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 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[1]. 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.

Consistent with the provisions of Title VII, Part B of the Higher Education Act of 1965, as amended, the Fund for the Improvement of Postsecondary Education (FIPSE) works to improve postsecondary education through grants to postsecondary educational institutions and agencies. Such grants are awarded to non-profit organizations on the basis of competitively reviewed applications submitted to FIPSE under its Comprehensive and Special Focus Competition Program grant competitions. The Department of Education is requesting permission to conduct combined data collection for the Comprehensive Program (84.116B), four (4) Special Focus Programs: European Union/United States of America Cooperation Program in Higher Education and Vocational Education and Training (EU-U.S. Atlantis Program), the Program for North American Mobility in Higher Education (North American Program), the U.S.-Brazil Higher Education Consortia Program (U.S.-Brazil Program), and the U.S.-Russia Program. The regulations governing these programs are contained in 34 CFR Part 75 (Education Department General Administrative Regulations).

The Comprehensive Program has been funding improvements in postsecondary education annually since its authorization in 1973. FIPSE has not received an appropriation from Congress to support the Comprehensive or International Partnership programs since 2011. However, FIPSE remains in the Federal Budget and may have future competitions to administer and therefore all reports are necessary. In addition, the projects funded in FY 2010 were funded for three and four years and will continue into 2014. Thus these grantees will not file their final reports until the end of 2014. We are requesting a revision since we are eliminating the Congressionally-Directed Grant annual report. We longer need this annual report because we have not and will not receive more Congressionally-Directed grants to administer.

[1] Please limit pasted text to no longer than 3 paragraphs.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Comprehensive and International Project Forms (annual and final reports for 84.116B, J, M, N, and S): The annual and final performance reports are necessary to ensure that the information and data to be collected will result in a balanced and effective assessment of the student exchanges and curricular developments of the Comprehensive and four international programs. The U.S. Department of Education standard forms for annual and final performance reports ask grantees to provide information that is not suited to consortium-based projects. The FIPSE forms include requests for performance information, a report narrative, a student mobility data sheet, a final budget summary, and a project description. We require the grantee to write an essay describing the key accomplishments and challenges of the project. The information to be collected in the forms reflects the focus of the project activities much more accurately and includes a required evaluation report.
FIPSE places great emphasis on the collection of information from performance reports as a means to assure the quality of program management and show progress toward meeting its performance goals.

Congressionally-directed Grant forms (final report for 84.116Z):
Results of the final performance report will be used to ensure that grant expenditures were used toward the accomplishment of a specified congressional purpose stated in the Appropriations Act. The reports are collected via the FIPSE database to strengthen FIPSE's methods of internal controls for monitoring grant expenditures and enhancing transparency of project activities. It will also serve as a safeguard and check-and-balance system against possible fraudulent activity. Since these are Congressionally-directed grants and therefore noncompetitive, FIPSE staff need to closely monitor these projects to assure that tax payer monies are spent according to Federal regulations. The data provided in the final performance reports will ascertain if grant recipients have expended funds for the Congressionally-directed purpose specified in the conference report, H. Rept. 111-366, pages 1066-1072 or if activities and expenditures were in compliance with discretionary grant regulations. We are eliminating the Congressionally-Directed Grant annual report. We longer need this annual report because we have not and will not receive more Congressionally-Directed grants to administer.

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 collection of information is designed for Web-based submission of all the information requested. Grantees will be able to use the FIPSE database (www.fipsedatabase.ed.gov) to submit final and annual performance information on their grants. The Comprehensive Program and the four (4) international programs will use the same forms for the annual and final performance report, with the exception of an added section for the international programs that *collects data on students studying abroad for the Department of State's International Agency Working Group (IAWG). The Congressionally-directed grants have a slightly different format due to the nature of Congressionally-directed grants.*

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

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

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

5. If the collection of information impacts small businesses or other small entities, 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.

The collection of information does not impact small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or 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.

No special circumstances apply.

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.

Each year FIPSE staff evaluates the effectiveness of grants and related processes, including data collection, through regular telephone and e-mail contacts with project directors, an annual meeting of the project directors in each program, and annual performance reports submitted by the grantees. Information gathered through such means is focused on objectives unique to individual projects. The FIPSE database greatly facilitates total program evaluation objectives such as the effectiveness of the consortia format or student learning outcomes that are common to a cohort of projects both within and across the four programs in areas such as engineering or business and if applicable any Congressionally-directed grants.
A separate 60-day Federal Register notice followed by a 30-day Federal Register notice will be published to solicit public comments.

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

ED does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. 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.[2] 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 confidentially of the data.

No assurance of confidentiality is provided to respondents

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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)

[2] 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)

- 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.

ANNUAL REPORT	**Form for 84.116B**	
Number of respondents	100	
Frequency of response	Annual	
Hour burden	17	
Total burden	1700	
Total est. cost to respondents	$85,000	
FINAL REPORT	**Form for 84.116B,J,M,N or S**	**Form for 84.116Z**
Number of respondents	100	147
Frequency of response	One time	One time
Hour burden	17	10
Total burden	1,700	1470
Total est. cost to respondents	$85,000	$73,500

Total est. cost to respondents $85,000 $73,500

- ***Annual Grand Total for three (3) forms: 4,870 hours***
- ***Annual Grand Total estimated cost to respondents for three (3) forms: $243,500***

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 are no annualized costs requested. There are no start-up costs associated with this request.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

5% of three staff salaries	*$ 13,500*
30% of overhead for support	*$ 3,000*
Contractor personnel costs	*$ 60,000*

Total cost of Contract and Department of Education staff/overhead.....$76,500

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 currently active collection. The reduction in burden hours resulted from decreases in the number of respondents for all the programs. Since 2010, we have not held new competitions for the Comprehensive or Special Focus Programs thus reducing the number of respondents. Moreover, we are eliminating the annual report for the Congressionally-directed grants since it is unlikely that there will be Congressionally-directed grants in the future. We made fewer Congressionally-directed grants in 2010 – only 147 – thus reducing the number of respondents. The number hours for completing the report have remained the same. The burden decrease resulted because of a decrease in respondents and because of the elimination of the Congressionally-Directed Annual report. Therefore, the adjustment change reflects the reduced numbers of respondents.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

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

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

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

We are not requesting any exceptions.