

SUPPORTING STATEMENT – PART A

Camp Lejeune Notification Database - OMB 0703-0057

A. JUSTIFICATION

1. Need for the Information Collection

Pursuant to section 315 of the 2008 Defense Authorization Act ([Public Law 110-181](#)), the Marine Corps is attempting to notify all persons potentially affected by contaminated drinking water at Marine Corps Base Camp Lejeune in North Carolina. The law requires the Marine Corps to directly notify as many former residents and workers as possible. In order to meet this requirement, the Marine Corps created a system to collect and maintain the mailing information of former residents and workers. There are no higher authorities. This effort will also provide updated information regarding this issue to inform scientific research that is under way studying the effects of the contamination.

This collection of information is needed to gather contact data (e.g., name, address, phone number) of people who may have been exposed to contaminated drinking water at Marine Corps Base Camp Lejeune. Water modeling studies have indicated that some persons who lived, worked or used the drinking water aboard Camp Lejeune between 1953 and 1987 may have been exposed to drinking water contaminated with the chemicals trichloroethylene (TCE), perchlorethylene (PCE) also known as tetrachloroethylene, and the fuel additive benzene.

Finally, this collection is required because neither the Marine Corps nor any other federal agency currently has a complete and accurate list of such persons, their contact information, or this type of historical information.

2. Use of the Information

The Marine Corps continues to conduct a robust outreach program where we advertise in national and regional newspapers, magazines, periodicals, websites etc. In the past we have run regional radio advertisements. These outreach efforts direct interested persons to our website and/or call center to register with us. Respondents are individuals who lived or worked on Camp Lejeune on or before 1987, and other generally interested parties. The respondents are participating in order to receive an official notification letter and other information on the Camp Lejeune historic drinking water contamination issue as it becomes available. The respondents can access the collection through a Marine Corps website <http://www.marines.mil/clwater>, and through a call center where interested parties may register over the phone with the assistance of a trained representative. The call center does have material they use to guide their communications with callers, however, it goes beyond just the registration process. A script is included in the PRA package. Our call center also helps callers get the information they need and directs them to where they need to go if we are not the right place. The respondents do not return any collection instrument because information is collected through the website, or through the call center. Respondents will enter their information only once unless they need to update or

change their contact information. The respondents are required to accept the terms of a Privacy Act Statement (PAS) when providing information via the website. No additional invitations are sent to the respondents. Per our Congressional mandate, registrants are sent an official notification letter from the Marine Corps as part of a welcome packet that includes additional information on the issue along with the results of recent studies completed on the issue. The official notification letter is included in the PRA package. Moving forward, they will receive additional information updates, e.g., the results of another study.

The information will be used by the Marine Corps to notify and provide information related to the Camp Lejeune water issue to the respondents. The information may also be used in the future to assist federal health agencies study this issue.

The collection instrument is the electronic database which is accessible through the website <http://www.marines.mil/clwater> or via the call center where interested parties may register over the phone with the assistance of a trained representative. Both formats (e.g., website and toll-free call line) collect the following information: name, mailing address, email address, and phone number.

3. Use of Information Technology

The Marine Corps collects the data via an online registry accessible through their website <http://www.marines.mil/clwater> and downloads/uploads these records via a secure server. The automated process enhances the ability to collect data accurately and in a timely manner. The Marine Corps also has made a toll-free call line available where interested parties may register over the phone with the assistance of a trained representative. Approximately 85 percent of registrations are collected through our website and the remaining 15 percent of registrations are collected through the toll-free call line.

4. Non-duplication

The Marine Corps ensures that the information being collected is not readily available from some other source. The Marine Corps has researched available military personnel records such as those held at the Defense Manpower Data Center (DMDC), Camp Lejeune base housing records, base histories, and civilian payroll records. This research led to the conclusion that the Marine Corps would be unable to effectively execute this notification relying solely on the existing systems.

5. Burden on Small Business

The Marine Corps Camp Lejeune Water Notification Registry data collection system has no impact on small entities.

6. Less Frequent Collection

If the Marine Corps could not collect any data it would severely degrade the Marine Corps' ability to fulfill its obligations under section 315 of the 2008 Defense Authorization Act (Public Law 110-181), which requires the Marine Corps "to make reasonable efforts to identify and notify directly individuals who were served by the" affected water systems. Additionally, failure to collect this information could hinder future studies/surveys on the effects of this contamination.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

Part A: A 60-Day Notice for the proposed collection was posted in the Federal Register from October 9, 2015 to December 8, 2015, 80 FR 61194. No comments were received.

A 30-Day Notice for the collection was published on October 31, 2016. The 30-Day FRN citation is 81 FRN 75385.

