Supporting Statement A

Center for Cancer Training (CCT) Application Form for

electronic Individual Development Plan (eIDP)

National Cancer Institute (NCI)

July 15, 2019

Name: Erika Ginsburg

Address: National Cancer Institute, 9609 Medical Center Drive, 2W106

Telephone: 240-276-5627

Email: ginsbure@mail.nih.gov

Check off which applies:

* New
* Revision
* Reinstatement with Change
* Reinstatement without Change
* Extension
* Emergency
* **X Existing Collection in Use Without an OMB Number**

**Table of Contents Page**

A. JUSTIFICATION 1

A.1 Circumstances Making the Collection of Information Necessary 1

A.2. Purpose and Use of the Information COLLECTION 1

A.3 Use of Information Technology and Burden Reduction 2

A.4 Efforts to Identify Duplication and Use of Similar Information 3

A.5 Impact on Small Businesses or Other Small Entities 3

A.6 Consequences of Collecting the Information Less Frequently 3

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5 3

A.8 Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency 3

A.9 Explanation of Any Payment of Gift to Respondents 3

A.10 Assurance of Confidentiality Provided to Respondents 3

A.11 Justification for Sensitive Questions 4

A.12 Estimates of Hour Burden Including Annualized Hourly Costs 4

A.13 Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers 5

A.14 Annualized Cost to the Federal Government 5

A.15 Explanation for Program Changes or Adjustments 5

A.16 Plans for Tabulation and Publication and Project Time Schedule 6

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate 6

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions 6

**Attachments**

Attachment 1a - eIDP Trainees Screenshots

Attachment 1b - eIDP Burden Statement

Attachment 2a – Exit Survey Part 1 - Alumni Network Survey

Attachment 2b – Exit Survey Part 2 - Feedback Survey

Attachment 3 – Email Notification

Attachment 4 – Privacy Impact Assessment

Attachment 5 – Privacy Act Memo

1. **Justification**

This information collection request is to approve the electronic Individual Development Plan (eIDP) for three years. The National Cancer Institute’s (NCI) Center for Cancer Training (CCT) supports NCI's goal of training cancer researchers with various educational levels (postbaccalaureate, graduate students, postdoctoral fellows) and for varying periods of time (3 months to 5 years). The eIDP is an online, detailed questionnaire focused on responses to career and professional goals and expectations while the trainee works at the NCI. The eIDP ensures the NCI trainees are receiving proper career and professional guidance, making appropriate progress, and determining activities to achieve their goals. The eIDP is also used to track trainees’ career and professional goals and to ensure trainees receive the tools needed to achieve those goals. It is expected the trainees will complete the eIDP annually and that the eIDP process could be improved by their responses. The effectiveness of training could also be enhanced by the reports received by the trainees completing the eIDP. Individual Development Plans have been collected by paper and pencil from trainees since 2001. As a result of the electronic system, it was brought to CCT’s attention that this also required PRA clearance.

**A.1 Circumstances Making the Collection of Information Necessary**

The National Cancer Institute’s (NCI) Center for Cancer Training (CCT) supports NCI's goal of training cancer researchers for the 21st century. Trainees come to the NCI with various educational levels (postbaccalaureate, graduate students, postdoctoral fellows) and for varying periods of time (3 months to 5 years). Training at the NCI focuses on the development of science, professional, and career skills. Completing an annual Individual Development Plan (IDP) is a crucial step in facilitating trainees’ career and professional development and is a standard in graduate and postdoctoral education. An IDP is an effective tool for trainees to think about their career goals and skills needed to achieve them during their tenure at the NCI. Trainees work together with their research mentor to organize and summarize their research projects, consider career goals, and set training goals and expectations.

This information collection request is to approve the electronic Individual Development Plan (eIDP). The data collected comes from a detailed questionnaire focused on responses to career and professional goals and expectations while the trainee works at the NCI. It is expected that the trainees will complete the eIDP annually and that the eIDP process could be improved by their responses. The effectiveness of training could also be enhanced by the reports received by the trainees completing the eIDP. The eIDP fulfills the requirements of the National Cancer Institute (NCI) training authority as established under: Section 413 (b) (3) of the Public Health Service Act, 42 USC 285a-2 (b) (3), as amended pertaining to the NCI, which states that the Director, NCI, in carrying out the National Cancer Program . . . shall . . . "support appropriate programs of education and training (including continuing education and laboratory and clinical research training).”

## A.2 Purpose and Use of the Information Collection

The purpose of the eIDP (**Attachment 1a**) is to ensure that NCI trainees are receiving proper career and professional guidance, making appropriate progress, and determining activities to achieve their goals. The eIDP is used to track trainees’ career and professional goals and to ensure trainees receive the tools needed to achieve those goals.

