHA personnel and from all organizations that fall under the administration, direction, and control of the DHA. The goal of the program is to minimize redundancy, cost, and burden and improve quality of information being collected by DHA personnel and reported in and outside the organization.

b. Update references for compliance with DoD policy and procedures for the management, review, control, approval, and licensure of SOIC for Internal DoD, other Federal Agencies or Office of Management and Budget (OMB) controlled surveys of ten or more members of the public. The goals of the program are consistent with those stated above for the DHA.

c. Transform varied Military Health System (MHS) Service/Component Survey approaches into a single, integrated DHA Information Collection Program that standardizes operations and optimizes business processes.

2. <u>APPLICABILITY</u>. This DHA-AI applies to Information Collections from all DHA personnel to include: assigned or attached active duty and Reserve members, commissioned corps, DoD civilians, contractors (where applicable), and other personnel assigned temporary or permanent duties at DHA, to include DHA field activities (remote locations), and subordinate organizations administered and managed by DHA, to include markets and military medical treatment facilities (MTFs) under the administration, direction, and control of the DHA.

3. <u>POLICY IMPLEMENTATION</u>. It is DHA's instruction, pursuant to References (a) through (l), that:

a. Applicable DoD policies and DHA procedures support the management and control of SOIC.

b. All SOIC collected from personnel from DHA organizations under the administration, direction, and control of the Assistant Secretary of Defense for Health Affairs/DHA involving information collections within the DHA Component shall be reviewed, approved, and licensed with a DHA Survey Control Number (SCN) by the DHA Information Management Control Officer (IMCO) prior to collection of any data.

c. All SOIC sponsored by or administered by organizations/agencies under the DHA where Information Collection crosses multiple Office of the Secretary of Defense (OSD) or DoD Components shall be reviewed, approved, and licensed with a Report Control Symbol (RCS) by the Director, Washington Headquarters Services (WHS) prior to collection of any data.

d. Unauthorized surveys (those that have not been reviewed, or licensed), shall be terminated.

e. Opportunities for continuous process improvement in Information Collection activities are continuously pursued.

4. <u>RESPONSIBILITIES</u>. See Enclosure 2.

5. <u>PROCEDURES</u>. See Enclosure 3.

6. <u>RELEASABILITY</u>. **Cleared for public release**. This DHA-AI is available on the Internet from the Health.mil site at: <u>www.health.mil/DHAPublications</u> and is also available to authorized users from the DHA SharePoint site on the SECURE Internet Protocol Router Network at: <u>https://info.health.mil/cos/admin/pubs/SitePages/Home.aspx</u>.

7. EFFECTIVE DATE. This DHA-AI:

a. Is effective upon signature.

b. Will expire 10 years from the date of signature if it has not been reissued or cancelled before this date in accordance with DHA-PI 5025.01 (Reference (c)).

8. <u>FORMS</u>. DD Form 2936, Request for Approval of DoD Internal Information Collection is available at: <u>https://www.esd.whs.mil/Portals/54/Documents/DD/forms/dd/dd2936.pdf</u>.

/S/ RONALD J. PLACE LTG, MC, USA Director

Enclosures

- 1. References
- 2. Responsibilities
- 3. Procedures

Glossary

ENCLOSURE 1

REFERENCES

- (a) DoD Directive 5136.01, "Assistant Secretary of Defense for Health Affairs (ASD(HA)),"September 30, 2013, as amended
- (b) DoD Directive 5136.13, "Defense Health Agency (DHA)," September 30, 2013
- (c) DHA-Procedural Instruction 5025.01, "Publication System," August 24, 2018
- (d) DoD Instruction 1100.13, "DoD Surveys," January 15, 2015, as amended
- (e) DoD Manual 8910.01, Volume I, "DoD Information Collections Manual: Procedures for DoD Internal Information Collections," June 30, 2014, as amended
- (f) DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections," June 30, 2014, as amended
- (g) DoD Instruction 8910.01, "Information Collection and Reporting," May 19,2014
- (h) Public Law 114-328, Section 702(e)(2), "Reform of Administration of the Defense Health Agency and Military Medical Treatment Facilities," December 23, 2016
- (i) Implementation of Department of Defense Survey Burden Action Plan-Reducing Survey Burden, Cost and Duplication, September 8, 2016
- (j) Public Law 104-13, "The Paperwork Reduction Act (PRA) of 1995," October 1, 1995
- (k) Public Law 96-511, "Paperwork Reduction Act of 1980," December 11, 1980
- (1) DoD 5400.11-R, "Department of Defense Privacy Program," May 14, 2007
- (m) DoD Manual 6025.18, "Implementation of the HIPAA Privacy Rule in DoD Health Care Programs," March 13, 2019

ENCLOSURE 2

RESPONSIBILITIES

1. <u>DIRECTOR, DHA</u>. Under the authority, direction, and control of the Under Secretary of Defense for Personnel and Readiness and the Assistant Secretary of Defense for Health Affairs, and in accordance with Reference (a), the Director, DHA, will:

a. Designate in writing, the IMCO for DHA.

b. Support the establishment and implementation of overall policy and strategic plans for the DHA Survey Program including all SOIC activities within DHA.

c. Support the IMCO in enforcement of this DHA-AI and the requirements of the Department for these activities.

