

Supporting Statement for Paperwork Reduction Act Submissions

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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.*

One of the core administrative activities of the office of International Education Programs Service (IEPS) is to award continuation grants under the fourteen discretionary programs cited in this information collection. Our capacity to conduct this activity, however, is contingent upon the availability of information that grant recipients submit in annual performance reports. The Education Department General Administrative Regulations (EDGAR) stipulates that a recipient that wants to receive a continuation award shall submit a performance report that provides the most current performance and financial expenditure information. The online reporting system described in this statement provides grantee institutions with a centralized repository for inputting their performance report data and narrative information.

There are a number of additional legal or administrative requirements that make this collection necessary, including -the program reporting and evaluation requirements in the Department of Education's Strategic Planning, Performance Management Database (PPMD); the Government Performance and Results Act (GPRA) of 1993; and the Performance Assessment Rating Tool (PART). PPMD is the Department's strategic planning performance data collection system. The IEPS reporting system (formerly known as EELIAS) gathers and maintains the information that program managers use to help them align program operations level with the Department's overall strategic goals and objectives. The PPMD contains the performance and efficiency measures for each of the 14 programs as well as the results of each measure, if available at this time. The GPRA requires all federal agencies to develop annual performance plans for their programs, in which the agencies specify the outcomes to be achieved, the indicators of success, and strategies to be followed to accomplish the plan. GPRA further requires the submission of an annual performance report to Congress.

One of the five initiatives on the President's Management Agenda is budget and performance integration. This initiative builds on the GPRA and previous efforts to identify program goals and performance measures and to link them with the budget process. The Office of Management and Budget's (OMB) PART initiative provides a common, transparent approach to assessing programs and supporting recommendations based on those assessments. The OMB uses PART data in part to determine which programs are successfully meeting their stated goals and objectives.

The IEPS reporting system was initially designed and implemented to respond to the GPRA mandate, that by Fall 2002, all federal agencies would have demonstrated that they had developed consistent and effective annual data collections with systematized evaluation for their respective programs. In 1998, the U.S. Department of Education's (ED) Office of International Education Programs Service (IEPS) funded a project to meet this mandate. The development of the IEPS reporting system made a fundamental change in how performance information and data for the fourteen International Education and Foreign Language Studies programs, authorized under Title VI of the Higher Education Act and section 102(b)(6) of the Mutual Educational and Cultural Exchange Act, also known as Fulbright-Hays (F-H), was collected. IEPS used this project to replace the paper collection instruments with an online performance reporting instrument.

The development of the system, which was a response to the GPRA mandate, was funded through a Title VI International Research and Studies Program (IRS) grant awarded to the National Foreign Language Center (NFLC) at the University of Maryland. In August 2004, at the conclusion of the grant, the administration of the system was incorporated into a contract administered by IEPS and awarded to Computer Business Methods, Inc. (CBMI). When IEPS gained control of the system, it became clear that improvements and enhancements to the systems were necessary including a complete review of the data collection instruments to identify quality control issues. Teams of IEPS staff have spent the past 18 months reviewing the instruments, making recommendations for changes, and identifying areas of concern voiced by grantees. Additionally, IEPS staff have worked with ED's Strategic Policy Staff to identify two performance measures and one efficiency measure for each of the 14 IEPS programs. With the development of these measures, screens had to be revised to ensure the correct data was being captured to allow for the measurement of each program's effectiveness.

The IEPS reporting system allows Title VI/F-H program grantee institutions to submit performance report information and data, including project abstracts, project status, GPRA information, and budget information that are more comprehensive, and comparable than the traditional paper reports. The reports provide IEPS management and program officers with valuable performance information to enable them to assess program effectiveness. The system also captures the data that is used for the GPRA, PPMD, and PART performance indicators.

