SUPPORTING STATEMENT A

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 sections or changed sections, if applicable.**

The purpose of Section 102(b)(6) of the Mutual Educational and Cultural Exchange Act of 1961 (Fulbright-Hays Act) is to promote and develop modern foreign language training and area studies throughout the educational structure of the United States. To help accomplish this objective, fellowships are awarded through US institutions of higher education to American doctoral dissertation fellows enabling them to conduct overseas research and enhance their foreign language proficiency.

Under the Fulbright-Hays Doctoral Dissertation Research Abroad (DDRA) program, individual scholars apply through eligible institutions for an institutional grant to support the research fellowship. These institutions administer the program in cooperation with the US Department of Education (US/ED) as provided under the authority of Sections 102(b)(6) and 104(e)(1) of the Mutual Educational and Cultural Exchange Act of 1961, 34 CFR Parts 662, the Policy Statements of the J. William Fulbright Foreign Scholarship Board (FSB), and the Education Department General Administrative Regulations (EDGAR).

Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; and the Government Paperwork Elimination Act.

In order to judge all applications in a consistent manner at each stage of the complex review process, and to reduce the time required for it, it is necessary to collect the appropriate information from all individual applicants by means of a uniform application form.

Program Covered under this Information Collection	CFDA Number	Application Submit Date	Information Collection Needed for New Awards
Fulbright-Hays Doctoral Dissertation Research Abroad Program	84.022A	5/2014	FY 2014

This is a request for a Reinstatement, with change, of the application for the Fulbright-Hays Doctoral Dissertation Abroad Program. This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections (1894-0005).

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.

The data requested are used by US/ED, US foreign language and area studies specialists, the US Department of State, US Embassies, Fulbright Commissions, host country officials and scholars, and the Fulbright Scholarship Board (FSB) in determining the academic qualifications and suitability of the individual applicant, potential political sensitivity and feasibility of the project in the host country, research climate, and adequacy of the proposed budget.

Failure to gather sufficient information on each individual applicant's academic background, language proficiency, extent of overseas experience, health, and ability to adapt to a foreign culture would make it impossible to properly evaluate his or her chances of successfully carrying out and completing the proposed research project. The data requested are the minimum necessary to administer the grant in compliance with program regulations.

Information gathered from the current collection is also used to compile program demographics and to generate informational lists for the public

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 information collection requires the electronic submission of applications using the G5 e-application system. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple hard copies of grant applications to the Department.

IFLE uses the Department's Web site to notify prospective applicants about the DDRA program competition and deadline date. IFLE posts the DDRA application package (instructions and forms) on the Web site for more effective and efficient access. Additionally, we post Frequently-Asked Questions about the program on the respective programmatic Web pages, which makes technical assistance to the public more immediate. Technical assistance is enhanced by posting a list of previously funded and currently funded projects on the Web site to help prospective applicants better understand the kinds of activities and projects that the DDRA program 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.

The collection and use of this information is not duplicated in US/ED.

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.

Since the grants awarded under this program are made annually and are not renewable, data must be collected for each new competition cycle. If the collection is not conducted, ED cannot meet its grant making activities in accordance with the approved schedule. These activities include publication of the closing date notice, providing technical assistance to new respondents, conducting the peer review, transmitting the funding slate to ED program officials and the FSB for approval, making grant awards, and notifying the Congress in a timely manner about successful applicants in the competition.

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.**

The information collection does not involve any special circumstances that would impose these requirements and conditions on respondents.

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.

A 30-day notice about this information collection will be published in the Federal Register for public comment. The Department will summarize any comments received and respond to them.

Institutional program directors and peer reviewers are consulted every three years regarding availability of data and clarity of instructions of the application form. Overseas diplomatic personnel and/or foreign affairs agencies are consulted regarding any American or host country requirements that may need to be addressed by new data elements. Student suggestions are retained and used during the revision of forms. The following administrators have been informally consulted regarding the revision of forms:

George Crandell, Auburn University	334-844-0299
Brian Prindle, University of Florida	352-392-3516

Brooke Noonan, University of Chicago 773-702-0871

Data from all of these sources have been used to calculate hour and cost burden to respondents.

The professionals, administrators, and organizations cited above do not have adverse comments about the information being requested or about the time it takes to complete a grant application.

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

No payment 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.

Each respondent is informed that his or her application is reviewed by staff of US/ED, the US Department of State, US Embassies, Fulbright commissions, host country officials and scholars, the FSB and American scholars. Comments made by any entity or individual involved in the review process are made available. Applicants and their referees are informed that in accordance with Section 552a(d) of the Privacy Act, the content of a reference form is subject to review by the applicant.

