

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

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.*

Information collection for the seven discretionary programs specified below is necessary for institutions of higher education, organizations, and individuals to apply for and receive grants. The Office of Management and Budget (OMB) number 1840-0068 that indicates approval for the collection of information for these programs expires on June 30, 2004. We request approval to continue this information collection to allow the International Education Programs Service (IEPS) to invite applications under these programs, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules.

Programs Covered under this Information Collection	CFDA No.	Date Respondents Submit Applications	Information Collection Required for Fiscal Year Awards (New)
Business and International Education	84.153	11/2004	FY 2005
Fulbright-Hays Group Projects Abroad	84.021	10/2004	FY 2005
International Research and Studies	84.017	11/2004	FY 2005
Undergraduate International Studies and Foreign Language	84.018	11/2004	FY 2005
Language Resource Centers	84.229	11/2005	FY 2006
National Resource Centers and Foreign Language and Area Studies Fellowships	84.015A 84.015B	11/2005	FY 2006
American Overseas Research Centers	84.274	11/2006	FY 2007

Six programs are authorized under parts A and B, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 96-374). The remaining program (Fulbright-Hays, Group Projects Abroad) is authorized by section 102 (b)(6) of the Mutual Educational and Cultural Exchange Act of 1961 (P.L. 87-256), most commonly known as the Fulbright-Hays Act. Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; the Government Paperwork Elimination Act; the Education Department General Administrative Regulations; and program specific regulations.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections (1890-0001).

The Business and International Education program provides grants to institutions of higher education to internationalize the business curriculum and to conduct outreach activities that will assist the local business community in competing in the global arena.

The Fulbright-Hays Group Projects Abroad program provides grants for overseas projects in training, research, and curriculum development in modern foreign languages and area studies for groups of teachers, students, and faculty.

The International Research and Studies program provides grants to public and private agencies, organizations, institutions of higher education, and individuals to conduct research and studies to improve and strengthen instruction in modern foreign languages, area studies, and other international fields.

The Undergraduate International Studies and Foreign Language program provides grants to institutions of higher education, partnerships between nonprofit educational organizations and institutions of higher education, and public and private nonprofit organizations, to implement programs to strengthen and improve undergraduate instruction in international studies and foreign languages.

The Language Resource Centers program provides grants to institutions of higher education to establish, strengthen, and operate centers serving as resources for improving the nation's capacity for teaching and learning foreign languages through teacher training, research, instructional materials development, and dissemination projects.

The National Resource Centers program provides grants to institutions of higher education for establishing or strengthening nationally recognized foreign language and area or international studies centers or programs. The Foreign Language and Area Studies Fellowships program provides allocations of fellowships to institutions of higher education to assist meritorious graduate students undergoing training in modern foreign languages and related area or international studies.

The American Overseas Research Centers program provides grants to a consortium of institutions of higher education to establish or operate a permanent center overseas to promote postgraduate research, exchanges, and area studies.

The authorizing legislation and program-specific regulations are incorporated in the application packages attached to this supporting statement.

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.

Eligible institutions of higher education and other eligible entities use the information to develop and submit grant applications to the Department of Education (ED). After grant applications are submitted, ED determines the budgetary and human resources it needs to conduct cyclical competitions. Expert review panels use the information to identify high-quality applicants. ED program officials consider the feedback from the expert review panels, in conjunction with the programs' legislative purposes, when making funding recommendations. ED also uses the information collection to develop monitoring plans, to inform strategic planning, and to align program assessment standards with Department performance goals and initiatives.

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

The information collection requires applicants for grants under the seven programs to submit applications electronically using the Electronic Grant Application System (e-Application) available through the Department's e-GRANTS system. With the exception of the National Resource Centers (NRC) and Foreign Language and Area Studies (FLAS) Fellowships programs (CFDA 84.015A and 84.015B), all programs referenced in this information collection have piloted e-Application for one or two competitions.

Based on consultations that IEPS has held with the Department's e-GRANTS Team over the past months, it is unclear at this time whether the Department-wide system will be enhanced by next year to accommodate the submission of NRC and FLAS applications using e-Application. Consultations with the e-GRANTS Team are ongoing.

Regarding the use of other forms of information technology, we use the Department's Web site to inform prospective applicants about the seven programs' funding opportunities and deadline dates. Application packages are posted on the Web site making access to them more effective and efficient. Additionally, we post Frequently-Asked Questions about these programs on our Web page, which makes technical assistance more immediate. Also as a technical assistance tool, we post abstracts of currently funded projects on the Department's Web site to help prospective applicants better understand the kinds of activities and projects the seven programs support.

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

No other information collections duplicate what is being requested under this collection. Likewise, there is no duplication elsewhere in the Federal government of IEPS program planning and oversight activities associated with these programs.

The legislative authorities, program regulations, and respondents covered by this information collection are unique to the seven programs listed in Item 1. Because of these inherently unique programmatic characteristics, no other similar programs exist in the Department, and no similar programs exist in other Federal agencies.

