

## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

### A. Justification

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

Information collection for the International Research and Studies (IRS) program is necessary for applicants to receive grants. The Office of Management and Budget (OMB) number 1840-0068 that indicates approval for the collection of information for this program expires on September 30, 2007. We request approval of a new information collection solely for the application of the IRS program to allow the International Education Programs Service (IEPS) to invite applications under the IRS program, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules.

Information Collection	CFDA No.	Date Respondents Submit Applications	Information Collection Required for Fiscal Year Awards (New)
International Research and Studies	84.017	11/2007	FY 2008

The IRS program is authorized under Part A, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 96-374). Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; the Government Paperwork Elimination Act; the Education Department General Administrative Regulations; and program specific regulations.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections.

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

The authorizing legislation and program-specific regulations are included on pages 39-50 of the application packages attached to this supporting statement.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

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

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

The information collection requires applicants for grants under the IRS program to submit applications electronically using Grants.gov.

The IRS program utilized the Grants.gov system for the FY 2007 competition and for four years before that, the applicants used the e-Grants system to submit their applications.

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

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

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

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

*5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), 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.*

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

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

*7. Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*

- *in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

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.*

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

On a regular basis, we hold informal discussions with various constituents and applicants who have completed grant applications under this program to ascertain whether the instructions and forms are clear and applicant-friendly. These include project directors, deans, chairs of academic departments, business professionals, fiscal representatives at institutions, and management analysts who are responsible for gathering the data needed to respond to the programs' selection criteria.

Our day-to-day technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer specific questions about the grant application instructions and to gauge whether or not application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance includes phone conversations, e-mails, faxes, and office visits.

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

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

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

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

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions of a sensitive nature are not asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.

This request for approval covers information collections (application forms). Using the communication mechanisms described in Item 8, we contacted a sampling of respondents to get their input on the time and resources they require to complete grant applications.

The data in the table are estimates of the time it takes for respondents to complete official forms, develop the application narrative and budget, and submit completed applications that respond to individual selection criteria through the Grants.gov system.

**Estimate of Annualized Burden Hours and Cost to Respondents**

Information Collection (Grant Application)	Number of Respondents	Hours per Response	Total Hours	Frequency of Response	Wage per Hour	Annualized Cost for the Information Collection
International Research and Studies (CFDA 84.017)	100	100	10,000	Annual	\$75	\$750,000

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) :  
 Total Annualized Costs Requested : \_\_\_\_\_

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

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

**Estimates of Annualized Cost to the Federal Government**

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	\$50	3	30	\$4,500
Develop application forms and instructions	\$50	2	60	\$6,000
Develop Notice of Closing Date	\$55	1	60	\$3,300
Enter approved collection into EDICS	\$40	1	10	\$400
Enter application and forms into Grants.gov Application module for respondents to access	\$50	1	40	\$2,000
Post application on the Department's website	\$50	2	20	\$2,000
Establish reader panels in e-READER to evaluate 100 applications	\$50	1	10	\$500
Send conflict of interest forms to reviewers; process certifications; consult with Executive Office for approvals; mail e-READER manuals to reviewers	\$40	1	25	\$1,000
Conduct e-READING conference calls; monitor panels via e-mails; read reviewers' comments in e-READER	\$50	2	100	\$10,000
Download and print 100 applications and 300 technical review forms	\$50	1	20	\$1,000
Compensate 18 reviewers after certifying satisfactory completion of e-READING to evaluate 100 e-Applications	\$1000 flat rate	18	100	\$18,000
Submit funding recommendations for program to Team Leader	\$55	1	3	\$165
Team Leader develops slate memo and attachments for program	\$55	1	8	\$440

Program officials approve slates	\$75	3	15	\$3,375
Commit 30 grants in GAPS	\$55	1	3	\$165
Team Leader obligates 30 grants in GAPS	\$55	1	1	\$55
Review revised budgets; mail 30 grant award documents	\$50	1	40	\$2,000
Document monitoring activities weekly for 30 projects in compliance with OPE standards	\$50	2	45	\$4,500
<b>TOTAL</b>			<b>590</b>	<b>\$59,400</b>

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

The previous request for this information collection was grouped together with seven application packages (OMB 1840-0068). Therefore, this information request only reflects the time and effort for the IRS program.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We 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.*
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.*

The collection of this information will not employ statistical methods.