This information collection package requests continued approval for the performance objectives and indicators for all fourteen programs: (1) American Overseas Research Centers Program (AORC), (2) Business and International Education Program (BIE), (3) Centers for International Business Education (CIBE), (4) Foreign Language and Area Studies Fellowships Program (FLAS), (5) Institute for International Public Policy Program (IIPP), (6) International Research and Studies Program (IRS), (7) Language Resource Centers Program (LRC), (8) National Resource Centers Program (NRC), (9) Technological Innovation and Cooperation for Foreign Information Access Program (TICFIA), (10) Undergraduate International Studies and Foreign Language Program (UISFL), (11) Fulbright-Hays Doctoral Dissertation Research Abroad Program (DDRA), (12) Fulbright-Hays Faculty Research Abroad Program (FRA), (13) Fulbright-Hays Group Projects Abroad Program (GPA), and (14) Fulbright-Hays Seminars Abroad Program (SA).

The statutes and regulations that necessitate this collection include the following and appear in [Attachment A](#):

- The Higher Education Act of 1965, as amended, Title VI Part A, section 601.
- The GPRA of 1993.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 602(a) National Language and Area Centers and Programs; section 602(b) Graduate Fellowships for Foreign Language and Area or International Studies.
- 34 CFR part 656 National Resource Centers Program for Foreign Language and Area Studies or Foreign Language and International Studies, sections 656.1 through 656.7, 656.10, 656.20 through 656.23 and 656.30.
- 34 CFR Part 657 Foreign Language and Area Studies Fellowships Program, sections 657.1 through 657.5, 657.10, 657.11, 657.20 through 657.22, and 657.31 through 657.34.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 603, Language Resource Centers.
- 34 CFR Part 669 Language Resource Center Program, sections 669.1 through 669.5, 669.20 through 669.22, and section 669.30.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 604, Undergraduate International Studies and Foreign Language Program.
- 34 CFR Part 658 Undergraduate International Studies and Foreign Language Program, sections 658.1 through 658.4, 658.10 through 658.12, 658.30 through 658.35, and 658.40 and 658.41.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 605, International Research and Studies.
- 34 CFR Part 660 International Research and Studies Program, sections 655.1 through 655.4, 655.10, and 655.30 through 655.32.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 606, Technological Innovation and Cooperation for Foreign Information Access.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 609, American Overseas Research Centers.
- The Higher Education Act of 1965, as amended, Title VI Part B – Centers for International Business Education Program sections 611 and 612.
- The Higher Education Act of 1965, as amended, Title VI Part B - Business and International Education Programs sections 611 and 613.
- The Higher Education Act of 1965, as amended, Title VI Part C – Institute for International Public Policy, section 1131 Minority Foreign Service Professional Development Program.
- The Mutual Educational and Cultural Exchange Act (The Fulbright-Hays Act), 1961, section 102 (b)(6), DDRA, FRA, GPA, and SA programs.

- 34 CFR Part 662, Fulbright-Hays Doctoral Dissertation Research Abroad Program.
- 34 CFR Part 663, Fulbright-Hays Faculty Research Abroad Program.
- 34 CFR Part 664, Fulbright-Hays Group Projects Abroad Program.
- 34 Code of Federal Regulations (CFR) part 655, General Provisions for International Education Programs, section 655.1 through 655.4, 655.10, 655.30 through 655.32.
- Education Department General Administrative Regulation (EDGAR), 34 CFR Part 74, section 74.51 and 34 CFR Part 75, sections 75.118, 75.253, 75.720.

Note: EDGAR citations include the requirements for the submission of annual and final performance reports and ED responsibilities for reviewing performance information to make continuation awards.

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.

IEPS management uses the data and information generated from the system to inform the Title VI/F-H program monitoring, evaluation, and budget processes. Management also uses the data to calculate the performance and efficiency measures required by PART. Reports are run in response to high-level requests within the Department for program information and statistics. The data in the system is being used externally by grantees and contractors to assess program effectiveness and to make recommendations for program administration and technical (including system) improvements.

