

SUPPORTING STATEMENT - PART A

Community Environmental Concerns Survey for U.S. Navy Clean-Up Actions – 0703-EGEN

1. Need for the Information Collection

The Department of the Navy (DON) recognizes all Americans have the right to be involved in government decisions that may affect their lives. Because of this, the Navy develops site-specific Community Involvement Plans (CIPs) for installations undergoing environmental restoration activities. This ensures nearby community members have opportunities to learn about and participate in this important clean-up process. The development and execution of a CIP promotes community involvement and provides information on how community members can stay informed and share information or concerns. This is an important component to the overall success of the Navy's Environmental Restoration Program (ERP).

Per Environmental Readiness Program Manual (OPNAV M-5090.1) and Environmental Compliance and Protection Manual (MCO P5090.2A), DON requires a formal CIP at all DON ERP sites, whether or not they are National Priorities List (NPL) sites. The CIP is based on information gathered from the community through qualitative surveys or interviews with local officials, residents, public interest groups, and other interested or affected parties to ascertain community concerns, community information needs, and how or when citizens would like to be involved in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. To strengthen and maintain community involvement as a useful tool for these purposes, DoD has directed installations to combine pertinent data gathered from surveys or interviews and the U.S. Bureau of the Census and various databases maintained by the military departments, defense agencies, local and tribal agencies, and other agencies to ensure that the CIP adequately characterizes the affected community and addresses community needs.

In accordance with Executive Order 12580, "Superfund Implementation," DoD is the lead agency for actions taken under the authority of CERCLA at DoD installations. Within DON, many organizations, commands, activities, and personnel work together to execute and manage the DON ERP. Naval Facilities Engineering Systems Command (NAVFAC) manages and executes the Navy's ERP and coordinates all actions. Remedial Project Managers (RPMs) are responsible for the management of the DON ERP at the installation and/or site level. Navy and Marine Corps Public Health Center (NMCPHC) routinely provides support for community involvement activities for the DON ERP. As the risk communication subject matter expert for DON, NMCPHC provides support in the following areas: developing/updating CIPs; assisting with Restoration Advisory Boards (RABs); and assisting with general risk communication.

Most of the Navy's ERP activity began in the early to mid-80's. With the recent update to U.S. Environmental Protection Agency (EPA) per- and polyfluorinated (PFAS) drinking water regulation, it is evident, environmental cleanup and restoration, related to Navy activity will continue for more than 50 years. Ongoing collection of community concerns and level of awareness of Navy actions is essential to successful outcomes for all.

2. Use of the Information

To ascertain community concerns, community information needs, and how or when citizens would like to be involved in the CERCLA process, the Navy typically provides a qualitative survey several months before the development of a CIP. The survey includes multiple choice questions on areas of concern, as well as a section for open comments. The survey is typically open for one to three months. Survey respondents include local officials, residents, public interest groups, and other interested or affected parties within a specific mile range of the given ERP site. Community members are responding to the information collection to provide input for the required updated CIP. The survey is also used to solicit new RAB members and inform the Navy on community awareness and understanding of the ERP process. Surveys are anonymous and any personal information such as home address or names are stored per SECNAV M-52101, Records Management regarding retention and disposition requirements.

With this request, we are seeking approval to conduct the survey via Qualtrics. In past years, the standard collection process involved providing the survey to respondents on paper or conducting in-person or over-the-phone surveys via a Navy representative who collected and stored the data at a Navy facility. The main form of marketing the survey is during the annual RAB meetings, which is open to the media and the public. During the 2020 pandemic, in-person surveys were not feasible, so Navy ERP activities began utilizing a downloadable and fillable PDF version of the survey. Respondents were provided access to the survey via the NAVFAC website or their respective community's websites. Respondents downloaded the PDF, completed it electronically, and then returned it via email to the NAVFAC Public Affairs Officer of the site being worked. Electronic PDF surveys were also disseminated to the community through current RAB Members who sent them through their personal emails or posted them to their community websites using their personal marketing capabilities to ensure the community was aware of how to take the survey. Completed surveys could also be printed out and mailed through the United States Postal Service to the respective Navy Office that is facilitating the site cleanup. Additionally, specific community influencers or key organizations were identified to join the RAB and help disseminate the survey via email. Samples of all the communications described above are provided in the information collection request package for OMB's review. A phone number was provided on the website to residents who would rather call the Navy Point of Contact to provide verbal responses to the survey via the telephone. However, this process proved to be inefficient and not user friendly.

