SUPPORTING STATEMENT - PART A

ISMO International Fellows Personal Information Collection – 0704-ISMO

1.   Need for the Information Collection

This system of records is used to maintain student data for all students at NDU, encompassing U.S. citizens and foreign nationals. Records are maintained in paper and electronic storage media. The primary student management system is hosted and maintained by the U.S. Office of Personnel Management (OPM). Additionally, information and electronic records are maintained in the NDU Enterprise Information System (NEIS), the NDU network. The NDU NEIS encompasses all hardware and software utilized to support the academic and business information hosted in university-owned systems. The information collected is used to pay foreign nationals through DTS or through their Temporary Living Allowances. The rest of the information is used for NDU account creations and used to authenticate and identify NDU personnel and students; track academic enrollment, assignments, progress, and assessments; track personnel records and actions; create academic transcripts and related reports; facilitate award of degrees and credentials; conduct analysis for regional and DoD academic accreditations; and create reports for University leadership to aid in the development of effective curricula, facilitate academic completion requirements

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.

2.   Use of the Information

The respondents in our collection are all Foreign Nationals attending the National Defense University. Each respondent answers as our office assists them in their transition to the United States and the National Defense University. Their preliminary information, including name, service, past assignments, etc. is collected via a form accessed by respondents in a link sent to them in email correspondence while they are still in their home country. More sensitive information such as passport information, DOB, Visa # and their FIN are collected either in person or over the WhatsApp messaging service, utilizing their end-to-end encryption. All information is entered into an Access Database accessible only to authorized NDU employees. Screenshots of the database are provided for OMB's review.

All respondents complete the preliminary information collection electronically, returning a completed form via email. The in-person/WhatsApp portion is completed with the foreign national providing answers as well as passport and visa information to a staff member who then enters this information into our database. There are additional emails sent to our foreign nationals concerning their transition to the United States. We have attached samples of the email series for OMB review. Respondents will also be provided with

Privacy Act Statement and Agency Disclosure Notice information. The information collected is used to ensure international students have a smooth transition to the United States and NDU. It also helps them secure driving licenses, CACs, FINs, TLA payments, and a DTS profile.

3. Use of Information Technology

This year, in our entirely virtual environment, 100% of this information was collected electronically. Given the success of this year's data collection process, we may move to this 100% electronic collection model for the future. In past years, 80% of data collection was done virtually, with just the sensitive PII collected in person to help increase the security of the data.

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 a substantial number of small businesses or entities.

6. Less Frequent Collection

All of our information is collected only once at the beginning of the year for our incoming students. It is not possible to reduce the frequency of collection below our once per year collection.

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 Friday, November 13, 2020. The 60-Day FRN citation is 85 FR 72642.

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

A 30-Day Federal Register Notice for the collection published on Friday, February 26, 2021. The 30-Day FRN citation is 86 FR 11733.

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

A Privacy Act Statement is required for our collection. We have attached it to the beginning of the virtual onboarding collection.

This collection has an associated system of records. The SORN 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/

A copy of the approved 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, we do collect some sensitive information from our International Fellows. Their bank account information is also collected and is used to create their DTS profiles and to ensure they are paid in DTS or to ensure that their TLA vouchers are paid and created on time.

12.   Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments
   [Virtual Onboarding Collection]
   a) Number of Respondents: 109
   b) Number of Responses Per Respondent: 1
   c) Number of Total Annual Responses: 109
   d) Response Time: 0.5 hour
   e) Respondent Burden Hours: 54.5

   [In-person response and validation]
   a) Number of Respondents: 109

b) Number of Responses Per Respondent: 1
c) Number of Total Annual Responses: 109
d) Response Time: 1 hour
e) Respondent Burden Hours: 109

2) Total Submission Burden (Summation or average based on collection)
    a) Total Number of Respondents: 109
    b) Total Number of Annual Responses: 218
    c) Total Respondent Burden Hours: 164

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)
[Virtual]
    a) Number of Total Annual Responses: 109
    b) Response Time: 0.5 hour
    c) Respondent Hourly Wage: $56.75
    d) Labor Burden per Response: $28.38
    e) Total Labor Burden: $3,092.88

[In person response and validation]
    a) Number of Total Annual Responses: 109
    b) Response Time: 1 hour
    c) Respondent Hourly Wage: $56.75
    d) Labor Burden per Response: $56.75
    e) Total Labor Burden: $6,185.75

2) Overall Labor Burden
    a) Total Number of Annual Responses: 218
    b) Total Labor Burden: $9,279

The Respondent hourly wage was determined by using the Regular Military Compensation calculator and only factoring in their base annual pay. To find the average salary, I used the average salary of U.S. military personnel at each rank represented here and averaged that amount across our international alumni's ranks.
https://militarypay.defense.gov/Calculators/RMC-Calculator/

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) Collection Instrument(s)
   [Virtual Onboarding Collection]
      a) Number of Total Annual Responses: 109
      b) Processing Time per Response: 1.3 hours
      c) Hourly Wage of Worker(s) Processing Responses: $28.85
      d) Cost to Process Each Response: $37.51
      e) Total Cost to Process Responses: $4,088.05

   [In processing and data validation]
      a) Number of Total Annual Responses: 109
      b) Processing Time per Response: .5 hours
      c) Hourly Wage of Worker(s) Processing Responses: $28.85
      d) Cost to Process Each Response: $14.43
      e) Total Cost to Process Responses: $1,572.33

2) Overall Labor Burden to the Federal Government
      a) Total Number of Annual Responses: 218
      b) Total Labor: $5,660.37

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories
      a) Equipment: $26,400
      b) Printing: $0
      c) Postage: $0
      d) Software Purchases: $754
      e) Licensing Costs: $129,000 (Vovici: $31,500 + NDU Student Profile/OPM Hosting Fees: $97,500)
      f) Other: $0

2) Total Operational and Maintenance Cost: $156,154

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: $5,660.37

2) Total Operational and Maintenance Costs: $156,154

3) Total Cost to the Federal Government: $161,814

15.   Reasons for Change in Burden

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

16.   Publication of Results

The results of this information collection will not be published.

17.   Non-Display of OMB Expiration Date

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

18.   Exceptions to "Certification for Paperwork Reduction Submissions"

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