

# SUPPORTING STATEMENT

**Title of Information Collection:** Grant Applicant Demographic Data Collection

**Type of Information Collection:** Renewal

## A. Justification

### 1. Explain the circumstances that make the collection of information necessary.

The Federal Government has a continuing commitment to monitor the operation of its review and award processes to identify and address any inequities in the awarding of grants consistent with the Civil Rights laws of the United States,

NASA is requesting demographic data based on gender, race, ethnicity, or disability of its proposed Principle Investigators/Co-Investigators in order to ensure compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., Title IX of the Education Amendments of 1972, 20 U.S.C. A § 1681 et seq., Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq., and NASA's implementing regulations.

NASA has chosen to focus on gender, race, and ethnicity because such groups are typically underrepresented in the STEM fields and NASA's strategic goal is to ensure all qualified proposers are evaluated based solely on the quality of the proposal submitted. Collecting these demographic data will provide insight and the opportunity to better manage the award process and help the Agency or Nation attract the highest caliber of scientists and engineers possible. In addition, such demographic collection is consistent with the practices of other science agencies such as the National Science Foundation and the National Institutes of Health.

### 2. Indicate how, by whom, how frequently, and for what purpose the information will be used.

NASA solicits scientific research proposals in the areas of aeronautics, planetary, Earth, heliophysics, astrophysics, life sciences (space biology and human research), and physical sciences fields. NASA research proposal solicitations occur six – ten times per year, targeting one or more of the seven science areas listed above.

Each NASA research solicitation will include information regarding the NASA Form 1839/*Demographic Data Collection*, its purpose, and instructions to fill and submit. The NASA Form 1839 requests that the proposer fill out a single form for each of the following roles:

- Principal Investigator/Project Director

- Co-Principal Investigator/Co-Project Directors

The NF 1839 will be used to collect the following information:

- demographic data to include gender
- ethnicity
- race
- disability status
- education background
- career classification

The NF1839 will also collect information related to current and/or previous project funding while serving in following roles:

- Principal Investigator
- Co-Principal Investigator
- Principal Director
- Co-Principal Director

Collecting information regarding prior history of grant awards on PIs enables NASA to develop trends. This establishes whether PIs have been successful (receiving grant awards) over time or whether they are consistently unsuccessful. This will help NASA determine whether a bias in grant selections is occurring.

Response is voluntary.

When grant proposals are received, each NF1839 submitted will be separated from the proposal and will not be a factor in the proposal review and award process.

The data collected via NF1839 will be analyzed by a third party and a summary report will be generated for each solicitation.

**3. Describe whether, and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

NASA Form 1839 'Demographic Data Collection' will be in an electronic format with capability to be filled in electronically. Completed NASA 1839 forms will reside in electronic form in the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) database.

Blank NASA Form 1839 'Demographic Data Collection' will be available in PDF format that can be filled in electronically. It will be available to the public via NASA Electronic Forms System (NEFS).

**4. Describe efforts to identify duplication.**

All new requests for applicant information will be assessed to ensure there is no duplication. In addition, the agency will conduct an annual review of the information that is being requested from grant applicants to ensure there is no duplication.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Proposals to NASA scientific solicitations typically originate from academic institutions. In some cases, large aerospace companies may be listed as co-investigators. Rarely are small businesses included in the proposals and never as principal investigators or co-investigators, in the solicitations we will be collecting the data on. Therefore, small businesses will not be required to complete the survey.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The Federal Government has a continuing commitment to monitor the operation of its review and award processes to identify and address any inequities based on gender, race, ethnicity, or disability of its proposed Principle Investigators/Co-Investigators.

NASA funds research in science, technology, engineering, and math (STEM fields.) If the collection is not conducted, NASA will not be able to analyze differences, if any, regarding grant awards to women, men, and minorities in STEM fields.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (Exceptions/special circumstances must be explained if the collection of information is not conducted in a manner consistent with the guidelines for PRA in 5 CFR 1320.6” below)**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

**8. Provide the date and page number of publication in the Federal Register for the 60-day and 30-day FRNs, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

**60-day FRN:** Federal Register Volume 83, Number 152, on August 7, 2018.

No comments were received.

**30-day FRN:** Federal Register Volume 83, Number 204, on October 22, 2018.

No comments were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments, gifts, or other remuneration are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute**

Privacy protected data are not collected as part of this information collection.

The form will be separated from the rest of the proposal package and associated only with the solicitation number so the required data can be analyzed.

An Initial Privacy Threshold Analysis (IPTA) was completed in the Privacy & CUI Assessment Tool (PCAT) on 05/03/2019. The analysis determined that due to the nature of the collection, a Privacy Impact Assessment (PIA) is not required at this time. However, when a substantial change is made to the electronic or non-electronic record the IPTA will be updated and a reassessment will be conducted.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

NASA is requesting demographic data based on gender, race, ethnicity, or disability of its proposed Principle Investigators/Co-Investigators in order to ensure compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., Title IX of the Education Amendments of 1972, 20 U.S.C. A § 1681 et seq., Section 504 of the

Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq., and NASA’s implementing regulations.

**12. Provide estimates of the hour burden of the collection of information.**

Category of Respondents	Number of Respondents	Estimated Burden per Response	Estimated Burden Hours
Individuals	5000	5 minutes	416.7 hours

**13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.**

Category of Respondents	Number of Respondents	Estimated Burden per Response	Respondents Hourly Wage	Labor Burden per Response	Total Labor Burden
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Individuals	5000	5 minutes	\$41.29	\$3.44	\$17,200
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**14. Provide estimates of annualized cost to the Federal government.**

The NASA cost to process the information collected is estimated at 15 minutes of labor at \$30 per hour for a total of \$7.50 per respondent. The estimated annualized cost to the federal government is \$37,500 based on the estimate of 5000 respondents. There is no travel or other expense associated with this survey.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 above.**

There are no program changes; however, adjustments were made based on the response rate of the data collection over the past couple years.

**16. For collections of information intended for publication, outline plans for tabulation and publication.**

Individual demographic data submitted per solicitation will be collected and analyzed by a third party. A non-published report will be submitted to NASA per each solicitation. NASA will summarize the data results annually and post the results on the NASA public website. This report will list the number of solicitations for the year, the number of respondents to the solicitations, the number of awards total and the number of awards made by gender, race, and ethnicity.

The Research Opportunities for Earth and Space Science data from February 2016 to November 2018 shows no obvious signs of bias in the panel review process. The submission vs. selection rate are either the same or within 2% for each category.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.**

The information collection expiration date will be displayed within the PRA Statement directly on the information collection instrument.

**18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.**

NASA does not seek exception.

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**B. Collection of Information Employing Statistical Methods.**

Not applicable.

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