

**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 International Research and Studies (IRS) program (CFDA Numbers 84.017A-1 and 84.017A-3). The Office of Management and Budget (OMB) number 1840-0795 that previously approved this information collection expires on August 31, 2010. Minor revisions have been made to both applications to clarify the directions for submitting the budget and other attachments. In addition, versions of the latest laws and regulations for the program have been updated. The collection is necessary for the office of International Education and Programs Service (IEPS) to conduct fiscal year (FY) 2011 grant administration pre- and post-award activities which include: inviting applications under this program, conducting the peer review of grant applications, selecting grant recipients, and making new awards within established grant schedules.

<b>Programs Covered under this Information Collection</b>	<b>CFDA Number</b>	<b>Applications Submitted</b>	<b>Information Collection Needed for New Awards</b>
International Research and Studies Program – Research, Surveys, and Studies	84.017 A(01)	12/2010	FY 2011
International Research and Studies Program – Instructional Materials	84.017 A(03)		

The IRS Program provides grants to conduct research and studies to improve and strengthen instruction in modern foreign languages, area studies, and other international fields.

Public and private agencies, organizations, institutions, and individuals use this information collection to apply for discretionary grants under this program.

The IRS program is authorized under part A, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 89-329). Other legislation and regulations relevant to this information collection include the Government Performance and Results Act of 1993; 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 and 660.

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.*

Public and private agencies, organizations, institutions, and individuals 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 IRS 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 IRS grant applications electronically using the Electronic Grant Application System (e-Application) accessible through the Department's e-Grants site.

IEPS uses the Department's Web site to notify prospective applicants about the IRS program competition deadline date. Links are provided for the Federal Register Notice inviting applicants for new awards for FY 2010 and to submit applications electronically, and instructions are posted on how to download a PDF copy of the application package. 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 this program supports. For fiscal year 2009, in addition to abstracts, IEPS posted exact copies of funded grant applications on the Web site to further assist prospective applicants.

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 IRS 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 IRS program. No other similar program exists in the Department, and no similar program exists 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, the Department 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 IRS competition; and, issuing the grant awards.

The Department requests approval of this information collection so that IEPS can announce the competition by September 2010 and make the application available so that eligible public and private agencies, organizations, institutions, and individuals 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 2011 grant awards by May 30, 2011.

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 contacted seven successful FY 09 applicants under both schedules. They provided IEPS with feedback on the number of hours required to complete the tasks associated with submitting an IRS 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 seven applicants 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 and project monitoring are the primary mechanisms we use to answer questions about the application instructions. These activities also allow the program officer 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 IRS program.

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**

<b>Information Collection (Grant Application)</b>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Hours per Response</b>	<b>Total Hours</b>
International Research and Studies Program – Research, Surveys, and Studies	38	38	127	4826
International Research and Studies Program – Instructional Materials	80	80	106	8480
Total	118	118		13,306

The Department established the “hours per response” indicated in the table by surveying seven grantees, three for research, surveys, and studies and four for instructional materials. We asked them to tell us how many total hours they require to complete the tasks associated with submitting an IRS 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.

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) :*

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*Total Annualized Costs Requested :*

The program in this information collection does 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 IRS program and requires the resources of one program officer, one branch chief, one management analyst, 4 program officers/panel monitors, and twenty-one external peer reviewers. (It should be noted that the IRS program has a new program officer who is at a lower grade than the previous program officer, and thus the total cost is significantly lower.)

**Estimates of Annualized Cost to the Federal Government**

<b>Pre-Award and Post-Award Program Tasks</b>	<b>Wage per Hour</b>	<b>Staff Resources</b>	<b>Total Hours</b>	<b>Cost to Federal Government</b>
Gather data and develop OMB justification statement	30	1	4	120
Develop application package forms and instructions	30	1	20	600
Develop Notices of Closing Date (CDN)	30	1	4	120
Enter approved collection into Education Department Information Collections System	30	1	1	30
Post application guidelines on Department's Web site	30	1	2	60
Develop FY 2011 Technical Review Plan	30	1	2	60
Screen applications for eligibility and prepare them for transport to peer review site	30	2	8	480
Select peer reviewers from Field Reader System, send conflict of interest forms, process acceptances	30	1	2	60
Read peer reviewers' profiles and assign reviewers to reading panels	30	2	5	300
Develop orientation information and materials for peer reviewers	30	1	5	150
Conduct orientation for peer reviewers	30	1	2	60
Conduct application peer review sessions for ten days	55	4	40	8800
Certify that reviewers have completed reviews and process payments for 21 peer reviewers	1000 flat rate			21000
Review project activities and budgets for applications in funding range	30	1	15	450
Prepare slate transmittal memo and attachments for ED officials	30	1	5	150
Enter amounts requested and amounts recommended into the Grant Administrative and Payment System (GAPS)	30	1	5	150
ED program official reviews and approves slate	150	3	2	900
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	30	1	5	150
Mail GANs and technical review forms	30	1	2	60
Provide technical assistance to grantees; review performance and evaluation reports; conduct monitoring activities for compliance with program specific regulations and ED requirements	30	1	520 (10 hrs/wk x 52 wks)	15600
<b>TOTAL</b>			<b>654</b>	<b>49432</b>

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

We are estimating a total burden adjustment of 13,306 hours. This is due to an estimated increase in the number of applications.

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.*

Successful applications will be posted on the Department Web site:  
<http://www.ed.gov/programs/iegpsirs/awards.html>.

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.