

**SUPPORTING STATEMENT A  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Survey of Post-Graduate Outcomes for International Education Fellowship Recipients  
U.S. Department of Education, Office of Postsecondary Education,  
International and Foreign Language Education (IFLE)

EDICS Tracking Number:

## **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.**

This new information collection is required to respond to a statutory mandate from Congress contained in Title VI of the Higher Education Opportunity Act (HEOA), P.L. 110-315, Section 602, which states: “The Secretary shall assist grantees in developing a survey to administer to students who have completed programs under this title to determine postgraduate employment, education, or training. All grantees, where applicable, shall administer such survey once every two years and report survey results to the Secretary.” The statute is attached in hard copy and is also available online at: <http://www.gpo.gov/fdsys/pkg/PLAW-110publ315/pdf/PLAW-110publ315.pdf> (page 257-258).

While the law does not specify due dates, we propose the following reporting schedule for this longitudinal survey. Respondents will be surveyed every two years, for a total of eight years. The first cohort will be Fiscal Year (FY) 2010, which consists of Academic Year (AY) 2010/2011 and summer 2011. The first survey will be conducted in fall 2012. The first two programs will be the Foreign Language and Area Studies (FLAS) (CFDA 84.015B) and the Institute for International Public Policy (IIPP) (CFDA 84.269A). The survey will be expanded to other Title VI grantees in subsequent years.

The target population for this data collection is fellowship recipients from the FLAS and IIPP programs who have completed the degree program they were in when they were given their fellowship.

**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.**

By Whom:

The International and Foreign Language Education (IFLE) office within the Office of Postsecondary Education (OPE) at the U.S. Department of Education will assist grantees by providing the survey questions, which they will then administer to the students who have graduated from the fellowship programs. The grantees will report the results of the survey back to IFLE.

How

The tool that will be used by grantees to administer the survey is Qualtrics. Qualtrics was chosen over Survey Monkey because of its functionality that will allow IFLE to create the survey and then “share” it with grantees. Grantees can then distribute the questionnaire to fellows on their own. Qualtrics allows them to add their own name and logo for their institution, and to manage responses on their own. Since the legislation authorizing this survey requires that grantees administer the survey, this technical solution fits our needs well. IFLE can ensure that the questions asked in the survey are standardized, thus reducing the potential for measurement error that would result if the grantees all used different tools managed in different ways.

Purpose

The purpose of this collection is to gather data on program outcomes to demonstrate effectiveness and impact. The data will be compared with other national surveys done by the National Science Foundation and the Census, including the Survey of Earned Doctorates, Survey of Doctorate Recipients, National Survey of College Graduates, and the American Community Survey. Our survey includes questions that are taken from those standard surveys so that we can do a comparison between our fellowship recipients and the general population, to better measure the effects of our grant programs.

The results of the survey will be available to grantees and the public on our website at <http://www2.ed.gov/about/offices/list/ope/iegps/index.html>. Congress and the Administration can use the results as a policy-making resource for international education. IFLE will be able to use the survey results to improve the Title VI and Fulbright-Hays programs. Grantees can use the results to improve their administration of the 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 given to using technology to reduce burden.**

The survey will be conducted electronically. Grantees will use Qualtrics to send an email to respondents that will include a website link where they can complete the questionnaire.

We will conduct the survey electronically so that non-relevant questions can be skipped, thus reducing burden. The survey instrument included in this package contains notations about which questions are skipped based on the response to an individual question.

In addition to skip patterns, Qualtrics will allow us to pre-populate basic data from the initial survey to subsequent years. For example, questions about the FLAS profile and demographics will not change, so these questions can be skipped once they are answered in the original survey.

**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. Data on post-graduate outcomes of fellowship recipients is not currently being collected.

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). However, IRIS collects data directly from grantees and only a minimal amount from fellows, and it does not include data on fellows after the end of the grant program. Post-graduate outcomes are not captured.

The statute authorizing this survey is clear that the Department itself is not supposed to administer the survey directly. The grantees must administer the survey and report the results to the Department. There are several challenges associated with this restriction. To properly collect data through a survey that will provide reliable results, we cannot let grantees ask questions of their fellows in different ways that may lead to measurement errors. The questions must be worded the same in order for the results to be reliable and for any conclusions to be drawn. If we provided the questionnaire to grantees and asked them to administer it and then report the results through IRIS, we would not have any way to ensure the reliability of the data. Qualtrics solves this problem. Qualtrics allows IFLE to create a questionnaire and “share” it with other users. Those users can then administer the survey and then submit the reports back to IFLE. They retain control of their own responses from their graduates, which they can analyze on their own, while the Department is able to ensure consistency and can analyze the results for the entire program.