2. <u>DEPUTY ASSISTANT DIRECTOR (DAD), STRATEGY PLANNING AND</u> <u>FUNCTIONAL INTEGRATION (SP&FI)</u>. The DAD-SP&FI has oversight responsibility for the DHA Survey Program IMCO activities in accordance with the policy procedures in this DHA-AI.

3. <u>DHA COMPONENT IMCO</u>. Under the authority, direction, and control of the Director, DHA, and DAD-SP&FI, the DHA Component IMCO will:

a. Serve as principal advisor and subject matter expert on all aspects of policy development, implementation, and priority setting related to the MHS Survey Program activities and operations.

b. Function as the office of record and approval authority for DHA internal Information Collections requirements.

c. Set goals and oversee execution of all phases of the review and licensure of DHA SOICs to maintain quality; minimize burden; ensure cost effectiveness, ensure scientific validity, and ensure mission essentiality.

d. Develop standard business rules for efficient execution of Information Collection activities across the enterprise.

e. Collaborate and coordinate SOIC policy and procedures within the DHA to include but not limited to Privacy, Records Management, Chief Information Officer, Office of General Counsel, Human Subjects Protection, DHA Publications and Forms Offices, the MHS Survey Workgroup, and other groups and coordinating organizations as necessary. f. Function as the primary liaison between DHA and outside agencies, to include but not limited to; Under Secretary of Defense for Personnel and Readiness IMCO, WHS, Office of People Analytics, OMB, other federal agencies, other Component(Army, Navy, and Air Force) IMCOs and other organizations as required for effective operation of the program.

4. MARKET DIRECTORS/MTF DIRECTORS. Market Directors and MTF Directors must:

a. Designate an individual within their organization to serve as the IMCO liaison to coordinate efforts, as required.

b. Ensure compliance with the implementation procedures outlined in this DHA-AI.

5. ACTION OFFICERS. Action Officers must:

a. Contact the IMCO for consultation prior to developing data collection instrument(s), letting a contract for data collection requirements, or conducting any data collection activities. A MTF/clinic may not conduct a survey without first going through the IMCO. The Component IMCO is located in the DAD-SP&FI at: (703) 681-3636 or e-mail <u>dha.ncr.j-5.list.ae-list-a-e-imco@mail.mil</u>.

b. Ensure sufficient lead time for the development, review, coordination, and licensure of your collection.

c. Prepare clearance paperwork to include, but not limited to: supporting statements, cost estimates, completed survey template, survey collection instrument, indicate relevant authority for the collection and obtain an Institutional Review Board review or other coordinating offices depending on the nature of the collection. Full instructions can be found in Enclosure 3.

d. Address and submit responses to all recommendations, questions and/or required revisions.

e. Act as the focal point for development, fielding operations, analysis, and reports of findings for the survey.

ENCLOSURE 3

PROCEDURES

1. <u>REVIEW AND LICENSURE REQUIREMENTS FOR DHA SINGLE COMPONENT</u> <u>DATA COLLECTIONS-SCN</u>

a. Consult with the DHA IMCO prior to any instrument development or prior to any data collection activities.

b. Internal requests for approval of surveys of DHA personnel must be submitted and pre-screened through the MHS Request Submissions Portal at: <u>https://info.health.mil/SitePages/mhsCAR_submit.aspx</u>. The request must be provided in writing and signed by the Sponsors Director or Deputy. The collection must be necessary, cost effective, non-duplicative and non-burdensome.

c. It is recommended that these surveys contain no more than 15 questions and are fielded no more than 2 times a year, to minimize burden on DHA staff.

d. Congressionally mandated requirements, Department directed or senior leader (Senior Executive Service or above), surveys will have the highest priority.

e. Funding for internal single component surveys should be identified by the action officer/Sponsor in the MHS Request Submission Portal documentation.

f. Submit the following documentation to the DHA IMCO: completed Supporting Statement, a copy of the questions and or a draft survey instrument; additional documents as identified by the IMCO and support staff.

g. The clearance process takes may take up to 4 weeks after submission of a completed documentation package and the assigned license will be valid for 3 years.

h. Upon approval, DHA IMCO will assign a Survey Control Number (SCN) which must be visible on the first page of the instrument or website. The survey approval will be valid for 3 years.

i. The IMCO can offer recommendations for tools and platforms for executing the survey to include Max.Gov, <u>https://portal.max.gov/portal/home</u>, the WHS Interactive Customer Evaluation platform, <u>https://ice.disa.mil/</u>, and others that may be allowed by the Department.

