

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.

The purpose of Section 102(b)(6) of the Mutual Educational and Cultural Exchange Act of 1961 (Fulbright-Hays Act) is to promote and develop modern foreign language training and area studies throughout the educational structure of the United States. To help accomplish this objective, fellowships are awarded through US institutions of higher education to American junior and senior scholars enabling them to conduct overseas research and enhance their foreign language proficiency.

Under the Fulbright-Hays Doctoral Dissertation Research Abroad (DDRA) and Faculty Research Abroad (FRA) programs, individual scholars and eligible institutions apply simultaneously for benefits under a single grant. Individual scholars apply for fellowships; however grants are made to the successful scholars' institutions. These institutions administer the program in cooperation with the US Department of Education (US/ED) as provided under the authority of Sections 102(b)(6) and 104(e)(1) of the Mutual Educational and Cultural Exchange Act of 1961, 34 CFR Parts 662 and 663, the Policy Statements of the J. William Fulbright Foreign Scholarship Board (FSB), and the Education Department General Administrative Regulations (EDGAR).

In order to judge all applications in a consistent manner at each stage of the complex review process, and to reduce the time required for it, it is necessary to collect the appropriate information from all individual applicants by means of a uniform application form.

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.

The data requested are used by US/ED, American language and area studies specialists, the US Department of State, US Embassies, Fulbright Commissions, host

country officials and scholars, and the FSB in determining the academic qualifications and suitability of the individual applicant, potential political sensitivity and feasibility of the project in terms of the host country reaction, research climate, and adequacy of the proposed budget.

Failure to gather sufficient information on each individual applicant's academic background, language proficiency, extent of overseas experience, health and ability to adapt to a foreign culture would make it impossible to properly evaluate his or her chances of successfully carrying out and completing the proposed research project. The data requested are the minimum necessary to administer the grant in compliance with program regulations.

Information gathered from the current collection is also used to compile program demographics and to generate informational lists for the public.

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.

Both the DDRA and FRA Programs applications must be submitted electronically via US/ED's e-Application system.

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 collection and use of this information is not duplicated in US/ED.

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.

This information collection does not apply to 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.

Since the grants awarded under these programs are made annually and are not renewable, data must be collected for each new competition cycle. If the collection were not conducted, potential applicants would be unable to apply for and receive

grants under these programs. Thus the US/ED would be unable to award the funds appropriated for these programs.

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 tht it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that would cause this information collection to be conducted in this manner.

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.

This information collection will be published for public comment in the Federal Register. Institutional program directors and peer reviewers are consulted every three years regarding availability of data and clarity of instructions of the application form. Overseas diplomatic personnel and/or foreign affairs agencies are consulted regarding any American or host country requirements that may need to be addressed by new data elements. Student suggestions are retained and used during the revision of forms. The following administrators have been informally consulted regarding the revision of forms:

*G.A. Benadom of the University of Michigan
Georgia Ehlers of the University of Arizona
Franci Farnsworth of Middlebury College*

Data from all of these sources have been used to calculate hour and cost burden to respondents.

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

No payment or gifts are provided to respondents.

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

Each respondent is informed that his or her application is reviewed by staff of US/ED, the US Department of State, US Embassies, Fulbright commissions, host country officials and scholars, the FSB and American scholars. Unclassified comments made

by any entity or individual involved in the review process are made available to the applicant upon request. Applicants and their referees are informed that in accordance with Section 552a(d) of the Privacy Act, the content of a reference form is subject to review by the applicant.

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.

The FSB, which has statutory responsibilities for all Fulbright programs, requires that “applicants must be of sound physical and mental health”. Therefore we include a medical certification in the application. This certification does not require the attachment of test results and is the most effective and least burdensome method of meeting the FSB’s requirement.

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.

