

# Supporting Statement for Paperwork Reduction Act Submission

## A. Justification for KEEP (Kennedy Educational Experiences Program)

**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.**

In May 2005 a report by the National Academies entitled "*Rising Above the Gathering Storm: Energizing and Employing America for a Brighter Economic Future*" proposed four broad recommendations to enhance the science and technology enterprise so the United States can successfully compete, prosper, and be secure in the global community of the 21st century: 1) increase America's talent pool by vastly improving K-12 science and mathematics education; 2) sustain and strengthen the Nation's traditional commitment to long-term basic research; 3) make the United States the most attractive setting in which to study and perform research; and 4) ensure that the United States is the premiere place in the world to innovate. To support the recommendations, NASA is taking a leading role to KEEP interest in science, technology, engineering, and mathematics (STEM), as few other organizations can through its unique mission, workforce, facilities, research, and innovations. NASA is also taking a leading role to make significant impacts in engaging underserved and underrepresented communities in STEM. NASA's founding legislation, the Space Act of 1958, directs the Agency to expand human knowledge of Earth and space phenomena and to preserve the role of the United States as a leader in aeronautics, space science, and technology. High achievement in STEM education is essential to the accomplishment of NASA's mission. To facilitate the recommendations, NASA-Kennedy Space Center (KSC) is implementing a program entitled KEEP (**Kennedy Educational Experiences Program**). KEEP is a job shadowing program intended to provide students with career exploration under the mentorship of a NASA- KSC or contractor employee.

Shadowing provides students with an opportunity to explore career possibilities available at KSC under the guidance of a KSC mentor. Students are provided with information about various careers, career paths, and KSC educational resources and programs. Students are exposed to STEM experiences and encouraged to consider graduate studies in STEM fields. Students will depart from NASA-KSC with knowledge that will be of value to them in career decision making and an awareness of additional educational opportunities and resources at KSC. Additionally, KEEP provides a public benefit by incorporating parent and community participation through program activities that inform and engage the public in NASA's Exploration Vision.

The application form is necessary only for students to apply for selection to NASA's (KEEP). 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 application and reviewed by a KEEP project specialist at NASA-KSC. Applications will be reviewed by the project specialist to determine minimal eligibility. The applications will then be reviewed and an interview conducted. Per NASA's Record keeping policy: "Records are not authorized for disposal at this time. Paper records are retained on site and are destroyed or transferred in accordance with the specific record series identified below".

- NASA Retention Schedule, 1441.1, **3330 Recruitment, Selection, and Placement;** Applications, resumes, vacancy announcements and related correspondence. DESTROY 2 YEARS AFTER REGISTRATION <DA: N1-255-89-4> (N 15-47)

**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 will be made by via the KEEP application and a database of applicant information. We believe this is the most efficient and cost effective way to collect the 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 for consideration only once. Students who had not applied previously would be required to apply.

**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 date of birth and 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. Any paper copies of the application would be kept in a locked cabinet when not in use and would be made available only to the center project specialist or selection panel.

**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.

The Agency Federal Register Notice will be identified when it is published.

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

No payment or gifts will be made to respondents.

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

A Privacy Act Statement has been finalized.

**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.**

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.

Respondents need apply only once for consideration. It is anticipated it will take no more than 1 hour to complete the application with supporting documentation: a signed parental/guardian permission statement and recommendations from two teachers. This burden was estimated based on experience of others who conduct recruiting/employment activities. We estimate there will be 20 applicants for each session. The burden to the applicants will be only their time. The time burden is estimated to be 20 hours total, i.e. 1 Hour to Complete Application X 20 Respondents = 20 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 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 primary burden to the applicants is the time needed to complete the application as there are no costs associated. We estimate it will take teachers 10 minutes to complete the Teacher Recommendation form, or \$3.20. This hourly cost is estimated based on the average annual salary of a full time (2087 hours) teacher to be \$39,705. (\$39,705/2087 equals \$19.02 per hour/6-10 minute time blocks in an hour equals \$3.20.) It will take less than a minute for a parent or guardian to sign the Parental Consent and Authorization form. The total annual cost for 20 respondents will be \$3.20 X 20 = \$64.00.

**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.**

The estimates cost burden to the government will be approximately \$479.16 and \$0.00 cost for contractor support. This is based on approximately \$50,000 in salary costs for the efforts needed to consider the students and record keeping

**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.**

Information about those who applied such as the names of those selected would 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.**

We are not seeking approval to not display an expiration date for OMB approval.

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

This does not request any exceptions to the certification 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 use of KEEP's application site does not require the use of sampling, estimation or statistical methods that would reduce the burden or improve accuracy of results. The application does not ask for information conducive to the use of sampling, estimation or statistical methods.

**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.

**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 application for KEEP is highly publicized through 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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