

## SUPPORTING STATEMENT – PART A

### The United States of America Vietnam War Commemoration 0704-0500

#### *Summary of Changes from Previously Approved Collection:*

- The burden increased due to the increase in responses.
- Added names to the DD Forms.

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

10 U.S.C. Section 113 (Public Law 110-181, div. A, title V, Section 598, Jan 28, 2008, 122 Stat. 141), Program to Commemorate 50<sup>th</sup> Anniversary of the Vietnam War authorized the Department of Defense to establish a Commemoration for the 50<sup>th</sup> Anniversary of the Vietnam War. Congressional objective one of five states “To thank and honor veterans of the Vietnam War, including personnel who were held as prisoners of war or listed as missing in action, for their service and sacrifice on behalf of the United States and to thank and honor the families of these veterans.” In order to thank and honor the seven million living Vietnam veterans and the nine million families of the veterans who served, The United States of America Vietnam War Commemoration (known as the Commemoration throughout the rest of this document) established the Commemorative Partner Program. This program is composed of partner organizations at the local, state and federal levels, as well as nongovernmental organizations that commit to conducting events and activities that thank and honor Vietnam veterans in their hometowns. This collection enables these commemorative partners to request materials, advertise their events, and provide feedback as to how the event went and how many veterans were recognized. In addition, the collection allows commemorative partners to order certificates of honor, as part of these events, to recognize special groups: Former, living American military POWs, immediate family members of those listed on the Vietnam Veterans Memorial in Washington, D.C., and immediate family members of those still listed as unaccounted for by the Department of Defense from the Vietnam War.

##### 2. Use of the Information

The information collection begins with already approved commemorative partner organizations requesting support for their events and activities whereby Vietnam veterans and their families will be recognized. The partners are asked to go the Commemoration’s website at [www.VietnamWar50th.com](http://www.VietnamWar50th.com) and enter the commemorative partner portal. The portal is accessed by a password and ID provided to the commemorative partner organization’s chairperson when they become partners. At the portal, commemorative partners will find information regarding how to obtain support for their events. The required forms are located on the commemorative partner portal and on average each takes about 15 minutes to fill out. The DD Form 2956 collects the basic information of the where, when, and how about the event and what materials

will be needed and where to ship them. It is a one page fillable document that is preferably completed online. If the commemorative partner expects to recognize former, living American military POWs or immediate family members of those listed on the Vietnam Veterans Memorial or immediate family members of those still listed as unaccounted for by the Department of Defense from the Vietnam War at their event, then the commemorative partner may submit Forms DD Forms 3027, 3028, and 3029. These one-page fillable forms request the information needed to properly produce the particular certificate of honor. The DD Form 3027 is completed to request a certificate of honor for immediate family members of those listed on the Vietnam Veterans Memorial. The DD Form 3029 is completed to request a certificate of honor for former, living American military POWs. The DD Form 3028 is completed to request a certificate of honor for immediate family members of those still listed as unaccounted for by the Department of Defense from the Vietnam War. Each eligible recipient is authorized only one certificate of honor. Finally, after completion of the event, the commemorative partner organization is encouraged to submit DD Form 2957, an After-Action Report, to inform the Commemoration how the event went, how many veterans and families were recognized and whether media was present. In addition, they may provide photos and videos, news clippings, etc. for posting on the Commemoration website. Respondents may fill out the requests online or download the forms and email, fax or mail them to the commemoration. The DD Form 2957 is an optional form. Currently, we are seeing a 35% return on these forms. We estimate with our new website an increase of 5% and therefore estimate 40% of the partners that submitted a DD Form 2956 will then submit a DD Form 2957 after their event, which is outlined in Section 12. If the need arises to contact the requesting organization, then phone calls, emails or personal contact is made to clarify needed information. Additionally, a tracking number for shipping items is sent to the requestor to let them know when their materials will arrive.

### 3. Use of Information Technology

The Commemoration's website is the preferred method of collecting information since it allows information from the respondent to be transferred directly into databases whereby the information can then be acted upon by staff. The Commemoration expects 80 percent of the information collection to be accomplished electronically. We estimate 20 percent submitted manually through fax or mail due to the potential lack of computer access of respondents.

### 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 Business

All of the forms are one page in length thereby reducing the amount of information that is being collected. Most of the forms are built to capture the information needed by checking boxes or selecting from a dropdown box or inserting numbers rather than the actual writing of sentences. However, the DD Form 2956 and DD Form 2957 does ask for a description of the event which

requires some writing, but overall does not create an excessive burden on small businesses acting as commemorative partners.

#### 6. Less Frequent Collection

The collection of information is based on the respondent's need for support for their event. Commemorative partner organizations are asked to conduct two events per year for a three-year period.

#### 7. Paperwork Reduction Act Guidelines

There would not be any 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: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Thursday, December 27th, 2018. The 60-Day FRN citation is 83 FRN 66685. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, March 8th, 2019. The 30-Day FRN citation is 84 FRN 8515.

