

SMART Scholarship Program

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Need for the Information Collection

Describe the information collection activity under review. Explain precisely why it is necessary; i.e., why the Department of Defense needs the information required by the proposed collection. Identify any legal or administrative requirements that mandate the collection, and include the title page and relevant portions thereof in your proposal package. Also include a copy of the relevant portions of any other statutes or regulation referenced in this supporting statement.

The information collection activity under review is a statutory and functional requirement of the Science, Mathematics and Research for Transformation (SMART) Scholarship Program as part of the National Defense Education Program and pursuant to 5 USC §3304 and 10 USC §2192a. Collection of information is necessary to administer the SMART Scholarship Program.

2. Use of the Information

Be specific in describing how, by whom, and for what purpose the information is to be used. Unless this is a new collection, describe how the information has been used in the past. Identify all formats used to collect the information in this paragraph.

Information collected will be used as needed by authorized SMART Scholarship Program officials to review new applicant's qualifications for participation in the SMART Scholarship Program, and monitor current participant's progress in the SMART Scholarship Program. Formats for collection include hard-copy official documents, email correspondence, secure online database entries by applicants to, and participants in, the SMART Scholarship Program, and secure online database entries made on behalf of the same by SMART Scholarship Program officials.

3. Use of Information Technology

Does the information collection involve the use of technological collection techniques; e.g., electronic response submission? Describe any consideration given to the use of information technology in reducing the respondent burden or why its use is not appropriate to the specific collection.

The majority of information collection is executed via technological means, including those outlined in Part A, Section 2 of this statement. Technological collection methods have been deemed most efficient for collection of SMART Scholarship Program information of all types, as they reduce respondent and collector burden.

It is expected that 5% of responses will not be able to be completed electronically for various reasons including respondents having intermittently limited access to electronic media and that some responses will require original signatures. All other information collection from respondents is expected to be via electronic media.

4. Non-duplication

Is there information already available which can be used, or modified for use, for the purposes of this collection?

No

5. Burden on Small Business

If any of the respondents are small businesses or other small entities, discuss efforts taken to minimize the burden imposed by this collection; i.e., developing separate or simplified requirements, etc.

Not applicable. Respondents are not small businesses or entities.

6. Less Frequent Collection

What would be the consequences if the collection were conducted less frequently? If there are technical or legal obstacles to reducing the burden in this manner, explain.

Less frequent information collection would result in failure to appropriately administer the SMART Scholarship Program as required by statute.

7. Paperwork Reduction Act Guidelines

Explain 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).

Not applicable. No special circumstances exist.

8. Consultation and Public Comments

a. Identify the date and page number of publication in the Federal Register of the Agency's 60-day notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Include a summary of any public comments received as

a result of the 60-day Federal Register Notice, and address actions taken in response to those comments. If no comments were received, so state.

July 24, 2009 (74 FR 36675). No comments were received.

b. Describe efforts made to consult with persons outside the sponsoring Agency regarding availability of requested information, frequency of collection, clarity of instructions, etc. Consultation with respondents, or their representatives, should occur at least every 3 years, even if the information collection does not change. If there are circumstances that mitigate against consultation, explain. This item does not refer to consultants, per se. Rather, it addresses the act of consulting with others to determine continued viability of collection elements, procedures, etc.

Information collection efforts are constantly being adjusted based upon feedback, mostly via email and other electronic media, from all stakeholders: SMART participants, mentors, academic advisors, Department of Defense civilian employees, etc.

9. Gifts or Payment

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

Not applicable. No such gifts or payments exist.

10. Confidentiality

Describe the extent of confidentiality inherent in the information collection. Address such things as protection provided against disclosure of information containing personal or organizational identifiers, disposal of completed forms or surveys, etc.

When an assurance of confidentiality is provided, the respondent is being asked to submit proprietary, trade secret, or confidential information to the agency. In turn the agency is assuring the respondent that it has instituted procedures to protect the confidentiality of the information to the extent permitted by law. Some laws governing confidentiality carry large penalties for the agency if the information is not protected properly. In addition, collections including an assurance of confidentiality must be supported by an authority established in statute or regulation.

Specifically address any assurance of confidentiality provided to respondents. Explain the basis for this assurance as provided in statute, regulation, or Agency policy.

Provide the Privacy Act System of Records Notice (SORN) ID number and title and address whether or not a Privacy Impact Assessment has been accomplished. Include a copy of the SORN and the PIA in the information collection package.

Under the Privacy Act of 1974, all Personally Identifiable Information (PII) collected is protected and secured appropriately. The use of any and all other information collected from respondents is exclusively internal, without exception. Respondents are informed of their privacy rights and have agreed prior to information collection to the terms and conditions of the collection (i.e. statutory and functional necessity). System of Records Notice ID number: DUSDA 14.

