

Supporting Statement A for

Application Forms for the NIDA Summer Research Internship Program (NIDA)

OMB Control Number: 0925-0738 and Expiration Date 03/31/2019

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Check off which applies:

- New
- Reinstatement without Change
- Reinstatement with Change
- Extension
- Emergency
- Existing

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Attachments (save file names to match what is being referenced: (ex: x.baseline; y.screener)

Attachments

Attachment 1 - Student Application Form

Attachment 2 - NIH 2019 High School Internship Program Policy

Attachment 3 - NIDA SRIP Privacy Act Memo

Attachment 4 - HHS Privacy Impact Assessment (PIA) Form

A. Justification

Abstract: The National Institute on Drug Abuse (NIDA), the National Institutes of Health (NIH), is submitting the clearance for the application forms for the NIDA Summer Research Internship Program so that information collected in the program application will be in compliance with the Act. **The NIDA Summer Research Internship Program** introduces undergraduate students to substance abuse and addiction research through internships with NIDA grantees at universities across the United States and Puerto Rico, with a goal of enhancing the number of underrepresented minorities in biomedical research. Students intern with NIDA principal investigators for eight weeks during the summer. Over the last three years, NIDA has awarded 180 undergraduate students the opportunity to intern with a NIDA-funded investigator at a research laboratory in the United States. For many of these interns, it was their first research experience and the exposure to novel and state-of-the-art science was invaluable. This opportunity has served as an introduction to the research process for many STEM students and provided the hands-on experience needed when considering a career in biomedical research. Past student intern and mentor feedback has been excellent.

A.1 Circumstances Making the Collection of Information Necessary

NIDA requests a three-year clearance for the application to be used by the Institute's programs that recruit college through early-stage underrepresented individuals and individuals of underrepresented populations into the research programs of the Institute for research training and research development.

The legal authority granted to NIH to train future biomedical scientists comes from several sources. Title 42 of the U.S. Code, Sections 241 and 282(b)(13) 282 (11)B authorize the NIH Director to conduct and support research training for which fellowship support is not provided under Part 487 of the Public Health Service (PHS) Act (i.e., National Research Service Awards), provided that it is not residency training of physicians or other health professionals. Sections 405(b)(1)(C) of the PHS Act and 42 U.S.C. Sections 284(b)(1)(C) and 285-287 grant this same authority to the Director of each of the Institutes/Centers at NIH.

A.2 Purpose and Use of the Information Collection

This is a request for a **reinstatement with change** for clearance of a modified existing Collection with a recently expired OMB Control Number. Over the past several months, NIDA's Project Clearance Liaison has changed several times due to staff turnover. In addition, the annual **NIDA Summer Research Internship Program** collection instrument – the Student Application Form (Attachment 1) - was modified to reflect the new NIH 2019 High School Internship Program (HS-SIP) Policy (Attachment 2). The NIDA Summer Research Internship Program revised its applicant eligibility criteria to include only undergraduate students over 18 years of age. Previously, the program was open to high school students and undergraduate students over 17 years of age. This change was made in response to the NIH HS-SIP Policy which created an NIH-wide internship

program and guidelines for high school students. The NIDA Summer Research Internship Program will continue to offer undergraduate students valuable internship opportunities, while high school students will receive internship opportunities through the NIH HS-SIP. NIDA is requesting clearance for the revised application form for this program. This application is essential to the administration of these training programs as it enables NIDA to determine the eligibility and quality of potential awardees; to assess their potential as future scientists; and to make decisions regarding which applicants will be proposed and approved for traineeship awards.

The annual NIDA Summer Research Internship Program introduces undergraduate students to substance use and addiction research through internships with NIDA grantees at universities across the United States and Puerto Rico. Students intern with NIDA principal investigators for 8 weeks during the summer. The internship experience may include laboratory experiments, formal courses, data collection, data analysis, patient recruitment, manuscript preparation, literature reviews and library research. This outreach and pipeline program exposes students to biomedical and behavioral substance use and addiction research careers and enhances underrepresented groups in biomedical research. For many of these interns, it is their first research experience and the exposure to novel and state-of-the-art science is invaluable. This opportunity has helped many students decide to pursue a research- or science-related career. Each year a new cohort of interns is accepted into the program and offered this opportunity to gain research experience, so participant information is collected annually, and information collection needs to be reinstated.

