

**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.*

This information collection includes the application instructions and forms for the National Resource Centers (NRC) program (CFDA Number 84.015A) and the Foreign Language and Area Studies (FLAS) Fellowships program (CFDA Number 84.015B). The Office of Management and Budget (OMB) number 1840-0068 that previously approved this information collection expired on September 30, 2007. The OMB number 0068 covered six additional CFDA Numbers under the international education programs. The Department requested to discontinue use of that number to allow the office of International Education and Programs Service (IEPS) to submit separate information collections for the international education programs it administers. This collection requests a new approval number for the NRC and FLAS instructions and forms. The collection is necessary for IEPS to conduct fiscal year (FY) 2010 grant administration pre and post award activities which include: inviting applications under these programs, conducting the peer review of grant applications, selecting grant recipients, and making new awards within established grant schedules.

Programs Covered under this Information Collection	CFDA Number	Applications Submitted	Information Collection Needed for New Awards
National Resource Centers Program Foreign Language and Area Studies Fellowships Program	84.015 A 84.015 B	2/2010	FY 2010

The NRC program provides grants to institutions of higher education (IHE) or consortia of IHE to establish, strengthen, and operate comprehensive and undergraduate language and area or international studies centers. The FLAS program provides allocations of fellowships to IHE or consortia of IHE to assist meritorious undergraduate and graduate students undergoing training in modern foreign languages and related area studies, international studies, or the international aspects of professional studies.

Institutions of higher education use this information collection to apply for discretionary grants under these programs.

The NRC and FLAS programs are authorized under part A, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 110-315). 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, the regulations in 34 CFR Parts 655, 656, and 657.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections (1894-0001).

The authorizing legislation and program-specific regulations are incorporated in the application package 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 institutions of higher education use the information collection to submit applications to the Department of Education (Department) to request funding in response to the competition announcement. After grant applications are submitted, the Department determines the budgetary and staff resources it needs to conduct the peer review of applications and post award activities. External review panels use the information to evaluate grant applications and to identify high quality applications. When developing funding slates, Department program officials consider the evaluations from the expert review panels in conjunction with the NRC program and FLAS program legislative purposes, and any Administration priorities. Department program officials also use the collection to-- inform strategic planning; establish goals, performance measures and objectives; develop monitoring plans; or, 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 to submit hard copies of NRC and FLAS grant applications because the electronic grant application (e-Application) available through the Department's e-GRANTS system is not currently designed to permit applicants to submit one grant application that covers two discretionary grant programs. Submitting grants using the Grants.gov system is not an option because of this same limitation.

IEPS uses the Department's Web site to notify prospective applicants about the NRC and FLAS programs competition deadline date, and we post the application package (instructions and forms) on the Web site for more immediate access and cost efficiency. The application package includes frequently-asked questions about the programs, which is an effective technical assistance strategy for the general public. Technical assistance is also enhanced by posting abstracts of the currently funded projects on the Web site to help prospective applicants better understand the kinds of activities and projects that these programs support.

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.

There are no available information collections that can be used or modified to collect the information requested in the NRC and FLAS application package. In regards to the uses listed in Item 2 above, there is no duplication elsewhere in the Federal government of IEPS program planning and oversight activities associated with this program.

The legislation, program regulations, and the respondents covered by this information collection are unique to the NRC program and the FLAS program. 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-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.*

If the collection is not conducted, ED cannot meet its grant making activities in accordance with approved schedules. These activities include publication of the closing date notice; providing technical assistance to respondents; conducting the peer review; transmitting the funding slate to Department program officials for approval; notifying the Congress in a timely manner about successful applicants under the NRC and FLAS competitions; and, issuing the grant awards.

The Department requests approval of this information collection so that IEPS can announce the competition by January 2010 and make the application available so that eligible institutions of higher education have at least 45 days from the announcement date to prepare grant applications. We are hopeful that timely approval of the application package will allow IEPS sufficient time to conduct the peer review of applications and make new fiscal year 2010 grant awards by June 30, 2010.

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.*

The information collection does not involve any special circumstances that would impose these requirements and conditions on respondents.

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.

We consulted with the international education community to obtain information about the hour burden, clarity of instructions, and the data that applicants are required to include in the NRC and FLAS applications. On February 2 – 3, 2009, IEPS hosted a Technical Assistance Workshop for prospective applicants. We held concurrent instructional sessions with various representatives from private and public institutions of higher education to provide guidance about the NRC and FLAS selection criteria, program instructions, and forms. Representatives included project directors, language coordinators, evaluation experts, and data analysts who are responsible for gathering the data required for the combined grant application.

We also contacted nine institutions who are grant recipients under both programs. They provided IEPS with feedback on the number of hours required to complete the tasks associated with submitting a NRC program and FLAS program grant request, including-- reading the instructions, gathering data, and submitting the application to the Department. The hours per response indicated in Item 12 are the estimated hours based on the information we received from the nine institutions we contacted.

These consultations also provided us feedback on the clarity of the instructions and forms, and whether the application forms and instructions solicit information that meets the purposes of the Title VI legislation, program regulations, and any announced priorities.