2. <u>REVIEW AND LICENSURE REQUIREMENTS FOR DoD MULTIPLE COMPONENT</u> <u>DATA COLLECTION-RCS</u>

a. Consult with the DHA IMCO prior to any instrument development or prior to any data collection activities.

b. Multiple Components surveys or surveys that cross Component lines need to be licensed by the WHS and the IMCO will coordinate this clearance process with the action officer.

c. The collection must be necessary, cost effective, non-duplicative and non-burdensome.

d. In general, the survey request should be submitted and pre-screened through the MHS Request Submissions Portal.

e. The collection should minimize burden on respondents (i.e., no more than 15 questions and no more than 2 fielding's a year).

f. Congressionally mandated requirements, Department directed, or senior leader surveys will have the highest priority.

g. Submit the following documentation to the DHA IMCO: a pre-coordination work sheet, a Cost Estimate Program Evaluation Report; a DD Form 2936 Request for Approval of DoD Internal Information Collection with Service coordination's as required, as copy of the survey instrument, all survey related materials (i.e., recruitment letters, follow-up correspondence etc.), and an OPA Supporting Statement. Additional documents may be identified by the IMCO and support staff.

h. The IMCO will assist the Sponsor in uploading documents into the WHS Information Collection System.

i. The clearance process takes approximately 4 to 6 months after submission of a completed documentation packet.

j. Upon approval, an RCS number will be assigned, and it must be visible on the first page of the instrument or website.

k. Coordinate with the DHA Forms Office when forms are included as part of the collection.

l. There are some exemptions to licensure, but this must be addressed by the action officer in conjunction with the IMCO and/or WHS.

3. <u>REVIEW AND LICENSURE REQUIREMENTS FOR COLLECTIONS FROM MEMBERS</u> <u>OF THE PUBLIC-OMB CLEARANCE</u>

a. Surveys involving members of the public (e.g., contractors, foreign nationals, retirees, caretakers, spouses, etc.), must be externally reviewed by the DoD review and licensure authority (WHS) and submitted to OMB for final approval and licensure.

b. Requests for approval of surveys of members of the public must first be submitted and pre-screened through the MHS Request Submissions Portal.

c. Determination of "public" begins with an initial consultation with the DHA IMCO. This should occur prior to instrument development or data collection activities.

d. Submit the following documentation to the DHA IMCO: OMB Supporting Statement Part A (include Part B when statistical methods are employed), Agency Disclosure Notice, Social Security Number Justification Memo (when required). You may also be asked to address other requirements including, but not limited to: System of Records Notices, Privacy Impact Assessments, Privacy Act Statements or advisories, Forms, and Data Sharing Agreement Applications.

e. The clearance process takes approximately 6 to 8 months, after submission of a completed documentation packet. The review process at OMB is not driven or influenced by the Department.

f. OMB-approved surveys will be issued an OMB control number and expiration date which must be displayed on the front upper portion of the collection instrument or in a comparable position on a web page.

g. Surveys that require OMB approval are matters of law (the Paperwork Reduction Act), and fielding unlicensed collections, are violations of law that are reported by OMB to Congress.

h. There are some exceptions to licensure, but these must be addressed by the action officer, IMCO and/or Licensing authorities. Additional guidance can be found at: <u>https://www.esd.whs.mil/Directives/collections_pub/</u>.

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

DAD	Deputy Assistant Director
DHA	Defense Health Agency
DHA-AI	Defense Health Agency-Administrative Instruction
IMCO	Information Management Control Officer
MHS	Military Health System
MTF	military medical treatment facility
OMB	Office of Management and Budget
OSD	Office of the Secretary of Defense
RCS	Report Control Symbol
SCN	Survey Control Number
SOIC	Surveys and Other Information Collections
SP&FI	Strategy, Planning, and Functional Integration
WHS	Washington Headquarters Services

PART II. DEFINITIONS

These terms and their definitions are for the purposes of this DHA-AI.

<u>DoD Public Information Collection</u>. Information Collections where an OSD or DoD Component collects information from the public (e.g., contractors, foreign nationals, former retired Federal and Military personnel, non-beneficiary caregivers, etc.). These collections require approval by OMB, via the DoD Information Collection Office (WHS), pursuant to the requirements of Reference (k).

<u>Information Collection</u>. A systematic collection of data or information (hard copy or electronic) for a specific purpose, using a specified format/instrument(s). The information is solicited from respondents (individuals, groups, businesses, organizations, etc.); collections have an associated frequency (one time, quarterly, annually, bi-annual, etc.), and the results are "owned" by the requester. Collections may include forms, applications, surveys, focus groups, and written reports including Congressional Inquiries, requested input for reporting or record keeping.

<u>members of the public</u>. Information Collections that extend to members of the public; contractors, foreign nationals, former retired Federal and Military personnel, Caregivers, etc. These collections of information need to be approved through the Department's Information Collection Office.

<u>Sponsor</u>. An endorsement by any OSD or DoD Component that may benefit from or has a direct interest in the Information Collection results. Sponsors may or may not fund projects, but they are always responsible for the content.

<u>survey</u>. Systematic data collections, using paper, telephonic or web-based survey collection tools, personal or self-administered questionnaires, in paper or digital format, from a sample or census of ten or more persons as individuals or representatives of agencies that elicit attitudes, opinions, behavior, and related demographic, social, and economic data. Surveys typically involve identical questions that are to be used for statistical compilations for research or policy assessment purposes.