The purpose of the proposed information collection is for the selection of a new cohort of interns for the NIDA Summer Research Internship Program. Application forms to obtain information about the interns for this research experience are necessary, and NIDA will request clearance for any additional forms should new programs be introduced in the future.

The information ensures that students applying to this program meet eligibility and program requirements and solicits information on their interest in substance use and addiction research, future career goals, academic success, and the area of research they are interested in studying. The information also enables decision-making and research site placement for selected applicants. In each case, completing the application is voluntary, but in order to receive due consideration, the prospective applicant must complete all fields.

The NIDA staff reviews the completed applications to determine which applicants will be selected to participate in the program. In the application, applicants provide three research sites they are interested in during the internship. NIDA matches selected interns with one of their site choices and works with the host research laboratory to coordinate the logistics of the summer internship. Participating research sites are sent the contact information of the summer intern (no confidential information such as race, ethnicity, or gender is sent to the host site).

The information may also be used by NIDA for future planning and programmatic support, performance analysis, and to provide information to the Administration and to Congress if needed.

A.3 Use of Information Technology and Burden Reduction

The program application is web based and will be accessible through the NIDA website: <http://www.drugabuse.gov/about-nida/organization/offices/office-diversity-health-disparities-odhd#research> or <https://www.training.nih.gov>. A Privacy Impact Assessment (PIA) has been obtained (see Attachment 4). The information requested is for the purpose of identifying interns for this program among all applications and evaluating program outreach and goals.

Features of the online applications include, but are not limited to, the following elements:

- Editable application until the application deadline
- E-mail notice to references for letter of recommendation request
- E-mail confirmation of successful submission of application, and recommendation letter submitted from each reference
- Reminder email to submit letter of recommendation
- E-mail notification of application status

In addition, prospective interns will be able to review webpages hosting the application, directions, and Frequently Asked Questions (FAQs) prior to submitting an application. The details posted on the site will enable applicants to carefully complete and submit a well-organized application. The estimated time to complete an application is approximately 60 minutes, based on a survey of applicants from a previous cohort.

The NIDA online system reduces the burden on every applicant by streamlining the application process, improves agency efficiency and responsiveness to the public, and reduces the financial cost and resources to applicants and the agency (there is no application fee for these programs).

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

Applicants to the programs must submit a completed application through the NIDA web-based application because there are no duplicate sources available for the information needed from applicants.

A.5 Impact on Small Businesses or Other Small Entities

No small business or other small entities will be affected by these programs. Every effort has been made to streamline processes and instructions and to simplify the applications and reporting processes. The IC's internal clearance process ensures that no undue burden is placed on any applicant for these funding programs.

A.6 Consequences of Collecting the Information Less Frequently

These programs are implemented annually; each year, a new set of participants are selected. The information is collected only once a year, and the information cannot be collected less frequently because every year a new cohort of interns participate in the program.

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

This information collection is consistent with these guidelines. Submitting an application to this program is voluntary.

A.8.1 Comments in Response to the Federal Register Notice

In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment was published on March 12, 2019 Vol. 84, page 8881 in the *Federal Register*. There were no public comments received.

A.8.2 Efforts to Consult Outside Agency

The forms and guidelines of this diversity enhancing research training program have been developed and vetted for clarity and burden by the NIDA Director of the Office of Diversity and Health Disparities (ODHD), Dr. Albert Avila, in cooperation with NIDA staff.

A.9 Explanation of Any Payment of Gift to Respondents

No payments or gifts are provided to respondents for completing an application form.

