SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

**(03287) 1840-NEW**

**A. Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Consistent with the provisions of Title VII, Part B of the Higher Education Act of 1965, as amended, the Fund for the Improvement of Postsecondary Education (FIPSE) works to improve postsecondary education through grants to postsecondary educational institutions and agencies. Such grants are awarded on the basis of competitively reviewed applications submitted to FIPSE under its Comprehensive and Special Focus Competition Program grant competitions. The Department of Education is requesting permission to conduct combined data collection for the Comprehensive Program (84.117B), four (4) Special Focus Programs: European Union/United States of America Cooperation Program in Higher Education and Vocational Education and Training (EU-U.S. Atlantis Program), the Program for North American Mobility in Higher Education (North American Program), the U.S.-Brazil Higher Education Consortia Program (U.S.-Brazil Program), and the U.S.-Russia Program (new program funded since FY 2007). The regulations governing these programs are contained in 34 CFR Part 75 (Education Department General Administrative Regulations).

The Comprehensive Program has been funding improvements in postsecondary education annually since its authorization in 1973 with the exception of 2005. Only non-profit organizations may apply for grants.

The EU-U.S. Cooperation Program was established under a formal U.S. and European Union Cooperation Agreement (The New Transatlantic Agenda) signed in June 1995 between the European Commission (EC) and the United States Information Agency. The discretionary grant program is jointly funded and administered by FIPSE for the U.S. Department of Education and the European Commission’s Directorate General for Education and Culture. The EU-U.S. Program has been funded annually since 1996. In June of 2006, a new seven-year Cooperation Agreement was signed by the U.S. State Department and the European Commission.

The Program for North American Mobility in Higher Education fosters student exchange within the context of multilateral curricular development. Students benefit from having an added "North American" curriculum and cultural dimension to their studies through combination of trilateral curricular innovation and study abroad. The Program is administrated collectively by the Fund for the Improvement of Postsecondary Education (FIPSE), U.S. Department of Education; Human Resources Development Canada (HRDC); and in Mexico by the Dirección de Desarollo Universitario, Secretaría de Educación Pública (SEP). The North American Program was funded in 1995-1997, 2000-2004, 2006, 2007, 2008—a competition was not held in 2009.

The U.S.-Brazil Higher Education Consortia Program awards grants to U.S. institutions participating in bilateral institutional cooperation and student exchange programs in the United States and Brazil. Institutions are funded by their respective government agencies: in the United States, the U.S. Department of Education’s Fund for the Improvement for Postsecondary Education (FIPSE); in Brazil, the Fundação Coordenação de Aperfeiçoamento de Pessoal de Nível Superior (CAPES), Brazilian Ministry of Education. The U.S.-Brazil Program was funded in 2001-2004, 2006-2009.

The U.S.-Russia program is to foster educational cooperation among institutions of higher education in the United States and Russia. On May 31, 2006, the U.S. Secretary of Education and the Minister of Education and Science of the Russian Federation signed an historic agreement aimed at promoting understanding between the peoples of the Russian Federation and the United States. The U.S.-Russia Program was funded from 2007-2009.

In Fiscal Years 2004, 2005, 2008, and 2009, FIPSE also administered and monitored a range of 300-400 Congressionally-directed grants.

*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.*

**Comprehensive and International Project Forms (two (2) forms for 84.116B, J, M, N, and S):** Annual and final performance reports are necessary to ensure that the information and data to be collected will result in a balanced and effective assessment of the student exchanges and curricular developments of the Comprehensive and four international programs. The U.S. Department of Education standard forms for annual and final performance reports ask grantees to provide information that is not suited to consortium-based projects. The new forms include requests for performance information, a report narrative, a student mobility data sheet, a final budget summary, and a project description. We will decrease the hour burden from 20 hours per response to 17 hours per response for both the annual and final reports. Some questions have been combined but less repetition is included. We are requiring the grantee to write an essay describing the key accomplishments and challenges of the project. The information to be collected in the new forms reflects the focus of the project activities much more accurately, and includes a required evaluation report which was not required in the previous reporting instrument. FIPSE’s evaluator reviews each evaluation report in detail and the collection will thus include successes to be shared with the greater education community.

FIPSE places great emphasis on the collection of information from performance reports as a means to assure the quality of program management and show progress toward meeting its performance goals.

