

Supporting Statement for Paperwork Reduction Act Submissions

Jacob K. Javits Fellowship Program

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.

Section 701 (a) of the Higher Education Act of 1965, as amended, authorizes the Secretary to award fellowships for graduate study in the arts, humanities, and social sciences to students of superior ability selected on the basis of demonstrated achievement, financial need, and exceptional promise.

Under the Jacob K. Javits Fellowship Program, individual scholars apply for fellowships. In order to judge all applications in a consistent manner and to reduce the time required for the review process, it is necessary to collect the appropriate information from all individual applicants by means of a uniform application form.

Javits Program management has determined that the use of the SF-424 would not suffice for collecting individual-level demographic data. Under the Jacob K. Javits Fellowship Program, individual scholars apply for fellowships. The *Applicant Information Form* is customized to acquire the extent of the required applicant information. Specifically, information regarding the applicant's history is initially collected on the *Applicant Information Form* in the "Educational History" section, which provides a listing of all institutions of higher education attended by an applicant, as well as the state in which each institution is located, the dates of attendance for that applicant, his or her major, the degree earned or anticipated, the date the degree is earned or anticipated, credits earned, as well as the applicant's G.P.A. This extensive academic information is thoroughly evaluated by the field reader against the required transcript and GRE score report materials submitted by each applicant in order to provide a comprehensive assessment of the applicant's actual achievement and promise of successfully completing a terminal degree program. This information, alongside the other required informational components of this application, makes the SF-424 impractical for the scope of this program's collection of individual demographic data.

The previous application form (OMB#1840-0562) will expire on August 31, 2009. In order to improve the clarity of the document, program staff has made revisions to the application package. Primarily, instructional language has been revised in several places throughout the document. For example, the "steps" required of both the applicant and the recommender in the preparation of letters of recommendation listed in the currently approved form's instructions have been modified from three to four "steps" in the proposed form. In addition, the language in Block 7 of the Applicant Information Form

has been modified to further clarify the educational status that must be identified by each applicant. While clarifying revisions have been made to the instructional language and the Applicant Information Form, we do not believe that any of these revisions will change the current burden.

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 is used by the Department of Education and the Jacob K. Javits Fellowship Board in determining the academic qualifications and suitability of the individual applicant. Failure to gather sufficient information on each individual applicant's academic background would make it impossible to properly evaluate his or her chances of actual achievement and promise of successfully completing the fellowship program.

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 Jacob K. Javits Program does not participate in the electronic submission of applications. Specifically, applicants are required to submit documents that are not available electronically, including: (1) three sealed letters of recommendation; (2) academic transcripts from each institution of higher education the applicant attended; (3) official Graduate Record Examination (GRE) scores; and (4) supporting art materials i.e. compact disks, digital video disks, photographs, slides, and manuscripts. In addition, a Javits application package can total up to 20 pages in length, mainly due to the numerous pages of academic records for an applicant who may have attended several institutions, for each of which they must supply documentation.

Due to the nature of the process of the collection of applicant information for the Javits program, it is not appropriate to require electronic submission.

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.

This information collection does not duplicate any other information collection at the Department of Education or elsewhere in the Federal government.

The legislative authorities, program regulations, and respondents covered by this information collection are unique to the Jacob K. Javits Fellowship Program. Because of the unique programmatic characteristics inherent to the Javits Program, no other similar programs exist in the Department.

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 doesn't 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 this program are made annually, data must be collected for each new competition cycle. Failure to collect this information would prohibit the Department from fulfilling its responsibility to award grants under this program.

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 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.**

This information collection does not include any special circumstances.

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.

In recent years, institutional program directors, peer reviewers, and representatives of the graduate education community were consulted regarding availability of data and clarity of instructions in the application form.

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

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, regulation, or agency policy.

Each respondent is informed that his or her application is reviewed by Department of Education staff and by panels of scholars and academics in the arts, humanities, and social sciences selected by the Jacob K. Javits Fellowship Board. As required by the Privacy Act of 1974, a System of Records Act Notice is currently in place and is actively maintained for the purpose of storing applicant data. Unclassified comments made by any entity or individual involved in the review process are made available to the applicant upon request.

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.

No questions of a sensitive nature are asked in this report.

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.**

It is estimated that the total reporting burden for this data collection is 4,000 hours. This includes approximately 800 respondents, each with an estimated response time of 5 hours.

Estimated number of student respondents.....	800
Estimated response time.....	5 hours
Frequency of response.....	1 annually
Total estimated burden hours.....	4,000

The estimated annual cost burden to respondents is \$40,000. This includes approximately 4,000 total burden hours at a rate of \$10 an hour per respondent. Applicants typically incur costs when applying to the program that may include photocopying required application material and using commercial carriers to submit supporting art materials.

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 : _____

There are no other costs to the respondent.

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 largest portion of the Government’s cost is borne directly by the Department of Education in designing the application package, securing clearance of the package, and in collecting, aggregating, and disseminating the information. Estimated annualized cost to the Federal government is as follows:

Task	Cost	Hours	Number	Total Cost
Securing OMB approval	\$25/hr	30		\$750
Form design	\$25/hr	5		\$125
Logging in, assembly and review of application by staff (3 weeks: 4 people full-time = 480 hrs)	\$25/hr	480		\$12,000
Forming review panels	\$25/hr	40		\$1,000
Review of applications by academic panels (honoraria, per diem, travel)	\$1,500/panelist		50	\$75,000
Cost of hotel facilities for conducting reviews (meeting space)	\$3,100/week		1	\$3,100
Staff to conduct supervised reviews	\$25/hr	240		\$6,000
Data entry and preparation of slate	\$25/hr	100		\$2,500
Staff to review and approve slate	\$40/hr	10		\$400
Staff to issue awards at 1 hour per fellowship for 70 fellowships	\$25/hr	100		\$2,500
OVERALL TOTAL				\$103,375

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

There is no change in the total burden hours.

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.

The application will display the expiration date for the OMB approval of the information collection as required.

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 to the certification statement.