A.10 Assurance of Confidentiality Provided to Respondents

The NIDA Privacy Officer and Information Systems Security Officer has assessed the Collection instrument and has determined that the Privacy Act applies to this data collection (see Attachment 3). As such, privacy is assured to the extent provided by law. The data collection is covered by NIH Privacy Act Systems of Record 09-25-0014, "Clinical Research: Student Records, HHS/NIH/OD/OIR/OE."

The information collected will be housed on an internal shared NIH server residing inside the NIH firewall. Applicant data will be made available only to NIH officials who are involved in the applicant selection and/or placement process.

A.11 Justification for Sensitive Questions

No sensitive information on sexual orientation, risk behaviors, religious beliefs, social security numbers, or other personal matters are asked. Date of birth is asked because several research sites have age requirements. In order to make sure that we place an appropriate intern at these labs, we ask for their date of birth. Race, ethnicity, and gender are asked to ensure programmatic balance and

assess if dissemination and program goals are being achieved. Academic records are asked. U.S. citizenship is asked due to funding mechanism requirements.

A.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

The estimated time to complete the online summer internship applications is 1 hour, based on feedback from past applicants to the training programs. The number of completed applications expected is 250, based on the number of applicants in the past year.

Table A12-1 Estimated Annualized Burden Hours

Form	Type of respondent	Number of respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Estimated total Annual Burden hours
Summer Internship	Individuals/Households	250	1	1	250
Totals			250		250

A.12-2 ANNUAL COST TO RESPONDENT

Table 12-2 Annualized Cost to Respondents

Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
Individuals/ households	250	\$7.25	\$1,812.50
TOTAL			\$1,812.50

*Individuals/Households refers to high school and undergraduate student participants. This rate is generated from the federal minimum wage under the Fair Labor Standards Act:

<https://www.dol.gov/whd/minwage/q-a.htm>

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

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

A.14 Annualized Cost to the Federal Government

The estimated annualized cost to the Federal Government to support this information collection is \$108,661.

Staff	Grade/Step	Salary	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
Albert Avila	GS 15/7	\$165,417	.10		\$16,542
Julie Huffman	GS 12/2	\$86,179	.35		\$30,163
NIDA IT Staff	GS 13/10	\$128,920	.30		\$38,676
Contractor Cost		97,000	.15	\$8,730	\$23,280
Total					\$108,661

*the Salary in table above is cited from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB.pdf>

A.15 Explanation for Program Changes or Adjustments

The program no longer accepts high school students due to the new NIH High School Summer Internship Program Policy (see Attachment 2), so the minimum age requirement had to be adjusted to 18 years old. The new policy requires an on-site coordinator as well as other requirements in order to provide internships to minors, which we cannot guarantee, thus the minimum age requirement for program eligibility program has been adjusted to 18 years old.

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

The information collected in the NIDA Summer Research Internship Program applications will not be published for the general public but will be used for applicant evaluation and annual program assessments to review services provided to the NIH trainee community by the NIDA. Federal regulations for the protection of human subjects do not apply to this activity. This research training program has specific application opening and closing dates as well as admission procedures. The following list gives a general overview of the admission process for this research training program.

1. Collection of applications
2. Evaluation of applications
3. Selected applicants receive offer of selection and internship placement

4. Applicants submit acceptance or rejection confirmation
5. Research site investigators are notified that an intern was selected for their lab
6. Rejection letters sent to all other applicants
7. Participants and research sites are added to NIDA Summer Research Internship Program population
8. Interns and research sites are sent a letter to introduce both parties to each other and facilitate communication
9. Research sites are sent information about submitted documents for summer intern funding
10. Funding documentation is due and reviewed for completion
11. Funding awards are made to the selected research sites
12. Interns are sent NIDA reading material and welcome information which the lab provides to them upon their arrival at the research site.

Table A16-1. Project Time Schedule: Application Opening and Closing Dates

Type of Respondent	Open Date	Close Date
NIDA Summer Research Internship Program - Application	January	Mid-February
Internship Offers and site selections are issued	March	April
Funding Documents is required from research sites	May	June

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

OMB number and expiration date will be displayed.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the Certification for Paperwork Reduction Act Submissions