

Supporting Statement

A. JUSTIFICATION

1. Need for the Information Collection

The DoD Information Assurance and Scholarship Program (IASP), authorized by Section 2200 of title 10 of the United States Code is designed to: increase the number of new entrants to DoD who possess key Information Assurance (IA) and Information Technology (IT) skill sets, and serve as a tool to develop and retain well-educated military and civilian personnel who support the Department's critical IT management and infrastructure protection functions. The IASP recruitment track is for college students who, on completion of the program, come to work for the DoD. The retention track is for current DoD employees who are excused from duty to attend college courses through the IASP. Pending availability of funds, the IASP may also award capacity-building grants to colleges and universities designated as Centers of Academic Excellence in Information Assurance Education or Research (collectively referred to herein as CAEs) for such purposes as developing IA curricula and faculty, and building IA laboratories. The National Security Agency (NSA) is the Executive Administrator of the program, serving on behalf of the Office of the DoD Chief Information Officer (DoD CIO).

The recruitment, retention and grant programs all require a competitive application process. Additionally, there is an assessment process which examines how grant funds were spent, as well as an assessment process requiring status reports from students in the program, their supervisors, and faculty representatives (Principal Investigators) for the purpose of periodic program reviews.

In order to apply for any aspect of the program, paperwork is required so that the DoD may judge the merits of a given application and determine how best to allocate IASP funds. The recruitment, capacity-building, and assessment aspects of the IASP apply to non-DoD employee members of the general public who choose to become involved in the program and thus become subject to information collection requirements. The retention aspect of the IASP applies only to current DoD personnel, and thus its information collection requirements are not addressed in this request.

2. Use of the Information

Students interested in participating in the DoD IASP recruitment program must complete and submit an application package through their college or university. The process for receiving, selecting and awarding recruitment scholarships is a two-part process involving the CAEs and the NSA Executive Administrator Office.

- CAE Process:
 - Students submit paper-based applications for the IASP recruitment program.
 - Students are required to provide certified transcripts printed on university security paper to the CAE Principal Investigators as part of their applications. Transcripts are deemed certified if they 1.) Have an embossed stamp from the applicant's school or 2.) Are certified by the CAE's Registrars Office.

- The Principal Investigator at each CAE reviews the student application form for accuracy and completeness and then saves each student application form as a PDF file.
- Principal Investigators submit two CDs containing all completed student application forms and supporting documentation to the DoD IASP Executive Administrator Office, along with one hard copy package of all data.
- DoD IASP Executive Administrator Office Process:
 - The DoD IASP Executive Administrator contacts CAE Principal Investigators to acknowledge receipt of the CDs and hard copy application packages.
 - The DoD IASP Executive Administrator reviews each CAE's student application packages for accuracy and completeness, and follows up with each Principal Investigator to validate and/or clarify anything that is unclear.
 - The IASP Executive Administrator creates electronic folders for each CAE to store applications and then creates a summary spreadsheet containing all applicants for the specific award year.
 - The IASP Executive Administrator provides the POC for each participating DoD Component a CD via certified mail. The CD contains the applications for all eligible students and a summary spreadsheet that lists personally identifiable information (PII) data on each applicant. To protect the privacy of student candidates, the spreadsheet contains the following privacy banner: "Privacy Sensitive – any misuse or unauthorized access may result in disciplinary action." Additionally, all participating Component POCs are required to sign conflict of interest statements and non-disclosure statements.
 - Student applicants are also screened by DoD Human Resources and Security professionals during the selection and award process.
 - After the selection process, all CDs and copies of student applications and documentation are destroyed according to participating DoD Component's policies. Furthermore, hard copies of all student applications and supporting documentation are retained and disposed according to NSA's record management processes.

Additionally, the DoD IASP Executive Administrator has instituted a process once scholarship selections are made for applicants to appeal a DoD decision of non-selection. The process, which is annually communicated to the CAE POCs and the students, include the student sending an email to the DoD IASP Executive Administrator's email address, askiasp@nsa.gov, to request information and/or clarification on the reasons for not qualifying for selection. All requests and/or clarifications are addressed swiftly and completely and are closed once a resolution is reached.

CAEs interested in applying for capacity-building grants must complete and submit a written proposal, and all colleges and universities subsequently receiving grants must provide documentation on how the grant funding was utilized. In addition, IASP participants and their Principal Investigators and/or workplace supervisors are required to complete annual program assessment documents. Without this written documentation, the DoD has no means of judging the quality of applicants to the program. It also provides helpful information regarding program performance.

