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.

One of the core administrative activities of the U.S. Department of Education's (ED) office of International and Foreign Language Education (IFLE) is to award continuation grants under the fourteen discretionary programs cited in this information collection. Our capacity to conduct this activity, however, is contingent upon the availability of information that grant recipients submit in annual performance reports. The Education Department General Administrative Regulations (EDGAR) stipulates that a recipient that wants to receive a continuation award shall submit a performance report that provides the most current performance and financial expenditure information. The International Resource Information System (IRIS), the online reporting system described in this statement, provides grantee institutions with a centralized repository for inputting their performance report data and narrative information.

There are a number of additional legal or administrative requirements that make this collection necessary, including the program reporting and evaluation requirements in the Department of Education's Visual Performance Suite (VPS) and the Government Performance and Results Act (GPRA) of 1993. VPS is the Department's strategic planning performance data collection system. IRIS gathers and maintains the information that program managers use to help them align program operations level with the Department's overall strategic goals and objectives. The VPS contains the performance and efficiency measures for each of the 14 programs as well as the results of each measure, if available at this time. The GPRA requires all federal agencies to develop annual performance plans for their programs, in which the agencies specify the outcomes to be achieved, the indicators of success, and strategies to be followed to accomplish the plan. GPRA further requires the submission of an annual performance report to Congress.

IRIS was initially designed and implemented to respond to the GPRA mandate, that by Fall 2002, all federal agencies would have demonstrated that they had developed consistent and effective annual data collections with systematized evaluation for their respective programs. In 1998, IFLE funded a project to meet this mandate. The development of IRIS made a fundamental change in how performance information and data for the fourteen IFLE programs, authorized under Title VI of the Higher Education Act and section 102(b)(6) of the Mutual Educational and Cultural Exchange Act, also known as Fulbright-Hays (F-H), was collected. IFLE used this project to replace the paper collection instruments with an online performance reporting instruments.

Teams of IFLE staff as well as grantees have spent the past seven months reviewing the instruments, making recommendations for changes, and identifying areas of improvement.

IRIS allows Title VI/F-H program grantee institutions to submit performance report information and data, including project abstracts, project status, GPRA information, and budget information that are more comprehensive, and comparable than the traditional paper reports. The reports provide IFLE management and program officers with valuable performance information to enable them to assess program effectiveness. The system also captures the data that is used for performance measurement.

This information collection package requests continued approval for the performance objectives and measures for all fourteen programs: (1) American Overseas Research Centers Program (AORC), (2) Business and International Education Program (BIE), (3) Centers for International Business Education (CIBE), (4) Foreign Language and Area Studies Fellowships Program (FLAS), (5) Institute for International Public Policy Program (IIPP), (6) International Research and Studies Program (IRS), (7) Language Resource Centers Program (LRC), (8) National Resource Centers Program (NRC), (9) Technological Innovation and Cooperation for Foreign Information Access Program (TICFIA), (10) Undergraduate International Studies and Foreign Language Program (UISFL).), (11) Fulbright-Hays Doctoral Dissertation Research Abroad Program (DDRA), (12) Fulbright-Hays Faculty Research Abroad Program (FRA), (13) Fulbright-Hays Group Projects Abroad Program (GPA), and (14) Fulbright-Hays Seminars Abroad Program (SA).

The statutes and regulations that necessitate this collection include the following and appear in Attachment A:

- The Higher Education Act of 1965, as amended, Title VI Parts A, B and C;

- The Mutual Educational and Cultural Exchange Act of 1961 (The Fulbright-Hays Act), section 102 (b)(6);

- 34 CFR Parts 655, 656, 657, 658, 660, 661, 662, 663, 664, and 669; and

- Education Department General Administrative Regulations (EDGAR), Part 74, section 74.51 and Part 75, sections 75.118, 75.253, 75.720.

