SUPPORTING STATEMENT - PART A

Web-based Legal Information Online System (WebLIONS)

OMB Control Number 0701-0161

Summary of Changes from Previously Approved Collection

- There has been a small increase in the respondent burden. However, this is due solely to a miscalculation in the previous request that excluded the burden for the AF Form 1175 in the total burden estimates submitted to OMB.

1. Need for the Information Collection

Information collection is necessary to create a profile in the Air Force Web-based Legal Information Online System (WebLIONS) for those seeking legal assistance from Department of the Air Force legal offices. The system collects and maintains individual's name, Electronic Data Interchange Personal Identifier Number (EDIPI), also referred to as the DoD ID number, financial records, personnel files, leases, tax documents, personal letters and documents, and all other information necessary to provide advice and assistance to respondents seeking legal assistance.

Authorities: 10 U.S.C. 9013, Secretary of the Air Force; 10 U.S.C. 9037, Judge Advocate General, Deputy Judge Advocate General: Appointment and duties; Air Force Instruction 51-304, Legal Assistance, Notary, and Preventive law Programs.

2. Use of the Information

Respondents to Web-based Legal Information Online System (WebLIONS) include active duty, retired military personnel, dependents of active duty and retired military personnel and Air Force civilian personnel stationed overseas. The completed online questionnaires are used during the intake process to determine an individual's eligibility for legal assistance, as well as assist attorneys in performing their official duties while providing services to their clients. WebLIONS also acts as a database to review and track cases as well as assist in conflicts checks.

When a respondent seeks legal assistance Air Force attorneys conduct an initial inquiry into eligibility and conflicts by entering the respondent's name and EDIPI number into WebLIONS. If the respondent previously sought legal assistance, other information, such as name, military branch, grade, addresses, and status will prepopulate into the next screen. However, if the respondent is seeking legal information for the first time, the respondent would have to provide such information to the attorney to determine eligibility for legal assistance. This information is vital to the sustainability and viability of continued Air Force support to legal assistance activities.

3. Use of Information Technology

The Agency uses electronic methods to collect the information approximately 95 percent of the time. Information is submitted online in a fillable online questionnaire by the attorney assigned to the case. The paper Air Force Form 1175, "Legal Assistance Record," is only used as a back-up when technological difficulties make WebLIONS inaccessible. In those circumstances, the information obtained on the AF Form 1175 is entered into WebLIONS as soon as the technological difficulties are resolved. The AF Form 1175 is immediately disposed of and destroyed once the data is entered into WebLIONS.

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 small businesses or entities.

6. Less Frequent Collection

Attorneys cannot access client information on WebLIONS or identify eligibility for services without entering the client's information into the system. As indicated through the screenshots, there is no mechanism for proceeding through WebLIONS without that initial information. The Agency would have to implement a new system for accessing clients' information if it was disallowed from collecting such initial information when accessing the system.

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 for the collection published on Friday, November 8, 2024. The 60-Day FRN citation is 89 FR 88740.

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

A 30-Day Federal Register Notice for the collection published on Friday, January 10, 2025. The 30-Day FRN citation is 90 FR 1979.

Part B: CONSULTATION

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 for this collection and is available on the system itself. It is accessible by clicking the link at the top right corner of the screen.

The published SORN (Legal Assistance Administration Records, F051 AFJA G) is available for review at the Federal Register website at https://www.federalregister.gov/documents/2008/12/31/E8-31044/privacy-act-of-1974-system-of-records.

A copy of the associated Privacy Impact Assessment for the Judge Advocate Functional Server (JAFS) has been provided with this request for review.

Records are retained in office files (T51-05-R-0600) until superseded, obsolete, no longer needed for reference, or on inactivation, and then destroyed by tearing into pieces, shredding, pulping, macerating, or burning. Computer records are destroyed by erasing, deleting, or overwriting.

11. Sensitive Questions

The system includes the collection of Electronic Data Interchange Personal Identifier Number (EDIPI), also referred to as the DoD ID number, in order to conduct eligibility checks for authorized military, dependent, and retirees before providing legal assistance. They also assist attorneys with conducting conflict checks, so the attorney does not represent or provide advice to opposing parties.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments
   WebLIONS
   a) Number of Respondents: 191,000
   b) Number of Responses Per Respondent: 1
   c) Number of Total Annual Responses: 191,000
   d) Response Time: 3 minutes
   e) Respondent Burden Hours: 9,550 hours

   AF Form 1175
   a) Number of Respondents: 3,000
   b) Number of Responses Per Respondent: 1
   c) Number of Total Annual Responses: 3,000
   d) Response Time: 3 minutes
   e) Respondent Burden Hours: 150 hours

2) Total Submission Burden
    a) Total Number of Respondents: 194,000
    b) Total Number of Annual Responses: 194,000
    c) Total Respondent Burden Hours: 9,700 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments
WebLIONS
    a) Number of Total Annual Responses: 9,550
    b) Response Time: 3 minutes
    c) Respondent Hourly Wage: $21.96
    d) Labor Burden per Response: $1.10
    e) Total Labor Burden: $209,718

AF Form 1175
    a) Number of Total Annual Responses: 3,000
    b) Response Time: 3 minutes
    c) Respondent Hourly Wage: $21.96
    d) Labor Burden per Response: $1.10
    e) Total Labor Burden: $3,294

2) Overall Labor Burden
    a) Total Number of Annual Responses: 194,000
    b) Total Labor Burden: $213,012

The Respondent hourly wage was determined by using the Defense Finance and Accounting Service Website (https://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.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 Instrument(s)
WebLIONS
    a) Number of Total Annual Responses: 191,000
    b) Processing Time per Response: 3 minutes
    c) Hourly Wage of Worker(s) Processing Responses: $21.96
    d) Cost to Process Each Response: $1.10
    e) Total Cost to Process Responses: $209,718

AF Form 1175
    a) Number of Total Annual Responses: 3,000
    b) Processing Time per Response: 3 minutes

c) Hourly Wage of Worker(s) Processing Responses: $21.96
d) Cost to Process Each Response: $1.10
e) Total Cost to Process Responses: $3,294

2) Overall Labor Burden to the Federal Government
   a) Total Number of Annual Responses: 194,000
   b) Total Labor Burden: $213,012

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: $213,012

2) Total Operational and Maintenance Costs: $0

3) Total Cost to the Federal Government: $213,012

15. Reasons for Change in Burden

There has been a small change in burden since the previous approval. However, this is the result of corrections made to calculation errors in the previous request.

16. Publication of Results

The results of this information collection will not be published for statistical use or analyses external to DoD.

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.