

SUPPORTING STATEMENT - PART A

Nuclear Test Personnel Review Forms – 0704-0447

Summary of Changes from Previously Approved Collection

- Added DTRA Form 150D, Atomic Veterans Service Certificate Application and Nuclear Test Personnel Review Information Request and Release
- Removed DTRA Form 150C, Crossroads Questionnaire due to number of respondents being less than ten.
- Increase in burden due to addition of DTRA Form 150D

1. Need for the Information Collection

The Defense Threat Reduction Agency (DTRA) is a Department of Defense (DoD) combat support agency that serves as executive agent for the Nuclear Test Personnel Review (NTPR) Program. The NTPR Program serves military personnel and DoD civilian employees who participated in U.S. atmospheric nuclear testing (1945-1962), with the occupation forces of Hiroshima and Nagasaki, Japan, or were prisoners of war in Japan at the conclusion of World War II. The NTPR Program assists these military and civilian participants, supports the Department of Veterans Affairs (VA) and Department of Justice (DOJ) in responding to radiogenic disease compensation claims, and provides information to organizations responsible for studies concerning the health effects of ionizing radiation. For DTRA to fulfill this role, it must collect information from veterans and former DoD civilian employees. DTRA Forms 150, 150A, 150B, and 150D serve as the collection vehicle. Two additional forms, 150C and 150E, are associated with this collection, but are not included in this package because they have less than ten respondents.

Authority to collect this information is provided by PL 98-542 (The Veterans' Dioxin and Radiation Exposure Compensation Standards Act) which appointed the Defense Nuclear Agency (now DTRA) as the Executive Agent for the NTPR Program. It also required the Secretary of Defense to publish guidelines (see 32 CFR 218, "Guidance for the Determination and Reporting of Nuclear Radiation Dose for DoD Participants in the Atmospheric Nuclear Test Program") describing DoD's process for generating radiation dose estimates. Section 581 of the John S. McCain National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2019 authorized the creation of the Atomic Veterans Service Certificate (AVSC). DTRA was assigned responsibility for establishing and managing the AVSC program since determining eligibility for the award is consistent with the duties associated with managing the NTPR Program. Overarching authorities are 38 U.S.C. 1112 and 1154 (Veterans' Benefits); and 42 U.S.C. 2210 (DOJ Radiation Exposure Compensation).

2. Use of the Information

The NTPR Program has collected information from former DoD employees via postal correspondence and telephone conversations since the late 1970s. This information has primarily been used in support of radiogenic disease claims filed with VA and DOJ. Beginning in 2019, this information has been used to award the Atomic Veterans Service Certificate (AVSC) to eligible veterans via the new DTRA Form 150D. In addition, this information has been used in radioepidemiology studies performed by the National Research Council, Institute of Medicine, and now Vanderbilt University. These studies were frequently mandated by public law.

The respondents to this collection include former DoD employees, veterans, or their family members ranging from those that participated in atomic testing following WWII to underground testing participants until 1992. Due to the age of some personnel records or lack of documentation, this collection may be required to help determine the history of each individual's time in service during the event they may be claiming to be a part of.

All parts of the collection are mailed to the respondents with a self-addressed stamped envelope for mailing of the completed form, along with a cover letter explaining the purpose of the form. All forms include Agency Disclosure Notices. The respondents are asked to answer the questions concerning their service to the best of their recollection. If the respondent fails to return the collection, we will attempt to contact them and receive as much of the information over the phone. If the respondent agrees to provide information over the phone, then the Agency Disclosure Notice and the agency's Privacy Act Statement are read to them. All phone conversations are transcribed on a call log and placed in our system database. When returned, the collection is added to the respondent's case file and used as research material to help us determine the circumstance and verification of the information in which the respondent is claiming. Without this collection, we may not be able to fully document a respondent's whereabouts, actions, job description, or event which would not only slow down our response time considerably but may result in some respondents not receiving the medical attention they so rightly deserve. A copy of the cover letter template that accompanies the DTRA Form 150 questionnaires and a blank veteran outreach call log are provided in our OMB submission for additional review. There are no other invitations or communications sent to the respondents associated with this information collection.

3. Use of Information Technology

0% of this collection is collected electronically. Although DTRA's NTPR Program maintains an elaborate website (<https://www.dtra.mil/DTRA-Mission/Reference-Documents/NTPR-Info/>), the majority of the respondents are in their 70s and 80s and are not comfortable with web-based data collection or lack any access to such systems. Unless a complete secure web-based option was developed to minimize the sending of personal information via electronic mail, there are not enough respondents to warrant the cost. Once collected, data is maintained by DTRA as digitized PDF documents associated with a structured query language, relational database.

4. Non-duplication

Some of this information may have already been collected by VA, DOJ, or the National Archives and Records Administration. Consequently, the NTPR Program first checks these sources so as to assure non-duplication of information collection.

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

Less frequent collection is not possible. This is a one-time collection effort (per respondent) for an individual to support processing of their radiogenic disease compensation claim.

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 (FRN) for the collection published on Monday, October 19, 2020). The 60-Day FRN citation is 85 FR 66312.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, January 13, 2021. The 30-Day FRN citation is 86 FR 2653.

