#### SUPPORTING STATEMENT - PART A

Camp Lejeune Notification Database - 0703-0057

Summary of Changes from Previously Approved Collection

• Changes from the previously approved collection are exclusive to those changes associated with burden. The factors that influenced these changes are increased labor costs as well as reduction in the contract costs. The overall burden decreased because of the aforementioned changes.

## 1. <u>Need for the Information Collection</u>

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. 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 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.

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 <a href="http://www.marines.mil/clwater">http://www.marines.mil/clwater</a> 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. Our call center also helps callers get the information they need and directs them to other sources of information. 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. 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, via email, or via the call center (the toll-free number and email address are provided on the website) where interested parties may register over the phone with the assistance of a trained representative. All three formats (e.g., website, email, and toll-free call line) collect the following information: name, mailing address, email address, and phone number. Once registration is completed via the website, email, or call center, registrants may request to have their information undated via the toll-free call line or via the email linked to the registration page.

## 3. <u>Use of Information Technology</u>

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

## 5. <u>Burden on Small Businesses</u>

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

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

This information collection occurs on occasion, at respondent registration or when they update their information. 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. <u>Paperwork Reduction Act Guidelines</u>

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 (FRN) for the collection published on Friday, August 16, 2019. The 60-Day FRN citation is 84 FRN 41977.

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

A 30-Day Federal Register Notice for the collection published on Thursday, December 19, 2019. The 30-Day FRN citation is 84 FRN 69732.

#### Part B: CONSULTATION

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

## 9. <u>Gifts or Payment</u>

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

## 10. <u>Confidentiality</u>

The Marine Corps displays a Privacy Act Statement (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 provided over the phone.

A Systems of Records Notice (SORN) is required. SORN M05100-6, MCB Camp Lejeune Historic Drinking Water Notification Registry can be accessed online <a href="http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570632/m05100-6/">http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570632/m05100-6/</a>.

A Privacy Impact Assessment (PIA) is required. The Camp Lejeune Historic Drinking Water PIA can be accessed online at https://www.doncio.navy.mil/exports.aspx?id=9025.

#### Retention and Disposal:

Destroy 50 years after Camp Lejeune is deleted from the National Priorities List.

#### 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

## 12. Respondent Burden and its Labor Costs

#### Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Camp Lejeune Historic Drinking Water Notification Database
  - a) Number of Respondents: 10,000
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 10,000
  - d) Response Time: 6 minutes
  - e) Respondent Burden Hours: 1,000 hours
- 2) Total Submission Burden
  - a) Total Number of Respondents: 10,000
  - b) Total Number of Annual Responses: 10,000
  - c) Total Respondent Burden Hours: 1,000 hours

#### Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Camp Lejeune Historic Drinking Water Notification Database
  - a) Number of Total Annual Responses: 10,000
  - b) Response Time: 6 minutes
  - c) Respondent Hourly Wage: \$24.98
  - d) Labor Burden per Response: \$2.498
  - e) Total Labor Burden: \$24,980
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 10,000
  - b) Total Labor Burden: \$24,980

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] ([http://www.dol.gov/dol/topic/wages/index.htm])

## 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

#### Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Camp Lejeune Historic Drinking Water Notification Database
  - a) Number of Total Annual Responses: 10,000
  - b) Processing Time per Response: 0.083 hours
  - c) Hourly Wage of Worker(s) Processing Responses: \$24.98
  - d) Cost to Process Each Response: \$2.07
  - e) Total Cost to Process Responses: \$20,700
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 10,000
  - b) Total Labor Burden: \$20,700

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$16,100
  - c) Postage: \$16,000
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$943,385.88
- 2) Total Operational and Maintenance Cost: \$975,458.88

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$20,700
- 2) Total Operational and Maintenance Costs: \$975,458.88
- 3) Total Cost to the Federal Government: \$996,158.88

## 15. Reasons for Change in Burden

The burden has decreased since the previous approval due to the decrease in associated contract costs.

## 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. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>
We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.