Part B: The Marine Corps did not conduct any consultations, but is working on consultations in the future.

9. Gifts or Payment

The Marine Corps provides no payment to the respondents to this collection.

10. Confidentiality

The Marine Corps placed a PAS on the website. Respondents are required to indicate that they have read and consent to the terms of the PAS prior to entering any information in the registry. There is also an Agency Disclosure Notice on the website for the respondents to read. For respondents that call, the Privacy Act Statement and Agency Disclosure Notice are told over the phone.

The Marine Corps completed a Privacy Impact Assessment (PIA) that was approved on 2 March 2016. The PIA evaluated the privacy impact of information collection for the Camp Lejeune Historic Drinking Water database (http://www.doncio.navy.mil/uploads/Summary_USMC_CLHDW_PIA_20160824.pdf) for members of the general public.

The Marine Corps published a revised Systems of Records Notice (SORN) on 23 March 2015 (M05100-6, 80 FR 15196). The SORN outlines the records retention and deletion

policy which indicates that records will be destroyed 50 years after Camp Lejeune is deleted from the National Priorities List. The SORN can be accessed online at <http://dpcl.dod.mil/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570632/m05100-6/>.

11. Sensitive Questions

The collection does not ask any questions of a sensitive nature and SSNs are not being collected.

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
Camp Lejeune Historic Drinking Water Notification Database (OMB 0703-0057)	10,000	1	10,000	6 min	1,000 hrs
Total	10,000	1	10,000	6 min	1,000 hrs

The table above presents the number of new respondents, the number of responses per respondent, the time required per respondent to complete the application, and the estimated total burden hours. The number of respondents is assumed to be 10,000 per year, based on historical data

of submissions. The hour burden per application was estimated at 6 minutes per application by conducting a test.

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 Responses multiplied by Response Time multiplied by Respondent Hourly Wage)
Camp Lejeune Historic Drinking Water Notification Database (OMB 0703-0057)	10,000	6 min	\$23.23	\$2.323	\$23,230
Total	10,000	6 min	\$23.23	\$2.323	\$23,230

To estimate labor costs for respondents from a diverse range of professions, a wage rate of \$23.23 is assumed, which is the average wage rate for all occupations according to the Bureau of Labor Statistics. To reflect the fact that the burden would be incurred by respondents during their leisure time and not their work time, an unloaded wage rate is used to estimate labor costs, which results in smaller labor costs than if a loaded compensation rate which accounts for the costs to employers of fringe benefits. The annual labor cost associated with the filings is thus \$23,230 (\$23.23 x 1,000 hours).

13. Respondent Costs Other Than Burden Hour Costs

There are no additional costs to the respondent/record keeper for this collection.

14. Cost to the Federal Government

	Collection Instrument #1	Total
Number of Responses	10,000	10,000
Processing Time Per Response (in hours)	0.083	0.083
Hourly Wage of Worker(s) Processing Responses	\$23.23	\$23.23
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$1.93	\$1.93
Total Cost to Process Responses	\$19,300.00 * The annual cost to process responses is \$19,300 (\$1.93 x	\$706,097.00

(Cost to Process Each Response multiplied by Number of Responses	10,000 responses). The remaining labor cost to the federal government (\$686,797.00) from the total fixed price contract labor amount (\$706,097.00) is used for other daily contractor tasks including submitting reports, drafting briefing materials, managing mail requests, answering phone calls, and maintaining electronic file system.	
--	---	--

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$0.00	\$10,000.00	\$5,000.00	\$0.00	\$0.00	\$688,933.00 (advertising costs)	\$703,939.00

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$703,939.00	\$706,097.00	\$1,410,036.00

The estimated annualized cost to the Federal Government is \$1,410,000, which is determined by the annualized cost of the fixed-price contract that supports this information collection. The contract is not broken down by specific categories. All information collection actions are processed by the contractor. The costs of the contract are indirect to the information

collection process and include advertising to interested parties to encourage registration to the database.

15. Reasons for Change in Burden

This is a reinstatement, with change, a previously approved collection for which approval has expired. The change in burden is a result of using historic values and results in a better estimate of the number of annual registrants based on the actual number of new registrants each year. Previous burden assessment did not use historic values. The number of respondents was previously estimated at 1,600 respondents, while the annual burden hours were estimated at 170 hours. Current estimates put the number of respondents at 10,000 and the burden hours at 1,000 annually.

16. Publication of Results

The results of this collection will not be published and no complex analytical techniques will be used.

17. Non-Display of OMB Expiration Date

Exemption for Non-Display of OMB expiration date is being requested.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

There are no exceptions being requested for the PRA submission.