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, upon completion of the program, will 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 and 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 institutional capacity building grant programs all require a competitive application process. Recruitment and retention scholarship applicants submit written documentation detailing their credentials. CAEs interested in applying for capacity-building grants must complete and submit a written proposal, and all CAEs receiving grants must provide documentation detailing the use of grant funding and the outcomes of the capacity building initiative. DOD requires this information collection (proposals and grant execution accomplishments) to measure the performance of the capacity building components of the IASP. DOD uses the information collected in the scholarship application process to assess the quality of applicants selected for inclusion in the IASP. Without this written documentation detailing scholarship applicants' credentials, grant proposals, and grant execution accomplishments, the DoD has no means of judging the quality of applicants to the program or collecting information regarding program performance.

    In order to apply for any aspect of the program, information is collected 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.

    More detailed information regarding the IASP in general as well as the additional Institutional Capacity Building component is included in Attachment 1-DoD IASP Solicitation for Proposals and in two supplemental documents, Attachment 1a – Annex1, and Attachment 1b – Annex 2.

2. <u>Use of the Information</u>

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.

- <u>CAE Process:</u>
  - 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 Registrar Office.
  - The Principal Investigator at each CAE reviews all student application forms for accuracy and completeness and then saves each student application form as a PDF file.
  - Principal Investigators submit two Compact Disks (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.

- <u>DoD IASP Executive Administrator Office Process:</u>
  - 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 secure electronic folders on a password-protected network for each CAE to store applications, and then creates a summary spreadsheet containing all CAE applicants for the specific award year.
  - The IASP Executive Administrator provides a CD to the POC for each participating DoD Component 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.
    - o Each CD has a sticker on it that reads "Unclassified for Official Use Only". Each CD is double wrapped and shipped via Certified Mail with a transmittal that must be returned. The package does not identify that it contains student applications. The title is "DoD IASP 20XX".
    - o 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 of 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 CAEs receiving grants must provide documentation detailing the use of grant funding and the outcomes of the capacity building initiative. IASP participants and their Principal Investigators (and/or workplace supervisors) are required to complete annual program assessments. DOD requires this information collection on program performance, capacity building proposals, and grant execution accomplishments to measure the performance of the capacity building components of the IASP. DOD uses the information collected in the scholarship application process to assess the quality of applicants selected for inclusion in the IASP. Without this written documentation detailing scholarship applicants' credentials, grant proposals, and grant execution accomplishments, the DoD has no means of judging the quality of applicants to the program or collecting information regarding program performance.

3. Use of Information Technology

The DoD IASP Executive Administrator Office uses information technology (IT) 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

DoD uses the scholarship program as an annual recruiting mechanism to maintain a continuous flow of new cybersecurity professionals into the DoD cybersecurity workforce. If the Information Collection (i.e. student scholarship applications) was conducted less frequently then there would be gaps in the pipeline for new entrants to the cybersecurity workforce. In addition, prior year submissions cannot be re-used; applicants must submit a separate, current application.

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. The 60-day FRN was published on 12/21/2012 on pages 75,619-75,620. 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). The NSA Privacy Advocate, approved/signed the Privacy Impact Assessment for the DoD IASP on January 7, 2013. The Privacy Impact Assessment (PIA), included as part of this submission as Attachment 2, states that all data collected for the purposes of the program will be protected under the Privacy Act to the extent permitted by law in accordance with NSA's privacy policy and procedures. 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.

SORN ID number: GNSA 27
SORN Title: Information Assurance Scholarship Program (October 5, 2011, 76 FR 61679) – included as Attachment 3 IASP System of Records Notice.
SORN Website address: http://dpclo.defense.gov/privacy/SORNs/component/nsa/GNSA-27.html

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. 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 announcement (See Attachment 1) sent to CAEs annually.

Recruitment Program

Applicants[1] 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 multiplying the number of 2012 respondents by the number of annual responses by the number of hours required to complete the response:

Student Application (Attachment D1 and Attachment D2)

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[1] There are two variations of the student application; 1) New Student Application – Attachment D1, 2) Returning Student Application – Attachment D2.

Number of Respondents:	289
Frequency of Responses:	1
Total Annual Responses:	289
Burden Per Response:	6 hours
Total Burden Hours:	1,734 hours

The 289 applicants are considered to be at minimum wage: $7.25 per hour. Cost is determined by multiplying the labor rate by total hours needed to complete the student scholarship application:
$7.25 x 1,734 = $12,571.50

Capacity-Building Program

Capacity-building grant proposals submitted by National CAE 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. Refer to Attachment 1 (Solicitation for Proposals) and Attachment A (Proposal Preparation Instructions) for additional details about the Capacity-Building Program and the solicitation process.

The response burden for capacity-building grant proposals is determined by multiplying the number of 2012 respondents by the number of annual responses by the number of hours required to complete the response:

Grant Proposal (Attachments B, C, E and G)

Number of Respondents:	48
Frequency of Responses:	1
Total Annual Responses:	48
Burden Per Response:	4 hours
Total Burden Hours:	192 hours

Cost is determined using an hourly rate of the average faculty salary from the Bureau of Labor Statistics[2] of $46 per hour x the total hours needed to complete the responses:
$46 x 192 = $8,832.

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. (In 2012, 23 grants were awarded.) The response burden for capacity-building grant reports is determined by multiplying the number of reports by the number of annual responses by the number of hours required to complete the reports:

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[2] The average faculty salary from the Bureau of Labor Statistics is $62,050 and the top 10 percent earn more than $130,510. Source: http://www.bls.gov/ooh/education-training-and-library/postsecondary-teachers.htm#tab-5 Principal Investigators are typically tenured professors at the top of the salary scale. Therefore, the average of $62,050 and $130,510 was used to determine the rate of $46 per hour.

IASP Grant Annual Report (electronic) (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 $46 x the total number of hours needed to complete the reports:
$46 x 48 hours = $2,208.00

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-12/5) 2012 hourly salary of $33 multiplied by the total hours the review would take:

Student Application Review

Number of Respondents:	289
Frequency of Responses:	1
Total Annual Responses:	289
Burden Per Response:	2 hours
Total Burden Hours:	578 hours
Average Cost Per Response: ($33 x 2 hours)	$66
Total Cost:	$19,074

Capacity-Building Program

Cost to the Federal Government for reviewing capacity-building grant proposals is determined using the reviewer's (GS-15/5) 2012 hourly salary of $54 multiplied by the total hours the review would take:

Grant Proposal Review

Number of Respondents:	48
Frequency of Responses:	1
Total Annual Responses:	48
Burden Per Response:	2 hours
Total Burden Hours:	96 hours
Average Cost Per Response: ($54 x hours 2 hours)	$108

Total Cost: _____ $5,184

    Cost to the Federal Government for reviewing capacity-building grant reports is determined using the reviewer's (GS-15/5) 2012 hourly salary of $54 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: ($54/hour)	$54
Total Cost:	$1,296

15. Reasons for Change in Burden

In all cases possible, actual 2012 response rates have been used for the number of respondents. The number of actual responses received in 2012 was higher than the estimates used on the previous documentation. Therefore, the figures have all increased to reflect the actual response rate. The amount of time to complete the applications and to evaluate the applications has not changed, nor have the costs associated with doing so.

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.