

**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 grant 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: EU-U.S. Atlantis Program. The EU-U.S. Atlantis Program has been funded annually since fiscal year 1996. The current application 1840-0636 expires on November 31, 2009. This information will be collecting using the US/ED forms and will not increase or decrease the burden to the applicant.

FIPSE's EU-U.S. Atlantis Program awards grants to U.S. institutions participating in bilateral institutional cooperation and student exchange programs between the United States and the European Union. Institutions are funded by their respective government agencies. The Program is administrated collectively by the Fund for the Improvement of Postsecondary Education (FIPSE), U.S. Department of Education and the European Commission's Directorate General for Education and Culture.

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 application guidelines for the EU-U.S. Atlantis Program have been used since fiscal year 1996. The guidelines which are developed in cooperation with the European Commission have not changed since the last clearance in 2006. The guidelines are used to provide institutions of higher education with information and criteria by which they can submit proposals to the EU-U.S. Atlantis Program grant competition.

The EU-U.S. Atlantis Program awards grants to U.S. institutions that form a bilateral consortium with institutions in the European Union. For each application, one institution in the U.S. and one in Europe is designated as the lead institution or fiscal representative responsible for submitting a

separate proposal to its respective government agencies. Using established review criteria in 34 CFR 75, external readers and FIPSE program staff review the U.S. applications. The typical number of applications received for this program is approximately 60; for fiscal year 2009, 75 applications were received. No more than 25 applications received and reviewed are funded.

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) will use its e-GRANTS system to receive grant applications. Fiscal Year 2010 will be the first year that many grant competitions within OPE will use this portal.

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 the European Union.

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 annual basis 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.

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.

These application guidelines have been used previously by FIPSE in FY 2007 and 2008; the guidelines were originally cleared in FY 2006. There are no changes made in the amounts or kinds of data collected, based on comments by applicants, external readers or applications, FIPSE's Advisory Board, the collaborating governmental agency, The European Commission, and currently funded project directors in the United States and Europe. We published the applicable 30-day Federal Register Notice to allow for public comment.

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: 60

Frequency of response: once annually

Annual hour burden: 30 hours per applications; total 1800 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 (\$34.00) per hour x 900 burden hours...\$61,200

The amount of time needed to fill out an application for the Atlantis program is quite high relative to other domestic programs at FIPSE. The reason for this is that all Atlantis grant applications require close coordination between the two U.S. institutions and the two European institutions in terms of designing the project. In addition, more coordination is required because the U.S. and the EU application contains common components such as the narrative, resumes, and letters of commitment that must be submitted in Europe and in the United States.

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

There are no start-up 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 (150 hours x \$50.50).....	\$7,575
Administrative and Support staff (100 hours x \$24 + 100 hours x \$50.50).....	\$7,450
Review by Outside Readers (180 readings x \$100).....	\$18,000
	<u>\$33,025</u>

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

The response time for each applicant has not changed. The number of applicants increased resulting in an adjustment of 300 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.

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**

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

omb and fed reg/2009 atlantis supporting statement