

## **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.

One of the core administrative activities of the U.S. Department of Education's (ED) Office of International Education Programs Service (IEPS) is to award continuation grants under the fourteen discretionary programs cited in this information collection. Our capacity to conduct this activity, however, is contingent upon the availability of information that grant recipients submit in annual performance reports. The Education Department General Administrative Regulations (EDGAR) stipulates that a recipient that wants to receive a continuation award shall submit a performance report that provides the most current performance and financial expenditure information. The online reporting system described in this statement provides grantee institutions with a centralized repository for inputting their performance report data and narrative information.

There are a number of additional legal or administrative requirements that make this collection necessary, including the program reporting and evaluation requirements in the Department of Education's Visual Performance Suite (VPS) and the Government Performance and Results Act (GPRA) of 1993. VPS is the Department's strategic planning performance data collection system. The IEPS reporting system gathers and maintains the information that program managers use to help them align program operations level with the Department's overall strategic goals and objectives. The VPS contains the performance and efficiency measures for each of the 14 programs as well as the results of each measure, if available at this time. The GPRA requires all federal agencies to develop annual performance plans for their programs, in which the agencies specify the outcomes to be achieved, the indicators of success, and strategies to be followed to accomplish the plan. GPRA further requires the submission of an annual performance report to Congress.

The IEPS reporting system was initially designed and implemented to respond to the GPRA mandate, that by Fall 2002, all federal agencies would have demonstrated that they had developed consistent and effective annual data collections with systematized evaluation for their respective programs. In 1998, IEPS funded a project to meet this mandate. The development of the IEPS reporting system made a fundamental change in how performance information and data for the fourteen International Education and Foreign Language Studies (IEFLS) programs, authorized under Title VI of the Higher Education Act and section 102(b)(6) of the Mutual Educational and Cultural Exchange Act, also known as Fulbright-Hays (F-H), was collected. IEPS used this project to replace the paper collection instruments with an online performance reporting instruments.

Teams of IEPS staff as well as grantees have spent the past seven months reviewing the instruments, making recommendations for changes, and identifying areas of improvement suggested by grantees. Additionally, IEPS staff have worked with ED's Strategic Planning Staff to revise the existing two performance measures and one efficiency measure for each of the 14 IEPS programs. With the revision of these measures, screens had to be revised to ensure the correct data was being captured to allow for the measurement of each program's effectiveness.

The IEPS reporting system allows Title VI/F-H program grantee institutions to submit performance report information and data, including project abstracts, project status, GPRA information, and budget information that are more comprehensive, and comparable than the traditional paper reports. The reports provide IEPS management and program officers with valuable performance information to enable them to assess program effectiveness. The system also captures the data that is used for performance measurement.

This information collection package requests continued approval for the performance objectives and measures for all fourteen programs: (1) American Overseas Research Centers Program (AORC), (2) Business and International Education Program (BIE), (3) Centers for International Business Education (CIBE), (4) Foreign Language and Area Studies Fellowships Program (FLAS), (5) Institute for International Public Policy Program (IIPP), (6) International Research and Studies Program (IRS), (7) Language Resource Centers Program (LRC), (8) National Resource Centers Program (NRC), (9) Technological Innovation and Cooperation for Foreign Information Access Program (TICFIA), (10) Undergraduate International Studies and Foreign Language Program (UISFL), (11) Fulbright-Hays Doctoral Dissertation Research Abroad Program (DDRA), (12) Fulbright-Hays Faculty Research Abroad Program (FRA), (13) Fulbright-Hays Group Projects Abroad Program (GPA), and (14) Fulbright-Hays Seminars Abroad Program (SA).

