

SUPPORTING STATEMENT - PART A

Department of Defense Education Activity Research Study Request

OMB Control Number 0704-0457

Summary of Changes from Previously Approved Collection

- The DoDEA Form 2071.3-F1 has been replaced with the new, updated DoDEA Form 1304.01-F1.
- The burden has increased since the previous submission as the number of responses has increased, though the labor cost of each individual response has gone down.

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."

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 the 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 1304.01-F1, "Research Study Request" 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. Use of Information Technology

100% of responses are collected electronically. All required forms are available in a fillable, electronic format and may be submitted to DoDEA online through the consolidated iRBNet portal.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Information is only collected as required. 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. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, February 12, 2019. The 60-Day FRN citation is 84 FRN 3421.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Thursday, May 23, 2019. The 30-Day FRN citation is 84 FRN 23778.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is provided to all respondents at the top of the DoDEA Form 1304.01-F1.

A copy of the System of Record Notice (SORN) may be found online at: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570574/dodea-27/>.

A draft copy of the PIA, DoDEA Research Approval Process, has been provided with this package for OMB's review.

Records are destroyed or deleted when two (2) years old, or two (2) years after the date of the latest entry, whichever is applicable.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) [DoDEA Form 1304.01-F1]
 - a) Number of Respondents: 50
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 50
 - d) Response Time: 1 hour
 - e) Respondent Burden Hours: 50 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) [DoDEA Form 1304.01-F1]
 - a) Number of Total Annual Responses: 50
 - b) Response Time: 1 hour
 - c) Respondent Hourly Wage: \$36.62
 - d) Labor Burden per Response: \$36.62
 - e) Total Labor Burden: \$1,831

The Respondent hourly wage was determined by using the mean hourly wage for Life, Physical, and Social Science Occupations of \$36.62.

(<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) [DoDEA Form 1304.01-F1]
 - a) Number of Total Annual Responses: 50
 - b) Processing Time per Response: 2 hours
 - c) Hourly Wage of Worker(s) Processing Responses : \$36.75
 - d) Cost to Process Each Response: \$73.50
 - e) Total Cost to Process Responses: \$3,675

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0

f) Other: \$0

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$3,675

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$3,675

15. Reasons for Change in Burden

The burden has increased since the previous approval due to internal recalculation of the number of annual responses and the labor cost of each response, based on actual respondent data.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.