All fields within the eIDP are required fields.

This request is to approve the eIDP involving approximately 1000 trainees in order to collect input on the application and review processes. Individual Development Plans have been collected by paper and pencil from trainees since 2001. With the implementation of an electronic system, a pilot sub-study, “Pilot Testing the National Cancer Institute’s Center for Cancer Training (CCT) Application Form for electronic Individual Development Plan (eIDP)

was submitted and approved under OMB (#0925-0046) and implemented in December 2018. The pilot improved the clarity of the instructions for the eIDP system, and incorporated feedback from the trainees to improve the overall trainee IDP experience, which advances the effectiveness of training.

The eIDP utilizes many of the following information fields:

* General information (name, year of training, training title, terminal degree, lab/branch/office name, research mentor and lab/branch/office chief names);
* Contact information (e-mail, phone and location for current lab/branch/office);
* Research training activities (project description, training needed to accomplish research goals, deliverables);
* Career goals and training activities (future career path, skills needed to achieve goals);
* Expectations for training (trainee and mentor expectations)

The eIDP will be administered electronically to new trainees as they on-board or to current trainees on a rolling basis upon their yearly appointment renewal dates (**Attachments 1a and 1b**). Upon completion of their training at the NCI, trainees will be asked to electronically complete an exit survey (**Attachments 2a and 2b**). Electronic email will be used to request completion of the eIDP (**Attachment 3**).

## A.3 Use of Information Technology and Burden Reduction

A completed Individual Development Plan has always been required annually by the trainee, but until now it has been paper based. Using an electronic IDP is advantageous because it will save time and lessens the burden to the users compared to managing paper copies.

The trainee will be invited to complete the web-based eIDP through an email (**Attachment 3**). The NCI Privacy Act Coordinator was consulted, and a Privacy Impact Assessment (PIA) is was submitted and approved by HHS (**Attachment 4).**

Applicants voluntarily submit their information to the eIDP by computer. Information collected is only made available through the system to NIH account holders who are NCI or NIH scientific and program officials who supervise trainees. These authorized individuals will access eIDPs using through NIH credentials. eIDPs for current trainees will be kept in the system for 5 years after the cutoff of course material after it is superseded or becomes obsolete. Longer retention is authorized if required for business use.

The trainees’ information is stored on information systems that are protected at all entry points by firewalls and intrusion detection devices.

## A.4 Efforts to Identify Duplication and Use of Similar Information

Once the eIDP is implemented, the former Individual Development Plan completed on paper will cease to be collected. Implementation of the eIDP will be phased in over a one-year period. To simplify the transition to the electronic system, the eIDP will be implemented on a rolling basis.The trainee will receive an automated email from eIDP system when it is time to complete the eIDP. Initiation of the eIDP will be based either on when the trainee first arrives to the NCI or upon their appointment renewal date. This information will not be collected anywhere else and is unique to the trainees’ eIDP.

## A.5 Impact on Small Businesses or Other Small Entities

There is no impact on small businesses or other small entities.

## A.6 Consequences of Collecting the Information Less Frequently

Information will be collected and updated once annually until the trainee leaves the NCI. Annual collection of the eIDP is needed to better train and track the trainee population in order to support NCI’s goal of training future cancer researchers.

## A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This survey will be implemented in a manner that fully complies with 5 C.F.R. 1320.5.

## A.8.1 Comments in Response to the Federal Register Notice

The 60-day Federal Register Notice was published on March 15, 2019 (Vol. 84, No. 5, P. 9537) and allowed 60 days for public comment. No public comments were received.

## A.8.2 Efforts to Consult Outside Agency

No efforts have been made to consult with an outside agency.

## A.9 Explanation of Any Payment of Gift to Respondents

No payments or gifts will be distributed to the individuals completing the eIDP.

## A.10 Assurance of Confidentiality Provided to Respondents

All information will be kept private to the extent provided by law. Only intramural trainees, NCI scientific staff or program officials who supervise trainees will have the ability to initiate trainees’ eIDPs using their NIH login credentials.

Personally Identifiable Information (PII) that is collected includes: name, contact information, and education. The NIH Privacy Act Officer has reviewed this submission and concluded the information collected is covered by the NIH Privacy Act Systems of Records Notice (SORN) is #09–25–0014, “Clinical Research; Student Records, HHS/PHS/NIH/OD/OIR/OE.” (**Attachment 5**).

## A.11 Justification for Sensitive Questions

Some sensitive questions will be asked including gender and ethnicity. Gender is pre-populated from data available from the NIH Enterprise Directory. The trainee may complete optional fields for gender/ethnicity. Data collected will be used for internal tracking to ensure the NCI attracts a diverse trainee population.