The statutes and regulations that necessitate this collection include the following and appear in Attachment A:

- The Higher Education Act of 1965, as amended, Title VI Part A, section 601 (as well as the amendments contained in the Higher Education Opportunity Act of 2008, P.L. 110-315, enacted August 14, 2008)).
- Department of Education 34 CFR Parts 655, 656, 657, et al. International Education Programs; Final Rule, Federal Register July 17, 2009.
- The GPRA of 1993.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 602(a) National Language and Area Centers and Programs; section 602(b) Fellowships for Foreign Language and Area or International Studies.
- 34 CFR part 656 National Resource Centers Program for Foreign Language and Area Studies or Foreign Language and International Studies, sections 656.1 through 656.7, 656.10, 656.20 through 656.23 and 656.30.
- 34 CFR Part 657 Foreign Language and Area Studies Fellowships Program, sections 657.1 through 657.5, 657.10, 657.11, 657.20 through 657.22, and 657.31 through 657.34.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 603, Language Resource Centers.
- 34 CFR Part 669 Language Resource Centers Program, sections 669.1 through 669.5, 669.20 through 669.22, and section 669.30.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 604, Undergraduate International Studies and Foreign Language Program.
- 34 CFR Part 658 Undergraduate International Studies and Foreign Language Program, sections 658.1 through 658.4, 658.10 through 658.12, 658.30 through 658.35, and 658.40 and 658.41.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 605, International Research and Studies.
- 34 CFR Part 660 International Research and Studies Program, sections 655.1 through 655.4, 655.10, and 655.30 through 655.32.

- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 606, Technological Innovation and Cooperation for Foreign Information Access.
- The Higher Education Act of 1965, as amended, Title VI Part A – International and Foreign Language Studies, section 609, American Overseas Research Centers.
- The Higher Education Act of 1965, as amended, Title VI Part B – Business and International Education Programs, sections 611 and 612, Centers for International Business Education Program.
- The Higher Education Act of 1965, as amended, Title VI Part B - Business and International Education Programs, sections 611 and 613.
- The Higher Education Act of 1965, as amended, Title VI Part C – Institute for International Public Policy, sections 621-629 Minority Foreign Service Professional Development Program.
- The Mutual Educational and Cultural Exchange Act of 1961 (The Fulbright-Hays Act), section 102 (b)(6), DDRA, FRA, GPA, and SA programs.
- 34 CFR Part 662, Fulbright-Hays Doctoral Dissertation Research Abroad Program.
- 34 CFR Part 663, Fulbright-Hays Faculty Research Abroad Program.
- 34 CFR Part 664, Fulbright-Hays Group Projects Abroad Program.
- 34 Code of Federal Regulations (CFR) part 655, General Provisions for International Education Programs, section 655.1 through 655.4, 655.10, 655.30 through 655.32.
- Education Department General Administrative Regulation (EDGAR), 34 CFR Part 74, section 74.51 and 34 CFR Part 75, sections 75.118, 75.253, 75.720.

Note: EDGAR citations include the requirements for the submission of annual and final performance reports and ED responsibilities for reviewing performance information to make continuation awards.

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.

IEPS management uses the data and information generated from the system to inform the Title VI/F-H program monitoring, evaluation, and budget processes. Management also uses the data to calculate the performance and efficiency measures required by OMB. Reports are run in response to high-level requests within the Department for program information and statistics. The data in the system is being used externally by grantees and contractors to assess program effectiveness and to make recommendations for program administration and technical (including system) improvements.

IEPS program officers use the system information and data since they need reliable, comparable information about their grantees' projects in order to determine whether grantees are completing grant-funded activities in compliance with the approved grant applications, and whether grantees are expending grant funds for allowable and allocable costs. The program officers' assessments of substantial progress (or not) provide the basis for making continuation awards in subsequent budget periods for the grant cycle.

The Help Desk is the primary source for systems related questions and concerns. Program officers also provide technical assistance on how to access the system's screens.