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.**

Small businesses or other small entities are not part of the target population of the information collection.

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.**

Title VI of the Higher Education Opportunity Act of 2008 requires this biennial data collection. The Secretary – and the grantees – would be out of compliance with the statute if the information were not collected.

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 was published in the Federal Register and allowed public comment. The Department summarized public comments and responded to them. Small changes were made to the original information collection based on feedback received in the public comments. IFLE also revised some survey terms (such as 4d) to provide more clarity to respondents.

IFLE staff has consulted extensively with groups and individuals to refine the survey. In July 2011, IFLE hosted a webinar for all FLAS grantees. One of the main topics was plans for the survey and ways that we were soliciting feedback. We discussed the availability of data, the schedule for the survey, the technical issues with different web-based survey tools, and the research questions on which the survey would focus. During the webinar, we asked if there were any grantees that had existing post-graduate tracking surveys and results from those surveys that they would be willing to share with us. Based on these responses, we convened a focus group of 9 individuals with experience surveying this population in September 2011. The focus group included representatives of institutions of higher education who have received FLAS and IIPP grants, as well as Department experts. Department experts included a statistician, multiple subject matter experts, and the Director of the Policy and Programs Studies Service within the Office of Planning, Evaluation, and Policy. The group reviewed research questions and draft surveys; discussed reporting definitions and procedures; and provided IFLE with feedback on the survey.

**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 gift will be provided to respondents in connection with this data collection.

**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.**

A Privacy Impact Assessment was submitted to the Department in March 2012. It was determined that the information being requested does not contain personally identifiable information.

The Department does not make a pledge about the confidentiality of data. The introduction to the survey states: “This survey asks about your employment and education after the completion of the [insert program name] fellowship program. The purpose of the survey is to report to U.S. Department of Education on the impact of this taxpayer-funded program, which will help ensure that future students can also benefit from the fellowships. The survey is a legislative requirement of the Higher Education Opportunity Act of 2008. Your answers will be provided to the university that awarded your fellowship. They will report fellow responses to U.S. Department of Education. The survey should take approximately fifteen minutes to complete. Thank you for your time.”

**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.**

The information collection includes no questions of a sensitive nature. The respondents should feel comfortable answering any of the questions.

**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.

<b>Number of Fellowship recipient respondents (estimated)</b>	4,468 individuals
<b>Frequency of response</b>	Survey will be administered every 2 years starting in Fall 2012  1,569 will be surveyed twice (cohorts 1 and 2)  2,899 will be surveyed once (cohorts 3 and 4)
<b>Annual hour burden</b>	15 minutes per respondent  670 hours total
<b>How was this burden estimated?</b>	Pilot testing of under 10 respondents
<b>Annual cost to fellow respondents</b>	No cost
<b>Number of Fellowship Coordinators administering the survey (estimated)</b>	127 individuals
<b>Frequency</b>	Once every 2 years
<b>Annual hour burden</b>	3 hour per respondent  381 hours total
<b>How was this burden estimated</b>	Number of Fellowship Coordinators and feed back from field
<b>TOTAL RESPONDENTS</b>	4595 individuals

<b>Annual cost to Fellow Coordinator respondents</b>	\$35 per hour \$13,335 per year
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### Justification for Estimates

The target population for this data collection is fellowship recipients from the FLAS and IIPP programs who have completed the degree program they were in when they were given their fellowship. So we are not surveying all fellows; just the ones who have graduated, since we are interested in employment outcomes. FLAS and IIPP Fellowship Coordinators are responsible for administering the survey to their respective fellows. This entails tracking their fellows, inputting fellow e-mail contact information into Qualtrics, and administering the survey. Coordinators will be responsible for following up on non-respondents.

Each year there are approximately 2,100 FLAS fellows and 20 IIPP fellows. However, not all of the FLAS fellows will have graduated. For FY10, only 18% of FLAS fellows graduated, according to their performance reports submitted to ED.

We also know that over the past five years, the distribution of FLAS fellows has been that 42% are doctoral students, 40% are Masters degree-only students, 13% are Masters/doctoral students, and 5% are undergraduates. Based on this distribution, we have made the following estimates about fellows and when they will graduate.