3. Use of Information Technology

The DoD IASP Executive Administrator Office uses information technology in a variety of ways to increase program efficiency. For example, the paper based student applications are scanned by the CAE Principal Investigators and placed on CDs. This process makes it easier to transport, review, and assess student documentation and eligibility information. It also significantly reduces the need for the NSA Executive Administrator Office to print multiple copies of each student application to share with participating Components. To further reduce the need for paper, all CAEs receiving grant funds for recruitment scholarships, are able to use OMB approved grant report forms and templates to submit required grant reports to the Office of Naval Research and the DoD IASP Executive Administrator Office via email.

Even with recent IT advances, there continues to be challenges with ensuring that student applicants provide original signatures on applications and that all information is submitted securely to the NSA Executive Administrator Office with minimal impact to student privacy. Therefore, the student submission process will remain a paper-based process until such time that all required supporting documents can be certified and submitted electronically.

4. Non-duplication

All information to be collected will be unique as it pertains to each individual applicant. No duplication of information requirements can be identified.

5. Burden on Small Business

The collection of information does not have any burden on small businesses or other entities.

6. Less Frequent Collection

The majority of the information is collected annually to minimize the information collection burden.

7. Paperwork Reduction Act Guidelines

The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Public comments were solicited in the Federal Register as required by 5 CFR 1320.8(d) in the preamble of the proposed rule. No comments were received on the information collection.

This data collection is constant with requirements of similar government and non-government sponsored programs.

9. Gifts or Payment

No gifts or payments outside the scope of the program will be provided to respondents.

10. Confidentiality

The DoD IASP Executive Administrator recognizes the importance of protecting Personally Identifiable Information (PII). As verified with the NSA Privacy Advocate, all data collected for the purposes of the program will be protected in accordance with NSA's privacy policy and procedures. Since the IASP recruitment student application is paper-based, a Privacy Impact assessment (PIA) was not required. However, a System of Records Notice (SORN) was developed for the IASP and was initially posted to the Federal Register on November 3, 2010 (75 FR 67697) by the Defense Privacy Office. The SORN was amended October 5, 2011 (76 FR 61679). The DoD IASP Executive Administrator performs the following additional protective measures to keep all parties information confidential and secure:

- Privacy Act Statements, including purposes of the information collections, routine uses and disclosure requirements are placed on student application forms and program surveys.
- Privacy Banners are placed on any spreadsheets containing student PII or any documentation shared with participating DoD Components.

11. Sensitive Questions

No questions of a sensitive nature, such as sexual behavior and attitudes or religious beliefs will be asked, nor is demographic information such as race or gender requested.

IASP-related information collection does not include social security numbers. The collection of other PII is addressed under item 10 above, "Confidentiality."

12. Respondent Burden

Information is to be collected on the following aspects of the IASP: the recruitment program, capacity-building program, and assessment program. Burden hours and associated costs for each aspect of the program are broken out below and are reflected on OMB Form 83-I. Agency Disclosure and Burden Statements are included on the student applications included in the Solicitation for Proposals announcements sent to CAEs annually.

Recruitment Program

Applicants apply for a scholarship and, if selected, fill a position within the Department of Defense upon graduation. The information collected for the competitive selection process includes: name, school address, permanent address, phone number, cell phone number, e-mail addresses, two letters of reference, self-certification of US citizenship, certification that official transcripts are provided, GPA, SAT and GRE test scores, self-certification of enrollment status at a CAE, anticipated date of graduation, resume (to include non-work activities such as

community outreach, volunteerism, athletics, etc.), a list of awards and honors, veteran status, OF 612 (Job Vacancy Application for the position the individual will fill on completion of the program), and desired DoD Agency (first, second, and third choices). This information is provided to the Government through the college/university the prospective scholarship recipients are attending.

The response burden for the recruitment program is determined by calculating the number of annual respondents multiplied by the number of responses, multiplied by the number of hours required to complete the response:

Student Application (TAB A, Attachment D)

Number of Respondents:	250
Frequency of Responses:	1
Total Annual Responses:	250
Burden Per Response:	6 hours
Total Burden Hours:	1,500 hours

The 250 applicants are considered to be at minimum wage, \$7.25 per hour. Cost is determined by using the labor rate by total hours needed to complete the student scholarship application: $\$7.25 \times 1,500 = \underline{\$10,875}$

Capacity-Building Program

Capacity-building grant proposal submitted by National CAE/IAEs must include a detailed description of the proposed project, including a cost breakout of each aspect of the proposal. Proposals are evaluated on the merits of the capacity-building proposal’s approach, the benefits to/alignment with DoD mission, and the reasonableness of the cost proposal.