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.*

The collection of information does not impact small businesses or other small entities.

6. *Describe the consequences 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.*

If the collection is not conducted, ED cannot meet its grant making responsibilities, including the publication of closing date notices, providing technical assistance to new respondents, conducting peer reviews of grant applications, transmitting slates with funding recommendations to program officials for approval, and making grant awards.

The Department needs to make grant applications available to its constituencies to give eligible applicants at least 30 days to develop and submit applications by the dates specified in Item 1, and to enable IEPS to make new fiscal year grant awards in a timely manner.

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 than 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.*

This information collection does not impose on respondents any of these requirements and conditions.

8. *If applicable, 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. 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 instruction and record keeping, 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.

A notice regarding this information collection will be submitted for publication in the Federal Register on July 13, 2004. OMB will be apprised of public comments received, if any.

On a regular basis, we hold informal discussions with various constituents and potential respondents who have completed grant applications under these seven programs to ascertain whether the instructions and forms are clear and applicant-friendly. These include project directors, deans, chairs of academic departments, experts in foreign language pedagogy and area studies and international studies, business professionals, fiscal representatives at institutions, and management analysts who are responsible for gathering the data needed to respond to the programs' selection criteria.

Additionally, we hold discussions periodically with professional organizations such as the National Council of Organizations of Less Commonly Taught Languages, the Center for Applied Linguistics, the Council of American Overseas Research Centers, the National Foreign Language Center at the University of Maryland, and area studies associations. These organizations provide feedback on the clarity of the instructions and forms, and whether the application forms and instructions solicit information that meets the purposes of the Title VI legislation and regulations.

Our day-to-day technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer specific questions about the grant application instructions and to gauge whether or not application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance includes phone conversations, e-mails, faxes, and office visits. We conduct formal technical assistance workshops for current and prospective applicants in the calendar year preceding a competition for new fiscal year grant awards. These technical assistance workshops cover all key elements of the grant application. The workshops are announced in the Federal Register.

In sum, these processes collectively inform IEPS about the viability of the application materials we use for our programs. The professionals, administrators, and organizations cited above do not have adverse comments about the information being requested or about the time it takes to complete a grant application under these seven programs.

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

Other than remuneration of grantees via grant awards, there are no payments or gifts to respondents.

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

Assurances of confidentiality related to this information collection are covered under the Privacy Act.

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. The 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.

Questions of a sensitive nature are not asked.

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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- ? 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 of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.

This request for approval covers seven information collections (application forms). Using the communication mechanisms described in paragraph Item 8, we contacted a sampling of respondents to get their input on the time and resources they require to complete grant applications. The table below presents the hour burden and cost for each form separately, as instructed. The aggregate burden for the seven forms appears in item 13 of OMB Form 83-1.

The data in the table are estimates of the time it takes for respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Department’s e-Application system which requires applicants to cut and paste information that responds to individual selection criteria (ranging from 6 to 10 criteria per program) into separate screens.

Estimate of Annualized Burden Hours and Cost to Respondents

Information Collection (Grant Application)	Number of Respondents	Hours per Response	Total Hours	Frequency of Response	Wage per Hour	Annualized Cost for the Information Collection
Business and International Education (CFDA 84.153)	100	100	10,000	Annual	\$65	\$650,000
Group Projects Abroad (CFDA 84.021)	90	100	9,000	Annual	\$55	\$495,000
International Research and Studies (CFDA 84.017)	90	70	6,300	Annual	\$30	\$189,000
Undergraduate International Studies and Foreign Language (CFDA 84.016)	85	100	8,500	Annual	\$55	\$467,500
Subtotal	365	370	33,800			\$1,801,500
National Research Centers and Foreign Language and Area Studies Fellowships	170	200	34,000	Every 3 Years	\$55	\$1,870,000

(CFDA 84.015A and 84.015B)						
Subtotal	170	200	11,333			\$623,333
American Overseas Research Centers (CFDA 84.274)	15	50	750	Every 4 Years	\$55	\$41,250
Language Resource Centers (CFDA 84.229)	27	80	2,160	Every 4 Years	\$30	\$64,800
Subtotal	42	130	728			\$26,513
TOTAL	577	700	45,861			\$2,451,346

NOTE (1.) To determine the total estimated annual respondent burden for programs that do not request applications annually, we have done the following calculations:

National Resource Centers and Foreign Language and Area Studies Fellowships: $34,000 \text{ hrs} \div 3 = 11,333$

American Overseas Research Centers (750) and Language Resource Centers (2160): $2,910 \text{ hrs} \div 4 = 728$

NOTE (2.) A similar calculation has been applied to determine the estimated annual cost for these programs, as well.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- ? *The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*
- ? *If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*
- ?
- ? *Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

Total Annualized Capital/Startup Cost:
Total Annual Costs (O&M) :

Total Annualized Costs Requested :

The programs in this information collection do not have costs that meet the criteria for inclusion in Item 13.

