

NASA JSC Cooperative Education Program (COOP) Supporting Statement

Annually, the JSC Cooperative Education Program (COOP) Application will collect rental property information from members of the public (landlords) who have rental properties available for use by JSC cooperative (co-op) employees and interns.

Collection Name	Start	End	Purpose	Method	Population	Est. # Respondents	Burden Hours
NASA JSC Cooperative Education Program Application	Aug. FY11	Aug. FY14	To identify rental properties available for use by to new and returning NASA co-ops and interns who are travelling into the JSC area from distant Texas cities or out-of-state.	Verbal interviews	Landlords (public citizens) in and around the JSC area	101	8.4 per year

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.

NASA Johnson Space Center (JSC) regularly employs cooperative (Co-op) and Intern employees. Access to this information, prior to co-op and intern arrival, would facilitate advance housing arrangements, and ease the burden of securing housing after arrival. There are no legal or administrative requirements for this data collection. Respondents provide this information voluntarily, and are notified as to how the supplied information will be used.

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.

Information is verbally collected from public citizens (landlords) by current JSC Human Resources Office (HRO) interns and co-ops. Because many co-ops and interns travel into the

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JSC area from distant locations, it was determined to be prudent to identify rental properties that can be used by those persons, prior to their arrival for duty.

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.

Respondents will be contacted directly by JSC HRO personnel and verbally interviewed. The information is then entered into a computer database and displayed on an Internet Information Server (IIS) web page. NASA interviewers use a questionnaire to gather information from the respondents. Collected data is retained as long as the respondents desire to list their properties as available for rent. Rental information is removed from the database immediately (or as soon as possible) when the respondents no longer wish to list their properties as available for rent. There is no way to determine if a property is (already) occupied, but modifications are planned to add that functionality to the system.

Because NASA personnel (co-ops and interns) conduct phone interviews with the prospective landlords using the questionnaire form, there is no burden placed on the landlords, save the time spent on the phone. Landlords are not granted access to the website and not required to personally fill out any forms; however, we are evaluating that functionality for future consideration.

Data is not directly collected from respondents using any automated, electronic, mechanical, or other technological means. Because the public is involved, it was determined less secure to give the landlords the ability to update the information about their rental properties. The burden is removed from the members of the public by having NASA personnel assume the task of entering and updating the information.

The COOP Application Questionnaire defines the interviewer's questions. There are no instructions required for the landlords. Personnel entering rental property information into the database transfer the information from the (paper-based) Application Questionnaire to an on-line version of that form.

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.

The information collected is publicly and readily available. However, the COOP application maintains rental property information from previously identified and JSC-preferred landlords whose preference is to provide temporary housing for JSC co-ops and interns.

In contrast to similar applications (e.g., Craigslist.org, et al), NASA vets the landlords participating in the Housing program, by conducting pre-approval site inspections and interviews. We establish a relationship with these landlords to ensure that they provide properties that are appropriate and safe for our (co-op and intern) personnel.

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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.

Small businesses will not be impacted.

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.

There is no impact to the Federal program or policy activities if the collection is not conducted or decreased. However, if this information is not collected, the burden would be placed on co-ops and interns, who are not familiar with the JSC area, to locate rental properties on their own. Additionally, co-ops and interns may find it necessary to acquire a hotel/motel room while attempting to locate rental properties in the JSC area. The alternative would be to provide the co-ops and interns with a [paper list](#) of rental properties, by U.S. mail, thereby defeating the spirit of paperwork reduction efforts. The properties list could be provided to each co-op and/or intern by electronic mail, resulting in unnecessary duplication of effort.

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 rotational period for JSC co-ops and interns is approximately 60 days. For accuracy, new information is collected and/or existing data updated near the end of that rotational period;
- Respondents are not required to submit self-completed documents; the information is verbally collected and entered into the database by JSC personnel (current co-ops and interns);
- Only the original of collected information is used; additional copies are not required;

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- Retention of collected data is not required, and is utilized only as long as respondents wish to participate in the program, or until respondents are removed from the program for any reason(s) deemed appropriate by JSC HRO personnel;
- Data collected is not used for statistical analysis or classification not approved by OMB;
- Data collected is of a “readily available, public” nature, and therefore, does not require a pledge of confidentiality;
- Data collected does not include any proprietary trade secrets or other confidential information.

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.

N/A

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

Because the collected data is publicly available, assurance of confidentiality is not required. However, the web page (URL) that displays the collected information is not publicized, and requires a USERNAME/PASSWORD combination to access, which is shared amongst participating co-ops and interns. The USERNAME/PASSWORD combination is used, not primarily for security reasons, as for access tracking.

JSC is in the process of placing a disclaimer on the website “login page”, stating that the site/application is for authorized use by NASA personnel. The disclaimer is as follows:

This is a U.S. Government System. This system is for the use of authorized users only. By accessing and using the computer system, you are consenting to system monitoring, including the monitoring of keystrokes. Unauthorized use of, or access to, this computer system may subject you to disciplinary action and criminal prosecution.

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NASA/JSC co-ops and interns are vetted through the Agency On-Boarding process (i.e., background checks, training, badging, access control, etc.).

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.

The only question asked that is of a “private nature” is “Marital Status” of the respondents (landlords). This information is requested, and provided on the web page display, as a means of potentially protecting the safety of single co-ops and/or interns who do not wish to rent available rooms, located in single-family homes, owned and occupied by single male or female landlords.

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 2 active co-ops/interns will spend an average of 40 - 45 minutes each, per duty rotation (60 days) collecting and updating information in the COOP database. This totals approximately 8.4 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

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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 respondents or recordkeepers.

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 negligible or NONE.

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

Collected data is added (if new) or updated (if existing) every 60 days.

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 collected information is neither published nor advertised by NASA. The collected information is already a matter of public record and may be published in local periodicals that frequently advertise rental properties. There are no current plans by JSC to further publish the collected data.

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.

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None