Note: In fiscal year (FY) 2011, IFLE contracted with Berkeley Policy Associates to develop logic models and new GPRA measures for all 14 of the programs included in this collection. The new GPRA measures were recently approved by OMB, but not in time to submit the revisions prior to the expiration. IFLE intends to resubmit this package for clearance in the coming months with public comment period, so that they can go into effect as soon as possible.

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.

IFLE management uses the data and information generated from the system to inform the Title VI/F-H program monitoring, evaluation, and budget processes. Management also uses the data to calculate the performance and efficiency measures required by OMB. Reports are run in response to high-level requests within the Department for program information and statistics. The data in the system is being used externally by grantees and contractors to assess program effectiveness and to make recommendations for program administration and technical (including system) improvements.

IFLE program officers use the system information and data since they need reliable, comparable information about their grantees' projects in order to determine whether grantees are completing grant-funded activities in compliance with the approved grant applications, and whether grantees are expending grant funds for allowable and allocable costs. The program officers' assessments of substantial progress provide the basis for making continuation awards in subsequent budget periods for the grant cycle.

The Help Desk is the primary source for systems related questions and concerns. Program officers also provide technical assistance on how to access the system's screens.

Grantee institutions use the IRIS reporting system to input program performance information, and to submit that information to ED as part of the annual report for obtaining continuation awards from ED. Currently, grantees are making a concerted effort to respond to reporting requirements by providing additional quantitative data through the IRIS reporting system. In doing so, grantees collectively make a powerful statement regarding the relevance of their projects and the importance of international education programs overall. In addition, the Congress and OMB use the information collected by the IFLE reporting system to determine the effectiveness of IFLE 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 of using information technology to reduce burden.

The IRIS reporting system is web-based. Grantees funded under the 14 IFLE programs submit their performance reports using the system. This is the most efficient way to collect and review grantee performance reports. It also allows for more rapid dissemination of the data collected as it is collected via the system and stored in a database. Select data elements from the reports are then made available to the general public on a contractor-maintained public web site.

This is the fifth clearance of this reporting system so the use of a web-based reporting system has been in practice for a number of years. It has worked well and continues to be improved so we are continuing its use.

Continuing to collect information electronically in a system that is being enhanced provides additional reductions in burden on the grantees.

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.

The IRIS reporting systems collects performance report data from grantees and is the only mechanism by which this data is collected. The information is not available through any other means. Therefore there is no duplication.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

The collection 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.

34 CFR § 74.51 and §75.118 require that grantees submit performance reports in order to provide the information required in §74.51(d)(1)-(3) and in order to provide program staff with enough information to determine that substantial progress has been made towards the project's goals (§75.118(a)) so that continuation funding may be awarded. The IRIS reporting system is the only mechanism for collecting the information needed to monitor and administer these grant programs. The system greatly facilitates much more efficient program monitoring than the earlier paper-based reporting process.

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 tht it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None of the special circumstances listed applies to this information collection clearance request.

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.

IFLE maintains an ongoing dialogue with the constituency regarding the use, improvements, and enhancements of the IRIS reporting system. Many of the suggestions are incorporated in the proposed screens.

Program officers receive queries from grantees on the system that are then shared with management and the contractor so that if there is a recurring question, it can be addressed. The help desk also tracks queries and again, if there is a recurrence, the contractor shares it with management and action is taken to improve the process.

Refer to Part 2 for copies of the proposed IFLE reporting system screens, and Attachment C for a spreadsheet documenting the proposed changes to the current system.

We publish the applicable 60 and 30 day Federal Register notices allowing for public comment.

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

This is not applicable as no payments 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.

Grantee institutions are not provided any assurance of confidentiality because confidentiality is not authorized in the applicable statutes, regulations, or agency policy. None of the 14 programs collects or will collect information that is covered under the Privacy Act of 1975. The data collected consists solely of quantitative data regarding individual program objectives and qualitative information relating to grantee status and accomplishment of program goals.

