

## **Supporting Statement for the ESMD Student Internship Application - Paperwork Reduction Act Submissions**

### **General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### **Specific Instructions**

#### A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is an online application for the Exploration Systems Mission Directorate (ESMD) Student Internship program. This is a 10 week student internship that is part of a NASA Agency-wide Higher Education Program funded by ESMD. All NASA Centers are able to participate in the project. The Program must select student candidates via a competitive process, and in order to do so must collect personal information in an application. General contact information is required from each applicant (name, address, email, etc.) as well as information on their student data, along with supporting documents that verify their qualifications (transcripts, reference letters, and other supporting documentation).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information is collected on a NASA secure Process Based Mission Assurance (PBMA) website <http://pbma.nasa.gov/>. Applicants must apply for membership to the secure website in order to review or access their application through <https://secureworkgroups.grc.nasa.gov/esmd-space-grant>. Only designated administrators for the ESMD Space Grant program at KSC have access to the student data. The Project is advertised to approximately 900 universities that are in the National Space Grant Consortia network. Advertisement for the Project is accomplished by sending a flyer to each of the 52 Space Grant Directors. The Space Grant Consortia distribute this information to the affiliated universities. The information that is collected on the application is needed to competitively select students to participate in the 10 week internships. After the students are

selected, the information will be retained throughout their work period. It will be deleted after the student leaves. Only contact information (for longitudinal tracking purposes) will be retained.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The applications will be collected within a verified secure online system, funded by NASA and currently used by the NASA Mission Assurance organization, as well as various other NASA organizations. This system allows the use of electronic submission of responses within a secure system. Once the data is requested, it will not need to be requested again for students who are selected as participants.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2.

No such similar data exists. Applicants must apply for this specific opportunity.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

N/A: The collection of this data does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information is not allowed to be collected, then the Program cannot exist. Candidates must apply for the Program, and to do so they must enter their personal data to show eligibility for the program, as well as providing contact information so that we may contact them when they are accepted. Applying for this opportunity is completely voluntary. Data is only collected once during the program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- \* requiring respondents to report information to the agency more often than quarterly;
- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- \* requiring respondents to submit more than an original and two copies of any document;

- \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- \* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- \* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None of the special circumstances that are listed in #7 are applicable for this program.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

N/A

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts or payments will be given to applicants. Those that are selected will receive a stipend for their labor.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All collected data is confidential. Only designated administrators for the ESMD Space Grant program at KSC are allowed access to information submitted by

applicants. The system being used is a verified secure online system, which was funded by NASA and currently used by the NASA Mission Assurance organization, as well as various other NASA organizations.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

N/A – there are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

\* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

\* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

The number of respondents will depend on the number of applicants, however, there were approximately 292 applicants in the past year. Applicants only need to apply one time to be considered for the program. The application can be completed in approximately 30 to 60 minutes. This burden was estimated by having four people complete the application as a pilot-test. The maximum estimated burden is computed to be: 292 applicants X 1 hour = 292 hours.

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

\* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors

including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

\* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use **10/95** existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The application form is being filled out by students on a voluntary basis on their own time. Therefore, the respondent cost is \$0. .

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized Costs to the Federal Government:

#### **Start-up costs incurred**

The cost incurred to create the application on PBMA are estimated to take approximately 5 hours, and will be completed by a Chickasaw Nation contractor. The cost incurred for this labor is estimated to be approximately \$150.00.

#### **Operation and Maintenance Costs**

The PBMA website is operated by Ares Corporation which is a NASA contractor. The ESMD Space Grant Educational Projects working group is one of hundreds. The site is of no cost to the KSC Educational Office, however there is a cost associated with this service contract (Ares). At this time the KSC Educational Office is not privy to that information.

Review and selection of the applications will be performed by a Chickasaw Nation contractor, overseen by a GS 13. The cost incurred for this labor is estimated to be approximately 150 hours, totaling approximately \$4500.00.

O&M will be maintained by a GS 13 at KSC. It is estimated that 40 hours/year will be allotted to maintenance of the website. 40 hours = \$1520.00

Start-up Costs:	\$ 150.00
Review Costs:	\$4500.00
<u>O&amp;M:</u>	<u>\$1520.00</u>
Total:	\$6170.00 start up costs

Yearly costs: \$1520.00

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

N/A

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The data collected from the applications will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

N/A

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement identified in Item 19. This online application is compliant with 5 CFR 1320.9 and all information required by 5 CFR 1320.8(b)(3) has been identified and explained in previous items in this statement.

## **B. Collections of Information Employing**

### **Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The last request for student applications resulted in 292 applications submitted with all required paperwork.

2. Describe the procedures for the collection of information including:

- \* Statistical methodology for stratification and sample selection,
- \* Estimation procedure,
- \* Degree of accuracy needed for the purpose described in the justification,
- \* Unusual problems requiring specialized sampling procedures, and
- \* Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

Students will only be allowed to submit applications when there are intern opportunities available. The application site will be closed when applications are not being accepted, therefore, students will not fill out applications unnecessarily.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Intern opportunities are promoted through the existing national Space Grant Consortia network, as well as other existing NASA venues, such as the portal.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

Applicants will only be asked for the minimal amount of information needed with regard to contact information, and enough technical and student information to be evaluated by potential technical mentors.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Statistical aspects do not apply for the manner in which this application is being used. All eligible applicants will be considered. The information is collected and analyzed by Theresa C. Martinez, 321-867-0590, NASA-KSC employee and Susan G. Sawyer, 321-867-5482, CNI contractor.