## SUPPORTING STATEMENT - PART A

National Defense University Student Profile – 0704-XXXX

### 1.    Need for the Information Collection

This information collection is required to complete the official student record, which is stored in the University Student Management System (USMS), a component of the NDU Enterprise Information System. Through this information collection, students provide profile information such as demographics, educational background, military service or professional background, and emergency contact information. The information is critical to university operations as it is used to fulfill mandatory reporting requirements and ensure the safety of students.

The authority by which to collect this information is 10 U.S.C. 2165, National Defense University; 10 U.S.C. 2163, Degree Granting Authority for National Defense University; and E.O. 9397, as amended (SSN).

### 2.    Use of the Information

The information is collected from students electronically, via a web-based form that contains a combination of selected-response (radio buttons, drop-down menus) and open-response items. The National Defense University Student Profile (NSP) is completed by all students, and is administered using a Drupal-based survey platform provided by USA Learning.

The student body includes US military service members, US government employees, other US civilians, and international officers and civilians. For the purposes of the Paperwork Reduction Act however, this submission only covers the estimated 150 public respondents. They respond to the information collection at the request of the university registrar in order to complete their student record. Students access the form using a link that is provided via an invitation email; access to the form requires the student to enter their student ID number, which is also provided in the email. The form functions like any typical web-based survey and is returned to the university when the student completes all of the items and submits the survey.

The data are downloaded, processed, and transferred to the USMS by NDU's Office of Institutional Research. The end result is a set of complete student records for each academic year in the official repository for such record. The data are used for various institutional purposes such as mandatory reporting and notifying students of emergencies or closures.

### 3.    Use of Information Technology

The percentage of responses collected electronically is 100%. The information is collected from students electronically, via a web-based survey form that contain a combination of

selected-response (radio buttons, drop-down menus) and open-response items. The NSP is administered using a Drupal-based survey platform provided by USA Learning.

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 any small businesses or entities.

6.     Less Frequent Collection

The information is collected only once per student, at the beginning of their program.

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, September 1, 2020.  The 60-Day FRN citation is 85 FRN 54359.

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

A 30-Day Federal Register Notice for the collection published on Thursday, March 18, 2021. The 30-Day FRN citation is 86 FR 14741.

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

The collection requires a Privacy Act Statement (PAS). It is located on the first page of the survey form.

This collection has an associated system of records. The SORN for (DNDU01, "National Defense University (NDU) Student Data Files," can be found on the DPCLTD website at the following link: https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570570/dndu01/

An approved copy of the PIA, National Defense University (NDU) Enterprise Information System (NEIS), has been provided with this package for OMB's review.

Individual and class academic records are destroyed after 40 years. Records pertaining to extension courses are held indefinitely before being retired to the National Personnel Records Center, St. Louis, MO. Individual training records are destroyed annually; management reports are destroyed when no longer needed.

11.      Sensitive Questions

Yes, sensitive questions are being asked of the respondent. The questions are being asked to build the student profile. Race and ethnicity data are collected in accordance with US Department of Education guidelines. The purpose of collecting these data are to fulfill an annual accreditation reporting requirement of the Middle States Commission on Higher Education (MSCHE). In addition, these data are used in the aggregate for various institutional research purposes such as educational outcomes research and descriptive statistics.

12.      Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) NDU Student Profile
   a) Number of Respondents: 150
   b) Number of Responses Per Respondent: 1
   c) Number of Total Annual Responses: 150
   d) Response Time: 20 minutes
   e) Respondent Burden Hours: 50 hours

2) Total Submission Burden
   a) Total Number of Respondents: 150
   b) Total Number of Annual Responses: 150
   c) Total Respondent Burden Hours: 50 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) NDU Student Profile
   a) Number of Total Annual Responses: 150
   b) Response Time: 20 minutes
   c) Respondent Hourly Wage: $64.72
   d) Labor Burden per Response: $21.57
   e) Total Labor Burden: $3,236

2) Overall Labor Burden
   a) Total Number of Annual Responses: 150
   b) Total Labor Burden: $3,236

The Respondent hourly wage is based on the salary of an O-6 with 20 years of service according the 2021 Military Basic Pay Table.
https://militarypay.defense.gov/Portals/3/Documents/2021%20Pay%20Table%203%20percent%20-%20FINAL.pdf

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) NDU Student Profile
   a) Number of Total Annual Responses: 150
   b) Processing Time per Response: 5 minutes
   c) Hourly Wage of Worker(s) Processing Responses: $50
   d) Cost to Process Each Response: $4.00
   e) Total Cost to Process Responses $600

2) Overall Labor Burden to the Federal Government
   a) Total Number of Annual Responses: 150
   b) Total Labor Burden $600

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

a) Equipment: $2200 computer work station
b) Printing: $0
c) Postage: $0
d) Software Purchases: $63
e) Licensing Costs: NDU Student Profile OPM Hosting Fees $97,500
f) Other: $0

2) Total Operational and Maintenance Cost: $99,763

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: $600

2) Total Operational and Maintenance Costs: $99,763

3) Total Cost to the Federal Government: $100,363

15. <u>Reasons for Change in Burden</u>

This is an existing collection currently in use without an OMB Control Number.

16. <u>Publication of Results</u>

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

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

18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

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