

**Supporting Statement  
for  
OMB 0704-0457,  
Department of Defense Education Activity Research Study Request  
(DoDEA Form 2071.3-F1)**

A. JUSTIFICATION

1. **Need for the Information Collection**

The Department of Defense Education Activity (DoDEA) is a Department of Defense (DoD) field activity operating under the direction, authority, and control of the Deputy Assistant Secretary of Defense for Readiness and Force Management. The DoDEA operates 196 schools in 14 districts located in 12 foreign countries, seven states, Guam, and Puerto Rico.

DoDEA receives requests from researchers both internal to DoDEA as well as outside the Federal government or DoD, to conduct research studies in DoDEA schools and districts. This information collection is needed to aid in the systematic and consistent collection of information on proposed research in accordance with guidelines established in DoDEA Administrative Instruction 2071.3, "Research Approval Process." (Atch 1) The information gathered is also necessary to ensure that the proposed research provides adequate protection to human subjects as outlined in DoD Directive 3216.2, "Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research."

2. **Use of Information**

DoDEA receives requests from members of the public to conduct research involving DoDEA schools, teachers, principals, students, and parents. These members of the public include, but are not limited to: Students and faculty at institutions of higher learning, independent researchers, researchers at profit and non-profit organizations, and private individuals. To aid in the systematic and consistent collection of information on the proposed research, DoDEA developed and is renewing DoDEA 2071.3-F1, "Research Study Request" (Atch 2) in DoDEA Administrative Instruction 2071.3.

The information gathered from individuals through this proposed form includes contact information, school or organizational affiliation (if applicable), summary of the proposed research, an explanation of how the research study is aligned with the DoDEA Community Strategic Plan, how the proposed study will impact the researcher's field of study, the major hypothesis(es) or question(s) to be tested, the population and/or sample to be studied, a description and copy of all proposed instruments, data collection activities, the timetable for the study, Institutional Review Board (IRB) approval for the study, and the statistical or other analytic techniques to be used during the study.

Each requestor receives a "decision letter" which indicates whether or not the research has been approved. If the request is turned down, specific reasons for the disapproval are provided and the individual is invited to address the cited concerns and resubmit the request.

A sample de-identified letter is attached. We feel the letter is a better way to notify individuals as we can provide them individual feedback.

Detailed information regarding the proposed research is necessary to enable DoDEA to properly evaluate the research proposal to ensure that the proposed research is of sound technical quality, does not unduly interfere with the classroom instructional process or the regular operations of the school, district, and/or areas, and adheres to all Federal laws. The information gathered is also necessary to ensure that the proposed research provides adequate human subjects protection to individuals selected for the proposed research. Information such as name, address, email address, and phone number is necessary for DoDEA to correspond with individuals regarding their research request and to distribute approval documents.

### **3. Improved Information Technology**

One of the goals of DoDEA is to improve the speed and quality of reviews of research proposals. Information technology is used to reduce the burden on the respondents as well as increase the efficiency with which the review process is completed. All required forms are available in a fillable electronic format and are available online for easy access through the official DoDEA homepage ([www.dodea.edu](http://www.dodea.edu)). Applicants will submit forms to DoDEA electronically via the consolidated DoD portal, iRBNet®.

### **4. Efforts to Identify Duplication**

The information sought by this collection process is not available from other government agencies or other sources. DoDEA has an internal research and evaluation office charged with reviewing each research request. Submitted requests will be logged into a database and updated and maintained by research and evaluation staff to prevent internal and external duplication of effort.

### **5. Methods Used to Minimize Burden on Small Entities**

The collection of information does not have a significant impact on small businesses or other entities.

### **6. Consequences of Not Collecting the Information or Collecting Less Frequently**

Without this collection, DoDEA will be unable to properly evaluate proposed research or ensure that the proposed research abides by DoD Directive 3216.2, "Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research."

### **7. Special Circumstances**

There are no special circumstances. The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

## 8. **Agency 60-Day Federal Register Notice and Consultation Outside the Agency**

The 60-day Federal Register Notice was published on January 23, 2012 (FR Vol. 77, No. 14, pages 3234-5. (Atch 3) No comments were received.

