**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 information collection for the Language Resource Centers (LRC) program (CFDA Number 84.229A) is necessary for institutions of higher education or consortia of institutions of higher education to apply for discretionary grants. The Office of Management and Budget (OMB) number 1840-0068 that approved the LRC program information collection expired on September 30, 2007. This LRC information collection was initially approved under OMB number 1840-0068, along with six other international education programs' applications. The OMB number 0068 was discontinued to allow the Department to submit separate information collections for the international education programs. We are requesting a new approval number for this information collection, however, the LRC information collection itself remains substantially the same as it was in the combined collection. The collection is necessary for the International Education Programs Service (IEPS) to invite applications under this program, conduct the peer review of grant applications, select grant recipients, and make new awards within established grant schedules.

| Program Covered under this Information Collection | CFDA Number | Applications Submitted | Information Collection Needed for New Awards |
|---|---|---|---|
| Language Resource Centers Program | 84.229A | 1/2010 | FY 2010 |

The LRC program is 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 LRC program specific regulations.

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

The Language Resource Centers program provides grants to institutions of higher education to establish, strengthen, and operate national language resource and training centers for improving the nation's capacity for teaching and learning foreign languages through teacher training, research, instructional materials development, and dissemination projects.

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 (ED) to request funding in response to the competition announcement. After grant applications are submitted, the Department determines the budget 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 ED program officials consider the evaluations from the expert review panels, in conjunction with the LRC legislative purposes and any Administration priorities. ED program officials also use the collection to inform strategic planning; to establish goals, performance measures and objectives; to develop monitoring plans; or, 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 the electronic submission of applications using the electronic grant application system (e-Application) available through the Department's e-GRANTS system. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple hard copies of grant applications to the Department.

IEPS uses the Department's Web site to notify prospective applicants about the LRC program competition and deadline date. We post the LRC application package (instructions and forms) on the Web site for more effective and efficient access. Additionally, we post Frequently-Asked Questions about the program on the LRC program Web page, which makes technical assistance to the public more immediate. Technical assistance is enhanced by posting the abstracts of currently funded projects on the Web site to help prospective applicants better understand the kinds of activities and projects that the LRC 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.*

There are no information collections available that duplicate the information that the LRC program application requests. 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 Language Resource Centers 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 new respondents, conducting the peer review, transmitting the funding slate to ED program officials for approval, making grant awards, and notifying the Congress in a timely manner about successful applicants in the competition.

The Department needs to make the application package available to the public so that eligible institutions of higher education have at least 45 days to prepare grant applications and submit them to the Department in December 2009. Allowing this application due date will give IEPS sufficient time to make new fiscal year 2010 grant awards before 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.*

The International Education Programs Service (IEPS) hosted a Technical Assistance Workshop February 2-3, 2009 for prospective applicants. During that time we met with various representatives from private and public institutions of higher education to discuss the LRC selection criteria, program instructions, and forms. Representatives included project directors, foreign language pedagogy experts, and data analysts who are responsible for gathering the data required for a LRC grant application. Workshop attendees also included postsecondary faculty and administrators who are recipients of the training materials and instructional services that Language Resource Centers provide.

We also consulted with prospective respondents during the Title VI 50th Anniversary Conference, March 19-21, 2009. They provided IEPS feedback on the average time it takes to complete the tasks associated with submitting a LRC grant application, including-- reading the instructions, gathering data, and submitting the application to the Department.

IEPS periodically meets with representatives from professional organizations such as the National Council of Organizations of Less Commonly Taught Languages, the Center for Applied Linguistics, the National Foreign Language Center at the University of Maryland, and area studies associations. These organizations provide 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 announced priorities.

Ongoing technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer questions about the LRC 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 is conducted by phone conversations, e-mails, office visits.

These consultations and activities collectively inform IEPS about the viability of the application materials we use for the LRC program. 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.

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 application narrative and budget, and submit completed applications through the Department's e-Application system.

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

| Information Collection (Grant Application) | Number of Respondents | Number of Responses (27x1) | Hours per Response | Total Hours |
|---|---|---|---|---|
| Language Resource Centers Program (84.229A) | 27 | 27 | 80 | 2160 |

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 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 LRC program and requires the resources of 1 program officer, 1 branch chief to provide oversight, 1 management analyst, and 6 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 | 50 | 1 | 20 | 1000 |
| Develop application forms and instructions | 50 | 1 | 90 | 4500 |
| Develop Notices of Closing Date (CDN) | 50 | 1 | 30 | 1500 |
| Enter approved collection into EDICS | 50 | 1 | 1 | 50 |
| Publish application guidelines and technical review forms in e-GRANTS e- Application module | 50 | 1 | 3 | 150 |
| Post application on Department's web site | 50 | 1 | 1 | 50 |
| Assign reader panels in e-READER | 50 | 1 | 6 | 300 |
| Send conflict of interest forms to reviewers; process reviewer certifications; mail grant proposals and e-READER instruction manuals to reviewers | 50 | 1 | 18 | 900 |
| Conduct orientation for e- Reading; schedule regular peer review conference calls; review readers' comments in e-Reader; provide follow-up via e-mail and phone communications | 50 | 2 | 60 | 6000 |
| Download and print 27 applications and 81 technical review forms | 50 | 1 | 45 | 2250 |
| Certify that reviewers have completed the e-Reading and process contracts to compensate 6 peer reviewers | 1000 (ED flat rate) | 6 | 60 | 6000 |
| Review applications in funding range, prepare slate memo and attachments for approval; enter grants into Grant Administrative Payment System | 50 | 1 | 90 | 4500 |
| ED program official reviews and approves slate | 150 | 3 | 3 | 1350 |
| Executive officer commits grants | 50 | 1 | 1 | 50 |
| Branch Chief obligates grants in GAPS and signs Grant Award Notifications (GANs) | 75 | 1 | 1 | 75 |
| Program officer conducts cost analysis of grantees' revised budgets; approves project plans; mails GANs | 50 | 1 | 9 | 450 |
| Program officer provides technical assistance to grantees; reviews performance and evaluation reports; conducts ongoing monitoring activities in compliance with OPE , HEP requirements | 50 | 1 | 780 (15 hrs/wk x 52 wks) | 39000 |
| **TOTAL** | | | **1218** | **68125** |

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

This is a new collection.

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.