Grantee institutions use the IRIS reporting system to input program performance information, and to submit that information to ED as part of the annual report for obtaining continuation awards from ED. Currently, grantees are making a concerted effort to respond to reporting requirements by providing

additional quantitative data through the IRIS reporting system. In doing so, grantees collectively make a powerful statement regarding the relevance of their projects and the importance of international education programs overall. In addition, the Congress and OMB use the information collected by the IEPS reporting system to determine the effectiveness of the International Education Programs.

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 IRIS reporting system is web-based. Grantees funded under the 14 IEPS programs submit their performance reports using the system. This is the most efficient way to collect and review grantee performance reports. It also allows for more rapid dissemination of the data collected as it is collected via the system and stored in a database. Select data elements from the reports are then made available to the general public on a contractor-maintained public web site.

This is the fourth clearance of this reporting system so the use of a web-based reporting system has been in practice for a number of years. It has worked well and continues to be improved so we are continuing its use.

Continuing to collect information electronically in a system that is being enhanced provides additional reductions in burden on the grantees.

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.

The IRIS reporting systems collects performance report data from grantees and is the only mechanism by which this data is collected. The information is not available through any other means. Therefore there is no duplication.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

The collection 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.

34 CFR § 74.51 and §75.118 require that grantees submit performance reports in order to provide the information required in §74.51(d)(1)-(3) and in order to provide program staff with enough information to determine that substantial progress has been made towards the project's goals (§75.118(a)) so that continuation funding may be awarded. The IRIS reporting system is the only mechanism for collecting the information needed to monitor and administer these grant programs. The system greatly facilitates much more efficient program monitoring than the earlier paper-based reporting process.

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.

None of the special circumstances listed applies to this information request.

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.

IEPS maintains an ongoing dialogue with the constituency regarding the use, improvements, and enhancements of the IRIS reporting system. In February 2009, three sessions were held at the NRC, FLAS, LRC, CIBE, and IIPP public technical assistance workshop to solicit input on how to improve the system. The room was filled to capacity and the exchange of information was very valuable. Users of the system for multiple IEPS programs participated so a broad array of feedback was received. Many of the suggestions are incorporated in the proposed screens.

Program officers receive queries from grantees on the system that are then shared with management and the contractor so that if there is a recurring question, it can be addressed. The help desk also tracks queries and again, if there is a recurrence, the contractor shares it with management and action is taken to improve the process.

Refer to Attachment B for copies of the proposed IEPS reporting system screens, and Attachment C for a spreadsheet documenting the proposed changes to the current system.

We publish the applicable 60 and 90 day Federal Register notices allowing for public comment.

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

This is not applicable as 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.

Grantee institutions are not provided any assurance of confidentiality because confidentiality is not authorized in the applicable statutes, regulations, or agency policy. None of the 14 programs collect or will collect information that is covered under the Privacy Act of 1975. The data collected consists solely of quantitative data regarding individual program objectives and qualitative information relating to grantee status and accomplishment of program goals.

ED assures the protection of fellow/participant data by using a password-protected system. Passwords will automatically be generated and assigned to authorized administrators at the FLAS, FRA, DDRA, and GPA grantee institutions upon creation of their IRIS reporting system account. When the grantee institutions submit the FLAS, FRA, DDRA, and GPA institutional lists, the IRIS reporting system will create a password for each fellow/participant on each institutional list. The fellow/participant uses the assigned password to complete and submit his or her performance reporting, including a language self-evaluation to ED. The self-evaluation portion of the report is available only to that fellow/participant and the ED program officers. Project directors will be able to view the academic portion of the fellow's reports.

Similarly, information in the NRC, IIPP, UISFL, BIE, CIBE, AORC, LRC, IRS, TICFIA, SA and the institutional portion of FRA, DDRA, and GPA performance reports is password-protected. The IEPS reporting system will automatically generate and assign a password to the project director at the grantee institutions upon creation of their IRIS account. Using their passwords, these administrators will have access to the system to input the names of other authorized users (who will have data input rights but not the ability to submit any reports), as well as complete and submit the performance reports to ED. After the performance reports are electronically submitted, the system prohibits access by one grantee institution to another grantee institution's performance report.

