

Supporting Statement for Paperwork Reduction Act Submission

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 to request OMB approval for a for a one-year extension in the approval of the INSPIRE application. During this time, we will develop a new application process whereby we ask for parental/legal guardian permission first before allowing students to apply. We will also review the application questions to ensure we are within the intent of applicable laws and regulations.

The Interdisciplinary National Science Project Incorporating Research and Education Experience, or INSPIRE, is a multitier year-round program designed for students in ninth to 12th grade who are interested in science, technology, engineering, and mathematics (STEM) education and careers.

The online application is necessary for students to apply for selection to Online Learning Community (OLC) of NASA's Interdisciplinary National Science Program Incorporating Research and Education Experience (INSPIRE) in May each year.

The centerpiece of INSPIRE is the Online Learning Community, or OLC. The OLC provides a place for INSPIRE students to interact with their peers, NASA experts and education specialists. Through grade-level-appropriate educational activities, chats and discussion boards, students and their families are exposed to the many careers and opportunities NASA has to offer. In addition, the OLC provides the parents/guardians of participating students with resources designed to help them champion their child's education and career goals.

In February each year, students in the OLC have the option to update their applications to compete for grade-appropriate summer STEM experiences. The summer STEM experiences are designed to provide hands-on opportunities to investigate education and careers in STEM at a NASA facility or a participating College/University.

There is no legal requirement or mandate that necessitates the collection of the data requested. There is an administrative requirement in that students who wish to be considered must provide 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 will be collected via an on-line application system and reviewed by an INSPIRE project specialist at the appropriate NASA Center to determine minimal eligibility. The applications will then be reviewed and interviewed conducted by a selection panel.

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 collection of information is made by the use of a Web-based on-line application system and a database of applicant information.

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 above.

There is no duplication of information to be collected since students will apply to the OLC for consideration only once. To apply for the grade-appropriate summer experience in February, students update their original OLC application by submitting an essay, a current academic transcript, and the names and email addresses of three individuals as character references.

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.

There is no impact on small business or other small entities since this involves individuals applying for consideration.

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.

The consequence to not collecting the applicant information will be that candidates cannot be considered unless the information is provided and informed decisions cannot be made in selection of the best qualified candidates.

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.***

The only potential confidential information that may be provided would be the student's social security number that may be on the official transcript. Most schools have deleted all but the last 4 digits, but some transcripts may still include the SSN. Paper copies of the application would be kept in a locked cabinet when not in use and would be made available to the selection panel only. Otherwise, none of the special circumstances mentioned above apply. The INSPIRE application package, which also includes instructions, indicates in the "TRANSCRIPT" section that if students are sending their transcript directly to NASA to please mark over their social security number with a black marker if the number is provided. We also ask the student that if their school is sending the transcript directly to NASA to ask the school to mark over your social security number with a black marker if possible.

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.

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

Not applicable.

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

The limited personally identifiable information collected through the application process is not accessible to the applicant or the site administrator without a valid login and password. Privacy statement is posted on the INSPIRE Web site.

INSPIRE has established an applicant database for the purpose of applicant selection. Applicants will only have access to their own data with a valid login and password.

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.

Not applicable.

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.**

We estimate that about 2000 students will complete the application, spending an average of two (2) hours each. This totals 4000 hours Annually.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers 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 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.*

There is no cost to applicants.

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 are estimated at \$80,502. This represents an estimate of \$60,000 (173.91 man hours @ \$28.75 per hour x 12 months) for operational expenses and \$20,502 (306 hours @ \$67 per hour) for application revision, review and selection.

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

N/A. The application has not changed substantially from the original approval other than it is now web based.

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 results of the application collection will not be published.

Once the application window is closed, representatives at each of the 10 NASA centers retrieve applications for students in their regions.

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.

The OMB number will be displayed within the application Web site.

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

Not applicable.

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.

Not applicable. No respondent selection methods will be used. No statistical analysis will be conducted.

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.***

Statistical methodology for stratification and sample selection:

Due to the subjective and individual nature of every application, statistical methods are not used. Instead, each application is reviewed on a case-by-case basis.

This is an annual data collection.

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.

The opening of the application window for the INSPIRE project is highly publicized through various NASA Web sites and other existing mechanisms used to inform the education audience of products and services available to them by NASA.

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.

No tests of procedures or methods are anticipated.

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.

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