

SUPPORTING STATEMENT - PART A

(Web-based Legal Information Online System (WebLIONS) – 0701-XXXX)

1. Need for the Information Collection

The Department of the Air Force proposes to establish a system of records that will be used to maintain individual's name, Social Security Number (SSN), financial records, personnel files, leases, tax documents, personal letters and documents, and all other information necessary to provide advice and assistance to respondents seeking legal assistance. The Agency has authority to collect this information through 10 U.S.C. 8013, Secretary of the Air Force; 10 U.S.C. 8037, Judge Advocate General, Deputy Judge Advocate General: Appointment and duties; Air Force Instruction 51-504, Legal Assistance, Notary, and Preventive law Programs; and E.O. 9397(SSN).

2. Use of the Information

Respondents to Web-based Legal Information Online System (WebLIONS) include active duty, retired military personnel, dependents of active duty and retired military personnel and Air Force civilian personnel stationed overseas. The completed online questionnaires are used during the intake process to determine an individual's eligibility for legal assistance, as well assist attorneys in performing their official duties while providing services to their clients. WebLIONS also acts as a database to review and track cases as well as assist in conflicts checks.

When a respondent seeks legal assistance from the Agency, Agency attorneys conduct an initial inquiry into eligibility and conflicts by entering the respondent's name and social security number into WebLIONS. If the respondent previously sought legal assistance, other information, such as name, military branch, grade, addresses, and status will prepopulate into the next screen. However, if the respondent is seeking legal information for the first time, the respondent would have to provide such information to the attorney to determine eligibility for legal assistance. This information is vital to the sustainability and viability of continued Air Force support to legal assistance activities.

3. Use of Information Technology

The Agency uses electronic methods for storing the information approximately 95 percent of the time. Information is submitted online in a fillable online questionnaire by the attorney assigned to the case. A paper questionnaire using Air Force Forms 1175, Legal Assistance Record, is only used when technological difficulties makes WebLIONS inaccessible. In those circumstances, the information obtained on the paper questionnaires are entered into the online questionnaire as soon as the technological difficulties are

resolved. The paper questionnaires are immediately disposed of and destroyed once the data is entered into the online questionnaire.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Attorneys cannot access client information on WebLIONS or identify eligibility for services without entering the client's information into the system. As indicated through the screenshots, there is no mechanism for proceeding through WebLIONS without that initial information. The Agency would have to implement a new system for accessing clients' information if it was disallowed from collecting such initial information when accessing the system.

7. Paperwork Reduction Act Guidelines

This collection of information does not require 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: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Friday, June 1, 2018. The 60-Day FRN citation is 83 FRN 25441.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Thursday, August 9, 2018. The 30-Day FRN citation is 83 FRN 39430.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is required for this collection and is available on the system itself, and is accessible by clicking the link at the top right corner of the screen.

A draft copy of the revised SORN, F051 AFJA G, has been provided with this package for OMB's review. The current SORN is available for review at the Defense Privacy and Civil Liberties Division, U.S. Department of Defense website at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569886/f051-afja-g/>

A copy of the Privacy Impact Assessment is available for review at the Air Force Privacy Act website and is located at <http://www.privacy.af.mil/Portals/26/documents/AFD-110328-117.pdf>

Records are retained in office files until superseded, obsolete, no longer needed for reference, or on inactivation, and then destroyed by tearing into pieces, shredding, pulping, macerating, or burning. Computer records are destroyed by erasing, deleting or overwriting.

11. Sensitive Questions

The system includes the collection of social security numbers, which as outlined in the Justification for the Use of Social Security Numbers Memorandum, is in order to conduct eligibility checks for authorized military, dependent, and retirees before providing legal assistance. They also assist attorneys with conducting conflict checks so the attorney does not represent or provide advice to opposing parties.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. WebLIONS

- a. Number of Respondents: 191,000
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 191, 000
- d. Response Time: 3 minutes
- e. Respondent Burden Hours: 9550 hours

2. Total Submission Burden (Summation or average based on collection)

- a. Total Number of Respondents: 191,000

- b. Total Number of Annual Responses: 191, 000
- c. Total Respondent Burden Hours: 9550 hours

b. Labor Cost of Respondent Burden

- 1. WebLIONS
 - a. Number of Total Annual Responses: 191,000
 - b. Response Time: 3 minutes
 - c. Respondent Hourly Wage: \$21.96 (average pay from lowest paid military member to highest paid military member in their first year of service; under the assumption that the military member is only working 9 hours a day).
 - d. Labor Burden per Response: \$1.10
 - e. Total Labor Burden: \$210, 100

2. Overall Labor Burden

- a. Total Number of Annual Responses: 191,000
- b. Total Labor Burden: \$210,100

The Respondent hourly wage was determined by using the Defense Finance and Accounting Service Website <https://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html>

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

- 1. WebLIONS
 - a. Number of Total Annual Responses: 191, 000
 - b. Processing Time per Response: 3 mins
 - c. Hourly Wage of Worker(s) Processing Responses: \$21. 96 (average pay from lowest paid military member to highest paid military member in their first year of service; under the assumption that the military member is only working 9 hours a day).
 - d. Cost to Process Each Response: \$1. 10
 - e. Total Cost to Process Responses: \$21,010

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 191, 000
- b. Total Labor Burden: \$ 21,010

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$0

- 1. Total Operational and Maintenance Costs: \$0
- 2. Total Labor Cost to the Federal Government: \$21,010
- 3. Total Cost to the Federal Government: \$21,010

15. Reasons for Change in Burden

This is a new Collection.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting an exemption to the provisions stated in 5CFR 1320.9.