ED assures the protection of fellow/participant data by using a password-protected system. Passwords will automatically be generated and assigned to authorized administrators at the FLAS, FRA, DDRA, and GPA grantee institutions upon creation of their IRIS reporting system account. When the grantee institutions submit the FLAS, FRA, DDRA, and GPA institutional lists, the IRIS reporting system will create a password for each fellow/participant on each institutional list. The fellow/participant uses the assigned password to complete and submit his or her performance reporting, including a language self-evaluation to ED. The self-evaluation portion of the report is available only to that fellow/participant and the ED program officers. Project directors will be able to view the academic portion of the fellow's reports.

Similarly, information in the NRC, IIPP, UISFL, BIE, CIBE, AORC, LRC, IRS, TICFIA, SA and the institutional portion of FRA, DDRA, and GPA performance reports is password-protected. The IRIS reporting system will automatically generate and assign a password to the project director at the grantee institutions upon creation of their IRIS account. Using their passwords, these administrators will have access to the system to input the names of other authorized users (who will have data input rights but not the ability to submit any reports), as well as complete and submit the performance reports to ED. After the performance reports are electronically submitted, the system prohibits access by one grantee institution to another grantee institution's performance report.

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 collection does not ask questions 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 16 of IC Data Part 1.

- 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.

Annual Performance Report Estimated Burden for Grantees from the 14 IFLE Programs

Program	Number of Respondents	Freq. Reports/Year	Number of Responses	Est. Avg. Hours /Response	Est. Number of Total Hours	Est. Hourly Wage of Respondent	Est. Cost per Respondent	Est. Total Cost
AORC	10	2	20	7.5	150	$45	$675	$6,750
BIE	50	2	100	10	1000	$45	$900	$45,000
CIBE	33	2	66	15	990	$45	$1,350	$44,550
DDRA Fellow	150	2	300	1	300	$20	$40	$6,000
DDRA Director	98	1	98	2	196	$40	$80	$7,840
DDRA Language Instructor	150	1	150	0.5	75	$30	$15	$2,250
FLAS Fellow	1809	1	1809	1	1809	$20	$20	$36,180
FLAS Director	126	4	504	5	2520	$35	$700	$88,200
FLAS Language Instructor	1809	1	1809	0.5	905	$30	$15	$27,135

FRA Fellow	20	2	40	2	80	$50	$200	$4,000
FRA Director	18	1	18	1	18	$40	$40	$720
FRA Language Instructor	20	1	20	0.5	10	$30	$15	$300
GPA Participant Annual	365	2	730	0.5	365	$35	$35	$12,775
GPA Director Annual	16	2	32	6	192	$45	$540	$8,640
GPA Participant Language	165	2	330	0.5	165	$20	$20	$3,300
GPA Director Language	11	2	22	6	132	$45	$540	$5,940
GPA Language Instructor	165	1	165	0.5	82.5	$30	$15	$2,475
IIPP	1	2	2	6	12	$45	$540	$540
IRS	30	2	60	5	300	$45	$450	$13,500
LRC	15	2	30	7.5	225	$45	$675	$10,125
NRC	127	2	254	12	3048	$45	$1,080	$137,160
SA Participant	45	2	90	0.5	45	$35	$35	$1,575
SA Admin Agency	6	1	6	2	12	$30	$60	$360
SA Domestic	3	1	3	1	3	$30	$30	$90
TICFIA	13	2	26	4	104	$45	$360	$4,680
UISFL	35	2	70	10	700	$45	$900	$31,500
TOTALS	**5290**	**45**	6754		**13438**	**970**		**$501,585**

Refer to Attachment D for a chart of the current reporting schedule for grantees, to Attachment E for a spreadsheet outlining the proposed screens required for each report, and Attachment F for an overview of all proposed screens, indicating on which report(s) the screens appear and whether or not these are required.

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)   : $501,585

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Total Annualized Costs Requested   : $501,585

The total annual cost burden to respondents is shown in the Table in Item 12 above.

