

1Supporting Statement – Part A

Emergency Request for Approval of an Information Collection for Office of Polar Programs (OPP) United States Antarctic Program (USAP) Sexual Assault and Harassment Prevention and Response (SAHPR) Data Collection Plan

OMB No. 3145-XXXX

A. JUSTIFICATION

In accordance with requirements of the Paperwork Reduction Act of 1995, the National Science Foundation is requesting an emergency approval. Under the provisions of 44 U.S.C. 3507(j) (1), permits an agency head to request OMB issue an expedited clearance of a collection of information if it is needed sooner than the expiration of usual processing times, provided that it is essential to the mission of the agency, and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court-ordered deadline to be missed.

The purpose of this collection is to gather data to support the SAHPR Needs Assessment, Implementation Plan and Training Material for the USAP. NSF is requesting emergency approval for this collection to maintain the SAHPR Program Implementation timeline, begin to implement recommendations before the 2021/2022 austral summer, and honor our commitment to the research and support community to provide a safe and equitable workplace.

This single request will serve as an overall request for approval for three information collections. This emergency request will be active for six months, during which time NSF will submit another request that will give the public an opportunity to comment on the permanent change.

Upon approval of this emergency request, NSF will immediately begin the process to implement recommendations resulting from these collections.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The online survey will collect information about organizational and community culture on the ice, perceptions of the issues of sexual assault and harassment, perceptions of leadership support, and the formal and informal interactions between USAP participants on the ice. The surveys will enable the data analysis effort to explore the differences in experience and perceptions based on demographic analysis.

The purpose of conducting focus groups is to ascertain an understanding of organizational and community culture on the ice, perceptions of the issues of sexual assault and harassment, perceptions of leadership support, unique needs, and the formal and informal interactions between USAP participants on the ice.

In support of the USAP Sexual Assault/Harassment Prevention and Response (SAHPR) Program, interviews focus on USAP leadership to identify policy, infrastructure and resources of each organization. Document details about specific training, reporting structure and investigation protocols concerning prevention and response staffing. Review relationships and gain a deeper understanding of roles on-ice.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

There are three types of information collections planned for this request:

Survey. The survey will collect information about organizational and community culture on the ice, perceptions of the issues of sexual assault and harassment, perceptions of leadership support, and the formal and informal interactions between USAP participants on the ice. The surveys will enable the data analysis effort to explore the differences in experience and perceptions based on demographic analysis. The survey will be conducted via an online portal and will not collect any personally identifiable information. The questions will be developed by professionals and will be representative best practices for similar efforts. The target audience will be USAP participants who have deployed to Antarctica within the previous three years.

Focus Groups. The purpose of conducting focus groups is to ascertain an understanding of organizational and community culture on the ice, perceptions of the issues of sexual assault and harassment, perceptions of leadership support, unique needs, and the formal and informal interactions between USAP participants on the ice. The focus groups will be facilitated by our SAHPR contractor and will follow a prescribed script. The groups will be comprised of USAP participants selected for specific groups based on organization, deployment type, work schedule, et cetera.

Stakeholder Interviews. The purpose of the stakeholder interviews is to gain a deeper understanding of current conditions, organizational capacity, and organizational needs that will inform and impact the creation of a realistic and effective USAP SAHPR implementation plan. Interviews will be conducted by our SAHPR contractor with vetted personnel representing various organizations comprising the USAP and will follow scripted questions.

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. Also describe any consideration of using information technology to reduce burden.**

Automated, electronic, mechanical, or other technological collection techniques are not an issue with this ICR.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Duplication is not an issue with this ICR.

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

Burden on small businesses or entities is not an issue with this ICR.

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.**

Any delays in this approval could significantly impact NSF's Office of Polar Programs' commitment to the research and support community to provide a safe and equitable workplace.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances with this ICR.

8. **Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The emergency Federal Register notice was published on June 29, 2021, at 86 FR 34281.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

NSF's Office of Polar Programs has consulted with the contractors who will conduct the focus groups, survey, and stakeholder interviews to determine respondents and estimated burden times.

9. Explain any decision to provide any payment or gift to respondents.

Not applicable.

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

All three information collections contain assurances of confidentiality:

Survey: We are holding several key stakeholder interviews, focus groups, and administering surveys as a part of this Needs Assessment with many USAP participants. We will not be asking you to provide any identifying information. Your participation in this survey is voluntary. Please feel free to skip questions you cannot or do not wish to answer. You may skip and quit at any time.

Focus Groups: Thank you so much for your time today. As a reminder, your names will not be used in any report. Your answers will be compiled with many others and themes from these conversations will be used to inform the Needs Assessment. Please feel free to contact us if you think of anything else you would like to add.

Stakeholder Interviews: Thank you for taking the time to meet with us and discuss your experience. We are holding several key stakeholder interviews, focus groups, and administering surveys as a part of this Needs Assessment with many USAP participants. We are going to record our conversation today and *[INSERT NAMES OF NOTETAKERS]* will be taking notes. We will capture the actual words that are said, to ensure the Needs Assessment accurately reflects participants' experiences and perceptions. After we complete the data collection process, we will analyze the information and identify themes to inform the Needs Assessment Report. ***Please note, we will not link your name to your words in any way.*** Recordings and transcripts will be available *only* to the Needs Assessment Team. They will not be made available to members of PPO or Partner Organizations. Themes and data will be summarized in group form for the Needs Assessment Report but there will be no way to link your name to anything you say. I do ask that you keep what is spoken here confidential. I will let you know before I start recording.

11. Provide additional justification for any questions of a sensitive nature.

Given the content of these information collections, there are some questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The burden estimates are as follows:

Information Collection Type	Number of Respondents	Burden Estimate	Total
Survey	1000	15 minutes	250 hours
Focus Groups	150	2 hours	300 hours
Stakeholder Interviews	30	1 hour	30 hours
Totals	1180		580 hours

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

The survey will be sent to USAP participants who have deployed within the last three years (2018-present). This amounts to approximately 4,000 participants. The estimated burden assumes a 30% response rate.

Individuals will be identified for focus group participation and will be invited to participate through scheduled virtual meetings. The SME will work to fill all 130 focus group spots.

Both the survey and focus group respondents will be from a wide range of positions throughout the USAP program. Positions could range from retail and food service positions to tenured faculty at institutions of higher education. Both information collections are voluntary and there is no current way to accurately predict which employees will respond to either the survey or focus groups. Given the wide range of potential hourly waged positions, the annual cost burden to respondents was calculated using the July 2021 U.S. Bureau of Labor Statistics median private industry hourly wage

of \$30.54 (<https://www.bls.gov/news.release/empsit.t19.htm>). The estimated cost to respondents for hourly burden is \$17,720.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

Through an Inter-Agency Agreement with the Department of Interior, NSF has contracted with Leading and Dynamic Services and Solutions (LDSS) to manage the project. Subject matter experts (SMEs) in sexual assault and harassment prevention and response were subcontracted from Alteristic, Inc. and the Victim Rights Law Center (VRLC), respectively to fulfill the objectives of the SAHPR implementation planning process.

The cost to perform this data collection for the needs assessment is \$187,536.

- 15. Explain the reasons for any program changes or adjustments (reasons for changes in burden).**

There are no changes in burden; this is a new request.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Nothing will be published as a result of this ICR.

- 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.**

There is no request for approval of non-display of the expiration date.

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

There are no exceptions to the certification statement.