##### Part B: CONSULTATION

Each of the forms in the collection was discussed with commemorative partner organizations to streamline the needed information to provide support for their events to thank and honor Vietnam veterans and their families. For the DD Forms 3027, 3028 and 3029, consultations were conducted over the last two and a half years to determine the minimum amount of information needed to provide the appropriate certificate of honor and not compromise the accuracy of the eligibility for the certificate.

#### 9. Gifts or Payment

The Commemoration is not offering compensation or gifts for this collection of information.

#### 10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

For the DD Forms 3027, 3028 and 3029, a Privacy Impact Assessment is required because the forms collect low-level privacy data, specifically, the name of the recipient to be included on the certificate for presentation. Because the information is being collected from Commemorative Partner organizations as third parties rather than directly from individuals, no Privacy Act Statement is included on the forms. A draft copy of the PIA has been provided with the package submission for OMB’s review.

The Records Retention and Disposition Schedule will be IAW NARA Records Disposition Authority Records Schedule DAA-0220-2013-0001-0002, Commemorative Program Administrative Files.

11. Sensitive Questions

The collection will not be asking questions of a sensitive nature.

12. Respondent Burden, and its Labor Costs

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time	Respondent Burden Hours
DD Form 3027	1500	1	1500	15 minutes	375
DD Form 3029	20	1	20	15 minutes	5
DD Form 3028	500	1	500	15 minutes	125
DD Form 2956	10,000	2	20,000	15 minutes	5000
DD Form 2957	4,000	2	8,000	15 minutes	2000
<b>Total</b>	<b>16,020</b>	<b>7</b>	<b>30,020</b>	<b>15 minutes</b>	<b>7505</b>
Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response	Total Labor Burden
DD Form 3027	1500	15 minutes	\$53.53	\$13.38	\$20,073.75
DD Form 3029	20	15 minutes	\$53.53	\$13.38	\$267.65
DD Form 3028	500	15 minutes	\$53.53	\$13.38	\$66,691.25
DD Form 2956	20,000	15 minutes	\$53.53	\$13.38	\$267,650
DD Form 2957	8,000	15 minutes	\$53.53	\$13.38	\$107,060
<b>Total</b>	<b>30,020</b>	<b>15 minutes</b>	<b>\$53.53</b>	<b>\$13.38</b>	<b>\$401, 742.65</b>

While most respondents are managers within smaller organizations (predominately volunteer), so the Department of Labor, Bureau of Labor Statistics median national income for General and Operational Managers (11-1021) was applied ([http://www.bls.gov/oes/current/naics4\\_561100.htm](http://www.bls.gov/oes/current/naics4_561100.htm)) to estimate the equivalent cost to the organization to participate in the program.

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

Labor Cost to the Federal Government						
	DD Form 3027	DD Form 3029	DD Form 3028	DD Form 2956	DD Form 2957	Total
Number of Responses	1500	20	500	20,000	8000	30,020
Processing Time Per Response (in hours)	.25	.25	.25	.25	.25	.25
Hourly Wage of Worker(s) Processing Responses	\$52.66	52.66	52.66	52.66	52.66	52.66
Cost to Process Each Response	13.17	13.17	13.17	13.17	13.17	13.17
Total Cost to Process Responses	\$19,755	\$263.40	\$6585.00	\$263,400	\$105,360	\$395,363.40
Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$4,600	\$1,100	\$246,235	---	---	\$744,855.90	\$996,790.90
Total Cost to the Federal Government						
Operational and Maintenance Costs		Labor Cost to the Federal Government			Total Cost	
996,790.90		\$395,363.40			\$1,392,154.30	

15. Reasons for Change in Burden

For the DD Forms 2956 & 2957, previous burden estimates were one response at 15 minutes per respondent per year. The number of Commemorative Partners (respondents) has increased from the previous estimate as has the number of responses per year. Previous estimates were prepared before program launch, while current estimates are projections based on actual responses after program launch. Additionally, original estimates did not attach an estimated labor cost to respondents' time, nor did they capture the total program costs associated with the forms for the Federal Government, such as postage, maintenance of a website and database for managing responses, etc. Since August 1, 2016, the Commemoration's partner organizations have increased and the Certificate of Honor Program has expanded its outreach to all partner organizations which has generated more requests for event support and certificates of honor.

The DD Forms 3027, 3028, and 3029 were new forms in 2016 associated with a new part of the Commemorative program. Respondent and Federal Government costs are projections based on actual assessment of time and costs associated with the existing Commemorative events and Certificate of Honor program effective 1 August 2016-30 November 2018

16. Publication of Results

A final report of the work of the Commemoration is due to Congress at the completion of the Commemoration period. The report will run from information collected from May 28 2012 to May 31 2025.

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 any exemptions to the provisions stated in 5 CFR 1320.9.