We estimate that 20% of a cohort of fellows will graduate in the same year in which they received their degree. Another 30% of those will graduate the following year, since many of the recipients are Masters degree students in two year programs. In the third year, an estimated 25% will graduate, and in the fourth, 15% will graduate, for a total of 90% graduating within four years. The remaining 10% are students who remain in school, which includes doctoral students who take longer than four years to complete their program.

See estimates and calculations below. The total of 2,217 for cohort 1 is based on actual data about fellows. Cohorts 2, 3, and 4 are estimates.

**FLAS Estimations for Graduation by Fellow Cohort and by Year, FY10 – FY13**

FLAS Fellow Cohorts	Total fellows	Graduate in FY10		Graduate in FY11		Graduate in FY12		Graduate in FY13		Total by Cohort
		% Graduating	# Graduating	% Graduating	# Graduating	% Graduating	# Graduating	% Graduating	# Graduating	
Cohort 1 - Fellowship received in FY2010	2,217	20%	443	30%	665	25%	554	15%	100	1,763
Cohort 2 - Fellowship received in FY2011	2,100	N/A	N/A	20%	420	30%	630	25%	105	1,155
Cohort 3 - Fellowship received in FY2012	2,100	N/A	N/A	N/A	N/A	20%	420	30%	630	1050
Cohort 4 - Fellowship received in FY2013	2,100	N/A	N/A	N/A	N/A	N/A	N/A	20%	420	420
<b>Total by Year</b>			443		1,085		1,604		1,255	<b>4,388</b>



Each year, the IIPP program graduates approximately 20 students. Adding together the FLAS estimates above and the IIPP graduates, we estimate that 1,569 fellows could potentially be surveyed in FY12. For the next survey two years later, in FY14, the estimate is 4,468. The number is higher for the second survey because we will have more cohorts and we expect more FLAS fellows to have graduated by then. The 1,569 individuals surveyed in FY12 will be surveyed a second time in FY14. So the total unique individuals surveyed will be 4,468.

**Burden Estimations for FLAS and IIPP Cohorts, by Graduation Year and Survey Year**

<b>Potential Survey Respondants for FY12 Survey</b>	FLAS Cohort 1, graduated in FY10 and FY11	1,109
	FLAS Cohort 2, graduated in FY11	420
	IIPP Cohort 1, graduated in FY10	20
	IIPP Cohort 2, graduated in FY11	20
	<b>Total</b>	<b>1,569</b>
<b>Potential Survey Respondants for FY14 Survey</b>	FLAS Cohort 1, graduated FY10 - FY13	1,763
	FLAS Cohort 2, graduated FY11 - FY13	1,155
	FLAS Cohort 3, graduated FY 12 and FY13	1,050
	FLAS Cohort 4, graduated FY13	420
	IIPP Cohort 1, graduated in FY10	20
	IIPP Cohort 2, graduated in FY11	20
	IIPP Cohort 1, graduated in FY12	20
	IIPP Cohort 2, graduated in FY13	20

**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 graduation dates and email addresses for their fellows.

- 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 will be approximately \$171,550. This cost includes the equivalent of 6 months of senior federal government staff time and the cost of employing a contractor to clean the data, analyze the data, and assist with preparing a draft of the final report. It also includes the cost of approximately \$6,250 a year for three years, for the Qualtrics software.

	Hours	Salary	Total
Qualtrics Software	\$6,250 (per year/3 years)		\$18,750
Contractor	Fixed price Contract		\$100,000
Senior Program Officer	960 (6 months)	\$55/hr	\$52,800

- 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).**

This is a new information clearance package mandated by the Higher Education Opportunity Act (HEOA) of 2008. Section 601 requires that; “The Secretary shall assist grantees in developing a survey to administer to students who have completed programs under this title to determine postgraduate employment, education, or training. All grantees, where applicable, shall administer such survey once every two years and report survey results to the Secretary.” The burden hour for this collection is 797.

**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 first survey 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.

<b>Survey Collection, Processing, Publication</b>	
12/2012	Training of grantees
1/2013	Start of survey
3/2013	Close of survey
5/2013	Data analysis complete
7/2013	ED approval of report complete
8/2013	Release of report to the public

The analytical techniques that will be used will include frequency distributions and descriptive statistics. The responses to questions from other national surveys done by the National Science Foundation and the Census, including the Survey of Earned Doctorates, Survey of Doctorate Recipients, National Survey of College Graduates, and the American Community Survey will be compared to the national population.

**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.**

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

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

There are no exceptions to the statement.