

**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. 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 section or changed sections, if applicable.

The information collection (instructions and forms) for the National Resource Centers (NRC) program (CFDA Number 84.015A) and the Foreign Language and Area Studies (FLAS) Fellowships program (CFDA Number 84.015B) is necessary for institutions of higher education to request discretionary grants under these programs. The Office of Management and Budget (OMB) number 1840-0807 for the information collection was discontinued on August 31, 2013 to allow for revisions based on new GPRA measures. The review type for this collection is reinstatement with change to allow the International and Foreign Language Education (IFLE) office to invite applications under the NRC and FLAS programs, conduct the peer review of grant applications, select grant recipients, and make new awards within established grant schedules. This information collection is also necessary to request information to support post-award project evaluation and performance reporting activities.

<b>Programs Covered under this Information Collection</b>	<b>CFDA Number</b>	<b>Application Submit Date</b>	<b>Information Collection Required for New Awards</b>
National Resource Centers Program Foreign Language and Area Studies Fellowships Program	84.015 A 84.015 B	06/2014	FY 2014

The NRC program provides grants to institutions of higher education (IHEs) or consortia of IHEs to establish, strengthen, and operate comprehensive and undergraduate language and area or international studies centers. The FLAS program provides allocations of fellowships to IHEs or consortia of IHEs to assist meritorious undergraduate and graduate students undergoing training in world languages and related area studies, international studies, or the international aspects of professional studies.

The NRC and FLAS programs are authorized under part A, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 110-315). Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; the Government Paperwork Elimination Act; the Education Department General Administrative Regulations; and, the regulations in 34 CFR Parts 655, 656, and 657.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections. This information collection is also associated with a notice of proposed priorities

The authorizing legislation and program-specific regulations are incorporated in the application package attached to this supporting statement.

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.

Eligible institutions of higher education use the information collection to develop and submit grant applications to the U.S. Department of Education (Department) to request funding in response to a notice inviting applications. After the grant applications are submitted, the Department determines the budgetary and human resources it needs to conduct the program competitions. External review panels use the information to evaluate the applications and identify the high-quality applications. Department program officials and senior management consider the evaluations from the expert review panels, in conjunction with the NRC and FLAS programs' legislative purposes, and any announced priorities, when it makes funding recommendations. The Department also uses the data and narrative information solicited by this collection to assess risk management, develop monitoring and compliance plans; to inform strategic planning, and to align program assessment with Department performance goals and initiatives.

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.

Electronic submission of responses is not possible. This information collection requires applicants to submit one grant application to respond to two different discretionary grant programs under the same CFDA number (with different alpha identifiers). The Department's G-5 e-GRANTS/e-Application functionality is not designed to accommodate this, and the e-Reader functionality in G5 is not designed to support the peer review process electronically, due to the nature of the technical reviews form, which is used to evaluate the application for both programs. We also explored the submission of NRC and FLAS applications using the Grants.gov system, but this is not an option due to the limitations previously described.

Regarding the use of other forms of information technology, we use the Department's Web site to notify the public about funding opportunities and application due dates. For immediate access and cost efficiency, we make the application guidelines available on the Web site. Effective and ongoing technical assistance is facilitated because we use the site to post Frequently-Asked-Questions, project abstracts, and program fact sheets to help prospective applicants better understand the kinds of activities and projects that the NRC and FLAS programs support.

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.

No other information collection duplicates what is being requested by this particular collection.

The legislative authorities, allowable activities and costs, and the pre-and-post award activities listed in Item 2 and covered by this information collection are unique to the NRC and FLAS programs and to IFLE's specific goals and objectives. For these reasons, no other similar programs exist in the Department or in other Federal agencies.

5. If the collection of information impacts small businesses or other small entities , describe any method 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.*

We will not be able to conduct the FY 2014 NRC and FLAS program competition and the activities necessary for issuing new grants if this collection is not conducted. These activities include the publication of the notice inviting applications, providing technical assistance to respondents; conducting the peer review of grant applications; transmitting the slate memorandum with funding recommendations to the Secretary, meeting the deadline for Congressional notifications, and, making the grant awards to the recommended institutions in a timely manner.

The Department needs to make the application instructions and forms available to the public in a timely manner so that eligible applicants have at least 30 days to develop and submit their applications by the date specified in Item 1, and that IFLE has sufficient time to complete all FY 2014 competition activities on time.

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

There are no circumstances that would cause this information collection to be conducted in this manner.

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.

Last September 23-24, 2013, we held a technical assistance workshop for IFLE programs that would be competing in FY 2014. The NRC/FLAS program sessions and the performance evaluation sessions allowed us obtain feedback from representatives from public and private IHES, including project directors, deans, faculty, fiscal representatives, area studies specialists, foreign language professionals, and evaluation experts. They shared their views about the clarity of the information collection and the time that is required for them to collect the information and data they need to respond the application requirements.

We also contacted a sample of nine prospective applicant institutions to ascertain an estimate of the hours they need to review the application instructions, gather data, and submit their application to the Department, based on their experience with these programs.

Routine desk monitoring (phone calls, e-mails, correspondence), office visits, day-to-day technical assistance, periodic Webinars, and occasional on site visits provide opportunities to discuss our programs and to ascertain whether our grant application instructions are useful, clear, and do not impose an unrealistic burden on respondents.

