#### **SUPPORTING STATEMENT – PART A**

# <u>Technical Assistance for Public Participation Application (DD Form 2749) OMB No.</u> 0704-0392

#### A. JUSTIFICATION

#### 1. Need for the Information Collection

This is a request for extension of the expiration date of the information collection requirement currently approved under OMB Control Number 0704-0392, *Technical Assistance for Public Participation (TAPP) Application (DD Form 2749*).

The information collection is necessary to identify products or services requested by community members of Restoration Advisory Boards (RABs) or Technical Review Committees (TRCs), and to receive community members' feedback on their overall satisfaction with the quality of the services and/or products received. The Department of Defense (DoD) formed RABs and TRCs to enhance public participation in the Defense Environmental Restoration Program (DERP) at DoD installations. Their request for technical assistance to help them actively participate in the DERP is the foundation of DoD's TAPP program. The TAPP program is an outgrowth of the recommendations of the Federal Facilities Environmental Restoration Dialogue Committee, also known as the Keystone Committee (Interim Report of the Federal Facilities Environmental Restoration Dialogue Committee, February 1993). Sec. 2705 of Title 10, U.S. Code, Notice of Environmental Restoration Activities, as amended by Sec. 326 of the National Defense Authorization Act for Fiscal Year 1996, directed DoD to develop and propose a program to provide technical assistance to community members of RABs and TRCs.

Detailed information about the TAPP program, including its authority, requirements, application process are outlined in Part 203 of title 32, Code of Federal Regulations (CFR). The TAPP application form is available at Section 203.9 of title 32, CFR Appendix A, as well as from DoD installations, DoD Component headquarters, or directly for the Office of the Deputy Assistant Secretary of Defense for Environment, Safety and Occupational Health (ODASD(ESOH)). Applicants should return completed TAPP applications to the installation included in section one of the TAPP application. ODASD(ESOH) has a website with additional information about the RABs or TRCs and the TAPP (http://www.denix.osd.mil/rab/).

#### 2. <u>Use of the Information</u>

This information collection involves the submission of an application form, DD Form 2749, *Technical Assistance for Public Participation (TAPP) Application*, and a Letter Report. RABs or TRCs can apply for TAPP funds when Federal, State, or local agencies responsible for overseeing environmental cleanup do not have the necessary technical expertise for the proposed project, or the proposed technical assistance will contribute to the efficiency, effectiveness, or timeliness of environmental cleanup

activities and is likely to contribute to community acceptance of those activities. Community members of RABs and TRCs submit the application to indicate those products or services they wish to obtain to assist them in participating in the DERP. Eligible activities for TAPP funding include interpretation of technical documents; training; and technical assistance to help community members understand the function and implications of technologies, contribute to risk evaluations, and to interpret potential health implications. The DD From 2749 specifies that applicants should return completed Forms directly to the installation identified in Section 1 of the DD 2749. Applicants can return the form electronically via email or in-person at a RAB or TRC meeting. Respondents who are asking for assistance will have an on-going working relationship with the installation through the RAB or TRC and will know the appropriate point of contact for submission through these working relationships. All communication between the installation and the applicant regarding the TAPP program will occur informally through the RAB or TRC. DoD uses the collected information to determine the eligibility of the project and, if eligible, begin the procurement process to obtain the requested products or services.

In addition, the community point of contact for the RAB or TRC will submit a brief Letter Report as part of the TAPP reporting requirements to installation and the ODASD(ESOH). The installation will forward the report to the DoD Component Deputy Assistant Secretary for the Environment (or equivalent). The Letter Report enables DoD to ensure value for its investment and meet its reporting requirements to Congress.

The Letter Report, which is required per section 203.14 of title 32 CFR, will include 1) a description of the TAPP project; 2) a summary of services and products obtained; 3) the amount of TAPP funds obligated by fiscal year; and 4) an evaluation of project. The point of contact preparing the letter can use the information from the DD Form 2749 to describe the TAPP project and summarize the services and products obtained. The evaluation of the TAPP project should be a written narrative, not to exceed one page and address whether the TAPP project assisted the community in participating in the environmental cleanup program and include a statement regarding the overall satisfaction with the quality of service and/or products received.

#### 3. Use of Information Technology

DoD uses improved information technology to the maximum extent practicable. Where possible, DoD collects information electronically. DoD estimates that it will collect approximately 15% of the total number of responses electronically. In many instances, TAPP applicants give their applications to installation personnel at RAB meetings.

#### 4. Non-duplication

No other Government Agency is responsible for this program. There is no duplication of effort involved in this data collection format or in the Letter Report.

