

SUPPORTING STATEMENT – PART A
DTRA Form(s) 150

A. JUSTIFICATION

1. Need for the Information Collection

The Defense Threat Reduction Agency (DTRA) is a Department of Defense (DoD) combat support 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 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 the Defense Nuclear Agency (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, Institute of Medicine, and now Vanderbilt University. 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 the paper forms are not returned in thirty days, NTPR Program staff contact the respondent by phone to assist them. Once a form is returned and the respondent's case completed, additional consultation is not required.

Although DTRA's NTPR Program maintains an elaborate website: <http://www.dtra.mil/SpecialFocus/NTPR/NTPRHome.aspx> 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 digitized PDF documents associated with a structured query language, relational database.

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.

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. DTRA's 60-day notice, required by 5 CFR 1320.8(d) was published in the Federal Register on March 13, 2014, Vol. 79, No 49, pages 14240-14241. No comments were received.

DTRA's 30-day notice was published in the Federal Register on May 23, 2014, Vol. 79, No 100, pages 29747-29748.

b. The NTPR Program deals directly with respondents or their representatives regarding the collection of information, by mailing these forms directly to them. As noted in the response to question 3, if any questions arise, NTPR Program staff contact the respondent by phone to assist them. Once a form is returned and the respondent's case completed, additional consultation is not required.

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 staff on a need-to-know basis. Hardcopy and electronic data is maintained in controlled physical spaces, and at specified DoD levels of data protection. Disposal of hardcopy files and media is either by shredding or incineration. Disposal of electronic systems includes standard deletion practices followed by processing through the agency's bulk demagnetizer for magnetic storage products.

The Privacy Act System of Records Notice (SORN): HDTRA 010, Nuclear Test Participants (May 11, 2012, 77 FR 27739), Nuclear Test Personnel Review (NTPR) Office, Defense Threat Reduction Agency, 8725 John J. Kingman Road, Fort Belvoir, VA 22060-6201, may be viewed at.

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6386/hdtra-010.aspx>

The associated Privacy Impact Assessment may be viewed at:

<http://www.dtra.mil/docs/documents-eeo-policy/ntrr-pia-public-2013-01-24.pdf?sfvrsn=0>

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. Labor Cost of Respondent Burden: Assuming an hourly wage of \$25/hr, then the cost per respondent becomes \$31.25 or approximately a total labor cost of \$11,563 (\$31.25 * 370).

13. Respondent Costs Other Than Burden Hour Costs

a. Total capital and start-up costs: \$0.

b. Total operation and maintenance cost: \$0.

14. Cost to the Federal Government

a. Cost to mail form 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

c. Annual cost to federal government: \$74,300

15. Reasons for Change in Burden

No change.

16. Publication of Results

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.

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