Part B: CONSULTATION

The NTPR Program deals directly with respondents or their representatives regarding the collection of information by mailing these forms directly to them. As noted in the response to question 3, if any questions arise, NTPR Program staff contact the respondent by phone to assist them. Once a form is returned and the respondent's case completed, additional consultation is not required. 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 and is provided on each form of the collection distributed to the respondents.

A draft copy of the revised SORN (HDTRA 010, Nuclear Test Participants) has been provided with this package for OMB's review.

A copy of the revised PIA, Nuclear Test and Radiological Review, HDTRA 010, has been provided with this package for OMB's review.

Records are permanent. DTRA retains physical and legal custody for 75 years after case termination, then the records are transferred and accessioned to NARA. The information is collected and maintained in accordance with the federal requirements for control of privacy act material. Access to data both hardcopy and electronic is restricted to authorized staff on a need-to-know basis. Hardcopy and electronic data is maintained in controlled physical spaces, and at specified DoD levels of data protection. Paper and microfiche records are collected in official disposal containers (burn-bags DTRA, and certified records disposal containers (contract service) at NTPR's offsite contract sites). With regard to magnetic tape (or hard disk drives), bulk demagnetizers are used to clean the disks/tape before they are turned over to DTRA logistics for disposal. Electronic files are transferred to NARA when no longer required.

11. Sensitive Questions

Social Security Numbers (SSNs) are collected using DTRA Forms 150 and 150 D. A SSN Justification Memo has been included with the submission package to OMB.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

Form 150 Information Release

- a) Number of Respondents: 20
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 20
- d) Response Time: .25 hours
- e) Respondent Burden Hours: 5

Form 150 A Continental Questionnaire

- a) Number of Respondents: 30
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 30

- d) Response Time: 1 hour
- e) Respondent Burden Hours: 30

Form 150 B Oceanic Questionnaire

- a) Number of Respondents: 28
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 28
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 28

Form 150 D AVSC Application

- a) Number of Respondents: 200
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 200
- d) Response Time: .25 hours
- e) Respondent Burden Hours: 50

2) Total Submission Burden

- a) Total Number of Respondents: 278
- b) Total Number of Annual Responses: 278
- c) Total Respondent Burden Hours: 113 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

Form 150 Information Release

- a) Number of Total Annual Responses: 20
- b) Response Time: .25 hour
- c) Respondent Hourly Wage: \$24.04
- d) Labor Burden per Response: \$6.01
- e) Total Labor Burden: \$120.20

Form 150 A Continental Questionnaire

- a) Number of Total Annual Responses: 30
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$24.04
- d) Labor Burden per Response: \$24.04
- e) Total Labor Burden: \$721.20

Form 150 B Oceanic Questionnaire

- a) Number of Total Annual Responses: 28
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$24.04
- d) Labor Burden per Response: \$24.04
- e) Total Labor Burden: \$673.12

Form 150 D AVSC Application

- a) Number of Total Annual Responses: 200
- b) Response Time: .25 hour
- c) Respondent Hourly Wage: \$24.04
- d) Labor Burden per Response: \$6.01
- e) Total Labor Burden: \$1,202

2) Overall Labor Burden

- a) Total Number of Annual Responses: 278
- b) Total Labor Burden: \$2,717

Due to the wide range of age groups, professions, and backgrounds possibly being sent this collection, the respondent hourly wage (\$24.04) is based off the most recently published Average Wage Index (2018). <https://www.ssa.gov/OACT/COLA/awidevelop.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

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instruments

Form 150 Release of Information

- a) Number of Total Annual Responses: 20
- b) Processing Time per Response: 1.5 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$66
- d) Cost to Process Each Response: \$99
- e) Total Cost to Process Responses: \$1,980

Form 150 A Continental Questionnaire

- a) Number of Total Annual Responses: 30
- b) Processing Time per Response: 1.5 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$66
- d) Cost to Process Each Response: \$99
- e) Total Cost to Process Responses: \$2,970

Form 150 B Oceanic Questionnaire

- a) Number of Total Annual Responses: 28
- b) Processing Time per Response: 1.5 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$66
- d) Cost to Process Each Response: \$99
- e) Total Cost to Process Responses: \$2,772

Form 150 D AVSC Application

- a) Number of Total Annual Responses: 200
 - b) Processing Time per Response: 1 hour
 - c) Hourly Wage of Worker(s) Processing Responses: \$66
 - d) Cost to Process Each Response: \$66
 - e) Total Cost to Process Responses: \$13,200
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 278
 - b) Total Labor Burden: \$12,144

Hourly wage based off of the 2020 average hourly wages of equivalent federal employees with similar time in the Washington-Baltimore Area. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$1,720
 - b) Printing: \$316
 - c) Postage: \$197
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$1,720
 - f) Other: \$1,720
- 2) Total Operational and Maintenance Cost: \$5,673

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$20,922
- 2) Total Operational and Maintenance Costs: \$5,673
- 3) Total Cost to the Federal Government: \$26,595

15. Reasons for Change in Burden

The burden has increased since the previous approval due to the creation of the AVSC award and the subsequent processing of DTRA Form 150 D AVSC application. The increased burden was mitigated by process improvements lowering the requirements for this 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 any exemptions to the provisions stated in 5 CFR 1320.9.