The response burden for capacity-building grant proposals is determined by calculating the number of responses, multiplied by the number of hours required to complete the response:

Grant Proposal (TAB A with Attachments B, C, E and G)

Number of Respondents:	38
Frequency of Responses:	1
Total Annual Responses:	38
Burden Per Response:	4 hours
Total Burden Hours:	152 hours

Cost is determined using an hourly rate of the average faculty salary from the Bureau of Labor Statistics of \$40 x the total hours needed to complete the responses: $\$40 \times 152 = \underline{\$6,080}$.

Institutions that are awarded capacity-building grants are required to provide an annual report that proves how the grant was spent. In a typical year, up to 24 capacity-building grants are

awarded. The response burden for capacity-building grant reports is determined by calculating the number of reports, multiplied by the number of hours required to complete the reports:

IASP Grant Annual Report (electronic) (TAB A, Attachment F)

Number of Respondents:	24
Frequency of Responses:	1
Total Annual Responses:	24
Burden Per Response:	2 hours
Total Burden Hours:	48 hours

Cost is determined using an hourly rate of the average faculty salary from the Bureau of Labor Statistics of \$40 x the total number of hours needed to complete the reports: $\$40 \times 48 \text{ hours} = \underline{\$1,920.00}$

IASP Assessment Program

IASP participants and their faculty advisors (Principal Investigators) and/or workplace supervisors are required to complete periodic program assessment documents, forwarded to them from the DoD IASP Executive Administrator. In general, the information requested relates to the respondent's overall assessment of the program, and suggestions for improvements. In a typical year there are 110 responses.

The response burden for the assessment program is determined by calculating the number of responses, multiplied by the total hours required to complete the response:

Performance Assessment (electronic) (TAB B)

Number of Respondents:	110
Frequency of Responses:	1
Total Annual Responses:	110
Burden Per Response:	.5 hours
Total Burden Hours:	55 hours

Cost is determined by estimating 80 student responses ($\$7.25 \text{ an hour} \times .5$) and 30 Principal Investigators ($\$40 \text{ an hour} \times .5$):

80 student responses at $\$3.63 = \290

30 Principal Investigator responses at $\$20 = \600

Total response cost = $\$890$

13. Respondent Costs Other Than Burden Hour Costs

None. There is no capital start-up cost associated with this information collection.

14. Costs to the Federal Government

Recruitment Program

Cost to the Federal Government for reviewing recruitment program packages is determined by using the reviewer's (GS-11/5) hourly salary of \$32 multiplied by the total hours the review would take:

Student Application Review

Number of Respondents:	250
Frequency of Responses:	1
Total Annual Responses:	250
Burden Per Response:	2 hours
Total Burden Hours:	500 hours
Average Cost Per Response: (\$32 x 2 hours)	\$64
<u>Total Cost:</u>	<u>\$16,000</u>

Capacity-Building Program

Cost to the Federal Government for reviewing capacity-building grant proposals is determined using the reviewer's (GS-15/5) hourly salary of \$63 multiplied by the total hours the review would take:

Grant Proposal Review

Number of Respondents:	38
Frequency of Responses:	1
Total Annual Responses:	38
Burden Per Response:	2 hours
Total Burden Hours:	76 hours
Average Cost Per Response: (\$63 x hours 2 hours)	\$126
<u>Total Cost:</u>	<u>\$4,788</u>

Cost to the Federal Government for reviewing capacity-building grant reports is determined using the reviewer's (GS-15/5) hourly salary of \$63 multiplied by the total hours the review would take:

IASP Grant Report Review

Number of Respondents:	24
Frequency of Responses:	1
Total Annual Responses:	24
Burden Per Response:	1 hour
Total Burden Hours:	24 hours
Average Cost Per Response: (\$63/hour)	\$63
<u>Total Cost:</u>	<u>\$1,512</u>

Assessment Program

Cost to the Federal Government for reviewing the Assessment Program responses is determined using the reviewer's (GS-11/5) hourly salary of \$32 multiplied by total hours the review would take:

Performance Assessment Review

Number of Respondents:	110
Frequency of Responses:	1
Total Annual Responses:	110
Burden Per Response:	.5 hour
Total Burden Hours:	55 hours
Average Cost Per Response: (\$32/hour)	\$32
<u>Total Cost:</u>	<u>\$1,760</u>

15. Reasons for Change in Burden

This report documents an existing collection in use without an OMB control number. The Information Assurance Scholarship Program was piloted in 2002. At that time, DoD's Office of General Counsel stated that information collection documentation and Federal Registrar submission were not required for the pilot year due to the small number of participants (fewer than 10). During a change in program leadership, the outstanding requirement for additional documentation was overlooked. As a result of recent program administration changes and the creation of a DoD IASP instruction, these requirements were identified and are being addressed through submission of the appropriate paperwork.

