



# NASA Education

To advance high quality Science, Technology, Engineering, and Mathematics (STEM) education using NASA's unique capabilities.

National Aeronautics and  
Space Administration



## NASA Education and the Paperwork Reduction Act



### What does the Paperwork Reduction Act do?

The Paperwork Reduction Act (PRA) requires each Federal agency (1) to seek public comment on proposed information collections and (2) to submit proposed collections for review and approval by the Office of Management and Budget (OMB). OMB's Office of Information and Regulatory Affairs (OIRA) reviews agency information collection requests for approval or disapproval. When OMB approves an information collection, it assigns an OMB control number that the agency must display on the information collection. Under the PRA, OMB approval for an agency to use each information collection instrument can last a maximum of three years.

### What types of information collections trigger the PRA?

The PRA applies to collections of information using identical questions posed to, or reporting or recordkeeping requirements imposed on, "ten or more persons." The following types of collections trigger the PRA:

- Requests for information to be sent to NASA, such as forms (e.g., program application form), written reports (e.g., grantee report), and surveys (e.g., educator survey);
- Recordkeeping requirements, which may involve compilation and maintenance of records, either alone or in conjunction with the reporting of information to the agency and/or some other person;
- Third-party or public disclosure requirements, which may involve a requirement to disclose information to other members of the public directly or through publication in media such as newspapers or magazines, or to post the information on labels.

Unless exempted, all NASA Education collections of information are subject to OMB review and approval regardless of collection technique (e.g., paper, telephone, in-person, automation, electronic) or whether the collections are mandatory or voluntary.

### What types of information collections are exempt from the PRA?

OMB regulations specify a number of items that are generally not considered "information" under the PRA and therefore do not require OMB approval. Important examples relevant to NASA Education include:

- Address information, certifications, or consent forms;
- Samples of products or other physical objects (e.g., request for lesson plans to share at an educator training event);
- Facts or opinions obtained through direct observation by a NASA employee or contractor (e.g., observations of NASA-supported educational programs);
- Facts or opinions submitted in response to general solicitations of comments from the general public, requested from a single person, or in connection with a public meeting;
- Examinations designed to test the aptitude, abilities, or knowledge of the persons tested.

For more information about the Paperwork Reduction Act:

- [The Paperwork Reduction Act](#)
- [Information Collection under the Paperwork Reduction Act](#)
- [Testing and Simplifying Forms](#)
- [FAQs about Common Forms](#)

### ***PRA & Sponsored Collections***

NASA Education uses many vehicles (grants, cooperative agreements, contracts) to accomplish its work. If you contract or enter into a cooperative agreement with another entity to collect information or otherwise cause that entity to obtain, retain, solicit, or require the disclosure to the public of information by or for our agency, NASA is a sponsor for the information collection and must seek PRA clearance. Similarly, when NASA requires a grantee to collect information or requires that NASA specifically approve the collection of information or collection methods, the PRA is triggered.

## What is the process for obtaining PRA clearance?

**Submit service request to initiate PRA clearance.** Submit an [OEID service request](#) for an initial consultation on your PRA need. An OEID subject matter expert will review your request, discuss the potential for use of common forms, and guide you on preparing your initial submission of the Information Collection Request, which includes the Supporting Statement and other documents. All submissions to the PRA Clearance Officer should be reviewed first with the OEID representative.

**Prepare the draft Information Collection Request (ICR) and draft 60-DAY FRN.** The next step is to prepare a draft ICR and draft 60-day Federal Register notice (FRN). Your OEID representative will share sample ICRs and FRNs. The ICR includes:

- A Supporting Statement includes narrative information explaining the purpose, scope, and benefit(s) of the collection. The Supporting Statement is divided into two parts; Part A (Justification) and Part B (Statistical Methodology). Part A is mandatory for all supporting statements; Part B is required for all supporting statements that involve statistical methods.
- Attachments should include the data collection form(s) (e.g., questionnaire, survey, interview guide, telephone interview script), as well as any instructions for completing the information collection. Introductory and follow-up correspondence to respondents, including consent forms, should be included.

**PRA Clearance Officer reviews ICR and FRN.** The draft ICR and FRN must be reviewed and approved by the PRA Clearance Officer. Expect several revisions of the documents prior to the release of the 60-day FRN.

**PRA Clearance Officer publishes 60-Day FRN.** The 60-Day Federal Register notice is published, informing the public of your intent to ask for clearance for the collection of information and soliciting comments for a 60-day period.

**Test data collection forms.** All forms should be tested to ensure they are not unnecessarily confusing or burdensome. Testing should occur either before or immediately after the 60-day Federal Register notice. Testing commonly takes the form of focus groups and/or in-person observations of individuals responding to the forms and questions (i.e. cognitive testing). An estimate of the time burden for each form should also be refined based on testing results. If testing involves over 9 members of the public, use the Fast Track PRA clearance process for permission to test the forms.

**Update the ICR at the conclusion of the 60-day period.** Based on testing results and public comments received during the 60-day period, update the ICR and resubmit it to the PRA Clearance Officer.

**PRA Clearance Officer publishes a 30-Day FRN and submits package to OMB.** Following the conclusion of the 60-day period and if the revised ICR has been approved by the PRA Clearance Officer, a 30-Day Federal Register notice (FRN) is published and the package is submitted electronically to OMB. This second opportunity for comment notifies the public that the clearance request has been submitted to OMB and they have an opportunity to comment on the final version of the ICR. Once OMB has received the ICR, the 60-Day OMB review period begins.

**OMB and NASA Pass-Back Period.** During the 60-Day OMB review period, discussions or negotiations concerning the ICR may occur between the PRA Clearance Officer and OMB by either conference call or e-mail. Comments received from the public during this review period can also be discussed at this time. Education staff may be involved if necessary during this period, including being asked to provide answers to OMB questions or revising the ICR.

**OMB Action.** At the conclusion of the 60-Day OMB review, OMB issues a Notice of Action (NOA). The OMB Notice of Action contains one of three responses: Approval, Disapproval, with a process for appeal, or Withdrawal. Additionally terms of clearance can be attached to the ICR.

