

## SUPPORTING STATEMENT – PART A

### The United State of America Vietnam War Commemoration 0704-0500

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

10 U.S.C. Section 113 (Public Law 110-181, div. A, title V, Section 598, Jan 28, 2008, 122 Stat. 141), Program to Commemorate 50<sup>th</sup> Anniversary of the Vietnam War authorized the Department of Defense 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 family members of all nine million veterans who served, The United States of America Vietnam War Commemoration (known as the Commemoration throughout the rest of this document) established the Commemorative Partner Program. This program is composed of 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 American military POWs, immediate family members of those listed on the Vietnam Veterans Memorial in Washington, D.C., and immediate family members of those listed as unaccounted for 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 collects the basic information of where, when, how about the event and what materials will be needed and where to ship them. It is a one page fillable document that is preferably completed online. If the commemorative partner expects to recognize former 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 from the Vietnam War at their event, then the commemorative partner may submit Forms DDx711, DDx712 or DDx713. These one-page fillable forms request the information needed to properly produce the particular certificate of honor. The DDx711 is completed to request a certificate of honor for immediate family

members of those listed on the Vietnam Veterans Memorial. The DDx712 is completed to request a certificate of honor for former American military POWs. The DDx713 is completed to request a certificate of honor for immediate family members of those still listed as unaccounted for. 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, an 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 DD2957 is an optional form where partners can submit photos and report on the success of their event. Currently, we are seeing a 20% return on these forms. We estimate with our new website an increase of 5% and therefore estimate 25% of the partners that submitted a DD2956 will then submit a DD2957 after their event, which is outlined in Section 12. 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 into databases whereby the information can then be acted upon by staff. The Commemoration's new website which will roll out in July 2016 will be more robust and capable of transferring a significant portion of the data collected directly into a database instead of the manual input system the Commemoration has now. The Commemoration expects 80 percent of the information collection to be accomplished electronically. We estimate 20 percent submitted manually through fax or mail due to the potential lack of computer access of respondents.

### 4. Non-duplication

There are no other collections that request this type of information so there would not be any duplication of effort.

### 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. Conceivably, a partner organization may only fill out these forms twice a year if they desire support from the Commemoration.

## 7. Paperwork Reduction Act Guidelines

There would not be any special circumstances that require the 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

The 60-Day Federal Register Notice was published on February 16, 2016 with the comment period closing on April 18, 2016. The volume and page number of the 60-Day Federal Register Notice was 81 FRN 7768. No comments were received.

- 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 711, 712 and 713, consultations are conducted over the last three 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

The Commemoration is not offering compensation or gifts for this collection of information.

## 10. Confidentiality

After consulting with OSD Privacy, we were advised that a Privacy Act Statement is not required for any of the forms in the collection.

After consulting with OSD(GC) and OSD Privacy, we were advised that a SORN is not required because the records are not retrievable by PII.

For the DD Forms 711, 712 and 713, a 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. Because the information is being collected from Commemorative Partner organizations as third parties rather than directly from individuals, no Privacy Act Statement is included on the forms. A draft copy of the PIA has been provided with the package submission 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

The collection will not be asking questions of a sensitive nature.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours)
DD Form 711	1480	1	1480	15 minutes	370
DD Form 712	20	1	20	15 minutes	5
DD Form 713	500	1	500	15 minutes	125
DD Form 2956	8000	2	16000	15 minutes	4000
DD Form 2957	2000	2	4000	15 minutes	1000

Total	12000	7	22000	15 minutes	5500
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b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
DD Form 711x	1480	15 minutes	\$49.51	\$12.38	\$18,322.40
DD Form 712x	20	15 minutes	\$49.51	\$12.38	\$247.60
DD Form 713x	500	15 minutes	\$49.51	\$12.38	\$6,190.00
DD Form 2956	16000	15 minutes	\$49.51	\$12.38	\$198,080.00
DD Form 2957	4000	15 minutes	\$49.51	\$12.38	\$49,520.00
Total	22000	15 minutes	\$49.51	\$12.38	\$272,360.00

While 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 additional costs to respondents other than the labor burden costs addressed in Item 12.

14. Cost to the Federal Government

	Labor Cost to the Federal Government					
	DD Form 711x	DD Form 712x	DD Form 713x	DD Form 2956	DD Form 2957	Total
Number of Responses	1480	20	500	16000	4000	22000
Processing Time Per Response (in hours)	.25	.25	.25	.25	.25	.25
Hourly Wage of Worker(s) Processing Responses	\$49.32	\$49.32	\$49.32	\$49.32	\$49.32	\$49.32
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$12.33	\$12.33	\$12.33	\$12.33	\$12.33	\$12.33
Total Cost to Process Responses (Cost to Process) Each Response multiplied by Number of Responses	\$18,248.40	\$246.60	\$6,165.00	\$197,280.00	\$49,320.00	\$271,260.00

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$4,600	\$1,000	\$177,400	---	---	\$825,200	\$1,008,200

Operational and Maintenance Costs are calculated as follows:

- Equipment: Includes the annualized cost of computers and printers dedicated to processing of this collection
- Printing: Includes the cost for toner and printing supplies.
- Postage: Includes the shipping costs to provide the completed products to requestors, and the cost to produce the Certificates of Honor, the accompanying lapel pins and presentation folders.
- Other: Includes the cost of certificate production, the accompanying lapel pins and presentation folders, and the proportional cost of development of the organization’s website and online database used to manage the DD Form 2956 & 2957 collection (the organization’s website development is not fully dedicated to this collection).

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$1,008,200	\$1,356,300	\$2,364,500

15. Reasons for Change in Burden

For the DD Forms 2956 & 2957, previous burden estimates were one response at 15 minutes per respondent per year. The number of Commemorative Partners (respondents) has increased from the previous estimate as has the number of responses per year. Previous estimates were prepared before program launch, while current estimates are projections based on actual responses after program launch. Additionally, original estimates did not attach an estimated labor cost to respondents' time, nor did they capture the total program costs associated with the forms for the Federal Government, such as postage, maintenance of a website and database for managing responses, etc.

The DD Forms 711x, 712x, & 713x are new forms associated with a new part of the Commemorative program. Respondent and Federal Government costs are projections based on actual assessment of time and costs associated with the existing Commemorative events program.

#### 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

The United States of America Vietnam War Commemoration is not requesting approval to omit the display of the expiration date of OMB approval.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

The Commemoration is not requesting any exemptions.