

SUPPORTING STATEMENT NTPR Forms

A. JUSTIFICATION

1. Need for the Information Collection

The Defense Threat Reduction Agency (DTRA) is a Department of Defense (DoD) Agency that serves as executive agent for the Nuclear Test Personnel Review (NTPR) Program. The NTPR Program serves military personnel and DoD civilian employees who participated in U.S. atmospheric nuclear testing (1945-1962), with the occupation forces of Hiroshima and Nagasaki, Japan, or were prisoners of war in Japan at the conclusion of World War II. The NTPR Program assists these military and civilian test participants, supports the Department of Veterans Affairs (VA) and Department of Justice (DOJ) in responding to radiogenic disease compensation claims, and provides information to organizations responsible for studies concerning the health effects of ionizing radiation. For DTRA to fulfill this role, it must collect information from veterans and former DoD civilian employees. DTRA Forms 150, 150-A, 150-B, and 150-C serve as the collection vehicle.

Authority to collect this information is provided by PL 98-542 which appointed DNA (now DTRA) Executive Agent for the NTPR Program. It also required the Secretary of Defense to publish guidelines (see 32 CFR 218) describing DoD's process for generating radiation dose estimates. Overarching authorities include: 38 U.S.C. 1112 and 1154 (Veterans' Benefits); and 42 U.S.C. 2210 (DOJ Radiation Exposure Compensation)

2. Use of the Information

The NTPR Program has collected information via postal correspondence and telephonic conversations from former DoD employees since the late 1970's. This information has primarily been used in support of radiogenic disease claims filed with VA and DOJ. In addition, this information has been used in radioepidemiology studies performed by the National Research Council and Institute of Medicine. These studies were frequently mandated by public law.

3. Use of Information Technology

The data collection process is primarily by paper forms mailed to the participant. DTRA's mailing to the participant includes a franked, self-addressed envelope for return mailing of the completed form. If any questions arise, NTPR Program staff contact the participant by phone to assist them. Although DTRA's NTPR Program maintains an elaborate website: <http://www.dtra.mil/>

the majority of the respondents are in their 70's and 80's and are not comfortable with web-based data collection. Data once collected, is maintained by DTRA as a structured query language database that is described most recently by a Privacy Act Notice in the Federal Register of Volume 70, Number 152, of August 9, 2005 (HDTRA 010 – Nuclear Test Participants). This notice may also be reviewed at: <http://www.dod.mil/privacy/notices/dswa/HDTRA010.html>

4. Non-Duplication

Some of this information may have already been collected by VA, DOJ, or the National Archives and Records Administration. Consequently, the NTPR Program first checks these sources so as to assure non-duplication of information collection.

DTRA's stated mission is to safeguard America and its allies from weapons of mass destruction by providing capabilities to reduce, eliminate, and counter the threat, and mitigate its effects. It follows that the Nuclear Test Personnel Review (NTPR) Program is the only veteran-centric, "legacy" program residing at this agency, and we are not aware of any other DTRA programs that collect this type of information.

While the NTPR Program has no reason to believe that similar information about atomic veterans is collected through other DoD initiatives, we cannot rule out the possibility. For example, the military services each have disability rating boards for combat-wounded veterans. However, these programs do not cover the cohort of atomic veterans, for which VA maintains specific benefit programs.

With regard to sensitive military information, the NTPR Program is in compliance with all applicable DoD/DOE information security requirements. In addition, the previous Secretary of Defense issued a policy statement about this type of information which is posted on both the DTRA and the Veterans' Advisory Board on Dose Reconstruction (VBDR) websites.

5. Burden on Small Business

No small business will be contacted during the collection of this information.

6. Less Frequent Collection

Less frequent collection is not possible. This is a one time collection effort for an individual to support processing of their radiogenic disease compensation claim.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require this collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. This information collection was published in the Federal Register on January 30, 2007 (72 FR 4246).

b. Comments received as a result of the 60-Day Notice:
No comments were received.

c. Nuclear participants will provide feedback on the validity of these forms. Changes to the forms will be made if changing requirements or scientific methodology mandates the change.

9. Gifts or Payment

No payment or gift will be provided to the respondents.

10. Confidentiality

The information is collected and maintained in accordance with the federal requirements for control of privacy act material. Access to data both hardcopy and electronic is restricted to authorized federal government and contract staff on a need-to-know basis. The IT system (servers and workstations), hardcopy records, and correspondence are maintained in controlled physical spaces. The IT system has been certified by DTRA Information Assurance personnel as satisfying current DoD Information Assurance standards.

As an official mission element of the NTPR Program (i.e., to support independent scientific studies of potential adverse health effects experienced by atomic veterans), we have shared personal information with at least one non-Federal organization for research purposes. Specifically, with the National Academy of Sciences (NAS), which was chartered by Congress in 1863 to advise the federal government on scientific and technical matters. We will continue to share personal information with the National Academies for future studies, as documented in our system of records notice.

The VBDR, while not a federal agency, is a Congressionally mandated advisory board chartered under the Federal Advisory Committee Act. From this perspective, we consider it to be a federal organization. Its members are Special Government Employees who receive annual ethics training. While our Routine

Uses statement includes several federal organizations, we generally share personal information only with the Departments of Veterans Affairs and Justice.

Privacy Act information is only provided to ensure accurate identification of individual veterans for the purposes of veteran radiogenic disease compensation, veteran medical care, and epidemiological study. For epidemiological studies, this is imperative to collect cause of death information from the National Death Registry and ensure study integrity. For most other uses, the release of Privacy Act data would not likely be necessary.

