

SUPPORTING STATEMENT – PART A

DoDEA Research Study Request – OMB 0704-0457

A. JUSTIFICATION

1. Need for the Information Collection

To ensure that all non-DoDEA sponsored research conducted in the DoDEA school system aligns with these directives, DoDEA created the DoDEA AI 2071.3-Form 1, “Research Study Request” that collects information that is necessary to review the proposed research study. The “Research Study Request” is required from individuals or organizations who wish to conduct research that involve DoDEA school personnel, school facilities, sponsors, students, and/or data. Information collected on the DoDEA AI 2071.3-Form 1 includes the researchers name, address, telephone number, email address, FAX number (if available), school affiliation (if applicable), the study title, and the study methodology, including the hypotheses to be tested, the proposed population, and the statistical methodologies that will be employed

The DoDEA Administrative Instruction 2071.3 (DoDEA AI 2071.3), “Research Approval Process,” is authorized by DoD Directive 3216.2, “Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research,” March 25, 2002. This policy states that “The rights and welfare of human subjects in research supported or conducted by the DoD Components shall be protected. This protection encompasses basic respect for persons, beneficence, and justice in the selection of subjects.” DoDEA’s form 1, “Research Study Request” gathers the relevant information for each proposed study necessary to determine if the research meets the requirements of this policy.

2. Use of the Information

The proposed DoDEA form and all accompanying instructions and DoDEA policies are publicly available on the DoDEA website-<http://www.dodea.edu/datacenter/research/requests.cfm> In addition, all principals and Superintendents in DoDEA are aware of DoDEA’s policy and communicate this to potential researchers who may approach the school or district office. The documentation collected via the DoDEA 2073.1 F-1 is necessary to enable DoDEA to properly evaluate the research proposal to ensure that the proposed research meets all the requirements for human subjects protection, has scientific merit, 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.

Potential respondents are individuals who wish to conduct research that includes DoDEA staff, students, or data. Respondents access the form via the DoDEA website at <http://www.dodea.edu/datacenter/research/requests.cfm> Respondents are directed to the website and form if they request or seek information on how to conduct research in DoDEA. Respondents must complete DoDEA 2071.3 in order to have their research reviewed to ensure it meets the requirements set forth in DoD Directive 3216.2. The form contains the required Privacy Act Statement at the top of the first page.

Once respondents complete the required forms, they are instructed to either hard copy mail or email them directly to the DoDEA Chief of Research and Evaluation. The instructions for submitting as well as the hard copy address and email can be found at http://www.dodea.edu/datacenter/research/upload/20121009_AI_instructions.pdf

3. Use of Information Technology

The DoDEA AI 2071.3-Form 1 is an electronic fillable form can either be emailed to DoDEA. Therefore, 100% of forms are collected electronically.

4. Non-duplication

The information gathered on the DoDEA AI 2071.3-Form 1 is not available in any other format or location.

5. Burden on Small Business

No respondents are small business or other small entities.

6. Less Frequent Collection

Each respondent is required to complete the DoDEA AI 2071.3-Form 1 only once; therefore less frequent collection is not possible.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. The Agency's 60-day notice, required by 5 CFR 1320.8(d), was published in the Federal Register on January 28, 2015, 80 FRN 4550. No comments were received. The 30-day notice was published in the Federal Register on January 20, 2016, 81 FRN 3121.

b. Consultation occurred with the individuals below. Each individual reviewed the draft form and provided feedback. Ms. Jones and LtCol Ritter reviewed the form to ensure that it captured all the information necessary to review the proposal for adherence to the rights and welfare of human subjects. Mr. Licari reviewed the form to determine if there were any redundancies in the information being collected and for clarification of language. Ms. Allard reviewed the form to ensure that the Privacy Act statement was correct and that all protections for respondents were clearly delineated.

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9. Gifts or Payment

No payment or gifts will be provided to respondents.

10. 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, and the DoDEA routine uses described on the System of Record Notice (SORN) at <http://dpclld.defense.gov/Privacy/SORNSIndex/DODwideSORNArticleView/tabid/6797/Article/570574/dodea-27.aspx>

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.

A draft PIA has been completed for this package.

11. Sensitive Questions

The DoDEA 2073.1 F1 does not ask any questions that could be considered sensitive.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The response burden for this collection was calculated by multiplying the total respondents (50) by the estimated time for completion (60 minutes).
 50 respondents* 1 hour = 50 hours.

b. Labor Cost of Respondent Burden

Anticipated labor costs are using the mean hourly earnings as reported by the Bureau of Labor Statistics www.bls.gov.

Labor costs = number of anticipated respondents (50) x average hourly wage (\$50.41) x number of hours (1). Labor costs = \$2,520.50.

13. Respondent Costs Other than Burden Hour Costs

a. There are no capital and start-up costs annualized over the expected useful life of the item(s).

b. There are no operation and maintenance costs.

14. Cost to the Federal Government

The estimated annualized cost to the Federal Government is based on time and expense incurred by the Federal Government for the review of all research proposals, including data management, correspondence with applicants, and review of research proposals. Labor costs for General Service (GS) employees reflected in the following table were taken from the hourly pay tables for GS employees as reported by the Defense Finance and Accounting System (DFAS) www.dfas.mil:

Title	Approximate Man Hours	Cost per hour	Total Annual Costs
Administrative Support staff (GS-9)	25 30 min per respondent	\$33.29	\$832.25
GS14 (DoDEA Chief, Research and Evaluation)	50 hrs.	\$66.19	\$33,095
GS13 (Reviewers – Content Instructional Systems Specialists and Research Analysts)	37.5 hrs. 3 reviewers per respondent at 15 min ea.	\$55.77	\$1,091.38
TOTAL			\$350,128.63

15. Reasons for Change in Burden

There is an increase of 20 hours in the burden. This increase is due to an increase in the number of individuals submitting requests.

16. Publication of Results

Results will not be published. Aggregate data on annual number of respondents will be made available to the Office of the Secretary of Defense for Personnel and Readiness Oversight Office.

17. Non-Display of OMB Expiration Date

No exception to display the expiration date of OMB approval on the instrument is being sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exception is being sought.