

SUPPORTING STATEMENT A

TITLE OF INFORMATION COLLECTION: NASA Software Release Request System (SRRS)

TYPE OF INFORMATION COLLECTION: Existing Collection without an OMB Control Number

A. JUSTIFICATION

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

This information collection is required by the NASA Procedural Requirements (NPR) NPR 2210.1C “Release of NASA Software”:

2.3.2 The Center SRA may use the Software Release Request authorization (SRRA) checklist and Compliance Matrices for Software Classification to gather information from software developers that is needed to software release assessments. Both of these completed documents may be attached to the appropriate record in NTTS for historical reference purposes.

It is also directed in NASA policy NPD 7120.4 “NASA Engineering and Program/Project Management Policy”:

1.a.(5)(e) Establishes procedures for external software release of software created by or for NASA that will maximize its benefit to NASA, the U.S. public, and the U.S. economy and to release software consistent with law and applicable agreements for commercial, industrial, educational, and Governmental purposes.

1.a.(5)(f) Establishes procedures for internal NASA reuse and sharing of NASA owned software created by or for NASA to maximize software development efficiencies and to reduce the cost of NASA programs, projects, and activities.

2. Indicate how, by whom, and for what purpose the information is to be used.

NASA Software Release Request System (SRRS) is a workflow tool that will allow Agency Software Release Authorities (SRAs) to easily develop and route software release documents, such as the Software Release Request Authorization (SRRA) and Section 508 Compliance Matrix in an automated fashion. SRAs will have the added ability to perform parallel routing, including the use of time-based email reminders, tracking and reporting progress on the processing of the software release requests so they can effectively manage this process at their respective centers. Software owners/developers can submit the Software Release Requests or view their submitted Software Release Requests that may need their attention.

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, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

NASA encourages the use of computer technology and is participating in Federal efforts to extend the use of information technology to more processes via the Internet. NASA accepts and encourages submission of software release documents via electronic means. Some NASA centers may still allow the submission of paper documents to satisfy software release requirements, but the preferred method of satisfying these requirements is through the SRRS system. The SRRS system itself is can only be submitted by electronic means.

4. Describe efforts to identify duplication.

The data collected is unique to software resulting from software development work made in the performance of work under Agency research by employees and contracts. The data is not otherwise available. Information collected through this information collection is not duplicated within NASA.

5. If the collection of information impacts small businesses or other small entities (Item 5 of the OMB Form 83-I), describe the methods used to minimize burden.

The burden on small business is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If any restrictions were placed on the collection of information, NASA would not be able to fulfill its mission and policy, consistent with statutory requirements, to promote the transfer and commercial utilization of inventions and software arising from NASA-supported research, as required by NASA NPR 7500.2 “NASA Technology Transfer Requirements” and NPR 2210.1 “Release of NASA Software”.

7. Explain any special circumstances that would cause an information collection to be conducted in an exceptional manner:

NASA does not anticipate circumstances arising that would cause information to be collected in a manner that requires explanation of special circumstances.

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

60-day FRN: Federal Register Volume 84, Number 204, on 10/22/2019. Yes/No comments were received.

30-day FRN: Federal Register Volume 85, Number 018, on 01/28/2020.

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

NASA does not provide gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The confidentiality of this information is governed by patent and copyrighting licensing clauses described in NPR 2210.1C “Release of NASA Software”:

p.2.Applicability b (3)g.(2) Upon request and depending on the Government's intellectual property rights and any other legal restrictions on release (e.g., export control), NASA computer programs that are used to read and manipulate computer databases may be publicly released with the computer databases, but only if such computer programs are not commercially available. In addition, certain types of information are restricted from dissemination via NASA public Web sites in accordance with NPR 2810.1, Security of Information Technology, section 11.3.9, Internet Publishing Content Requirements.

h. In general, software is not considered a record under the Freedom of Information Act (FOIA) and, therefore, is not subject to the mandatory release requirements of the FOIA. Requests for software under the FOIA shall be coordinated between the Center FOIA Office and the Center Software Release Authority.

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.

Questions of a sensitive nature, as indicated above, will not be asked.

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

RESPONDENT CATEGORY	NUMBER OF RESPONDENTS	ESTIMATED COMPLETION TIME	ANNUAL BURDEN
NASA-funded Contractors	63	240 mins.	15,120 mins. (252 hrs.)
Government Employees	63	240 mins.	15,120 mins. (252 hrs.)
Totals	126	240 mins.	30,240 mins. (504 hrs.)

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

ESTIMATED FEDERAL COST: The estimated annual cost to the Federal government:

(126 respondents per year X 240 mins.) / (60 mins. / hour) = 504 hours per year
Using OPM 2017 GS-14 Step 1 hourly pay rate (excluding locality pay rate) = \$42.23/hour

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/GS_h.aspx

Estimated Annual Federal Cost = \$42.23 X 504 hrs. = \$21,283.92 per year

14. **Cost to the Federal Government: Provide estimates of annualized costs to the Federal government.**

The responsibility to process the Software Release requests submitted through the SRRS is performed by the Software Release Agent at each NASA center, as part of their official program duties. No additional cost is associated with the SRRS.

15. **Changes in Burden: Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I, if applicable.**

There are no program changes or adjustments.

16. **Publication of Results: For collections of information whose results will be published, outline plans for tabulation and publication.**

No information is intended for publication.

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

NASA will display the expiration date within the required PRA Statement.

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

N/A

The NASA office conducting or sponsoring this information collection certifies compliance with all provisions listed above.

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