We are seeking to host the survey on Qualtrics because neither the in-person survey nor the fillable PDF have proven to be cost effective or convenient methods for community members to provide their input. Because NMCPHC provides communication and community support to Navy agencies in relation to environmental restoration and cleanup, it began pursuing a fully online option for the survey, with the goal of promoting the survey via Qualtrics by summer of 2024. Please note that no surveys will be fielded until the use of Qualtrics is approved internally. NMCPHC will submit a revised information collection request when this occurs to account for any changes.

All returned surveys are provided to the NMCPHC Environmental Health, Environmental Programs, Risk Communication Team. All collected data is analyzed and used in the development of a CIP. The data is also used to inform Navy RPMs in their decision-making process and determine if there is a need to provide further community education and awareness of the ERP site along with the CIP. Data is stored on a Navy-owned, government computer per SECNAVINST 5510.36B, DON Information Security Program.

The final result of the survey is to provide valuable information in the development of site-specific CIPs and inform the Navy ERP activity on whether there is a need to further develop any necessary communication strategies to specific audiences about a specific issue, event, or concern. The CIP provides the backbone of the community involvement program and serves as a useful resource that Navy teams often turn to during the cleanup for advice on appropriate activities for community involvement. Transitioning the survey to a more convenient online option via Qualtrics will provide a better return on investment.

3. Use of Information Technology

Data findings proved that the introduction of the fillable PDF surveys increased electronic collection and ease of dissemination. However, respondents reported that it was not user friendly. For this reason, NMCPHC is in the process of fielding the survey via Qualtrics, which will provide respondents a more convenient method of responding, increasing response rates. The collection will be conducted 100% electronically as soon as use of Qualtrics is approved.

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

For each site, surveys are conducted one time over a period of one to three months, and thereafter once every three to five years when the CIP needs to be updated. This cadence provides adequate information for the purpose of building tools to help involve and communicate to the communities affected by Navy environmental actions that can or may affect them.

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 35744.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, August 16, 2023. The 30-Day FRN citation is 88 FR 55672.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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 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.

The records schedule number is DAA-NU-2015-0006-0005. Cutoff at end of calendar year of last treatment. Destroy 75 year(s) after cutoff.

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

Community Environmental Concerns of U.S. Navy Clean Up Actions

- a) Number of Respondents: 178
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 178
- d) Response Time: 20 minutes

- e) Respondent Burden Hours: 59.33 hours
- 2) Total Submission Burden
 - a) Total Number of Respondents: 178
 - b) Total Number of Annual Responses: 178
 - c) Total Respondent Burden Hours: 59 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument
Community Environmental Concerns of U.S. Navy Clean Up Actions
 - a) Number of Total Annual Responses: 178
 - b) Response Time: 20 minutes
 - c) Respondent Hourly Wage: \$73.16
 - d) Labor Burden per Response: \$24.39
 - e) Total Labor Burden: \$4,340.83
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 178
 - b) Total Labor Burden: \$4,341

The average respondent hourly wage estimate is based on the average household income in Bethpage, New York. Bethpage is currently being cleaned up under the Navy Environmental Restoration Program and it was determined that the location serves as a good estimate for all future ERP locations. The hourly wage is based on the average household income of \$152,176 from American Community Survey estimates (<https://data.census.gov/table?q=Bethpage+CDP,+New+York+Income+and+Poverty&tid=ACSST5Y2021.S1902>).

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
Community Environmental Concerns of U.S. Navy Clean Up Actions
 - a) Number of Total Annual Responses: 178
 - b) Processing Time per Response: 2 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$50.16
 - d) Cost to Process Each Response: \$100.32
 - e) Total Cost to Process Responses: \$17,856.96
- 2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 178
- b) Total Labor Burden: \$17,856.96

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: \$17,856.96
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$17,857

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

16. Publication of Results

The results of each survey are published in a final CIP. Typically, a final CIP is housed on a NAVFAC website related to the environmental site. The current projected release of the Bethpage CIP is 2024. The purpose of publishing the data is to ensure transparency within the community being surveyed. The number of CIPs vary annually based on the needs of customers, who are required to update their CIP every three to five. There may be one to more than three publications per year.

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.