

CyberCorps®: Scholarship for Service (SFS) Registration system

OMB No. 3206-0246

Justification – Part A Supporting Statement

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Scholarship for Service (SFS) Program was established by the National Science Foundation (NSF) in collaboration with the U.S. Office of Personnel Management (OPM) and the Department of Homeland Security (DHS), in accordance with section 302 of the Cybersecurity Enhancement Act of 2014, as amended (15 U.S.C. 7442). This initiative reflects the critical need for Information Technology (IT) professionals, industrial control system security professionals, and security managers in Federal, State, local, and tribal governments. The program provides selected colleges and universities scholarship grants to attract students to the information assurance and cybersecurity field. Students identified by their institutions for SFS Scholarships must meet selection criteria established by the participating institution and SFS eligibility requirements set forth in 15 U.S.C. 7442(f).

Operationally, this is an interagency program administered by NSF in collaboration with OPM who share primary responsibility for managing the program. The NSF is responsible for reviewing and processing the proposals, and OPM is responsible for providing appropriate program-related procedures for the screening, placement, and continuing career development of the scholarship recipients. The collection of information is necessary to allow for OPM to fully perform its responsibilities under this program.

Each scholarship recipient, as a condition of receiving a scholarship under the program, enters into an agreement under which the recipient agrees to participate in meaningful summer internship opportunities or other meaningful temporary appointments in the Federal information technology and cybersecurity workforce during the scholarship period, and to work for a period equal to the length of the scholarship, following receipt of the student's degree, in a position related to cybersecurity and in the cyber security mission of –

- (1) an executive agency (as defined in 5 U.S.C. 105);
- (2) Congress, including any agency, entity, office, or commission established in the legislative branch;
- (3) an interstate agency;
- (4) a State, local, or Tribal government;
- (5) a State, local, or Tribal government-affiliated non-profit that is considered to be critical infrastructure (as defined in 42 U.S.C. 5195c(e)); or
- (6) as an educator in the field of cybersecurity at a qualified institution of higher education that provides SFS scholarships.

Additionally, scholarship recipients agree to provide OPM (in coordination with NSF) and the qualified institution of higher education with annual verifiable documentation of post-award employment and up-to-date contact information.

As required by 15 U.S.C. 7442, a SFS scholarship recipient shall be financially liable to the United States if the individual: fails to maintain an acceptable level of academic standing; is dismissed from the applicable institution of higher education for disciplinary reasons; withdraws from the eligible degree program before completing the program; declares that they do not intend to fulfill the post-award employment obligation; or fails to maintain or fulfill any of the post-graduation or post-award employment obligations or requirements. Failure to satisfy the academic requirements of the program or to complete the service requirement will result in forfeiture of the scholarship award, which must either be repaid or reverted by the institution to a student loan pro-rated accordingly to reflect partial service completed.

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.

The information collection is used by OPM's Human Resources Solutions Division to register

scholarship recipient's education and experience background and to provide this information to potential government employers.

The SFS system is an automated online application, located at <http://sfs.opm.gov> that collects and maintains information provided by participating students, agency officials from participating agencies, and representatives from participating academic institutions.

There are five types of SFS application system users, and each type of user can access certain SFS functions through the website. These include the general public Internet user, Students/SFS participants, Principal Investigator and those investigators who must gain access to the SFS system by filling out an on-line registration form, agency officials, and the administrators of the SFS program office.

Student information is used by approved OPM personnel to make updates in the system and facilitate the tracking of students to ensure they are meeting program requirements. Student SSNs are encrypted at the time of registration and are only retrieved and used if the student defaults on their scholarship obligations. In those cases, OPM must send the student's information to the NSF for collection, which may occur via the academic institution or the Department of Treasury.

Students are selected by participating universities/colleges to receive the scholarship. Once selected and approved, the student is provided instructions on how to register their profile and resume on-line. Approved agency officials and approved academic institution officials are then able to retrieve resumes, including contact information, of the scholarship recipients through a password-protected website.

All information collected by the SFS system is submitted via the SFS website by individuals (administrators of the SFS program office, students, agency officials, or academic institution officials) with authenticated user identities and valid authorization credentials. SFS implemented login.gov in FY23. Login.gov uses two-factor authentication, and stronger passwords, that meet new National Institute of Standards of Technology requirements for secure validation and verification. All information received from the SFS web application is stored in the SFS database.

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.