The information has been shared in the past with scientists under VA or DoD contract for research on the health effects of exposure to ionizing radiation. For example, one of the studies performed by the Institute of Medicine was entitled, "The Five Series Study, Mortality of Military Participants in U.S. Nuclear Weapons Tests": <http://www.iom.edu/CMS/3795/18297.aspx>

This requirement for VA and DoD to perform radioepidemiology research is in support of federal radiogenic disease compensation programs. Congress has requested that we perform these studies and appropriately communicate these risks to our veterans. For example, see PL 108-183, Sec 601(c)(2)(c) and PL 102-578, Sec 10(A).

In no case has an individual veteran been identified with Privacy Act material in a publicly released study. However, to perform these studies, scientists must be able to uniquely identify a veteran, their morbidity/mortality status, and their associated radiation dose. This information is jointly provided by VA and DoD.

Clarification on why collection of SSN information by the NTPR Program is necessary:

a. The purpose of requesting the SSN is to assist the NTPR Program in locating the correct military service records and/or information to respond to a veteran's inquiry. The authority for federal agencies to use SSN information as the primary means of personal identification was granted in E.O. 9397. Furthermore, the Director of the Defense Nuclear Agency directed the NTPR Program in 1978 to collect SSN information as a means of promoting consistent historical research.

b. Upon receipt of an inquiry from VA or DOJ (or a veteran) to verify participation status, we request service records (and medical records, when necessary) from the National Personnel Records Center (NPRC). The service record is vital for determining a veteran's assignments, travel, and activities, and

NPRC requires a SSN to perform this search (see <http://www.archives.gov/st-louis/military-personnel/social-security-numbers.html>). Without a SSN, NPRC cannot locate and provide the requested records, my program is unable to function, and VA and DOJ cannot administer compensation to eligible veterans.

c. Upon receipt of an inquiry from VA (or a veteran) to furnish a radiation dose estimate, the NTPR Program requests a radiation exposure history from the U.S. Department of Energy's Nuclear Testing Archive (NTA). Like NPRC, the NTA requires the SSN to confirm a match within their records (see <http://www.nv.doe.gov/library/forms/pdfs/NV192.pdf>).

d. Repositories for Merchant Marine and National Guard units also rely on SSN information for positive identification of veteran participants.

e. VA and DOJ share veteran SSN information with the NTPR Program as the primary means of identifying veterans. However, VA and DOJ requests constitute only a portion of our interaction with veterans and their families. When veterans submit inquiries directly to the NTPR Program, the SSN is still necessary for location of pertinent records. While the NTPR Program wishes to avoid duplication of information collection, these veterans may or may not have contacted VA/DOJ (or NPRC) prior to submitting the inquiry. Furthermore, VA and DOJ are under no obligation to share personally identifying information with the NTPR Program in the absence of a valid claim for benefits.

f. Military identification numbers are not sufficient for several reasons. Foremost, they are frequently transposed in historical documents, they were not assigned to civilians, and common names in the NTPR database of 480,000+ persons makes it critical to collect as much uniquely identifying information as possible about each veteran who requests information; for example, the NTPR database currently includes 832 entries for "J. Smith." Furthermore, NTPR estimates that several thousand records in this database have duplicate military ID numbers. Finally, family members who submit requests for information about a veteran often do not have the military ID number; sometimes, they also lack unit, service dates, and other potentially useful information. However, they almost always have the SSN due to the prevalence of this unique identifier.

g. The NTPR Program has recently agreed to coordinate the DoD response on a limited number of cases involving activities that don't fall under NTPR purview, yet relate to nuclear testing (notably, the Cleanup of Enewetak Atoll). Because this activity began in 1972 (after or about the time that military services discontinued the use of military ID numbers), SSN information is the only means available to positively identify participants.

h. Another primary mission element of the NTPR Program is to support independent studies regarding the health of atomic veterans (see http://www.dtra.mil/rd/programs/nuclear_personnel/pdf/NTPR%20Program.pdf). Cause of death information is key to any epidemiological study and is generally available only through the National Death Index. As one might expect, SSN information is crucial to searching this massive database.

11. Sensitive Questions

There are no sensitive questions asked in this information collection.

12. Estimates of Respondent Burden

a. Estimation of Respondent Burden:

Response per respondent:	1
Number of respondents:	370
Hours per Response:	1.25 hrs
Total Burden:	463 hrs

b. Annual Cost to Respondent: Assuming an hourly wage of \$25/h, then the respondent cost becomes \$31.25. Total cost to respondents: \$11,562.50.

13. Respondent Costs Other Than Burden Hour Costs

- a. Total capital and start-up cost component: \$0.
- b. Total average annual operational and maintenance cost: \$0.

14. Cost to the Federal Government

a. Cost to Post Document to Nuclear Participant (prorated, since forms are included with other documents in mailing): \$300/yr

b. Cost for Analyzing the Comments and Maintaining Electronic/Paper Records: 740 hrs @ 100.00/hr \$74,000/yr

Annual Cost to Federal Government: \$74,300

15. Reasons for Change in Burden

This is a new collection resulting in an increased burden of 463 hours.

16. Publication Plans/Time Schedule

No plan at this time to publish this information for statistical use.

17. Non-Display of OMB Expiration Date

Approval not to display an expiration date is not being sought.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

No exceptions to the certification statement are being sought.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods for sampling.