Program	Number of Respondents	Frequency of Response	Hours	Total Burden Hours
<i>Student respondent</i>	600	<i>Annual</i>	35	21,000

<i>Faculty respondent</i>	60	<i>Annual</i>	24	1,440
<i>Institution (DDRA)</i>	80	<i>Annual</i>	40	3,200
<i>Institution (FRA)</i>	40	<i>Annual</i>	40	1,600
Total	780		99	27,240

The burden of individual respondents is estimated at an average of 35 hours for each student and 24 hours for each faculty member. These estimates are based on feedback from the respondents during the last three years. The annual respondent burden of the 120 institutional project directors is estimated at 40 hours each for the completion of the following tasks:

- Registration in e-Application system
- Screening individual completed applications
- Assembling students' human subjects research narratives
- Transmitting completed individual applications to US/ED in a single submission

Estimated total annual cost burden to respondents.

Program	Number of Respondents	Frequency of Response	Hours	Total Burden Hours	Wage	Total Cost
<i>Student respondent</i>	600	<i>Annual</i>	35	21,000	\$16/hr	\$336,000
<i>Faculty respondent</i>	60	<i>Annual</i>	24	1,440	\$32/hr	\$46,080
<i>Project director (DDRA)</i>	80	<i>Annual</i>	40	3,200	\$27/hr	\$86,400
<i>Project director (FRA)</i>	40	<i>Annual</i>	40	1,600	\$27/hr	\$43,200
Total	780		99	27,240		\$511,680

The increase is due to an increase of DDRA applications in the past 3 years, and a subsequent increased burden on institutional project directors as a result of this. Since more students are applying, project directors spend more time screening applications and compiling the institutional submissions. It is also important to note that certain features of the e-Application system require project directors to spend more time on the application process; for example, project directors must compile all of the student applicants' human subjects research narratives into one document by cutting and

pasting from separate submissions, and upload them as a single attachment, rather than just collecting hard copy responses and sending them via mail or courier.

The increase in burden hours may also be affected by the fact that faculty and student references are now required to submit forms and letters online. Some faculty members and references are not familiar with the Internet and require a great deal of technical assistance. This usually falls to the e-Grants Help Desk, but frustrated references also will contact student/faculty applicants and project directors for help, requiring both student/faculty applicants and project directors to spend more time on the application process.

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 : \$.00

The only costs are for the customary and usual business practices.

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.

Task	Cost	Hours	Total Cost to USG
<i>Securing OMB approval (every 3 years)</i>	<i>\$42/hr</i>	<i>25</i>	<i>\$1050</i>
<i>Forms design (every 3 years)</i>	<i>\$42/hr</i>	<i>5</i>	<i>\$210</i>
<i>Logging in and review of applications by staff</i>	<i>\$42/hr</i>	<i>100</i>	<i>\$4,200</i>
<i>Forming panels</i>	<i>\$42/hr</i>	<i>15</i>	<i>\$630</i>
<i>Review of applications by academic panels (honoraria, per diem, travel)</i>	<i>\$1,800 per panelist for 32 panelists</i>	<i>--</i>	<i>\$57,600</i>
<i>4 ED staff to conduct the federally supervised reviews</i>	<i>\$42/hr</i>	<i>160</i>	<i>\$6,720</i>
<i>Review of forms by US Embassies and binational commissions</i>	<i>\$42/hr</i>	<i>80</i>	<i>\$3,360</i>
<i>3 ED staff for data entry, slate generation, funding recommendations for 65 grants</i>	<i>\$42/hr</i>	<i>260</i>	<i>\$10,920</i>
<i>Department staff to review and approve</i>	<i>\$78/hr</i>	<i>4</i>	<i>\$312</i>

<i>slate</i>			
<i>ED to issue awards at 1 hour per grant for 65 grants</i>	<i>\$42/hr</i>	<i>65</i>	<i>\$2,730</i>
<i>Annual monitoring and technical assistance</i>	<i>\$42/hr</i>	<i>2,600</i>	<i>\$109,200</i>
Total			\$196,932

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

Changes in cost and burden hours are due to: (1) increase in staff salaries, (2) increase in number of grants.

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 Department is not planning to publish any information from this collection.

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.

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

No exceptions are being requested.

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.

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.

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.

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.

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.

The collection of this information will not employ statistical methods.