The SFS Program Office is pursuing enhancements to automate information collection through the SFS system. The current process involves manual and ad hoc collection via email, and as described above, via the SFS system. The collection was under-reported in the previous submission because it has historically occurred through manual processes, with data entry into the system performed by the SFS Program staff. The SFS system enhancements will make the entire SFS registration process fully automated with limited information collected via mail or email. The following information is collected and managed by program administrators. For Student Participants: Full name, Preferred name, Social Security Number (SSN), date of birth, signature, full address, phone number, email address, complete emergency contact information, university/college attending, degree funded, field of study, expected graduation date, date available for internship, date available for post-graduation commitment, high school background, post high school education background, current certifications, cybersecurity employment information and history, resume information, demographic information (gender, ethnicity, race), citizenship or permanent resident status, U.S. Armed Forces status, Internship and Post-graduation placement information to include agency name, sub agency name, job title, salary range and pay plan/series/grade, dates of employment and required training information. In some situations, program administrators may also collect from student participants deferral request information (including justification documentation) or discharge/waiver request information (including justification documentation).

The following information is collected for academic institution officials: Full name, Preferred name, role, university/college, department/field, address, fax number, phone number, email address, website, SFS grant award information, institution demographics. In some situations, program administrators may also collect from academic institution officials funding disbursement details, funding disbursement information, and/or funding amounts repaid and owed.

The following information is collected for agency officials: Agency name, sub agency name, agency type, full name, agency address, work location, work phone number, work fax number, work email address, and agency website.

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.

The SFS registration is filed individually. Once registration information is received and approved, it is stored on a backend database table. The user is permitted to update limited registration information via their profile page (i.e., name, address, and emergency contact information). OPM SFS program office administrators are permitted to modify all other fields on the registrant's profile page upon user request. Additionally, OPM system administrators maintain audit logs and have applicable validation rules in place, both of which would identify and prevent duplicate information needing resolution. Therefore, duplication is minimized.

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

Collection for scholarship recipients and academic institution officials is required for receipt of Federal funding (i.e., scholarship and grant funding). Collection is necessary regardless of the size of the academic institution, and the information collected is the same regardless of size. The same is true for agency officials representing potential employers. The burden cannot be minimized any further for small entities because the program collects the minimum amount of information necessary to administer the program and ensure compliance with statutory requirements.

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.

In return for the scholarship, selected students must work for a government agency or affiliated nonprofit organization, or for a qualified higher education institution, for 1 to 3 years depending on the length of their scholarship. Annual verification of up-to-date contact information and employment verification for SFS participants is required by 15 U.S.C. 7442. Regular reporting on the program to monitor success of recruiting individuals for scholarships under this law and on hiring and retaining those individuals in the public sector cyber workforce is also required by 15 U.S.C. 7442. Less frequent collection of the information could decrease the success of the program and make it much more difficult to place students successfully and meet requirements of Public Law 113-274 and related amendments.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Not applicable. Collection of information for SFS participants and associated academic institution and agency officials is requested initially during a participant's registration with the program. Scholarship recipients, academic institution officials, and agency officials may update their information as needed following the initial registration.

- 8. If applicable, provide a copy and identify the date and page number of publications 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. Specifically address comments received on cost and hour burden.**

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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On November 7, 2023, a 60 Day Federal Register Notice was published at 88 FR 76865. There were no comments received. On September 9, 2024, a 30 Day Federal Register Notice was published at 89 FR 73130. No comments were received.

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

Not applicable. No payments or gifts are provided to respondents as part of this information collection.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here**

An annual review of the IT system or electronic information collection is conducted as required by the Federal Information Security Management Act (FISMA). Security controls are monitored monthly and annually tested as required by FISMA. Personnel using the system have been trained and made aware of their responsibilities for protecting the PII being collected and maintained. Respondents are notified that the information collected may be furnished to government agencies and other entities to facilitate their employment. Information collected is password protected. Links to the Privacy Act Statements are provided on the website and the applicable SORN is OPM INTERNAL-18, Federal Cyber Service: Scholarship for Service (SFS).

- 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private.

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

Estimates are provided by collection group and period. Scholarship recipients and academic officials have two collection time periods, one for new recipients and one for ongoing maintenance. For each new recipient, initial registration is estimated to take approximately 30 minutes, with a total annual

estimated burden of 200 hours. For each active scholar, annual maintenance of their profile and employment is estimated to take 15 minutes, totaling 197 hours per year. For academic officials registering new cohorts, the current manual process takes roughly 30 minutes per recipient. A to-be estimate is provided to reflect the reduced burden resulting from SFS portal improvements. The current annual burden of new cohort registration is estimated at 245 hours and ongoing maintenance and review of active scholars is 123 hours. Agency officials have an estimated total annual burden of 3 hours.