#### 5. Burden on Small Business

The data to be collected are from community members of RABs and TRCs. The results of this data collection will be the initiation of a procurement by DoD to obtain the requested products or services, and to determine the overall satisfaction of community members of RABs or TRCs receiving the products or services. These procurements will be performed under Part 13 of the Federal Acquisition Regulations, and will be reserved for small businesses. DoD expects a maximum of 25 to 50 procurements annually, with an expected dollar value of \$5,000 to \$25,000 for each procurement. As such, this collection of information will not have a significant impact on a substantial number of small businesses or other small entities.

## 6. <u>Less Frequent Collection</u>

If this data collection is not performed, DoD will be unable to conduct the TAPP program and provide technical assistance to community members of RABs and TRCs, as directed by Sec. 2705 of Title 10, U.S. Code, nor will it receive feedback on the overall level of satisfaction of the RABs and TRCs receiving the TAPP products and services.

## 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 Section 1320.5(d)(2) of title, 5 CFR. By following guidelines in 1320.5(d)(2) of title 5, CFR, DoD ensures unnecessary duplication of efforts; reduces the burden on small entities; uses plain language; ensures consistency with reporting and recordkeeping practices; and clearly explains to applicants what information is collected and why DoD is collecting it.

#### 8. Consultation and Public Comments

The data collection format and accompanying rule were developed in a Working Group comprised of members from the DoD Components and the Environmental Protection Agency.

DoD most recently solicited public comments in the <u>Federal Register</u> on October 13, 2015 (80 FRN 197 61399); DoD did not receive any comments.

DoD installation personnel talk to community representatives and other stakeholders regularly at RAB meetings. There are opportunities for DoD to discuss the TAPP program and application process at these meetings. No one has raised any issues to DoD regarding the TAPP application and information collection process.

### 9. Gifts or Payment

No payment of gift will be provided to the respondents.

## 10. Confidentiality

This data collection does not require the provision of personal identifying information. Therefore, the data collection instrument does not require a Privacy Act Statement or a Privacy Impact Statement. A System of Records Notice is not required because records are not retrievable by personally identifiable information. The information collected is consistent with prudent business practice, current regulations, and statutory requirements.

#### 11. Sensitive Questions

The collection does not solicit any sensitive information.

# 12. Respondent Burden, and its Labor Costs

# a.\_Estimation of Respondent Burden

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours)
DD Form 2749 (TAPP Application)	25	1	25	4 hours	100 hours
Letter Reports	25	1	25	4 hours	100 hours
Total (AVERAGE)	50	2	50	8 hours	200 hours

# b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage*	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
DD Form 2749 (TAPP Application)	25	4 hours	\$44.37*	\$177.48	\$4,437.00

Letter Reports	25	4 hours	\$44.37*	\$177.48	\$4,437.00
Total (AVERAGE)	50	8 hours	\$88.74	\$354.96	\$8,874.00

<sup>\*</sup>The average cost to each respondent is estimated to be \$44.37 per hour, based on the equivalent of a GS-12, step 5 salary, plus 32.45 percent overhead burden.

## 13. Respondent Costs Other Than Burden Hour Costs

We do not estimate a capital and start-up cost component, and there is no operation and maintenance component.

## 14. Cost to the Federal Government

Labor Cost to the Federal Government				
	DD Form 2749 (TAPP Application)	Letter Reports	Total	
Number of Responses	25	25	50	
Processing Time Per Response (in hours)	20	1	21	
Hourly Wage of Worker(s) Processing Responses	\$44.37*	\$44.37*	\$44.37	
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$887.40	\$44.37	\$931.77	
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses	\$22,185	\$1,109.25	\$23,294.25	

\*The average cost to each respondent is estimated to be \$44.37 per hour, based on the equivalent of a GS-12, step 5 salary, plus 32.45 percent overhead burden.

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$0	\$0	\$0	\$0	\$0	\$0	\$0

DoD does not estimate an operational and maintenance costs associated with this information collection.

Total Cost to the Federal Government					
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)			
\$0	\$23,294.25	\$23,294.25			

## 15. Reasons for Change in Burden

This is an extension of a previously approved collection. Burden rates have increased slightly due to an increase in the respondent hourly wage.

## 16. Publication of Results

DoD will not publish the results for collection of this information in a DoD publication or in a publication external to DoD.

## 17. Non-Display of OMB Expiration Date

DoD is not seeking approval to omit display of an expiration date of OMB approval on the collection instrument.

## 18. Exceptions to "Certification for Paperwork Reduction Submissions"

 $\,$  DoD is not seeking exceptions to the provisions certified to in Item 19.a. of the OMB Form 83-I.