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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.*

The annualized cost to the Federal government in the table below includes costs related to primary operational and programmatic tasks necessitated by this collection of information. This information collection covers seven programs that require the resources of 14 program officers, 2 team leaders, 3 administrative assistants, and external peer review panels to conduct the tasks.

Estimates of Annualized Cost to the Federal Government

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	\$40	1	45	\$1,800
Develop 7 application forms and instructions	\$40	7	1,764 (7x7x36hr)	\$70,560
Develop Notices of Closing for 7 programs	\$40	7	882 (7x7x18hr)	\$35,280
Enter approved collection into EDICS	\$40	1	9	\$ 360
Enter 7 application and forms into e-GRANTS e-Application module for respondents to access	\$40	7	126 (7x1x18hr)	\$5,040
Post 7 applications on the Department’s website	\$40	3	81 (3x27hrs)	\$3,240
Establish reader panels in e-READER to evaluate 577 e-Applications	\$40	14	378 (14x27hr)	\$15,120
Send conflict of interest forms to reviewers; process certifications; consult with Executive Office for approvals; mail e-READER manuals to reviewers	\$20	3	135 (3x45hr)	\$2,700
Conduct e-READING conference calls; monitor panels via e-mails; read reviewers’ comments in e-READER	\$40	14	**630	\$25,200
Download and print 577 applications and 1,731 technical review forms	\$40	14	**630	\$25,200
***Compensate 115 reviewers after certifying satisfactory completion of e-READING to evaluate 577 e-Applications	\$1000 flat rate	115	4600	\$115,000

Submit funding recommendations for 7 programs to Team Leader	\$40	14	252 (14x18hr)	\$10,080
Team Leaders develop slate memo and attachments for 7 programs	\$55	2	54 (2x27hr)	\$2,970
Program officials approves slates	\$75	3	54 (3x18hr)	\$4,050
Commit 400 grants in GAPS	\$40	14	252 (14x18hr)	\$10,080
Team Leaders obligate 400 grants in GAPS	\$55	2	36 (2x18hr)	\$1,980
Review revised budgets; mail 400 grant award documents	\$40	14	252 (14x18hr)	\$10,080
Document monitoring activities weekly for 400 projects in compliance with OPE standards	\$40	14	630 (14x45)	\$25,200
TOTAL			10,810	\$363,940

** e-Readings are conducted over two weeks. The 630 hours includes 10 days @ 9 hrs x 7 grant competitions. The same calculation is used for downloading and printing documents from e-GRANTS.

*** The 577 e-Applications require 3 readings (evaluations) for a total of 1,731 readings. To complete 1,731 readings, a reasonable workload is 3 readings a day x 5 days for 15 readings a week. Dividing 1,731 by 15 =115 reviewers.

15. *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I*

This is a request for reinstatement of an information collection. The information provided below explains what has occurred regarding the total number of respondents and the total annual hours for programs included in this request.

The total number of respondents on line a. in Item 13 in this request is 577. This reflects an increase of 49 over the current inventory of 528. This increase is due to additional respondents in the following programs:

- The International Research and Studies Program (IRS): 35
- The Language Resource Centers Program (LRC): 9
- National Resource Centers (NRC) and Foreign Language and Area Studies (FLAS) Fellowships Program: 5

The total annual hours on line c. in Item 13 in this request is 45,861. This reflects an increase of 7,236 over the current inventory of 38,625. The additional 7,236 hours are based on the following

- The total burden hour for NRC and FLAS respondents is increased from 6,600 hours to 11,333, to provide 170 respondents additional time to submit applications using e-Application for the first time. The transition from preparing hard copy grant applications to submitting applications online is expected to consume a significant amount of time because of the types of data respondents will have to complete and upload into the system, including, but not limited to, course lists, enrollment data, career placements, key personnel curriculum vitae, and outreach activities.

Adjustment: + 4733

- The increase in the number of IRS respondents has caused the total burden hour to increase from 3850 to 6300.
Adjustment: + 2450
- The slight increase in the number of LRC respondents has caused the hours needed to complete an application to increase slightly, from 480 hours to 540.
Adjustment: + 60
- The burden hour for the American Overseas Research Centers Program in the previous collection was calculated on the basis of tri-annual competitions, resulting in an hour burden of 195. The burden hour in this request is calculated on the basis of quadrennial competitions, resulting in a burden of 188.
Adjustment: - 7

Total adjustment: 7,243 - 7 = 7236

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.*

There are no plans to publish the results of this collection of information.

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.*

We are not seeking approval to not display the expiration date for OMB approval of the information collection. On the contrary, we are requesting approval for a new OMB expiration date to be displayed on the seven applications included in this information collection.

18. *Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This collection does not employ statistical methods.

Item 8 first revised 7/8/04 per Joe Schubart