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.

This collection does not ask 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 16 of IC Data Part 1.
- 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.

**Annual Performance Report Estimated Burden for Grantees from the 14 IEPS Programs**

Program	Number of Respondents	Freq. Reports/Year	Responses	Est. Avg. Hours / Response	Est. Number of Total Hours	Est. Hourly Wage of Respondent	Est. Total Cost
AORC	11	2	22	7.5	165	\$40	\$6,600
BIE	54	2	108	10	1080	\$40	\$43,200
CIBE	31	2	62	15	930	\$40	\$37,200
DDRA Fellow	150	2	300	2	600	\$17	\$10,200
DDRA Director	49	1	98	4	196	\$35	\$6,860
FLAS Fellow	1916	1	1916	1	1916	\$15	\$28,740
FLAS Director	140	4	560	5	2800	\$30	\$84,000
FLAS Language	1916	1	1916	0.5	958	\$25	\$23,950

Instructor							
FLAS Student Tracking*	140	Every other year	140	20	1400*	\$30	\$42,000*
FRA Fellow	20	2	40	2	80	\$45	\$3,600
FRA Director	18	1	18	1	18	\$35	\$630
GPA Participant Annual	465	2	930	0.5	465	\$30	\$13,950
GPA Director Annual	31	2	62	6	372	\$40	\$14,880
GPA Participant Language	270	2	540	0.5	270	\$15	\$4,050
GPA Director Language	18	2	36	6	216	\$40	\$8,640
GPA Language Instructor	270	1	270	0.5	135	\$25	\$3,375
IIPP	1	2	2	6	12	\$40	\$480
IIPP Student Tracking*	1	Every other year	1	10	5*	\$40	\$200*
IRS	30	2	30	5	300	\$40	\$12,000
LRC	15	2	30	7.5	225	\$40	\$9,000
NRC	146	2	292	12	3504	\$40	\$140,160
SA Participant	142	2	284	0.5	142	\$30	\$4,260
SA Admin Agency	9	1	9	2	18	\$25	\$450
SA Domestic	3	1	3	1	3	\$25	\$75
TICFIA	13	2	26	4	104	\$40	\$4,160
UISFL	54	2	108	10	1080	\$40	\$43,200
<b>TOTALS</b>	<b>0</b>		<b>0</b>		<b>16994</b>		<b>\$545,860</b>

*\*This is the annualized burden and cost. The actual burden and cost will be incurred every other year.*

Refer to [Attachment D](#) for a chart of the current reporting schedule for grantees, to [Attachment E](#) for a spreadsheet outlining the proposed screens required for each report, and [Attachment F](#) for an overview of all proposed screens, indicating on which report(s) the screens appear and whether or not these are required.

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) : \$545,860

Total Annualized Costs Requested : \$545,860

The total annual cost burden to respondents is shown in the Table in Item 12 above.

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 hourly wages of a GS-14/5 and GS-13/5 education program specialists/management analysts and contractor support are used to estimate costs:

<b>IEPS Staff Task</b>	<b>Hourly Cost</b>	<b>Hours per Task</b>	<b>Number of Reports</b>	<b>Total Hours for Task</b>	<b>Cost to Federal Government</b>
Request OMB Clearance	\$55	200	1	200	\$11,000
Review AORC Performance Reports	\$47	2	22	44	\$2,068
Review BIE Performance Reports	\$47	2	108	216	\$10,152
Review CIBE Performance Reports	\$47	2	62	124	\$5,828
Review DDRA Fellow Performance Reports	\$47	0.5	150	75	\$3,525
Review DDRA Institutional List	\$47	0.5	49	24.5	\$1,152
Review FLAS Student Performance Reports	\$47	0.25	1916	479	\$22,513

