

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

The Department of Defense (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, faculty, and building IA laboratories. Each CAE has designated faculty who work on the grants and with the scholarship students; the faculty are referred to as Principal Investigators (PIs). 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 IASP Program Office has a responsibility to collect information from scholarship recipients on the effectiveness of program operations, and from PIs on the effectiveness of program administration. This is in accordance with DoD Instruction 8145.01, "DoD Information Assurance Scholarship Program", which states that "The DoD CIO shall...oversee and provide program direction over...DoD IASP metrics and analysis of performance results, including student, CAE, and sponsoring DoD Component feedback." Since the inception of the IASP very little data has been collected from a student or PI perspective about how the program is operated. This Information Collection will allow the IASP Program Office to find out directly from students and PIs about areas needing improvement and the challenges students and PIs encounter in acquiring scholarships and grants. Collecting student and PI assessments will enable the IASP Program Office to replicate or expand upon successful components of the IASP processes and investigate or address the less-effective aspects of the program. Without this written documentation the DoD has no means of evaluating the effectiveness of the application process and program performance.

The IASP recruitment and PI surveys 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

All student scholarship recipients will receive a student assessment survey asking them to provide feedback and suggestions regarding program performance. IASP recruitment students

can provide valuable feedback in three key areas: the scholarship application process; the support provided by their PI during their schooling; and the value of the scholarship program in preparing them for employment within the DoD. The survey will collect data on how satisfied students are with IASP, suggestions for improvement, and how helpful their university was in mentoring them, advising them on program curricula, and managing IASP funds. The survey responses are anonymous and these responses will support improvement in recruitment and mentoring activities across the program.

A separate assessment survey will be distributed to IASP PIs. One focus area of the survey will be on PI interaction with scholarship applicants. Once funding has been distributed to scholarship recipients, PIs are asked to routinely meet with students to mentor them, advise them on program curricula, and encourage them to participate in extracurricular IA/IT activities. The survey responses received from PIs will help the IASP Program Office better understand how strongly developed the relationships are between PIs and scholarship recipients.

The IASP also supports capacity building initiatives at universities in several areas through a grants program to CAEs. Centers of Academic Excellence interested in participating in the IASP must complete and submit a written grant proposal, and all CAEs receiving grants must provide documentation detailing the use of grant funding and the outcomes of the capacity building initiative. The PIs technical and deep understanding of IA/IT programs can provide significant insight on how effective the different types of capacity grants are as well as how the IASP grants program can be enhanced. This direct feedback from the PIs about strengths and weaknesses of the IASP, and their comments and suggestions for improvements can positively impact several aspects of the program. The information gathered will be used to drive improvements to program processes, strategic planning, human resources management, and communications at all levels and to all audiences of the program.

3. Use of Information Technology

The Assessment surveys are distributed electronically; the IASP Executive Administrator will send one email out to all PIs with the survey document attached and one email out to all recruitment scholarship recipients with their survey document attached. All respondents are asked to e-mail their completed surveys back to an IASP email address/mailbox created specifically for survey responses. Each day the mailbox will be checked for new responses. As surveys are received each day, they will be opened and uploaded, and the emails from which they were sent will be deleted. This will occur daily for a period of no more than sixty days. After sixty days, no more survey responses will be collected and the mailbox will be shut down. There is no identifying or personal information being collected on the surveys.

Responses can also be mailed to the below address and scanned into a computer.

Survey Response Address:
IASP Program Office for Survey Responses
Attn: DoD CIO IM & IT/IM Workforce Team
4800 Mark Center Drive, Suite 11E08
Alexandra, VA 22350

4. Non-duplication

The information obtained from the surveys is not available anywhere else and this information has not been previously collected.

5. Burden on Small Business

This Information Collection 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. surveys) is conducted less frequently, there will likely be a loss of data fidelity from a sample group, and gaps in understanding the effectiveness of any programmatic changes. Applicants cannot use prior year submissions; they must submit a separate, current application. We cannot decipher which scholarship recipients will re-apply to the program the next year, and many recipients are in their final year of schooling when they enter the program, therefore we need to administer the survey once per year to capture feedback from all scholarship recipients.

7. Paperwork Reduction Act Guidelines

The Information Collection 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 Federal Register Number was published on 12/21/2012 on pages 75,619-75,620. No comments were received.

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

9. Gifts or Payments

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 two surveys under review in this Information Collection do not contain any PII. The NSA Privacy Advocate approved/signed the Privacy Impact Assessment for the DoD IASP on January 7, 2013. The Privacy Impact Assessment, 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 Collection, 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 from IASP scholarship recipients and from PIs at each of the CAEs on the following aspects of the IASP: the application process, IA/IT curriculum development, mentoring opportunities, program management, and communications at all levels of the 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 surveys, as well as in the Solicitation for Proposals announcement (See Attachment 1) sent to CAEs annually.

IASP Assessment Program

IASP participants and their faculty advisors (the PIs) are asked to complete a program assessment survey, sent to them from the DoD IASP Program Office. In general, the information requested relates to the respondent's overall assessment of the program and suggestions for improvements. It is important to note that the survey has not previously been distributed. There are no previous year's response rates to use as a baseline; however, based upon the number of scholarship recipients and the number of PIs, the program expects to receive 174 responses.

The response burden for the assessment program is determined by multiplying the number of respondents by the number of annual responses by the total hours required to complete the response:

Table 1: Proposed Population for Assessment Collection

Current recruitment students	93
Principal Investigators	400
Total	493

Average Burden per Response: Test Case Respondent took the survey and it took her about 15 minutes to complete.

Annual Burden Hours: 493 responses x 15 minutes = 123.25 hours

Performance Assessment (electronic) (TAB B)

Number of Respondents:	493
Frequency of Responses:	1
Total Annual Responses:	493
Burden Per Response:	.25 hours
Total Burden Hours:	123.25 hours

Cost is determined by estimating 93 student responses (\$7.25 an hour x .25) and 400 Principal Investigators (\$53 an hour x .25):

93 student responses at \$1.81 = \$168.33

400 Principal Investigator responses at \$13.25 = \$5300

Total response cost = \$5468.33

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

Assessment Program

Cost to the Federal Government for reviewing the Assessment Program responses is determined using the reviewer's (GS-12/5) hourly salary of \$33 multiplied by total hours the review would take:

Performance Assessment Review

Number of Respondents:	493
Frequency of Responses:	1
Total Annual Responses:	493
Burden Per Response:	.5 hour
Total Burden Hours:	246.5 hours
Average Cost Per Response: (\$33/hour)	\$16.50
Total Cost:	<u>\$4,067.25</u>

15. Reasons for Change in Burden

An Information Collection package was submitted for IASP last year, including surveys for recruitment students and PIs; the surveys were approved condition to requested changes from OMB, and were ultimately not distributed. The surveys submitted last year had an average burden per response of one half hour of time. The surveys have been streamlined and shortened to reduce the average burden to 15 minutes of time, or .25 hours per response. Key changes include reducing the 7 point scale to a 5 point scale, revising the questions to be more direct, and reducing the number of questions. The number of questions on the PIs survey was reduced from 28 questions to 13 questions. The number of questions on the Recruitment Student survey was reduced from 19 questions to 15 questions.

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

The expiration date of the Information Collection for OMB approval can be displayed.

18. Exceptions to "Certification for Paperwork Reduction Submission"

No exceptions to the certification statement are being sought.