

SUPPORTING STATEMENT NTPR Forms

A. JUSTIFICATION

1. Need for the Information Collection

The Defense Threat Reduction Agency (DTRA) is a Department of Defense (DoD) 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 test 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, 150-A, 150-B, and 150-C serve as the collection vehicle.

Authority to collect this information is provided by PL 98-542 which appointed DNA (now DTRA) Executive Agent for the NTPR Program. It also required the Secretary of Defense to publish guidelines (see 32 CFR 218) describing DoD's process for generating radiation dose estimates. Overarching authorities include: 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 via postal correspondence and telephonic conversations from former DoD employees since the late 1970's. This information has primarily been used in support of radiogenic disease claims filed with VA and DOJ. In addition, this information has been used in radioepidemiology studies performed by the National Research Council and Institute of Medicine. These studies were frequently mandated by public law.

3. Use of Information Technology

The data collection process is primarily by paper forms mailed to the participant. DTRA's mailing to the participant includes a franked, self-addressed envelope for return mailing of the completed form. If any questions arise, NTPR Program staff contact the participant by phone to assist them. Although DTRA's NTPR Program maintains an elaborate website: <http://www.dtra.mil/>

the majority of the respondents are in their 70's and 80's and are not comfortable with web-based data collection. Data once collected, is maintained by DTRA as a structured query language database that is described most recently by a Privacy Act Notice in the Federal Register of Volume 70, Number 152, of August 9, 2005 (HDTRA 010 – Nuclear Test Participants). This notice may also be reviewed at: <http://www.dod.mil/privacy/notices/dswa/HDTRA010.html>

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 Business

No small business will be contacted during the collection of this information.

6. Less Frequent Collection

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

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require this collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. This information collection was published in the Federal Register on January 30, 2007 (72 FR 4246).

b. Comments received as a result of the 60-Day Notice:
No comments were received.

c. Nuclear participants will provide feedback on the validity of these forms. Changes to the forms will be made if changing requirements or scientific methodology mandates the change.

9. Gifts or Payment

No payment or gift will be provided to the respondents.

10. Confidentiality

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 federal government and contract staff on a need-to-know basis. The IT system (servers and workstations), hardcopy records, and correspondence are maintained in controlled physical spaces. The IT system has been certified by DTRA Information Assurance personnel as satisfying current DoD Information Assurance standards.

The SSN is collected for identification/tracking purposes. DTRA will follow policy and procedures for using another unique identifier if it is so decided by the Department. No decision by the Department has been made at this time.

11. Sensitive Questions

There are no sensitive questions asked in this information collection.

12. Estimates of Respondent Burden

a. Estimation of Respondent Burden:

| | |
|--------------------------|----------|
| Response per respondent: | 1 |
| Number of respondents: | 370 |
| Hours per Response: | 1.25 hrs |
| Total Burden: | 463 hrs |

b. Annual Cost to Respondent: Assuming an hourly wage of \$25/h, then the respondent cost becomes \$31.25. Total cost to respondents: \$11,562.50.

13. Respondent Costs Other Than Burden Hour Costs

- a. Total capital and start-up cost component: \$0.
- b. Total average annual operational and maintenance cost: \$0.

14. Cost to the Federal Government

a. Cost to Post Document to Nuclear Participant (prorated, since forms are included with other documents in mailing): \$300/yr

b. Cost for Analyzing the Comments and Maintaining Electronic/Paper Records: 740 hrs @ 100.00/hr \$74,000/yr

Annual Cost to Federal Government: \$74,300

15. Reasons for Change in Burden

This is a new collection resulting in an increased burden of 463 hours.

16. Publication Plans/Time Schedule

No plan at this time to publish this information for statistical use.

17. Non-Display of OMB Expiration Date

Approval not to display an expiration date is not being sought.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

No exceptions to the certification statement are being sought.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods for sampling.