11. Sensitive Questions

Provide thorough justification for any questions of a sensitive nature, such as those pertaining to sexual behavior or attitudes, religious beliefs, race and/or ethnicity, or other matters usually considered private such as the collection of the SSN. Does the question violate the Privacy Act (Reference (w)), as implemented by DoD 5400.11-R (Reference (k))? What explanation of the necessity for collecting this data will be provided the respondents prior to their responding?

Questions of a sensitive nature (e.g. race and/or ethnicity) are not obligatory and do not violate the Privacy Act. All questions of such nature are used exclusively to provide baseline demographic data for internal use.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Explain how the burden estimate reported in Item 13 of the OMB Form 83-I was determined. While not required, consultation with a sample of the potential respondents is desirable. Remember, however, that your sample must be of fewer than 10 potential respondents or the sample effort itself must be approved by OMB.

The estimated total number of respondents in any given year (1,000) is expected to provide information four (4) times annually, at an estimated rate of fifteen (15) minutes per response.

If the collection consists of more than a single instrument of collection; i.e., form, survey, questionnaire, etc., provide burden estimates for each instrument, and aggregate the total burden in Item 13, of OMB Form 83-I.

b. Labor Cost of Respondent Burden

Provide an estimate of annualized cost to respondents of only the burden hours imposed by the collection. Do not include capital, start-up, contracting out, or operations and maintenance costs. Respondent cost other than burden hour costs should be shown in Item 13 of the Supporting Statement.

The annualized cost to respondents is based upon an annual requirement of one hour per respondent. The estimate for all respondents is \$25,000 (burden rate of \$25 per hour @ 1,000 hours)

13. Respondent Costs Other Than Burden Hour Costs

Provide an estimate of annualized costs to respondents, other than the burden hour costs addressed in Item 12, resulting from the collection of information. This item expands upon the entries in Item 14 of OMB Form 83-I. Break this item into two components:

a. Total capital and start-up costs annualized over the expected useful life of the item(s). Capital and start-up costs include the purchase of computers and software; testing equipment; and record storage facilities.

There are no anticipated costs associated with the operation of the system. It is reasonable to assume that all respondents (as they are either students or government employees) will have access to a computer and the internet without incurring a direct cost for those services.

b. Total operation and maintenance costs. Take into account those costs associated with generating, maintaining, and disclosing or providing the information. O&M costs include such activities as contracting out for services and operational expenses, e.g., postage and printing.

There are no anticipated operation and maintenance costs associated with the operation of the system.

14. Cost to the Federal Government

Annualize the costs incurred by the Federal Government in collecting and processing the information collected, and explain the methods used in determining these estimates. Include such elements as quantification of hours, operational expenses; i.e., equipment, overhead, printing, support staff, postage, contracting out for services, etc., and any other expense that would not have been incurred without this information collection. These costs, along with those estimated in items 12 and 13, may be aggregated in a single table.

The following outlines the cost to the Federal Government:

a. Design, testing, and evaluation (one-time): \$475,000

b. Operation and maintenance (annually): \$50,000

The SMART Program contracted with the Defense Technical Information Center (DTIC) to design, test, and evaluate the database. The operation and maintenance budget does include some funds for technical adjustments to the system.

15. Reasons for Change in Burden

Briefly explain the reason for change in burden, if any, as indicated in Item 13 of OMB Form 83-I. Remember that any proposal which starts from a current OMB inventory of "0" hours must be a Program Change, e.g., reinstatement of a previously approved collection for which approval has expired or a new collection. (See OMB Form 83-I for explanation of program change or program adjustment.)

This is an existing collection in use without an OMB Control Number. However, the database is a new method of collecting the information and will become operational upon approval of this collection.

16. Publication of Results

If the results of the information collection will be published for statistical use, outline plans for tabulation, statistical analyses, and publication. Provide a timeline for the entire project including the beginning and ending dates of the actual collecting of information, estimated completion date of the report, its publication date, as well as any other scheduled actions.

Not applicable. Results of information collection will not be published.

17. Non-Display of OMB Expiration Date

If you are requesting approval to omit display of the expiration date of OMB approval on the instrument of collection, provide justification for this request.

Not applicable. Display of expiration date omission not requested.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

Use this item to explain any provision of Item 19.a of OMB Form 83-I to which you cannot certify. You should also have identified these items at the bottom of Item 19.a. Unless you can demonstrate that these exceptions are necessary to satisfy statutory requirements, or other substantial need, OMB will not approve the collection of information.

Not applicable. No exceptions exist.