

## SUPPORTING STATEMENT - PART A

Technical Assistance for Public Participation (TAPP) Application – 0704-0392

### Summary of Changes from Previously Approved Collection

- The burden to the Federal Government has decreased due to recalculating the average cost for each response.
- The estimate for respondent burden has increased due to an increase in the average wage of community members participating in RABs and TRCs.

#### 1. Need for the Information Collection

The information collection is necessary to identify products or services requested by community members of Restoration Advisory Boards (RABs) or Technical Review Committees (TRCs), and to receive community members' feedback on their overall satisfaction with the quality of the services and/or products received. The Department of Defense (DoD) formed RABs and TRCs to enhance public participation in the Defense Environmental Restoration Program (DERP) at DoD installations. Their request for technical assistance to help them actively participate in the DERP is the foundation of DoD's TAPP program. The TAPP program is an outgrowth of the recommendations of the Federal Facilities Environmental Restoration Dialogue Committee, also known as the Keystone Committee (*Interim Report of the Federal Facilities Environmental Restoration Dialogue Committee*, February 1993). Sec. 2705 of Title 10, U.S. Code, *Notice of Environmental Restoration Activities*, as amended by Sec. 326 of the National Defense Authorization Act for Fiscal Year 1996, directed DoD to develop and propose a program to provide technical assistance to community members of RABs and TRCs. Detailed information about the TAPP program, including its authority, requirements, and application process, are outlined in Part 203 of title 32, Code of Federal Regulations (CFR).

#### 2. Use of the Information

This information collection involves the submission of an application form, DD Form 2749, "Technical Assistance for Public Participation (TAPP) Application," and a Letter Report. RABs or TRCs can apply for TAPP funds when Federal, State, or local agencies responsible for overseeing environmental cleanup do not have the necessary technical expertise for the proposed project, or the proposed technical assistance will contribute to the efficiency, effectiveness, or timeliness of environmental cleanup activities and is likely to contribute to community acceptance of those activities. Community members of RABs and TRCs submit the application to indicate those products or services they wish to obtain to assist them in participating in the DERP. Eligible activities for TAPP funding include interpretation of technical documents; training; and technical assistance to help community members understand the function and implications of technologies, contribute to risk evaluations, and to interpret potential health implications.

The DD Form 2749 is available at Section 203.9 of title 32, CFR Appendix A, as well as from DoD installations, DoD Component headquarters, or directly for the Office of the Deputy Assistant Secretary of Defense for Environment and Energy Resilience (ODASD(E&ER)). It is also posted on the DoD Forms Website. Applicants should return completed TAPP applications to the installation included in section one of the TAPP application.

ODASD(E&ER) has a website with additional information about the RABs or TRCs and the TAPP (<http://www.denix.osd.mil/rab/>). The DD Form 2749 specifies that applicants should return completed Forms directly to the installation identified in Section 1 of the DD 2749. Applicants can return the form electronically via email or in-person at a RAB or TRC meeting. Respondents who are asking for assistance will have an on-going working relationship with the installation through the RAB or TRC and will know the appropriate point of contact for submission through these working relationships. All communication between the installation and the applicant regarding the TAPP program will occur informally through the RAB or TRC. DoD uses the collected information to determine the eligibility of the project and, if eligible, begin the procurement process to obtain the requested products or services.

In addition, the community point of contact for the RAB or TRC will submit a brief Letter Report as part of the TAPP reporting requirements to the installation and the ODASD(E&ER). The installation will forward the report to the DoD Component Deputy Assistant Secretary for the Environment (or equivalent). The Letter Report enables DoD to ensure value for its investment and meet its reporting requirements to Congress.

The Letter Report, which is required per section 203.14 of title 32 CFR, will include 1) a description of the TAPP project; 2) a summary of services and products obtained; 3) the amount of TAPP funds obligated by fiscal year; and 4) an evaluation of project. The point of contact preparing the letter can use the information from the DD Form 2749 to describe the TAPP project and summarize the services and products obtained. The evaluation of the TAPP project should be a written narrative, not to exceed one page and address whether the TAPP project assisted the community in participating in the environmental cleanup program and include a statement regarding the overall satisfaction with the quality of service and/or products received.

### 3. Use of Information Technology

DoD uses improved information technology to the maximum extent practicable. Where possible, DoD collects information electronically. DoD estimates that it will collect approximately 15% of the total number of responses electronically. In many instances, TAPP applicants give their applications to installation personnel at RAB meetings.

### 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

If this data collection is not performed, DoD will be unable to conduct the TAPP program and provide technical assistance to community members of RABs and TRCs, as directed by Sec. 2705 of Title 10, U.S. Code, nor will it receive feedback on the overall level of satisfaction of the RABs and TRCs receiving the TAPP products and services.

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, June 13, 2022. The 60-Day FRN citation is 87 FR 35743.

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

A 30-Day Federal Register Notice for the collection published on Monday, September 26, 2022. The 30-Day FRN citation is 87 FRN 58332.

Part B: CONSULTATION

The data collection format and accompanying rule were developed in a Working Group comprised of members from the DoD Components and the Environmental Protection Agency.

DoD installation personnel talk to community representatives and other stakeholders regularly at RAB meetings. There are opportunities for DoD to discuss the TAPP program and application process at these meetings. No one has raised any issues to DoD regarding the TAPP application and information collection process.

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 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.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

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 Instruments

TAPP Application – DD Form 2749

- a) Number of Respondents: 25
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 25
- d) Response Time: 4 hours
- e) Respondent Burden Hours: 100 hours

TAPP Application –Letter Reports

- a) Number of Respondents: 25
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 25
- d) Response Time: 4 hours
- e) Respondent Burden Hours: 100 hours

2) Total Submission Burden

- a) Total Number of Respondents: 25
- b) Total Number of Annual Responses: 50
- c) Total Respondent Burden Hours: 200 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

TAPP Application – DD Form 2749

- a) Number of Total Annual Responses: 25
- b) Response Time: 4 hours
- c) Respondent Hourly Wage: \$50.77
- d) Labor Burden per Response: \$203.08

e) Total Labor Burden: \$5,077

TAPP Application – Letter Reports

- a) Number of Total Annual Responses: 25
- b) Response Time: 4 hours
- c) Respondent Hourly Wage: \$50.77
- d) Labor Burden per Response: \$203.08
- e) Total Labor Burden: \$5,077

2) Overall Labor Burden

- a) Total Number of Annual Responses: 50
- b) Total Labor Burden: \$10,154

The Respondent hourly wage was determined by using the Bureau of Labor Statistics 2022 Average hourly earnings of all employees for professional and business services with a 32.45 percent overhead burden (<https://www.bls.gov/news.release/empsit.t19.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) Collection Instruments

TAPP Application – DD Form 2749

- a) Number of Total Annual Responses: 25
- b) Processing Time per Response: 20 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$49.13
- d) Average Cost to Process Each Response: \$982.6
- e) Total Cost to Process Responses: \$24,565.00

TAPP Application – Letter Reports

- a) Number of Total Annual Responses: 25
- b) Processing Time per Response: 1 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$49.13
- d) Average Cost to Process Each Response: \$49.13
- e) Total Cost to Process Responses: \$1,228.25

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 50
- b) Total Labor Burden: \$25,793.25

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$25,793.25
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$25,793.25

15. Reasons for Change in Burden

The burden to the Federal Government has decreased since the previous approval due to recalculating the average cost for each response.

The estimate for respondent burden has increased due to the increase number of total number of annual responses and also an increase in the average wage of community members participating in RABs and TRCs.

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.