Federal regulations for the protection of human subjects do not apply to this activity.

## A.12.1 Estimated Annualized Burden Hours

A list of trainees who are required to complete the eIDP is identified by NCI’s Center for Biomedical Informatics & Information Technology (CBIIT) using information available through NIH Enterprise Directory and the Fellowship Payment System. It is estimated there will be 1000 trainee respondents who will complete the eIDP, the Alumni Exit Survey, and the Exit Feedback Survey every year. The eIDP and two surveys will take approximately 5 to 60 minutes to complete, depending on the form. The estimated hour burden included for this information collection is 1,209 hours (Table A.12-1), which amounts to a total of 3,627 hours over a three-year information collection period.

Table A12-1. Estimated Annualized Burden Hours

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Type of Respondent** | **Number of Respondents** | **Number of Responses Per Respondent** | **Average Time Per Response (in hours)** | **Total Annual Burden Hours** |
| Individuals Trainees | 1000 | 1 | 1 | 1000 |
| Individuals Alumni | 500 | 1 | 5/60 | 42 |
| Individuals Feedback | 500 | 1 | 20/60 | 167 |
| Totals | 1000 | 1000 |  | 1,209 |

## A.12.2 Annualized Cost to Respondents

The annualized cost to respondents is estimated to be $55,843.71 (Table A.12.2) or approximately $167,531.13 over a three-year information collection period.

A12.2. Annualized Cost to the Respondents

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of Respondent** | **Total Annual Burden Hours** | **Hourly Wage Rate\*** | **Respondent****Cost** |
| Individuals | 1209 | $46.19 | $55,843.71 |
| Total |  |  | $55,843.71 |

\*The source of the mean Hourly Wage Rate is a Medical Scientist (19-1042) from the Bureau of Labor and Statistics (<https://www.bls.gov/oes/current/oes_nat.htm>).

## A.13 Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no capital costs, operating costs, or maintenance costs to report.

##

## A.14 Annualized Cost to the Federal Government

The annualized cost to the Federal Government for the proposed data collection effort is estimated to be $130,569.89 (Table A.14.1). The federal personnel are responsible for completing and approving the trainees’ eIDP. The estimated contractor costs are for providing production support, operations and maintenance of the eIDP system, including updates and potential changes.

Table 14.1 Annualized Cost to the Federal Government

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Staff** | **Grade/Step** | **Salary\*\*** | **% of Effort** | **Fringe (if applicable)** | **Total Cost to Gov’t** |
| **Federal Oversight** |  |  |  |  |  |
|  Training Director | 15/5 | $152,760 | 5% |  | $7,638.00 |
|  Research Mentor (PI) | 15/6 | $157,253 | 0.5% |  | $786.27 |
|  Lab/Branch/Office Chief | 15/7 | $161,746 | 0.5% |  | $808.73 |
|  CCT Admin Staff | 14/6 | $133,689 | 1% |  | $1,336.89 |
| **Contractor Cost** |  |  |  |  |  |
|  Production Support, Operations and Maintenance |  |  |  |  | $120,000.00 |
| **Travel** |  |  |  |  | $0 |
| **Other Cost** |  |  |  |  | $0 |
| Total |  |  |  |  | $130,569.89 |

\*\* <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/DCB.aspx>

## A.15 Explanation for Program Changes or Adjustments

This is an existing collection in use without an OMB number. While the Individual Development Plans have been collected by paper and pencil from trainees since 2001, it wasn’t until we implemented the electronic system, that it came to our attention that OMB clearance was needed. A request was written expeditiously and submitted as a pilot sub-study, “Pilot Testing the National Cancer Institute’s Center for Cancer Training (CCT) Application Form for electronic Individual Development Plan (eIDP) under OMB (#0925-0046) which was approved in August 2018 and then implemented in December 2018.

## A.16 Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation since this is an Individual Development Plan. The eIDP ensures the NCI trainees are receiving proper career and professional guidance, making appropriate progress, and determining activities to achieve their goals. The eIDP is also used to track trainees’ career and professional goals and to ensure trainees receive the tools needed to achieve those goals.

The project time schedule is outlined in Table A.16-1.

Table A16-1. Proposed Time Schedule

|  |  |
| --- | --- |
| Activity | Months after OMB Approval |
| Initiate implementation of eIDP | Month 0-2  |
| Begin renewal process for PRA Clearance | Months 30-36 |

## A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

The OMB Expiration Date will be displayed as shown in the attachments.

## A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

This request will comply with the requirements in 5 C.F.R. 1320.9.