IEPS program officers use the system information and data since they need reliable, comparable information about their grantees' projects in order to determine whether grantees are completing grant-funded activities in compliance with the approved grant applications, and whether grantees are expending grant funds for allowable and allocable costs. The program officers' assessments of substantial progress (or not) provide the basis for making continuation awards in subsequent budget periods for the grant cycle.

The CBMI Help Desk is the primary source for systems related questions and concerns, and currently the help desk calls are being logged in with detail so that eventually online technical assistance can be developed and provided within the system. Program officers also provide technical assistance on how to access the system's screens

Grantee institutions use the IEPS reporting system to input program performance information, and to submit that information to ED as part of the annual report for obtaining continuation awards from ED. Currently, grantees are making a concerted effort to respond to reporting requirements by providing additional quantitative data through the IEPS reporting system. In doing so, grantees collectively make a powerful statement regarding the relevance of their projects and the importance of international education programs overall. In addition, the Congress and OMB use the information collected by the IEPS reporting system to determine the effectiveness of the International Education Programs.

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 IEPS reporting system is web-based. Grantees funded under the 14 IEPS programs submit their performance reports using the system. This is the most efficient way to collect and review grantee performance reports. It also allows for more rapid dissemination of the data collected as it is collected via the system and stored in a database. Select data elements from the reports are then made available to the general public on a contractor-maintained public web site.

This is the third clearance of this reporting system so the use of a web-based reporting system has been in practice for a number of years. It has worked well and continues to be improved so we are continuing its use.

Continuing to collect information electronically in a system that is being enhanced provides additional reductions in burden on the grantees.

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.

The IEPS reporting systems collects performance report data from grantees and is the only mechanism by which this data is collected. The information is not available through any other means. Therefore there is no duplication.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The collection 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.

34 CFR § 74.51 and §75.118 require that grantees submit performance reports in order to provide the information required in §74.51(d)(1)-(3) and in order to provide program staff with enough information to determine that substantial progress has been made towards the project's goals (§75.118(a)) so that continuation funding may be awarded. The IEPS reporting system is the only mechanism for collecting the information needed to monitor and administer these grant programs. These programs cannot be administered in compliance with the Education Department's regulations without this system.

7. Explain any special circumstance 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.

None of the special circumstances listed applies to this information request.

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.

IEPS maintains an ongoing dialogue with the constituency regarding the use, improvements, and enhancements of the IEPS reporting system. In February 2005, three sessions were held at the NRC and FLAS public technical assistance workshop to solicit input on how to improve the system. The room was filled to standing room only and the exchange of information was very valuable. Users of the system for multiple IEPS programs participated so a broad array of feedback was received. Many of the suggestions are incorporated in the proposed screens.

Program officers receive queries from grantees on the system that are then shared with management and the contractor so that if there is a recurring question, it can be addressed. The help desk also tracks queries and again, if there is a recurrence, the contractor shares it with management and action is taken to improve the process. No online help or paper-based help documents were provided by NFLC after the grant ended, so we are in the position of developing help documents.

Refer to [Attachment B](#) for copies of the proposed IEPS reporting system screens, and [Attachment C](#) for a spreadsheet documenting the proposed changes to the current system.

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

This is not applicable as no payments or gifts are provided to respondents.

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

Grantee institutions are not provided any assurance of confidentiality because confidentiality is not authorized in the applicable statutes, regulations, or agency policy. None of the 14 programs collects or will collect information that is covered under the Privacy Act of 1975. The data collected consists solely of quantitative data regarding individual program objectives and qualitative information relating to grantee status and accomplishment of program goals.