16. Publication of Results

Data obtained in this information collection will be limited to the use of the DoD IASP Executive Administrator (NSA) and the sponsoring organization (DoD CIO).

17. Non-Display of OMB Expiration Date

We do not seek approval not to display the expiration date for OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submission"

No exceptions to the certification statement are being sought.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

1. The purpose of the IASP project assessment surveys is to measure the performance of the IASP from different stakeholder viewpoints (for the purposes of this collection requirement, we are specifically referring to the following two stakeholder groups: active recruitment scholars and their faculty advisors (Principal Investigators)). Ideally the surveys would take place annually and all active stakeholders from both groups would be asked to participate.

Because the two groups have different goals and expectations of the program, student participants are asked to complete a separate survey than their faculty advisors. The questions asked in each survey are broad and comprehensive in scope, so that the DoD IASP Executive Administrator and the IASP Steering Committee factors in all aspects of the respondents program experiences and satisfaction levels. The data from the survey responses is compiled into key themes (e.g., satisfaction with application process, ways to improve marketing efforts, the performance of the Executive Administrator, etc) and is used to identify key performance gaps that require immediate attention, as well as any enhancements or changes that needed to be made to continuously improve the IASP program experience for all groups involved. Previous surveys have been effective in examining program strengths and weaknesses. The information gathered is used to drive improvements to program processes, strategic planning, human resources management, and communications at all levels and to all audiences of the program.

The potential respondent universe varies by the number of recruitment students funded each year; the number of academic institutions with enrolled scholarship recipients; and the length of each student’s funded scholarship period of study. Typically, the scholarship recipient population ranges from 50 to 80 students and the number of Principal Investigators (faculty members overseeing each participating institution’s IASP students) ranges between 15 to 30 individuals.

Table 1: Proposed Universe for Collection

Current recruitment students (expanded collection)	80
Principal Investigators (proposed new collection)	30

Table 2: Previous Year’s Response Rate:

	Solicited	Responded	Percentage
Current recruitment students (serving internships)	22	9	41%

2. The scope of our investigation is too narrow to be stratified beyond the two parameters identified in Table 1. We will employ a process that identifies respondents within the two parameters to create a snapshot of the program from different perspectives. Approximately half of questions are qualitative and our goal is to achieve a 40 percent response rate. Due to the small population and nature of the survey, it may not be viewed as statistically valid. However, obtaining a broad perspective of opinions for the purposes of our assessment will provide sufficient information to make informed decisions about any changes/improvements that could be made to the program.

Maintaining an annual collection schedule allows for yearly snapshots of how the program is perceived by its most important stakeholders and provides for regular opportunities to improve.

The steps in the assessment process are as follows:

- a. Identify the individuals to be surveyed.
- b. Send an e-mail to the individuals with an embedded link to an online survey.
- c. Individuals open the link and complete the assessment.
- d. Assessment data is collected.
- e. Quantitative data is tabulated.
- f. Qualitative data is reviewed to identify common themes.
- g. An aggregate report of qualitative and quantitative data is generated for the IASP Steering Committee and the DoD Chief Information Officer.

3. The assessment participation email will be followed up with a general reminder email and phone call to all participants if a sufficient number of responses are not received. The expectation is that the recruitment students and Principal Investigators will have the same sense of ownership of the program and a degree of empowerment in the process such that the response rate will be met, similar to that of previous government participant assessments. The assessment serves as a mechanism for managing the program and is the only means for obtaining essential feedback from the students and Principal Investigators.

4. The assessment was developed with input from key stakeholders. It has been refined over time into a tight, cohesive collection of questions designed to capture information central to improving the IASP experience for all. This method of continuous improvement via collaborative development serves as an effective testing mechanism.

5. Individual consulted on statistical aspects of the assessment design:

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301-225-8174

Point of contact for data collection and analysis:

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