

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

EDICS Tracking and OMB Number: (XXXX) XXXX-XXXX

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.**

The office of International and Foreign Language Education (IFLE) at the US Department of Education has not conducted a comprehensive assessment of the National Resource Center (NRC), Business and International Education (BIE), and Undergraduate International Studies and Foreign Languages (UISFL) programs. IFLE has awarded a contract to EPI International (EPI) to help in the creation of, and the administration of survey phone interviews. EPI will analyze data collected through the phone interviews and will submit a final report outlining the results of the data collected, as well as making program recommendations to IFLE.

This is a new collection and the purpose of the phone interviews administered to a sampling of the recipient universe is to collect information to assist IFLE staff in developing a comprehensive plan for analysis and formative assessment of the UISFL, BIE and NRC programs. Statute and Regulations for each program are included as an attachment to this package.

The phone interviews will allow EPI to delve deeper into the programmatic questions with respondents and obtain a richer and more detailed picture of the program data. .

- 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.**

The information will be used by IFLE to determine, and implement both minor short-term and fundamental long-term changes to programs. The information collected will help demonstrate accomplishments of the programs, including international education capacity building on campuses. IFLE will use the results to improve the Title VI programs. The information collected will assist IFLE in developing program priorities, possibly revising regulations, and will provide valuable information which will assist in

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guiding the programs to help better meet their legislative intent. The information will also assist IFLE in demonstrating program impact to Congress.

Once the final report is published, grantees will be able to use the results to improve their administration of the programs on their campus.

- 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 phone interview protocols are to be administered by an EPI researcher via phone interviews to a sampling (approximately 15 grantees) of the population of grantees in each program. A total of 45 grantees (15 per program) will be contacted.

- 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 information collection will not duplicate any other collections.

The only other information collected about these programs is their performance reports submitted through the International Resource Information System (IRIS, OMB No. 1840-0759 Expiration Date 04/30/2013). Data on pre and post-award activities, including capacity building is not collected through IRIS.

- 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 collection will not impact small businesses or 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.**

The phone interviews will provide data on the outcomes of the NRC, BIE, and UISFL programs. The data will be used analyze program effectiveness and will enable IFLE staff to take a strategic look at the programs to determine whether changes to regulations and program policies are warranted. This information has not been collected in the past. If the phone interview information is not collected, IFLE will be impeded in its work towards program and will not be able to implement necessary changes to programs. If IFLE cannot demonstrate program outcomes to Congress, in this tight budget climate, there is a chance that the IFLE budget may be cut further.

There are no technical or legal obstacles to reducing burden.

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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 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.**

There are no special circumstances that would require this information collection to be conducted in any of the ways listed as part of this question.

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.

A 60-day notice and a 30-day notice about this information collection were published in the Federal Register to allow public comment. The Department summarized public comments and responded to them.

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Changes were made to the original information collection based on feedback received in the public comments. Public comments focused mainly on the written survey, which has been removed from this clearance package. Only information pertaining to the phone interview survey is now included. Comments reflected the fact that much of the data requested in the written survey has been reported by grantees in the past through IFLEs on-line reporting system, "International Resource Information System (IRIS)". Comments reflected that asking for the survey information was repetitive and the estimated hour burden was too low. The comments stated that requesting that grantees submit the IRIS information again is burdensome. Comments regarding the appropriateness of the phone interviews were positive. IFLE carefully reviewed the comments, and based on the comments, revised the information collection to reflect only the phone interviews. The written survey that was to be collected by EPI through Survey Monkey will not be administered. EPI will administer only phone interviews to 15 grantees per program, for a total of 45 phone interviews.

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

No payments or gifts to respondents will be given.

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 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.

This collection is not subject to 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.

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This collection does not collect information about matters that are commonly considered private.

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 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 number of burden hours for the phone interview is based on the actual time of pilot interviews. This information can also be found in the ROCIS IC Burden Analysis Table submitted with this package. The NRC, BIE, and USIFL phone interview protocols were created with the assistance of the TAG members, who are experts in the field of international studies, as well as current and past grantees. The phone interviews will require current and past grantees to submit information only once. There is no cost to the respondents as the information has already been collected.

The phone interviews are estimated at 45 minutes per respondent for each program (no variance).

Number of NRC respondents Phone Interview	15
Annual hour burden	6.75
Number of BIE respondents Phone Interview	15
Annual hour burden	6.75

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Number of UISFL respondents Phone Interview	15
Annual hour burden	6.75
Annual cost to all respondents	No cost

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.
- 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 is no capital, start-up, or maintenance cost to respondents. Record keepers are already maintaining survey information.

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

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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 will be approximately \$260,663. This includes the equivalent of one person- month of senior federal government staff time and the cost of employing a contractor to create the surveys, administer the surveys, and to clean the data, analyze the data, and prepare the draft of the final report.

	Hours	Salary	Total
Senior Program Officer	160 (1 month full time)	\$55/ hour	\$8,800
Contractor	Fixed price Contract		\$251,863

- 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 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).**

Not applicable, 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.**

17. The phone interviews will be conducted in fall 2012 for a period of two months. IFLE and a contractor will then analyze the data. A draft report will be submitted internally to the Department three months later. After internal approval, estimated to take two months, it will be published online for grantees and the public on our website at <http://www2.ed.gov/about/offices/list/ope/iegps/index.html>.

This timeline is dependent upon approval for this information collection package. Below is the tentative schedule.

Survey Collection, Processing, Publication	
11/2012	Start of survey
01/2013	Close of survey
4/2013	Data analysis complete

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7/2013	ED approval of report complete
8/2013	Release of report to the public

18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

IFLE will instruct EPI to display the expiration date for OMB approval of the information collection on the Surveys.

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

Not applicable.