

## SUPPORTING STATEMENT – PART A

### U.S. Vietnam War Commemoration Commemorative Planned Events - 0704-0500

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

- Changed 2012 Presidential Proclamation to President Obama and 2017 Proclamation to President Trump for the DD 2956/2957.
- Additional changes to DD2956 and DD2957: Removed “Team Chief” from mailing address in the Instructions, box item 4. Added note to block 11 for DD 2956 stating how the information will be used.
- Changed title of the ICR to “U.S. Vietnam War Commemoration Commemorative Planned Events.”

#### 1. Need for the Information Collection

10 U.S.C. Section 113 (Public Law 110-181, div. A, title V, Section 598, January 28, 2008, 122 Stat. 141), Program to Commemorate 50<sup>th</sup> Anniversary of the Vietnam War authorized the Department of Defense (DoD) 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 U.S. 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 Prisoners of War (POW), 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 DoD 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, "Vietnam War Commemoration Commemorative Events Request," 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. Respondents may fill out the requests online or download the forms and email, fax or mail them to the commemoration.

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 DoD from the Vietnam War at their event, then the commemorative partner may submit DD Form 3027, "Vietnam War 50<sup>th</sup> Commemoration Certificate of Honor: In Memory Of," DD Form 3028, "Vietnam War 50th Commemoration Certificate of Honor: Former Vietnam War POW," and DD Form 3029 "Vietnam War 50th Commemoration Certificate of Honor: Unaccounted For." 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 3028 is completed to request a certificate of honor for immediate family members of those still listed as unaccounted for by the DoD from the Vietnam War. The DD Form 3029 is completed to request a certificate of honor for former, living American Military POWs. 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, "Vietnam War Commemoration 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 47% return on these forms. 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 to the Commemoration 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 of the information to be 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. If information is collected less frequently, respondents may not receive the support they need.

#### 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

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, February 23, 2022. The 60-Day FRN citation is 87 FR 10180.

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

A 30-Day Federal Register Notice for the collection published on Monday, April 25, 2022. The 30-Day FRN citation is 87 FR 24288.

#### 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

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 only for DD Forms 3027, 3028 and 3029. It is located at the top of each form.

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, an Adapted 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. An adapted PIA is required by OMB in accordance with OMB Memorandum M-10-23. The Adapted PIA is included with this package 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

No questions considered sensitive are being asked in this collection.

## 12. Respondent Burden, and its Labor Costs

### Part A: ESTIMATION OF RESPONDENT BURDEN

#### 1) Collection Instrument

[DD Form 2956]

- a) Number of Respondents: 10,000
- b) Number of Responses Per Respondent: 2
- c) Number of Total Annual Responses: 20,000
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 5,000 hours

#### 2) Collection Instrument

[DD Form 2957]

- a) Number of Respondents: 4,000
- b) Number of Responses Per Respondent: 2
- c) Number of Total Annual Responses: 8,000
- d) Response Time: 15 minutes

- e) Respondent Burden Hours: 2,000 hours
  
- 3) Collection Instrument  
[DD Form 3027]
  - a) Number of Respondents: 1,500
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 1,500
  - d) Response Time: 15 minutes
  - e) Respondent Burden Hours: 375 hours
  
- 4) Collection Instrument  
[DD Form 3028]
  - a) Number of Respondents: 500
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 500
  - d) Response Time: 15 minutes
  - e) Respondent Burden Hours: 125 hours
  
- 5) Collection Instrument  
[DD Form 3029]
  - a) Number of Respondents: 20
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 20
  - d) Response Time: 15 minutes
  - e) Respondent Burden Hours: 5 hours
  
- 6) Total Submission Burden
  - a) Total Number of Respondents: 16,020
  - b) Total Number of Annual Responses: 30,020
  - c) Total Respondent Burden Hours: 7,505 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument  
[DD Form 2956]
  - a) Number of Total Annual Responses: 20,000
  - b) Response Time: 15 minutes
  - c) Respondent Hourly Wage: \$53.53
  - d) Labor Burden per Response: \$13.38
  - e) Total Labor Burden: \$267,650

2) Collection Instrument

[DD Form 2957]

- a) Number of Total Annual Responses: 8,000
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$53.53
- d) Labor Burden per Response: \$13.38
- e) Total Labor Burden: \$107,060

3) Collection Instrument

[DD Form 3027]

- a) Number of Total Annual Responses: 1,500
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$53.53
- d) Labor Burden per Response: \$13.38
- e) Total Labor Burden: \$20,073.75

4) Collection Instrument

[DD Form 3028]

- a) Number of Total Annual Responses: 500
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$53.53
- d) Labor Burden per Response: \$13.38
- e) Total Labor Burden: \$6,691.25

5) Collection Instrument

[DD Form 3029]

- a) Number of Total Annual Responses: 20
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$53.53
- d) Labor Burden per Response: \$13.38
- e) Total Labor Burden: \$267.65

6) Overall Labor Burden

- a) Total Number of Annual Responses: 30,020
- b) Total Labor Burden: \$401,742.65

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

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

##### 1) Collection Instrument

[DD Form 2956]

- a) Number of Total Annual Responses: 20,000
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$52.66
- d) Cost to Process Each Response: \$13.17
- e) Total Cost to Process Responses: \$263,400

##### 2) Collection Instrument

[DD Form 2957]

- a) Number of Total Annual Responses: 8,000
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$52.66
- d) Cost to Process Each Response: \$13.17
- e) Total Cost to Process Responses: \$105,360

##### 3) Collection Instrument

[DD Form 3027]

- a) Number of Total Annual Responses: 1,500
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$52.66
- d) Cost to Process Each Response: \$13.17
- e) Total Cost to Process Responses: \$19,755

##### 4) Collection Instrument

[DD Form 3028]

- a) Number of Total Annual Responses: 500
- b) Processing Time per Response: 15 minutes

- c) Hourly Wage of Worker(s) Processing Responses: \$52.66
- d) Cost to Process Each Response: \$13.17
- e) Total Cost to Process Responses: \$6,585

5) Collection Instrument

[DD Form 3029]

- a) Number of Total Annual Responses: 20
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$52.66
- d) Cost to Process Each Response: \$13.17
- e) Total Cost to Process Responses: \$263.40

6) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 30,020
- b) Total Labor Burden: \$395,363.40

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$4,600
- b) Printing: \$1,100
- c) Postage: \$246,235
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$744,855.90

2) Total Operational and Maintenance Cost: \$996,790.90

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$395,363.40
- 2) Total Operational and Maintenance Costs: \$996,790.90
- 3) Total Cost to the Federal Government: \$1,392,154.3

15. Reasons for Change in Burden



There has been no change to the burden since the last approval. ROCIS will show a slight increase in the burden due to a more accurate calculation.

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.