This data collection requirement has been discussed with the following individuals:

Francine R. Jones, CIP  
Northrop Grumman Corporation  
Contractor to Force Health Protection and Readiness Programs, TRICARE Management Activity Office of the Assistant Secretary of Defense (Health Affairs)  
703-575-3536

Cindy Allard  
Chief, OSD/JS Privacy Office  
Office of Freedom of Information  
571-372-0461

## 9. **Payments to Respondents**

No payments or gifts will be provided to respondents.

## 10. **Assurance of Confidentiality**

A Privacy Act Statement is provided at the top of the form. In addition to disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, these records or information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) and the DoD Blanket Routine Uses, described at [http://dpclo.defense.gov/privacy/SORNS/blanket\\_routine\\_uses.html](http://dpclo.defense.gov/privacy/SORNS/blanket_routine_uses.html), and the DoDEA routine uses described on the System of Record Notice (SORN) at <http://dpclo.defense.gov/privacy/SORNS/component/osd/DODEA27.html>.

This information collection does not ask the respondent to submit proprietary, trade secrets, or confidential information to the Department. The information received by DoDEA will be consistent with the requirements of 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130, and will be maintained according to System of Records, DoDEA 27.

Information collected electronically will be stored on a secure server accessible only by authorized DoD and DoDEA research and evaluation staff. All hard copies will be stored in a locked file drawer accessible only by such authorized staff. Confidentiality during the review process of research proposals will also be ensured by deleting all personally identifiable information from research proposals, such as name and affiliation, prior to distribution to staff outside of research and evaluation for review.

**11. Personally Identifiable Information (PII), Social Security Number (SSN), Privacy Impact Assessment (PIA), System of Records Notice (SORN)**

PII: Respondents are advised that their data are For Official Use Only and will be maintained and used in strictest confidence in accordance with Federal law and regulations. Procedures are in place to protect the confidentiality of the information. The paper forms will be secured to protect PII in accordance with DoD regulations.

Sensitive Questions: N/A

PIA: The collection is covered by the PIA located at:  
[http://www.tricare.mil/tma/privacy/downloads/Electronic%20Institutional%20Review%20Board%20\(EIRB\)%20PIA\\_Final\\_02.15.2011\\_Sec%201&2.pdf](http://www.tricare.mil/tma/privacy/downloads/Electronic%20Institutional%20Review%20Board%20(EIRB)%20PIA_Final_02.15.2011_Sec%201&2.pdf) (Atch 4)

SORN: The existing SORN is numbered as “DoDEA 27” and is currently accessed at <http://dpclo.defense.gov/privacy/SORNS/component/osd/DODEA27.htm> (Atch 5)

**12. Estimates of Annual Response Burden and Labor Costs for Hour Burden to the Respondent for Collection of Information**

Estimate of Respondent Burden:

Number of Respondents:	30
Frequency of Responses:	1
Total Annual Responses:	30
Burden Per Response:	1 hour
Total Burden Hours:	30 hours
Average Cost Per Respondent: (GS-13 @ \$49.77 hour)	(\$49.77/hour)(30 hours)
Total Respondents Cost:	\$1,493.10

**13. Estimates of Other Cost Burden for the Respondent for Collection of Information**

- a. There is no capital start-up cost associated with this information collection.
- b. There are no operational or maintenance costs associated with this information collection.

**14. Estimates of Cost to the Federal Government**

The estimated annualized cost to the Federal Government is \$5,864.00. This estimate is based on hourly costs of DoDEA staff. The amount of time and expense incurred by the Federal Government is due to the review of all research proposals, including data management, correspondence with applicants, and review of research proposals.

	Hours	Cost
Cost to print notification letters (GS7-\$23.60 per hour)	75	\$1,770.00
Cost to review research proposals (GS13 - \$49.77 per hour)	23	\$1,145.00
Cost to coordinate research proposals (GS14 = \$65.53 per hour)	45	\$2,949.00
Total cost to the government		\$5,864.00

Note: All numbers rounded to the nearest whole number dollar amount.

15. **Reasons for Change in Burden**

This is a reinstatement of a previously approved collection. In renewing the OMB number for this form, the average burden per response has remained the same, but the respondent numbers have decreased based on actual respondent data over the past three years.

16. **Publication of Results**

The information gathered is for internal use. No publication or reporting of information will occur.

17. **Approval Not to Display 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”**

Exceptions to the Certification Statement are being sought:

- (c) The collection of this information does not involve small businesses.
- (i) It uses effective and efficient statistical survey methodology.

B. **COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection of information does not employ statistical methods.