Ongoing technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer questions about the application instructions. These activities also allow program officers to determine whether the application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance is conducted by phone conversations, e-mails, and office visits. These consultations and post grant award activities collectively inform IEPS about the viability of the application materials we use for the NRC and FLAS programs.

The contacts cited above did not have adverse comments about the information being requested or the time it takes to complete a grant application.

As required by 5 CFR 1320.8(d), the Department will publish a notice in the *Federal Register* to solicit public comments on this information collection.

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

Other than remuneration of grantees through official 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.

The data in the table is an estimate of the time it takes for respondents to complete official forms, develop the budget, application narrative, and appendices.

Estimate of Annualized Burden Hours to Respondents

Information Collection (Grant Application)	Number of Respondents	Number of Responses (178x1)	Hours per Response	Total Hours
National Resource Centers Program (84.015A) Foreign Language and Area Studies Fellowships Program (84.015B)	178	178	400	71,200

The Department established the “hours per response” indicated in the table by surveying nine grantee institutions. We asked them to tell us how many total hours they require to complete the tasks associated with submitting a combined NRC and FLAS grant application, including reading the instructions and forms; searching existing data resources; gathering the appropriate data for the application; preparing the application narrative and budget; and, conducting a final review of the application before submitting it to the Department. The total hours ranged from 123 hours to 1,230 hours per response. The 400 hours per response indicated above is the median number of hours within the range of lowest to highest total estimated hours. The 400 hours is reasonable, given the application components required for these programs.

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.*

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? *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 programs in this information collection do 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.

The annualized cost to the Federal government in the table below includes costs related to primary operational and programmatic tasks necessitated by this collection of information. This information collection covers the NRC program and FLAS program and requires the resources of four program officers, one branch chief, one management analyst, and fifty-five external peer reviewers.

Estimates of Annualized Cost to the Federal Government

Pre-Award and Post-Award Program Tasks	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	57	1	9	513
Develop application package forms and instructions	50	1	30	1500
Develop Notices of Closing Date (CDN)	57	1	4	228
Enter approved collection into Education Department Information Collections System	50	1	1	50
Post application guidelines on Department's Web site	57	1	2	114
Develop FY 2010 Technical Review Plan	57	1	2	114
Screen applications for eligibility and prepare them for transport to peer review site	50	5	8	2000
Select peer reviewers from Field Reader System, send conflict of interest forms, process acceptances	50	1	1	50
Read peer reviewers' profiles and assign reviewers to reading panels	50	4	2	400
Coordinate hotel logistics for the peer review	50	1	20	1000
Develop orientation presentations and materials for peer reviewers	50	4	5	1000
Conduct orientation for peer reviewers	50	4	2	400
Conduct application peer review sessions for ten days	50	4	90	18000
Certify that reviewers have completed reviews and process payments for 57 peer reviewers	1000 flat rate			57000
Review project activities and budgets for applications in funding range	50	4	80	16000
Prepare slate transmittal memo and attachments for ED officials	50	1	5	250
Enter amounts requested and amounts recommended into the Grant Administrative and Payment System (GAPS)	50	4	8	1600
ED program official reviews and approves slate	150	3	3	1350
Executive officer commits grants	57	1	1	57
Branch Chief obligates grants in GAPS and signs Grant Award Notifications (GANs)	75	1	1	75
Review revised budgets from grantees	50	4	1	200

Mail GANs and technical review forms	50	4	2	400
Provide technical assistance to grantees; review performance and evaluation reports; conduct monitoring activities for compliance with program specific regulations and ED requirements	50	4	520 (10 hrs/wk x 52 wks)	104000
TOTAL			797	206301

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

For the FY 2010 information collection, the number of respondents entered in Item 13 of OMB Form 83-1 is adjusted from 577 to 178, which is the number of respondents for the NRC and FLAS programs only. The previous information collection included respondents for seven IEPS programs.

The total annual hours entered in Item 13 of OMB Form 83-1 is also adjusted from 45,861 to 71,200. This increase is a more realistic indication of the time it takes for 178 respondents to complete a NRC and FLAS application. Based on IEPS consultations with the representatives described in Item 8 above, the information collection is estimated to average 400 hours per response, 178 x 400 hours = 71,200.

IEPS offers the following additional information to explain the adjustments reported in Item 13 of OMB Form 83-1:

The current inventory of 45,861 hours is the total burden hours for all programs in the FY 2005 information collection. The programs in that information collection conducted competitions either annually, every three years, or every four years. We entered 170 NRC and FLAS respondents in Item 12 of the supporting statement, and the number of hours per response at 200 hours, for a total of 34,000 hours. IEPS was instructed to divide 34,000 hours by three to determine the “annual” burden of 11,333 because at that time, the NRC and FLAS programs held a competition every three years. This resulted in our reporting only 11,333 total hours entered in Item 12 which are included in the 45,861 hours entered in Item 13 of OMB Form 83-1.

For FY 2010, the number of NRC and FLAS respondents has increased to 178, and the number of hours it takes for respondents to complete a NRC and FLAS application is a more realistic estimate of 400 hours per response.

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 for publication of results.

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.*

Not applicable. The expiration date for OMB approval will be displayed on the information collection.

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

Not applicable. There are no exceptions to the certification statement identified in Item 20.

B. Collection of Information Employing Statistical Methods

This collection does not employ statistical methods.