These oversight and technical assistance activities collectively inform us about the viability of the application materials that IFLE uses for its grant programs. The institutions and individuals cited above did not have adverse comments about the information collection or the time it takes to prepare a grant application under these programs.

As required by 5 CFR 1320.8(d), and the Streamlined Clearance Process for Discretionary Grant Applications (1894-0001) the Department will publish one 30-day notice in the Federal Register to solicit public comments on this information collection. The notice will be published jointly with the FY 2014 Notices of Proposed Priorities for these programs, and the comment periods for the information collection and the proposed priorities will run concurrently.

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

Other than official grant awards, there are no payments or gifts to respondents.

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

Assurances of confidentiality related to this information collection are covered under 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.

Questions of a sensitive nature are not asked.

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 ROCISIC Burden Analysis Table. (The table should at the 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 not be included in Item 14.

Whether they are respondents to the NRC program, the FLAS program, or both programs, all applicant IHEs will use this information collection (application instructions and forms).

The data in the table are estimates of the time it takes for respondents to read the instructions, gather data, complete the forms, develop the application narrative in response to the selection criteria and announced priorities, develop the project evaluation plan and project budget, and submit the applications to U.S./ED. The aggregate burden for the form appears in Item 13 of OMB Form 83-I.

As described in Item 8, we conducted a sampling of nine grantee institutions. We asked them to estimate the total hours they need to read the instructions and forms; search existing data resources; develop the

application narrative and budget; and submit their applications to the Department. The estimated 450 hours per response is the median of the hours they reported. IFLE believes this estimate is reasonable, considering that FY 2014 respondents will be required to include GPRA-and project-specific performance measures as well as more detailed evaluation plans in their applications.

**Estimate of Annualized Burden Hours and Cost to Respondents**

<b>Information Collection (Grant Application)</b>	<b>Number of Respondents</b>	<b>Hours per Response</b>	<b>Total Hours</b>	<b>Frequency of Response</b>	<b>Wage per Hour</b>	<b>Cost for the Information Collection</b>
National Resource Centers Program (84.015A) Foreign Language and Area Studies Fellowships Program (84.015B)	178	450	80,100	Every 4 years	\$75	\$6,0075

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:  
 Total Annual Costs (O&M) :  
 Total Annualized Costs Requested :

The programs in this information collection do not have costs that meet the criteria for inclusion in Item 13.

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 in the table below includes costs related to primary operational and programmatic tasks necessitated by this collection of information. This information collection covers the NRC program and FLAS program and requires the resources of four program officers, one division director, one management analyst, and external peer review panels to conduct the tasks.

**Estimates of Annualized Cost to the Federal Government**

<b>Operational or Programmatic Task</b>	<b>Wage per Hour</b>	<b>Staff Resources</b>	<b>Total Hours</b>	<b>Cost to Federal Government</b>
Gather data and develop OMB justification statement	\$60	1	9	\$540
Develop application package forms and instructions	\$60	1	30	\$1800
Develop Notice Inviting Application (NIA))	\$60	1	4	\$240
Enter information collection into ICRAS	\$60	1	1	\$60
Post application guidelines on Department’s Web site	57	1	2	114
Develop FY 2014 Technical Review Plan	\$60	1	2	\$120
Screen applications for eligibility and prepare them for transport to peer review site	\$50	4	8	\$1600
Select peer reviewers from Field Reader System, send conflict of interest forms, process acceptances	\$50	1	3	\$150
Read peer reviewers’ profiles and assign reviewers to reading panels	\$50	4	5	\$1000
Develop orientation presentations and materials for peer reviewers	\$50	4	5	\$1000
Conduct orientation for peer reviewers	\$50	4	2	\$400
Conduct application peer review 5 days @ 9 hr/day	\$50	4	45	\$9000
Compensate 57 peer reviewers (est.)	\$1000 flat rate	57	45	\$57,000
Review project activities and budgets for recommended applications	\$50	4	80	\$16000
Prepare slate transmittal memo and attachments for ED officials	\$60	1	5	\$300
Enter budgets into G5	\$50	4	8	1600
ED program officials review and approve slates	\$85	3	15	\$3825
Executive Office commits grants in G5	\$60	1	1	\$60
IFLE License Holder obligates grants in G5	\$65	1	1	\$75
Mail GANs and technical review forms	50	4	2	400

Provide routine and targeted technical assistance to grantees; review performance and evaluation reports; monitor projects for compliance	50	4	520 (10 hrs/wk x 52 wks)	104000
<b>TOTAL</b>			<b>793</b>	<b>199,284</b>

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).

The adjusted 450 burden hours are the result of performance reporting requirements and the program regulations. The FY 2014 information collection (reinstatement with change) requires all applicants to include information about how their proposed projects will respond to the GPRA measures that IFLE established for the NRC and FLAS programs, in consultation with the Department’s Office of Planning, Evaluation, and Program Development and approved by OMB. Additionally, all applicants will be required to include project-specific performance measures and more extensive evaluation plans in response to the “Impact and Evaluation” selection criterion in the NRC program and FLAS program regulations. The GPRA, project-specific requirements, and evaluation information represent the necessity for IFLE to collect information to enable us to demonstrate the impact of these programs in meeting their authorized purposes in a more meaningful and quantifiable way.

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.

There are no plans for publication of 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.*

Not applicable. We plan to display the approved OMB expiration date on the information collection.

18. *Explain each exception to the certification statement identified in Item 20, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.*

Not applicable. No exceptions are being requested.