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 FSB, which has statutory responsibilities for all Fulbright programs, requires that "applicants must be of sound physical and mental health". Therefore we include a medical certification in the application. This certification does not require the attachment of test results and is the most effective and least burdensome method of meeting the FSB's requirement.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range**

of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The data in the table is an estimate of the time it takes for both institutional project directors and student respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Department's G5 e-Application system.

Estimate of Annualized Burden Hours and Cost to Respondents

Program	Number of Institutional Respondents	Number of Individual Responses	Hours Per Institutional Respondent	Hours Per Individual Response	Total Institutional Hours	Total Individual Hours
Doctoral Dissertation Research Abroad	80	600	25	25	2,000	15,000

The burden of individual respondents is estimated at an average of 25 hours for each student. These estimates are based on feedback from the respondents during the last three years. The annual respondent burden of the 80 institutional project directors is estimated at 25 hours for each DDRA application. These estimates incorporate the completion of the following tasks:

- Registration in the G5 e-Application system
- Screening individual completed applications
- Transmitting completed individual applications to US/ED in a single submission

Estimated total annual cost burden to respondents:

Program	Number of Respondents	Frequency of Response	Hours	Total Burden Hours	Wage	Total Cost
Student Respondent	600	Annual	25	15,000	$20/hr	$300,000
DDRA Project Director	80	Annual	25	2,000	$40/hr	$90,000
Total	**850**			**17,000**		**$390,000**

The total burden hours and cost of the package has decreased due to the exclusion of the Fulbright-Hays Faculty Research Abroad program application. The total burden hours has increased for DDRA. FY 2012 was the first year the DDRA application was submitted via the

G5 e-application system. Because the system functions slightly differently, there is a learning curve regarding use of the G5 e-application. The cost has increased due to an increase in wages.

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.

Estimated annualized cost the Federal government:

<u>Estimates of Annualized Cost to the Federal Government</u>

Pre-Award and Post-Award Program Tasks	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	50	1	25	900
Develop application forms and instructions	50	2	5	900
Develop Notices of Closing Date (CDN)	50	1	5	900
Enter approved collection into ICRAS	50	1	1	36
Publish application guidelines and technical review forms in G5 e- Application module	50	2	2	270
Assign reader panels in G5 e-Reader	50	1	2	270
Conduct orientation for G5 e- Reading	50	2	4	720
Schedule regular peer review conference calls; review readers' comments in e-Reader; provide follow-up via e-mail and phone communications	45	5	80	18,000
Certify that the 35 reviewers have completed the e-Reading for issuance of honoraria	1000 (ED flat rate)	2	n/a	35,000
Review applications in funding range, revise budget requests, prepare slate memo and attachments for approval; enter grants into G5	45	2	200	18,000
Review of forms by US Embassies and binational commissions	45	2	80	7,200
ED program official reviews and approves slate	75	3	3	675
Executive officer commits grants	50	1	1	50
Obligate grants in G5 and signs Grant Award Notifications (GANs)	50	1	1	60
Program officer provides technical assistance to grantees; reviews performance and evaluation reports; conducts ongoing monitoring activities in compliance with OPE , IFLE requirements	45	2	780 (15 hrs/wk x 52 wks)	70,200
TOTAL			**1,256**	**157,771**

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 reinstatement of a previously approved collection. As required by GPRA, ED has developed a strategic plan that reflects its organizational priorities and also integrates IFLE's mission and program authorities. ED's stated goal for IFLE is "to meet the nation's security and economic needs through the development and maintenance of a national capacity in foreign languages, and area and international studies." In FY 2013 the Department revised its GPRA measures to better target performance and evaluation measures. The changes reflected in the application document represent an effort to assist applicants with providing data for collection to respond to these new GPRA measures. Program-specific guidance has been provided in the collection on preparing evaluation plans, proposing project-specific measures, and reporting data to respond to program GPRA measures for use in the FY 2014 competition cycle and beyond. It will take applicants additional time to review this new guidance, and to develop more amplified evaluation plans. The application also asks new applicants to include project-specific measures in their grant proposal, which is a new requirement.

Please note that the burden resulting from the Faculty Research Abroad (FRA) program application have been removed from this collection's total burden calculation. The FRA program has not been funded since FY 2010, and there is no reasonable expectation that it will be funded in the forseeable future.

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. The expiration date for OMB approval will be displayed on the information collection.

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

Not applicable. No exceptions are being requested.