

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

(03287) 1840-NEW

#### 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 Title VII, Part B of the Higher Education Act of 1965, 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. The Department of Education is requesting permission to conduct combined data collection for the Comprehensive Program (84.117B), four (4) Special Focus Programs: European Union/United States of America Cooperation Program in Higher Education and Vocational Education and Training (EU-U.S. Atlantis Program), the Program for North American Mobility in Higher Education (North American Program), the U.S.-Brazil Higher Education Consortia Program (U.S.-Brazil Program), and the U.S.-Russia Program (new program to be initiated in FY 2007). The Comprehensive Program has been funded annually since 1973 with the exception of 2005. The EU-U.S. Program has been funded annually since 1996. The North American Program was funded in 1995-1997, 2000-2004, and 2006. The U.S.-Brazil Program was funded in 2001-2004, and 2006. The U.S.-Russia Program will be funded for the first time in 2007. Regulations governing these programs are contained in 34 CFR Part 75 (Education Department General Administrative Regulations). Previous program regulations (34 CFR Part 630) were removed in a notice in the Federal Register on March 6, 1997 (62 FR 10397). Removal took effect on October 1, 1997.

The Comprehensive Program has been funding improvements in postsecondary education since its authorization in 1973. Only non-profit organizations may apply for grants.

The EU-U.S. Cooperation Program was established under a formal U.S. and European Union Cooperation Agreement (The New Transatlantic Agenda) signed in June 1995 between the European Commission (EC) and the United States Information Agency. The discretionary grant program is jointly funded and administered by FIPSE for the U.S. Department of Education and the European Commission's Directorate General for Education and Culture. The Agreement between the United States and the EC concluded its initial five-year period in June 2000. On December 7, 2000, a new five-year Cooperation Agreement was signed by the U.S. State Department and the European Commission.

The Program for North American Mobility in Higher Education fosters student exchange within the context of multilateral curricular development. Students benefit from having an added "North American" curriculum and cultural dimension to their studies through combination of trilateral curricular innovation and study abroad. The Program is administrated collectively by the Fund for the Improvement of Postsecondary Education (FIPSE), U.S. Department of Education; Human Resources Development Canada (HRDC); and in Mexico by the Dirección de Desarrollo Universitario, Secretaría de Educación Pública (SEP).

The U.S.-Brazil Higher Education Consortia Program awards grants to U.S. institutions participating in bilateral institutional cooperation and student exchange programs in the United States and Brazil. Institutions are funded by their respective government agencies: in the United States, the U.S. Department of Education's Fund for the Improvement for Postsecondary Education (FIPSE); in Brazil, the Fundação Coordenação de Aperfeiçoamento de Pessoal de Nível Superior (CAPES), Brazilian Ministry of Education.

FIPSE made approximately 400 grants in FY 2004 and again in FY 2005 that were Congressionally-Directed grants (earmarks). The numbers were fewer in FY 2001-FY 2003.

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.*

**Comprehensive and International Project Forms (two (2) forms for 84.116B, J, M, N, and S):** Annual and final performance reports are necessary to ensure that the information and data to be collected will result in a balanced and effective assessment of the student exchanges and curricular developments of the Comprehensive and four international. U.S. Department of Education standard forms for annual and final performance reports ask grantees to provide information that is not suited to consortium-based projects. The new forms include requests for performance information, a report narrative, a student mobility data sheet, a final budget summary, and a project description. Although the new forms will take an average of twenty hours per response, the same as the old forms, the information to be collected in the new forms reflects the focus of the project activities much more accurately, including the accuracy of membership lists for the consortium, the use of key descriptors for indexing purposes, contributions of the project partners, evaluation results, mobility of students, and agreements on tuition and credit exchanges. The collection also includes a request for a project description that will be disseminated on the FIPSE Web site. This project description collection is the same for all of these programs.

**Congressionally-Directed Project Forms (two (2) forms for 84.116Z):** Annual and final performance reports are necessary to ensure that Congressional earmarks are carefully monitored and that grant funds are appropriately expended. Performance information, a performance narrative, budget information, and a project description are collected in both the annual and the final report forms.

FIPSE places great emphasis on the collection of information from performance reports as a means to assure the quality of program management and show progress toward meeting its performance.

*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 collection of information is designed for Web-based submission of all the information requested. Grantees will be able to use FIPSE's Web site to submit annual and final performance information on their grants. The Comprehensive Program and the four (4) international programs will use the same forms for the annual performance report and the final performance report. Management of information needed by FIPSE for evaluation of program effectiveness and dissemination will be much enhanced by the electronic collection.

*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.

*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.*

According to the Government Performance and Results Act of 1993 (GPRA), FIPSE grant competitions are required by law to collect information regarding program and project effectiveness.

*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.

No special circumstances apply.

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.*

FIPSE staff will respond to any questions or comments resulting from the publication of the information collection in the Federal Register, published in Vol. 70, No. 188/Thursday, September 29, 2005 [as required by 5CFR 1320.8(d)] and prior to the submission to OMB. Since the inception of the International Consortia Programs, FIPSE staff has discussed with project directors the need to develop an electronic method to collect information that includes accurate data and information on learning outcomes, student exchanges, and curriculum developments. Each year FIPSE staff evaluates the effectiveness of grants through regular telephone and e-mail contacts with project directors, an annual meeting of the project directors in each program, and annual performance reports submitted by the grantees. Information gathered through such means is focused on objectives unique to individual projects. Electronic

submission and collection gathering will greatly facilitate total program evaluation objectives such as the effectiveness of the consortia format or student learning outcomes that are common to a cohort of projects both within and across the three programs in areas such as engineering or business.

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

ED 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, the Family Rights Education and Privacy Act, and the Department of Education's policies governing the process of collecting information for project and program evaluation.

*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.*

This program does not include information 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.*

<b>ANNUAL REPORT</b>	<b>Form for 84.116B, J, M, N, or S</b>	<b>Form for 84.116Z</b>
Number of respondents	140	100
Frequency of response	Annual	Annual
Hour burden	20	15
Total burden	2,800	1,500
Total est. cost to respondents	\$78,400	\$42,000
<b>FINAL REPORT</b>		
Number of respondents	85	400
Frequency of response	One time	One time
Hour burden	20	15
Total burden	1,700	6,000
Total est. cost to respondents	\$47,600	\$168,000

- Annual Grand Total for four (4) forms: 12,000 hours
- Annual Grand Total estimated cost to respondents for four (4) forms: \$336,000

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)	:	
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Total Annualized Costs Requested	:	

The only cost to respondents is the staff time shown above in item 12.

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.

5% of four staff salaries	\$ 20,000
30% of overhead for support	\$ 6,000
Contractor personnel costs	\$160,000

Total cost of Contract and Department of Education staff/overhead.....\$186,000

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 new collection.

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.

The findings and results obtained from this collection will be based on self-reported information and on inferences and conclusions drawn across all of the funded projects. Selected information is available on the FIPSE Web site.

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.

We are not requesting any exceptions.