Review FLAS Performance Reports	\$47	1	560	560	\$26,320
Review FLAS Student Tracking Report	\$47	.5	147	74	\$3,478
Review FRA Institutional List	\$47	0.5	18	9	\$423
Review FRA Fellow Performance Reports	\$47	0.5	20	10	\$470
Review GPA Institutional Performance Reports	\$47	2	98	196	\$9,212
Review GPA Fellow Performance Reports	\$47	0.5	735	367.5	\$17,273
Review IIPP Performance Reports	\$47	2	2	4	\$188
Review IIPP Student Tracking Report	\$47	.5	1	.5	\$24
Review IRS Performance Reports	\$47	2	60	120	\$5,640
Review LRC Performance Reports	\$47	2	30	60	\$2,820
Review NRC Performance Reports	\$47	2	292	584	\$27,448
Review SA Domestic Agency Performance Reports	\$47	0.5	3	1.5	\$71
Review SA Overseas Agency Report	\$47	1	9	9	\$423
Review SA Fellow Performance Reports	\$47	0.5	142	71	\$3,337
Review TICFIA Performance Reports	\$47	2	26	52	\$2,444
Review UISFL Performance Reports	\$47	2	108	216	\$10,152
Prepare New and Continuation Grant Awards Notifications	\$47	2	620	1240	\$58,280
Technical Assistance to Grantees	\$47	1200			\$56,400
Contractor Support	\$100, \$55	4000			\$310,000
<b>Overhead</b>					\$28,200
<b>Total</b>					<b>\$618,841</b>

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

This is a revision of a currently approved collection. The changes in the hours and dollars reflect the time it will take to complete the revised or new screens as well as changes in wages since the previous collection. The increase in cost is partially due to the first-time inclusion of contractor support to maintain and enhance the system. Contractor support has been in place for a number of years but the cost had not been included in prior submissions. The HEOA added a student tracking component to Title VI programs which resulted in new screens and 1405 annualized new burden hours. IEPS has added Evaluation, Foreign Language Instructor, and Results screens in order to collect data regarding program outcomes and these screens have been added as a response to the recommendations contained in the National Academies review of IEPS programs. We have also had an increase in appropriations so there are more grantee respondents using the system. These items account for the remaining additional 1453 burden hours. The reduction in burden is a result of fewer grantees in some programs and/or the streamlining of the collection instruments by reducing the number of data fields on the screens.

Program	Previous Burden	Revised Burden	Difference	Reason	Legislated
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AORC	180	165	-15	program	
BIE	620	1080	460	program	
CIBE	900	930	30	program	
DDRA Fellow	600	600	0	program	
DDRA Director	148	196	48	program	
FLAS Fellow	1550	1916	366	program	
FLAS Director	2800	2800	0	program	
FLAS Language Instructor	n/a	958	958	program	
FLAS Student Tracking*	n/a	1400	1400	program	Yes
FRA Fellow	100	80	-20	program	
FRA Director	22	18	-4	program	
GPA Participant Annual	500	465	-35	program	
GPA Director Annual	450	372	-78	program	
GPA Participant Language	500	270	-230	program	
GPA Director Language	180	216	36	program	
GPA Language Instructor	n/a	135	135	program	
IIPP	12	12	0	program	
IIPP Student Tracking*	n/a	5	5	program	Yes
IRS	200	300	100	program	
LRC	210	225	15	program	
NRC	4380	3504	-876	program	
SA Participant	143	142	-1	program	
SA Admin Agency	18	18	0	program	
SA Domestic	3	3	0	program	
TICFIA	80	104	24	program	
UISFL	540	1080	432	program	
<b>TOTALS</b>	<b>14136</b>	<b>16994</b>	<b>0</b>		

*\*This is the annualized burden. The actual burden will be incurred every other year.*

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.

IEPS does not plan to publish the information collection 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.

IEPS will display the OMB expiration date.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

IEPS does not have exceptions to this statement.