Collection Audience and Period	Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in minutes)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost (rounded)
New Scholarship Recipients – Initial Registration	SFS Portal	3206-0246	400	1	30	200	\$17.79 ¹	\$3,558
Active ² Scholarship Recipients – Ongoing Maintenance and Annual Reporting	SFS Portal	3206-0246	785	1	15	197	\$46.67 ³	\$9,194
Principal Investigator or Academic Official ⁴ – Initial New Cohort Request	Current: via email		98	1-10 ⁵	30	245	\$48.05 ⁶	\$11,775
	Planned: via SFS Portal	3206-0246	98	1-10	15	123	\$48.05	\$5,910
Principal Investigator or Academic Official – Ongoing Maintenance and Annual	SFS Portal	3206-0246	98	15	5	123	\$48.05	\$5,910

¹ Respondents submitting this collection of information are students receiving an annual living stipend in lieu of working. Average Hourly Wage calculated based on living stipend of \$37,000 divided by 2,080 hours.

² “Active” scholarship recipients are either the academic or employment phases of the program, which means they are either in school, searching for post-graduate employment, or meeting their service obligation. New scholarship recipients are excluded from this count and captured in their own row.

³ Based on salary data collected between 2018 and 2023, the average salary of a scholarship recipient earning a bachelor’s degree or equivalent is \$97,088. This figure divided by 2,080 was used to calculate an Average Hourly Wage for “Active” scholarship recipients.

⁴ Principal Investigators or Academic Officials provide initial registration information by cohort (i.e., class of scholarship recipients). A cohort can vary in the number of scholarship recipients with grant and academic institution information being consistent across recipients while individual program of study and awardee information varying by individual scholarship recipient.

⁵ The average number of scholars in an academic institution’s new cohort is 5 based on Fall 2023 enrollment.

⁶ According to the Bureau of Labor Statistics, the median annual wage for postsecondary education administrators was \$99,940 or \$48.05/hour in May 2022. https://www.bls.gov/ooh/management/postsecondary-education-administrators.htm?utm_source=fit/programs/3500/utm_medium

Reporting								
Agency Official Initial Registration and Ongoing Maintenance ⁷	SFS Portal	3206-0246	20	1	10	3	\$52.66 ⁸	\$158
Total: Scholarship Recipients								\$12,752
Total: Principal Investigators or Academic Officials								Current: \$17,685 Planned: \$11,820
Total: Agency Officials								\$158

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

There is no cost to the respondent or record keepers.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annualized total cost to the Federal government to collect and manage the collection of information is increasing due to program growth. Participation, as evidenced by the number of academic institutions and number of scholarship recipients, increases year over year, and the program is responding to increased oversight requirements compared to previous years. Expenses are categorized below as “Program Office” and “IT System” and reflect salary hours devoted to the monitoring, maintenance, and technical support of the data collection in addition to IT operation and maintenance costs associated with the SFS system.

Expense Category	Estimated Cost
Program Office	\$300,000
IT System	\$775,000
Total	\$1,075,000

In addition, we estimate there will be 100% overhead. Therefore the total annualized cost to the Federal Government is estimated at **\$2,150,000**.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Each year NSF awards grants to additional universities to use for scholarships under the SFS program which increases the number of students that receive scholarships, and consequently, the number of scholars that need to be monitored through the completion of their service commitment. Each student awarded a scholarship must register their profile and resume with the SFS website for the successful facilitation of their placement with a government agency, and they must maintain up-to-date profile and employment information through program completion. Additionally, the previous data collection only included new scholars registering with the SFS portal, and it did not include the IT system costs. IT costs, and the requirement for scholars to provide annual employment verification and to maintain an up-to-date profile, have been captured in this submission in addition to the information collected from academic and agency officials.

⁷ Agency officials are primarily Federal employees; however, they may include officials representing State, Local, or Tribal governments, or government-affiliated non-profits considered to be critical infrastructure.

⁸ According to OPM’s 2023 General Schedule Pay Table, \$52.66 is the hourly rate for a GS-13 step 10.

- 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.**

NSF uses basic summary information in its biennial report to Congress for each program year.

- 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.**

Not applicable. The expiration date for OMB approval will be displayed on the SFS application system.

- 18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

No exceptions.