

NIJ Body Armor Compliance Testing Program

June 13, 2008

Supporting Statement for Paperwork Reduction Act:

A. Justification

1. This collection of information will be undertaken as part of the NIJ Body Armor Compliance Testing Program (CTP), which is authorized pursuant to the Homeland Security Act of 2002, relevant portions as codified at 6 U.S.C. 162(b)(4) and 6 U.S.C. 162(b)(6)(B). This act authorizes NIJ/Office of Science and Technology “to establish and maintain performance standards in accordance with the National Technology Transfer and Advancement Act of 1995 for, and test and evaluate law enforcement technologies that may be used by, Federal, State, and local law enforcement agencies.” The collection of this information is necessary for the operation of the CTP which governs the testing and evaluation of body armor for law enforcement officers.
2. This collection is a reinstatement of a previously approved collection, and NIJ will use this information to determine compliance of body armor models with *NIJ Standard-0101.06, Ballistic Resistance of Body Armor*.
3. At implementation of the newly enhanced CTP, the information will be collected in paper form. However, as soon as NIJ has an electronic system operational, collection will be done electronically in a web-based form via www.justnet.org.
4. This is a reinstatement , without change, of a previously approved collection for which approval has expired. This information is not already available. The design of the forms ensures that there is no duplicate information requested.

5. This information collection will not have a significant economic impact on a substantial number of small entities.
6. The operation of the CTP would not be possible without this information collection. The information requested has been minimized as much as possible yet still enabling NIJ to perform all activities required to ensure body armor is safe, reliable, and meets performance requirements.
7. The only special circumstances relevant to the CTP are detailed below:
 - CTP Applicants (armor manufacturers) are required to submit three forms (the *Ballistic Body Armor Model Application and Build Sheet*, the *Declaration for Ballistic Body Armor*, and the *CTP Conformity Assessment Follow-Up Agreement*) for each individual model submitting for testing through the CTP. These are not submitted at a regular interval but only when the applicant decides to submit a new model for testing.
 - Respondents are required to maintain records for a minimum of 5 years.
 - Respondents are required to commit to keeping proprietary information confidential.
 - Respondents agree to share armor model build sheets and testing results with the CTP, and the CTP has procedures for maintaining confidentiality of that information.
8. The details of the revised standard were finalized in May 2008, and the forms could not be completed until then. Even though the standard is finished, testing to it cannot begin until these forms are approved for use. The CTP ensures that the body armor approved for Federally-subsidized purchase by law enforcement agencies around the country complies with the latest safety standards. Time is of the essence because manufacturers and labs are currently operating under an interim standard that is less effective at testing

whether body armor will hold up over time under conditions of everyday wear. A federal register notice for the CTP forms has been submitted, and NIJ did not receive any comments from the public. NIJ has routine contact with all body armor stakeholders to share information and solicit feedback. For example, a stakeholder workshop was held in May to describe the revised standard and CTP, and all stakeholder questions/comments were recorded and are being addressed by NIJ.

9. There are no payments or gifts to respondents.
10. No assurances of confidentiality are provided in the CTP forms.
11. There are no questions of a sensitive nature as described in this question.
12. CTP Applicant Agreement: Estimated 50 respondents; 1 hour each; for a total of 50 burden hours

Ballistic Body Armor Model Application and Body Armor Build Sheet: Estimated 50 respondents (estimated 250 responses) at 30 minutes each; for a total of 125 burden hours

Declaration for Ballistic Body Armor: Estimated 50 respondents (estimated 250 responses) at 15 minutes each; for a total of 62.5 burden hours

CTP Conformity Assessment Follow-up Agreement: Estimated 50 respondents (estimated 250 responses) at 15 minutes each; for a total of 62.5 burden hours

NIJ-Approved Laboratory Application and Agreement: Estimated 8 to 10 respondents at 1 hour each; for a total of 10 burden hours.

The Total burden hour for this collection is calculated as follows:

(50 + 125 + 62.5 + 62.5 + 10 = 310) The total burden hours is 310.

The information requested on the forms is information that is already maintained by the respondents, and no new information must be generated to complete the forms.

Therefore, the estimated time is based on the time required to read and complete the forms.

13. There are no start up or capital costs associated with this information collection because the information requested is already maintained by the respondents. There is an estimated cost increase in testing costs for the CTP applicants (armor manufacturers) due to increased testing required by the revised standard; however, this cost is unrelated to this information collection.
14. The information system for receiving and managing the information is already in place, and no additional staff members are anticipated at this time.
15. The emergency approval on this collection expired in June and we are requesting a reinstatement because data is needed from this collection. Data was never collected using the emergency approval. As a result of this collection expiring the previously approved burden was zero and therefore this reinstatement is resulting in an increase in the burden.
16. The information collected will not be published or released in any way, except as may be required by federal law. A list of NIJ-approved test labs and a list of compliant armor models will be published on www.justnet.org.
17. This is not applicable.
18. There are no exceptions to the certification statement; however, it is noted that item 19 (i) on the 83I does not apply to this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods are being employed in this information collection.