ED assures the protection of fellow/participant data by using a password-protected system. Passwords will automatically be generated and assigned to authorized administrators at the FLAS, FRA, DDRA, and GPA grantee institutions upon creation of their IEPS reporting system account. When the grantee institutions submit the FLAS, FRA, DDRA, and GPA institutional lists, the IEPS reporting system will create a password for each fellow/participant on each institutional list. The fellow/participant uses the assigned password to complete and submit his or her performance reporting, including a language self-evaluation to ED. The self-evaluation portion of the report is available only to that fellow/participant and the ED program officers. Project directors will be able to view the academic portion of the fellow's reports.

Similarly, information in the NRC, IIPP, UISFL, BIE, CIBE, AORC, LRC, IRS, TCFIA, SA and the institutional portion of FRA, DDRA, and GPA performance reports is password-protected. The IEPS reporting system will automatically generate and assign a password to the project director at the grantee institutions upon creation of their IEPS account. Using their passwords, these administrators will have access to the system to input the names of other authorized users (who will have data input rights but not the ability to submit any reports), as well as complete and submit the performance reports to ED. After the performance reports are electronically submitted, the system prohibits access by one grantee institution to another grantee institution's performance report.

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 collection does not ask 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. 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 be included in Item 14.

Annual Performance Report Estimated Burden for Grantees from the 14 IEPS Programs

(Estimates are based on previous usage of the system by the grantees as well as contractor and staff input on the revised screens.)

| Program | Number of Respondents | Est. Number of Hours/ Respondent | Frequency (Reports/Year) | Total Number of Screens / Year | Est. Number of Total Hours | Est. Hourly Wage of Respondent | Est. Total Cost |
|---------------|-----------------------|----------------------------------|--------------------------|--------------------------------|----------------------------|--------------------------------|-----------------|
| AORC | 12 | 15 | 2 | 17 | 180 | \$35 | \$6,300 |
| BIE | 31 | 20 | 2 | 20 | 620 | \$35 | \$21,700 |
| CIBE | 30 | 30 | 2 | 22 | 900 | \$35 | \$31,500 |
| DDRA Fellow | 150 | 4 | 2 | 12 | 600 | \$15 | \$9,000 |
| DDRA Director | 37 | 4 | 1 | 6 | 148 | \$35 | \$5,180 |

| | | | | | | | |
|--------------------------|-------------|------------|-----------|------------|--------------|--------------|------------------|
| FLAS Fellow | 1550 | 1 | 1 | 4 | 1550 | \$15 | \$23,250 |
| FLAS Director | 140 | 20 | 4 | 9 | 2800 | \$25 | \$70,000 |
| FRA Fellow | 25 | 4 | 2 | 13 | 100 | \$35 | \$3,500 |
| FRA Director | 22 | 1 | 1 | 6 | 22 | \$35 | \$770 |
| GPA Participant Annual | 500 | 1 | 2 | 3 | 800 | \$30 | \$24,000 |
| GPA Director Annual | 45 | 10 | 2 | 14 | 450 | \$35 | \$15,750 |
| GPA Participant Language | 500 | 1 | 2 | 4 | 450 | \$15 | \$6,750 |
| GPA Director Language | 18 | 10 | 2 | 14 | 180 | \$35 | \$6,300 |
| IIPP | 1 | 12 | 2 | 17 | 12 | \$35 | \$420 |
| IRS | 20 | 10 | 2 | 15 | 200 | \$35 | \$7,000 |
| LRC | 14 | 15 | 2 | 15 | 210 | \$35 | \$7,350 |
| NRC | 146 | 30 | 2 | 20 | 4380 | \$35 | \$153,300 |
| SA Participant | 143 | 1 | 2 | 8 | 143 | \$35 | \$5,005 |
| SA Admin Agency | 9 | 2 | 1 | 8 | 18 | \$25 | \$450 |
| SA Domestic | 3 | 1 | 1 | 4 | 3 | \$25 | \$75 |
| TICFIA | 10 | 8 | 2 | 14 | 80 | \$35 | \$2,800 |
| UISFL | 27 | 20 | 2 | 22 | 540 | \$35 | \$18,900 |
| TOTALS | 3433 | 220 | 41 | 267 | 14386 | \$675 | \$419,300 |

Refer to [Attachment D](#) for a chart of the current and planned reporting schedule for grantees, to [Attachment E](#) for a spreadsheet outlining the proposed screens required for each report, and [Attachment F](#) for an overview of all proposed screens, indicating on which report(s) the screens appear and whether or not these are required.

