



Paperwork Reduction Act (PRA) Coverage for Military and Civilian Personnel

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Purpose & Authorities



- Based on current Administration priorities, the Office of Management and Budget (OMB) has requested that certain collections of information from DoD's military and/or civilian personnel (commonly referred to as "DoD Internal") be submitted to OMB for approval pursuant to the Paperwork Reduction Act (PRA) of 1995.
- OMB may exercise such approval authority for collections based upon-
 - The definition of "collection of information" in 44 U.S.C. 3502(3)(A)(ii) and 5 C.F.R. 1320(c)(3). The relevant portion of the regulation's definition states: *"Collection of information' includes questions posed to agencies, instrumentalities, or employees of the United States, if the results are to be used for general statistical purposes, that is, if the results are to be used for statistical compilations of general public interest, including compilations showing the status or implementation of Federal activities and programs."* 5 C.F.R. 1320(c)(3)
 - 5 C.F.R. 1320.18(a) which states *"OMB shall determine whether any collection of information or other matter is within the scope of this Act, or this Part."*



Current Topics of Interest



- Sexual Harassment/Sexual Assault
- Suicide/Suicide Prevention
- COVID-19 Response
- Racial Equity
- Gender Relations
- Military Families
- Food Security
- Climate Change
- Economic Relief
- Ukraine
- Abortion care/Response to the Supreme Court Decision on Dobbs v. Jackson Women's Health Organization
- Veterans Burn Pits Exposure Act of 2021
- Inflation Reduction Act
- CHIPS and Science Act
- Polyfluoroalkyl Substances (PFAS)
- Any other topic of high visibility*

**If you are unsure if your collection covers a topic of "high visibility" please contact the IC Org Box at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil*



Coverage



When figuring out if PRA clearance is needed for your collection to military and/or civilian personnel, consider the following:

- Does your collection cover one of the topics of interest?
- Are you collecting information from ten or more people?
- Is the collection of information in a standardized/structured format?
- Is the collection required to fulfill an NDAA requirement?
- How will information be collected?
- Will the results/data be published?
- Will the results be used to make significant policy decisions/changes?



Review & Determination



- Collections of information must be submitted through your Component PRA Liaison to the Office of Information Management (OIM) for review and determination of coverage. A list of Component liaisons may be found on the [OIM website](#).
- If it has been determined that your collection is covered by the PRA, your PRA Liaison (in coordination with OIM) will provide guidance on the information collection request process.



Criteria for OMB Approval



- Benefits of information collection need to outweigh its cost (cost = burden + agency funds)
- Collection needs to meet research needs or contribute to proper functioning of the Department
- Collection should be sufficiently accurate, valid, and reliable to meet the goals of research
- Collection should avoid unnecessary duplication
- Collection should minimize public burden and agency costs



Certification of Compliance



The DoD PRA Clearance Officer, on behalf of the CIO Designated Official, must certify that the collection of information complies with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3). The following are topics regarding proposed collections that must be certified:

- ✓ It is necessary for the proper performance of agency functions;
- ✓ It avoids unnecessary duplication;
- ✓ It reduces burden on small entities;
- ✓ It uses plain, coherent, and unambiguous language that is understandable to respondents;
- ✓ Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- ✓ It indicates the retention periods for recordkeeping requirements;
- ✓ It informs respondents of the information called for under 5 CFR 1320.8(b)(3);
- ✓ It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;
- ✓ It uses effective and efficiently statistical survey methodology (if applicable); and
- ✓ It makes appropriate use of information technology.

If the Clearance Officer is unable to certify compliance with any of these provisions, the item must be identified and clearly justified.



Possible Outcomes of PRA Review



- Approval
- Approval with “Terms of Clearance”
- Disapproval
- Disapproval and Continue
- Withdrawal
- Improperly Submit