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 hourly wages of a GS-14, GS-13, and GS-12 education program specialists/management analysts and contractor support are used to estimate costs:

IEPS Staff Task	Hourly Cost	Hours per Task	Number of Reports	Total Hours for Task	Cost to Federal Government
Request OMB Clearance	$51	200	1	200	$10,200
Review AORC Performance Reports	$57	2	20	40	$2,280
Review BIE Performance Reports	$57	2	100	200	$11,400
Review CIBE Performance Reports	$44	2	66	132	$5,808
Review DDRA Fellow Performance Reports	$57	1.25	300	375	$21,375

Review DDRA Institutional List	$57	1	49	49	$2,793
Review FLAS Student Performance Reports	$48	0.25	1809	452.25	$21,708
Review FLAS Performance Reports	$48	2	560	1120	$53,760
Review FRA Institutional List	$40	1	1809	1809	$72,360
Review FRA Fellow Performance Reports	$40	1.25	40	50	$2,000
Review GPA Institutional Performance Reports	$40	2.5	65	162.5	$6,500
Review GPA Fellow Performance Reports	$40	0.5	200	100	$4,000
Review IIPP Performance Reports	$57	2	2	4	$228
Review IRS Performance Reports	$57	2	60	120	$6,840
Review LRC Performance Reports	$40	2	30	60	$2,400
Review NRC Performance Reports	$48	2	254	508	$24,384
Review SA Domestic Agency Performance Reports	$40	0.5	3	1.5	$60
Review SA Overseas Agency Report	$40	2	6	12	$480
Review SA Fellow Performance Reports	$40	0.5	90	45	$1,800
Review TICFIA Performance Reports	$40	2	26	52	$2,080
Review UISFL Performance Reports	$57	2	70	140	$7,980
Prepare New and Continuation Grant Awards Notifications	$44	2	604	1208	$53,152
Technical Assistance to Grantees	$44	1200			$52,800
Contractor Support	$101	4000			$404,000
Overhead					$26,400
Total					**$796,788**

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

This is a revision of a currently approved collection. The changes in dollars reflect changes in wages since the previous collection. The overall burden hours decrease from 16,994 to 13,678. The previous burden hours included a student tracking component to Title VI programs which resulted in new screens and 1405 annualized new burden hours. The student tracking will be completed using another mechanism, so these screens have been removed from IRIS, resulting in decreased burden. We have also had a reduction in appropriations so there are fewer grantee respondents using the system. IFLE added Foreign Language Instructor screens to DDRA and FRA in order to collect data regarding program outcomes, and has removed the Foreign Language Self-Evaluation screens associated with these programs.

Program	Previous Burden	Revised Burden	Difference	Reason	Legislated
AORC	165	150	-15	program	
BIE	1080	1000	-80	program	
CIBE	930	990	60	progra	

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DDRA Fellow	600	300	-300	program	
DDRA Director	196	196	0	program	
DDRA Language Instructor	0	75	75	program	
FLAS Fellow	1916	1809	-107	program	
FLAS Director	2800	2520	-280	program	
FLAS Language Instructor	958	904.5	-53.5	program	
FLAS Student Tracking	1400	0	-1400	program	
FRA Fellow	80	80	0	program	
FRA Director	18	18	0	program	
FRA Language Instructor	0	10	10	program	
GPA Participant Annual	465	365	-100	program	
GPA Director Annual	372	192	-180	program	
GPA Participant Language	270	165	-105	program	
GPA Director Language	216	132	-84	program	
GPA Language Instructor	135	82.5	-52.5	program	
IIPP	12	12	0	program	
IIPP Student Tracking	5	0	-5	program	
IRS	300	300	0	program	
LRC	225	225	0	program	
NRC	3504	3048	-456	program	
SA Participant	142	45	-97	program	
SA Admin Agency	18	12	-6	program	
SA Domestic	3	3	0	program	
TICFIA	104	104	0	program	
UISFL	1080	700	-380	program	
TOTALS	**16994**	**13438**	**-3556**		

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.

IFLE does not plan to publish the information collection results.

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 display the OMB expiration date.

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

IFLE does not have exceptions to this statement.