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.

The total annual cost burden to respondents is shown in the Table in Item 12 above.

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 hourly wages of a GS-14 and GS-13 education program specialists/management analysts are used to estimate costs:

| IEPS Staff Task | Hourly Cost | Hours per | Number of | Total Hours | Cost to Federal |
|-----------------|-------------|-----------|-----------|-------------|-----------------|
|-----------------|-------------|-----------|-----------|-------------|-----------------|

| | | Task | Reports | for Task | Government |
|---|------|------|---------|----------|------------------|
| Request OMB Clearance | \$50 | 40 | 1 | 40 | \$2,000 |
| Review AORC Performance Reports | \$42 | 2 | 12 | 45 | \$1,890 |
| Review BIE Performance Reports | \$42 | 2 | 60 | 180 | \$7,560 |
| Review CIBE Performance Reports | \$42 | 2 | 30 | 120 | \$5,040 |
| Review DDRA Institutional List | \$42 | 1 | 37 | 40 | \$1,680 |
| Review DDRA Fellow Performance Reports | \$42 | 1 | 150 | 500 | \$21,000 |
| Review FLAS Performance Reports | \$42 | 2 | 124 | 405 | \$17,010 |
| Review FLAS Student Performance Reports | \$42 | 0.25 | 1550 | 250 | \$10,500 |
| Review FRA Institutional List | \$42 | 1 | 22 | 60 | \$2,520 |
| Review FRA Fellow Performance Reports | \$42 | 1 | 25 | 70 | \$2,940 |
| Review GPA Institutional Performance Reports | \$42 | 2 | 65 | 260 | \$10,920 |
| Review GPA Fellow Performance Reports | \$42 | 0.5 | 200 | 100 | \$4,200 |
| Review IIPP Performance Reports | \$42 | 1 | 1 | 1 | \$42 |
| Review IRS Performance Reports | \$42 | 2 | 45 | 135 | \$5,670 |
| Review LRC Performance Reports | \$42 | 3 | 14 | 42 | \$1,764 |
| Review NRC Performance Reports | \$42 | 2 | 124 | 330 | \$13,860 |
| Review SA Domestic Agency Performance Reports | \$42 | 1 | 2 | 20 | \$840 |
| Review SA Overseas Agency Report | \$42 | 2 | 10 | 40 | \$1,680 |
| Review SA Fellow Performance Reports | \$42 | 0.5 | 160 | 160 | \$6,720 |
| Review TICFIA Performance Reports | \$42 | 2 | 10 | 30 | \$1,260 |
| Review UISFL Performance Reports | \$42 | 2 | 60 | 180 | \$7,560 |
| Prepare New and Continuation Grant Awards Notifications | \$42 | 2 | 604 | 1731 | \$72,702 |
| Technical Assistance to Grantees | \$42 | 1200 | | | \$50,400 |
| Total | | | | | \$249,758 |

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision of a currently approved collection. Therefore, a change has been made on OMB Form 83-1. The changes in the hours and dollars reflect the time it will take to complete the new screens as well as changes in wages since the previous collection. Overall the improved system will result in lesser burdens (both hours and costs) for the grantees.

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.

IEPS does not plan to publish the information collection results.

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.

IEPS will display the OMB expiration date.

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

IEPS does not have exceptions to this statement.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 17 on Form OMB 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

This is not applicable, as IEPS does not use statistical methods in this collection.

1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information, including:

- Statistical methodology for stratification and sample selection.
- Estimation procedure.
- Degree of accuracy needed for the purpose described in the justification.
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.