

**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.

Consistent with the provisions of P.L. 105-244 (Title VII, Part B, Section 741 of the Higher Education Act as amended), the Fund for the Improvement of Postsecondary Education (FIPSE) works to improve postsecondary education through grants to postsecondary educational institutions and agencies. Such grants are awarded on the basis of competitively reviewed applications submitted to FIPSE under its Comprehensive and Special Focus Competition Program grant competitions (see P.L. 105-244 [Title VII, Part B, Section 744(c)(3) and (4)] for Special Focus Competitions). The U.S. Department of Education is requesting approval of the grant application guidelines used to solicit applications for new grants under the Special Focus Program: the U.S.-Russian Program: Improving Research and Educational Activities in Higher Education (U.S.-Russia Program). This is a new Special Focus Competition under FIPSE. The U.S.-Russia Program is an outgrowth of a Memorandum of Understanding (MOU) signed on May 31, 2006 between the U.S. Department of Education and the Russian Ministry of Education and Science. The MOU supports the promotion of understanding between the peoples of the Russian Federation (RF) and the United States (U.S.) and improving the quality of their human resource development. It is the intent of the U.S. Department of Education and the Russian Ministry to conduct the first competition for the U.S.-Russia Program in fiscal year 2007. The request and justification provided here applies to the applications instruction package, which includes program-specific forms for the U.S.-Russia competition as well as other information required for submissions through the electronic portal, "Grants.gov."

FIPSE's U.S.-Russia Program will award grants to U.S. institutions participating in bilateral institutional cooperation to support innovative projects that will improve research and education activities in higher education in the U.S. and Russia. The rationale for the U.S.-Russia Program is based upon the growing pace of global interconnectedness, which is

requiring postsecondary education to prepare individuals for work that will be in an international environment. Institutions will be funded by their respective government agencies: in the United States, the U.S. Department of Education's Fund for the Improvement of Postsecondary Education (FIPSE); in Russia, the Russian Ministry of Education and Science.

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.

It is intended that the application guidelines for the U.S.-Russia Program will be used for the first time in fiscal year 2007. The guidelines have been developed in cooperation with the Russian Ministry for Education and Science. The guidelines are used to provide institutions of higher education with information and criteria by which they can submit proposals to the U.S.-Russia grant competition.

The U.S.-Russia Program awards grants to U.S. institutions that form a bilateral consortium with institutions in Russia. At least one institution from the U.S. and one institution from the Russian Federation comprise a collaborative study program. Collaborative study programs or consortia also may involve more institutions in the U.S. and Russia. It is recommended that no more than six institutions comprise a consortium or collaborative study program (i.e., three institutions from the U.S. and three institutions from the Russian Federation.) For each country, one institution is designated as the lead institution or fiscal representative responsible for submitting a separate proposal to its respective government. Using established review criteria in 34 CFR 75, external readers and FIPSE program staff review the U.S. applications. It is anticipated that approximately 10 - 12 applications will be received for this program. For fiscal year 2007, 3 applications will be funded. Funded applications will receive awards of approximately \$400,000 for a two-year period. The first year of funding will be approximately \$150,000 - \$200,000.

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 U.S. Department of Education's Office of Postsecondary Education (OPE) is now using the electronic portal "Grants.gov" to receive grant applications. Fiscal Year 2006 was the first year that many grant competitions within OPE

used this portal. Submission through “Grants.gov” will be the method by which applications are received in the U.S.-Russia Program.

As a result of efforts to streamline electronic submission for FIPSE’s Special Focus Programs – all of which currently are international programs, (i.e., the U.S.-Brazil Program, the North American Program, and the E.U.-U.S.-Atlantis Program), the Title Page, Budget Form, and Consortia Identification Partner Form) were consolidated for use within “Grants.gov “ in Fiscal Year 2006. The consolidated forms have an OMB expiration date of January 31, 2009. However, procedures within “Grants.gov have changed for fiscal year 2007. Therefore, these forms will no longer be consolidated forms that require Pure Edge software for use in “Grants.gov.” They will be part of the application package for the U.S.-Russia Program, which means that they will be used by applicants as Word documents and then uploaded into “Grants.gov” as attachments to the applications package. The information on the forms has not changed but the procedure for using them has (i.e., “Grants.gov” no longer uses Pure Edge software). For the U.S.-Russia Program, the three forms are included as part of the U.S.-Russia application package to OMB.

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.

FIPSE staff has made every effort to ensure that there is no duplication of data acquisition. The collection is unique to the collaborative postsecondary efforts between the United States and Russia through the respective governmental programs: FIPSE and the Russian Ministry for Education and Science.

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.

This application process occurs on an occasional basis (less than once a year) to enable applicants to compete for Federal funds that are appropriated by Congress. This application is the lowest frequency possible to award funds appropriated for this purpose.

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.

Please note that no special circumstances apply to the circumstances cited.

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.

Fiscal Year 2007 will be the first time that these application guidelines will be used.

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

The U.S. Department of Education does not provide any payment or gift to respondents.

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

No assurance of confidentiality is provided to respondents except as provided by the Privacy Act and the U.S. Department of Education's policies governing the review of discretionary grant applications.

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.

There are no 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 not be included in Item 14.

Number of Respondents: 12

Frequency of response: once annually

Annual hour burden: 30 hours per applications; total 360 annual hour burden. Annual hour burden was estimated based on oral accounts of applicants and grantees.

Estimated Annualized Cost to Respondents of Hour Burdens:

Preparation of applications (\$28.00) per hour x 360 burden hours...  
\$10,080

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	: \$ .00
Total Annual Costs (O&M)	: \$ .00
Total Annualized Costs Requested	: \$ <u>.00</u>

Respondents will submit applications through Grants.gov; therefore, there are no postage and printing costs.

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.

Review by FIPSE program staff (200 hours x \$30.50).....	\$6,100
Administrative and Support staff (50 hours x \$14 + 175 hours x \$30.50).....	\$6,037
Review by Outside Readers (3 x \$100 x 12).....	\$3,600
	<u>\$15,737.00</u>

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

There are no printing and postage costs for mailings as a result of use of "Grants.gov." The application guidelines will be available through the "Grants.gov" electronic portal.

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.

No data or results of this information collection are published.

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 will display the expiration date for OMB approval of the 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.

## **B. Collection 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 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:

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 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.

Not applicable: FIPSE does not employ statistical methods in this collection of information.

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.

Not applicable: FIPSE does not employ statistical methods in this collection of information.

1. 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.

Not applicable: FIPSE does not employ statistical methods in this collection of information.

2. 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.

Not applicable: FIPSE does not employ statistical methods in this collection of information.

3. 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.

FIPSE does not employ statistical methods in this collection of information.