

## SUPPORTING STATEMENT

Department of Defense Education Activity (DoDEA) Non-Sponsored Research Program

### A. JUSTIFICATION

#### 1. Need for Information Collection.

The Department of Defense Education Activity (DoDEA) is a DoD Field Activity operating under the authority, direction, and control of the Principal Deputy Under Secretary of Defense for Personnel and Readiness. DoDEA provides education to eligible Department of Defense military and civilian dependents from preschool through grade 12 at sites both in the United States and overseas. The DoDEA operates 199 schools in four areas located in 13 foreign countries, seven states, Guam, and Puerto Rico.

DoDEA receives requests from researchers both internal to DoDEA as well as outside the Federal government or the Department of Defense to conduct research studies in DoDEA schools and districts. This information collection is needed to aid in the systematic and consistent collection of information on proposed research in accordance with guidelines established in DoDEA Administrative Instruction 2071.3, "Department of Defense Education Activity Administrative Instruction: Research Approval Process." The information gathered is also necessary to ensure that the proposed research provides adequate protection to human subjects as outlined in DoD Directive 3216.02, "Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research."

#### 2. Uses of the Information.

DoDEA receives requests from members of the public to conduct research involving DoDEA schools, teachers, principals, students and parents. These members of the public include, but are not limited to: students and faculty at institutions of higher learning, independent researchers, profit and non-profit organizations, as well as private individuals. To aid in the systematic and consistent collection of information on the proposed research, DoDEA developed and is proposing to implement DoDEA 2071.3 Form 1, "Research Study Request" in DoDEA Administrative Instruction 2071.3 (DoDEA AI 2071.3), "Administrative Instruction."

The information gathered from individuals through this proposed form includes: contact information for the researcher submitting the request, school or organizational affiliation (if applicable), summary of the proposed research, an explanation of how the research study is aligned with the DoDEA Community Strategic Plan, how the proposed study will impact the researcher's field of study, the major hypothesis(es) or question(s) to be tested, the population and/or sample to

be studied, a description and copy of all proposed instruments, data collection activities, the timetable for the study, IRB approval for the study, and the statistical or other analytic techniques to be used during the study.

Detailed information regarding the proposed research is necessary to enable DoDEA to properly evaluate the research proposal to determine if the proposed research ensures that the proposed research is of sound technical quality; does not unduly interfere with the classroom instructional process or the regular operations of the school, district, and/or areas; and adheres to all federal laws. The information gathered is also necessary to ensure that the proposed research provides adequate human subjects protection to individuals selected for the proposed research (e.g. students, teachers, parents, principals) outlined in DoD Directive 3216.02, "Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research." Personal information, such as name, address, email address, phone number are necessary for DoDEA to correspond with individuals regarding their research request and to distribute approval documents.

### 3. Improved Information Technology.

One of the goals of DoDEA is to improve the speed and quality of reviews of research proposals. Information technology will be used whenever possible to reduce the burden on the respondents as well as increase the efficiency with which the review process is completed. All required forms will be created in an electronic and printable format and will be available online for easy access through the official DoDEA homepage ([www.dodea.edu](http://www.dodea.edu)). All forms will be made available in both Microsoft Word and pdf format. Although applicants will be encouraged to complete and submit forms to DoDEA electronically, applicants will also be provided the option to mail or FAX hard copies of all forms to DoDEA.

### 4. Efforts to Identify Duplication.

The information sought by this information collection is not available from other government agencies or other sources. DoDEA has an internal research and evaluation office charged with reviewing each research request. Submitted requests will be logged into a database and updated and maintained by research and evaluation staff to prevent internal and external duplication of effort.

### 5. Methods Used to Minimize Burden on Small Entities.

This information collection does not involve small businesses or small entities.

### 6. Consequences of Not Collecting the Information.

Without this collection, DoDEA will be unable to properly evaluate proposed research and ensure that the proposed research abides by DoD Directive 3216.2,

“Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research.”

7. Special Circumstances.

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency.

An agency 60-day Federal Register Notice was published in 70 FR 73210-73211, December 9, 2005, as required by 5 CFR 1320.8(d). No public comments were received in response to the notice.

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9. Payments to Respondents.

Applicants will not receive any monetary payments or gifts associated with completion of the proposed forms.

10. Assurance of Confidentiality.

This information collection does not ask the respondent to submit proprietary, trade secret, or confidential information to the Department.

The information received by DoDEA will be consistent with the requirements of 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130 and maintained according to System of Records, DoDEA 27.

Information collected electronically will be stored on a secure server accessible only by research and evaluation staff; and all hard copies will be stored in a locked file drawer accessible only by research and evaluation staff. Confidentiality during the review process of research proposals will also be ensured by deleting all

personally identifiable information from research proposals, such as name and affiliation, prior to distribution to staff outside of research and evaluation for review.

11. Sensitive Questions.

Questions of a sensitive nature are not applicable to this information collection.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information.

| Burden Estimates           |          |
|----------------------------|----------|
| Total annual respondents   | 75       |
| Frequency of Response:     | 1        |
| Burden hours per response: | 1 hour   |
| Total burden hours:        | 75 hours |

b. Explanation of how burden was estimated.

This is a new information collection and DoDEA does not know at this time how many members of the public will submit research proposals. DoDEA estimates that 75 individuals annually will submit requests. Estimates for burden hours were based on DoDEA Research and Evaluation staff completing the proposed form.

c. Labor Cost to Respondent.

Estimated labor costs to the respondents based on an average of 60 minutes are:

|                    | Low* | Medium**<br>N= 45 | High***<br>N=30 | Total      |
|--------------------|------|-------------------|-----------------|------------|
| <b>Respondents</b> |      | \$929.70          | \$918.60        | \$1,848.30 |
| <b>Total</b>       |      |                   |                 | \$1,848.30 |

\*\$5.85 per hour \*\*\$20.66 per hour \*\*\*\$32.72 per hour

13. Estimates of Other Cost Burden for the Respondent for Collection of Information:

a. Total Capital and Start-up Cost. There are no capital or start-up costs associated with this information collection.

b. Operation and Maintenance Cost. There are no operational or maintenance costs associated with this collection if individuals submit forms electronically. However, costs for printing and postage will be required if individuals choose to submit their forms in hard copy.

14. Annualized Cost to the Federal Government.

The estimated annualized cost to the Federal Government is \$10,875. This estimate is based on hourly costs of DoDEA staff. The amount of time and expense incurred by the Federal Government is due to the review of all research proposals, including data management, correspondence with applicants, and review of research proposals.

|   | Hours | Cost     |
|---|-------|----------|
| Cost to print notification letters (GS5-\$14per hour)           | 75    | \$1,050  |
| Cost of computer data management (GS9 \$22 per hour)            | 37.5  | \$825    |
| Cost to review research proposals (GS13/14 - \$40 per hour)     | 150   | \$6,000  |
| Cost to coordinate research proposals (GS13/14 = \$40 per hour) | 75    | \$3,000  |
| Total cost to the government                                    |       | \$10,875 |

15. Changes in Burden.

Changes in burden are due to a new information collection.

16. Publication Plans/Time Schedule.

The information gathered is for internal use, no publication or reporting of information will occur.

17. Approval Not to Display Expiration Date.

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

18. Exceptions to the Certification Statement.

DoDEA is not seeking approval to exempt the display of the expiration date of the OMB approval.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methodology and selection of a sample do not apply for this information collection.