

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.*

The Fulbright-Hays Group Projects Abroad (GPA) long-term program (CFDA Number 84.021B) supports advanced overseas intensive projects in training, research, and curriculum development in modern foreign languages and area studies for groups of teachers, students, and faculty engaged in a common endeavor. GPA long-term projects are designed to take advantage of the opportunities present in the foreign country that are not present in the United States when providing intensive advanced foreign language training. Projects can range in duration from eight weeks to four years.

This information collection for the GPA long-term program is necessary for institutions of higher education or consortia of institutions of higher education to apply for discretionary grants. In the past, the GPA long-term program shared a single application package with the GPA short-term program (CFDA Number 84.021A). The last collection of information for these programs (OMB number 1840-0792) was discontinued on May 31, 2012 to allow for revisions to the collection due to new GPRM measures and evaluation requirements. When the collection was reinstated, it included instructions and forms for the GPA short-term program only. The attached information collection is the new application package (instructions and forms) for the GPA long-term program. This is a new collection that will allow the International and Foreign Language Education office (IFLE) to comply with Congressional mandates to invite applications under the (GPA long term) program in spring 2016, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules in FY 2016.

Program Covered under this Information Collection	CFDA Number	Applications Submitted	Information Collection Needed for New Awards
Group Projects Abroad Advanced Overseas Intensive Language (Long-Term) Program	84.021B	6/2016	FY 2016

This new information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections.

This information collection is also associated with the 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 submit applications to the Department of Education (ED) to request funding in response to the competition announcement. After grant applications are submitted, the Department determines the budget and staff resources it needs to conduct the peer review of applications and post award activities. External review panels use the information to evaluate grant applications and to identify high quality applications. When developing funding slates ED program officials consider the evaluations from the expert review panels, in conjunction with the GPA long-term legislative purposes and any Administration priorities. ED program officials also use the collection to inform strategic planning; to establish goals, performance measures and objectives; to develop monitoring plans; or, to align program assessment standards 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.

The information collection requires the electronic submission of applications using Grants.gov. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple hard copies of grant applications to the Department.

Program competitions are held every four years. The GPA long-term program will utilize the Grants.gov system for the second time in FY 2016. During competitions prior to FY 2012, the GPA long-term program used the Department's e-Grants system for submission of applications.

IFLE uses the Department's Web site to notify prospective applicants about the GPA long term program competition and deadline date. We post the GPA long-term program 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 GPA long-term program Web page, which makes technical assistance to the public more immediate. Technical assistance is enhanced by posting the abstracts of currently funded projects on the Web site to help prospective applicants better understand the kinds of activities and projects that the GPA long-term program supports.

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.

There are no information collections available that duplicate the information that the GPA long-term program application requests. In regards to the uses listed in Item 2 above, there is no duplication elsewhere in the Federal government of IFLE program planning and oversight activities associated with this program.

The legislation, program regulations, and the respondents covered by this information collection are unique to the Group Projects Abroad program. No other similar programs exist in the Department, and no similar programs exist in other Federal agencies.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

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.

If the collection is not conducted, ED cannot meet its grant making activities in accordance with statutes and approved schedules. 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 for approval, making grant awards, and notifying the Congress in a timely manner about successful applicants in the competition.

The Department needs to make the application package available to the public so that eligible institutions of higher education have at least 45 days to prepare grant applications and submit them to the Department in June 2016. Allowing this application due date will give IFLE sufficient time to make new fiscal year 2016 grant awards before September 30, 2016.

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.

The Department will publish a notice of proposed priorities in the Federal Register to solicit public comments simultaneously with a Notice of Information Collection on this application package. The comment periods for the information collection and the proposed priorities will run concurrently.

IFLE hosted a Technical Assistance Workshop in October 2015 for future prospective applicants. During that time we met with various representatives from private and public institutions of higher education to discuss the GPA long-term selection criteria, program instructions, and forms. Representatives included project directors, foreign language pedagogy experts, and data analysts who are responsible for gathering the data required for a GPA-LT grant application. Workshop attendees also included postsecondary faculty and administrators who are recipients of the training materials and instructional services that the GPA program provides.

IFLE periodically meets with representatives from professional organizations such as the National Council of Organizations of Less Commonly Taught Languages, the Center for Applied Linguistics, the National Foreign Language Center at the University of Maryland, and area studies associations. These organizations provide feedback on the clarity of the instructions and forms, and whether the application forms and instructions solicit information that meets the purposes of the Fulbright-Hays legislation, program regulations, and announced priorities.

Ongoing technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer questions about the GPA long term program application instructions and to gauge whether or not application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance is conducted by phone conversations, e-mails, office visits. We also conduct technical assistance workshops at various conferences throughout the year. These consultations and activities collectively inform IFLE about the viability of the application materials we use for the GPA long-term program. 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.

As required by 5 CFR 1320.8(d), the Department will publish a notice in the Federal Register to solicit public comments on this information collection.

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

Other than remuneration of grantees through 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 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**

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

Estimate of Annualized Burden Hours and Cost to Respondents

Information Collection (Grant Application)	Number of Respondents	Hours per Response	Total Hours	Frequency of Response	Wage per Hour	Annualized Cost for the Information Collection
Fulbright-Hays Group Projects Abroad Advance Overseas Intensive Language (Long-Term) Program	30	100	3000	Every 4 years	\$85	\$70,125

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 GPA-LT program and requires the resources of 1 senior program officer, 1 director to provide oversight, 1 management analyst, and 21 external peer reviewers.

Estimates of Annualized Cost to the Federal Government

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	\$60	1	25	\$1500
Develop application forms and instructions	\$60	1	10	\$600
Develop Notices of Inviting Application (NIA)	\$60	1	10	\$600
Enter approved collection into Departmental and OMB clearance process	\$60	1	1	\$60
Publish application guidelines and technical review forms in G5 e- Application module	\$60	1	2	\$120
Assign reader panels in G5 e-Reader	\$60	1	3	\$180
Conduct orientation for G5 e-Reading	\$60	1	4	\$240
Schedule regular peer review conference calls; review readers' comments in e-Reader; provide follow-up via e-mail and phone communications	\$60	1	80	\$4800
Certify that the 21 reviewers have completed the e-Reading for issuance of honoraria	\$700 (ED flat rate)	1	n/a	\$14,700
Review applications in funding range, revise budget requests, prepare slate memo and attachments for approval; enter grants into G5	\$60	1	200	\$12,000
ED program official reviews and approves slate	\$75	3	3	\$675
Executive officer commits grants	\$75	1	1	\$75
Obligate grants in G5 and signs Grant Award Notifications (GANs)	\$60	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	\$60	1	780 (15 hrs. /wk. x 52 wks.)	\$46,800
TOTAL			1120	\$82,410

15. *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I*

This is a new collection. The GPA short- and long-term programs previously shared a single application package. However, when that package was revised in FY 2014 to include new GPRA measures and additional evaluation activities, it was cleared only for the GPA short-term program. This new collection is the application package for the GPA long-term program. It will include the same GPRA measures and additional evaluation activities that were included in the GPA short-term program application.

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 2012 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 competition cycles.

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 to publish the results of this collection of information.

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 Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

Not applicable. There are no exceptions to the certification statement identified in Item 20.

B. Collection of Information Employing Statistical Methods

This collection does not employ statistical methods.