

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

EDICS Tracking and OMB Number: (04821) 1840-0501

Revised XX/XX/XXXX

RIN Number: XXXX-XXXX (if applicable)

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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

International and Foreign Language Education (IFLE), within the U.S. Department of Education, Office of Postsecondary Education, administers the Fulbright-Hays Seminars Abroad (SA) Program, which is authorized by Section 102(b)(6) of the Mutual Educational and Cultural Exchange (Fulbright-Hays) Act of 1961, as amended. The program is administered under the policies established by the J. William Fulbright Foreign Scholarship Board (FSB), a Presidentially-appointed 12-member body. ED solicits applications and recommends candidates for seminar positions abroad in accordance with FSB policies. The applicable statute is attached.

The SA program provides opportunities for U.S. educators to participate in short-term study seminars abroad in the social sciences and humanities. The purpose of the program is for educators to obtain knowledge and disseminate that knowledge through a curriculum development project. The application is necessary in order for the Department to award funds under this program.

This is an extension to a currently approved collection. The changes to this collection are minor and include clarifying language and the replacement of e-Grants instructions with G5 instructions. Four standard forms have been removed, as they are not applicable to the program's applicants, who are individuals as opposed to institutions. One small addition that requests the type of institutional affiliation was made to the application form; it does not add to burden hours or costs.

- 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.**

This application package will be used by applicants to the Fulbright-Hays Seminars Abroad Program. Applicants are individual educators at the elementary, secondary and

RIN Number: XXXX-XXXX (if applicable)

postsecondary levels. Information submitted by applicants is used by peer reviewers to evaluate potential program participants.

- 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 given to using technology to reduce burden.**

The SA Program application package is made available on the program Web site.

Ninety-nine percent of applicants submit applications electronically via the Department's G5 e-Application system.

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

The application for the SA program is program-specific in nature and is not duplicated within ED or collected by any outside agencies.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This information collection does not impact small businesses or 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 this information was not collected, ED would be unable to award funds under this program. Information must be collected annually, as ED awards funds annually.

- 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;**

RIN Number: XXXX-XXXX (if applicable)

- **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 that 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.**

This information collection does not include any of the special circumstances outlined above.

- 8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

ED held informal consultations with review panelists, previous seminar participants and members of the academic community in preparing this application package. The appropriate 30-day Federal Register Notice was published to solicit public comment.

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

No payment 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. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. Requests for this information are in accordance**

RIN Number: XXXX-XXXX (if applicable)

with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information). If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

The Privacy Act statement included in this application package informs applicants who will have access to the information provided in their applications and for what purpose. Applicants are assured of the privacy of personal information based on Section 552a(d) of the Privacy Act and the Freedom of Information Act. Any information disclosed is in accordance with those Acts.

The System of Records Notice for this program was published in the Federal Register on June 4, 1999, and begins on page 30175. No PIA is necessary since there have been no changes to the personally identifiable information collected since the program's inception, prior to the e-Government Act (per Privacy Safeguards Division).

- 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.**

No questions of a sensitive nature are asked in the application package.

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

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 the ROCIS**

RIN Number: XXXX-XXXX (if applicable)

IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)

- **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 be included in Item 14.**

The burden of the applicants is estimated at an average of eighteen hours for each applicant and includes the time needed to get references. We have checked with our respondents and they have indicated that this amount of time is accurate.

Program	Number of Respondents	Frequency of Response	Hours	Total Burden Hours	Wage	Total Cost
Applicant respondents	400	Once	18	7,200	\$31/hour	\$223,200.00
Total	400			7,200		\$223,200.00

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 acquiring and maintaining 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.**

RIN Number: XXXX-XXXX (if applicable)

- **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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost:**Total Annual Costs (O&M):****Total Annualized Costs Requested:**

There are no additional costs to the applicants other than those indicated in the response to #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.**

Task	Cost	Hours	Number	Total Cost to USG
Securing OMB approval (every 3 years)	\$60/hr	60		\$3,600.00
Initial application design	\$30/hr	15		\$450
Application design (every 3 years)	\$30hr	15		\$450
Logging in, review and data entry of applications (1 hour per application; 400 applications)	\$36/hr	1	400	\$14,400
Review of applications for eligibility (.5hr/400 applications)	\$36/hr	.5	400	\$7,200
Academic Panel Review (Outside reviewers)				\$30,000
Total				\$56,100.00

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be**

RIN Number: XXXX-XXXX (if applicable)

disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

There is an increase in burden hours from 1,200 to 7,200. The costs increase from \$37,200 to \$223,200. These are revisions that are the result of re-estimating burden in response to feedback from program applicants.

- 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.**

ED does not plan to publish any results of this collection.

- 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.**

ED will display the expiration date on the collection.

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

No exceptions are being requested.