**Congressionally-directed forms (two (2) forms for 84.116Z):**

Results of the annual and final performance reports will be used to monitor the allowability and reasonableness of grant expenditures toward the accomplishment of a specified congressional purpose stated in the Appropriations Act. The reports are collected via the FIPSE database to strengthen FIPSE’s methods of internal controls for monitoring grant expenditures and enhancing transparency of project activities. It will also serve as a safeguard and check-and-balance system against possible fraudulent activity. Since these are Congressionally-directed grants and therefore noncompetitive, FIPSE staff need to closely monitor these projects to assure that tax payer monies are spent according to Federal regulations. The data provided in the annual and final performance reports for fiscal year 2010 projects will ascertain if grant recipients have expended funds for the Congressionally-directed purpose specified in the conference report, H. Rept. 111-366, pages 1066-1072 (2010) or if activities and expenditures were in compliance with discretionary grant regulations. The burden will be reduced from 15 hours to 8 hours due to format of the form and combining of questions.

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 collection of information is designed for Web-based submission of all the information requested. Grantees will be able to use FIPSE’s Web site to submit annual and final performance information on their grants. The Comprehensive Program and the four (4) international programs will use similar forms for the annual performance report and the final performance report. The forms vary slightly because we are collecting data on students studying abroad for the Department of State’s International Agency Working Group (IAWG) for the international programs and have a different form for the Comprehensive program thus allowing for any special focus competitions that may be held under the Comprehensive program. The Congressionally-directed grants have a slightly different format due to the nature of Congressionally-directed grants.

The data collected in the FIPSE database enables our evaluation specialist to conduct program evaluation of FIPSE’s programs to provide outcomes and outputs as well as improve the program management of the programs.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

FIPSE staff has made every effort to ensure that there is no duplication of data acquisition.

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.

According to the Government Performance and Results Act of 1993 (GPRA), FIPSE grant competitions are required by law to collect information regarding program and project effectiveness.

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.

No special circumstances apply.

1. *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.*

Each year FIPSE staff evaluates the effectiveness of grants through regular telephone and e-mail contacts with project directors, an annual meeting of the project directors in each program, and annual performance reports submitted by the grantees. Information gathered through such means is focused on objectives unique to individual projects. The FIPSE database greatly facilitates total program evaluation objectives such as the effectiveness of the consortia format or student learning outcomes that are common to a cohort of projects both within and across the four programs in areas such as engineering or business and if applicable any Congressionally-directed grants.

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

ED does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No assurance of confidentiality is provided to respondents.

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 program does not include information of a sensitive nature.

*12. Provide estimates of the hour burden of the collection of information. The statement should :*

*-Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*

*-If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.*

*-Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.*

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| --- | --- | --- |
| ANNUAL REPORT | **Form for 84.116B, J, M, N, or S** | **Form for 84.116Z** |
| Number of respondents | 140 | 132 |
| Frequency of response | Annual | Annual |
| Hour burden | 17 | 8 |
| Total burden | 2,380 | 1,056 |
| Total est. cost to respondents | $66,640 | $29,568 |
|  |  |  |
| FINAL REPORT |  |  |
| Number of respondents | 100 | 529 |
| Frequency of response | One time | One time |
| Hour burden | 17 | 10 |
| Total burden | 1,700 | 5,290 |
| Total est. cost to respondents | $47,600 | $148,120 |

* Annual Grand Total for four (4) forms: 10,426 hours
* Annual Grand Total estimated cost to respondents for four (4) forms: $291,928

*13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)*

*-The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*

*-If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*

*-Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

*Total Annualized Capital/Startup Cost :* *$ .00*

*Total Annual Costs (O&M) :*  *.00*

*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

*Total Annualized Costs Requested :*

The only cost to respondents is the staff time shown above in item 12.

*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.*

5% of four staff salaries $ 20,000

30% of overhead for support $ 6,000

Contractor personnel costs $160,000

Total cost of Contract and Department of Education staff/overhead.....$186,000

*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 currently active collection. We have reduced the burden to the public. Please see above. The increase in the number of respondents is due to the fact that we have more congressionally –directed grants to administer.

*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.*

The findings and results obtained from this collection will be based on self-reported information and on inferences and conclusions drawn across all of the funded projects. Selected information is available on the http://www2.ed.gov/about/offices/list/ope/fipse/index.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.*

We will display the expiration date for OMB approval of the collection.

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

We are not requesting any exceptions.