

## 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.**

Information collection for the Fulbright-Hays, Group Projects Abroad (GPA) program is necessary for institutions of higher education, nonprofit educational organizations, and public and private nonprofit organizations. The Office of Management and Budget (OMB) number is 1840-0792. The collection of information was discontinued on August 31, 2013. We request reinstatement with change of the information collection to allow the International and Foreign Language Education (IFLE) office to invite applications under the GPA program, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules.

Information Collection	CFDA No.	Date Respondents Submit Applications	Information Collection Required for Fiscal Year Awards (New)
Fulbright-Hays, Group Projects Abroad	84.021A 84.021B	04/2014	FY 2014

The Fulbright-Hays, Group Projects Abroad program is authorized by section 102 (b)(6) of the Mutual Educational and Cultural Exchange Act of 1961 (P.L. 87-256), most commonly known as the Fulbright-Hays Act. 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.

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

The Fulbright-Hays Group Projects Abroad program provides grants for overseas projects in training, research, and curriculum development in modern foreign languages and area studies for groups of teachers, students, and faculty.

The authorizing legislation and program-specific regulations are included in the application package submitted with 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, nonprofit educational organizations, and public and private nonprofit organizations use the information to develop and submit grant applications to the Department of Education (US/ED). After grant applications are submitted, the Department determines the budgetary and human resources it needs to conduct competitions. Expert review panels use the information to identify high-quality applicants. US/ED program officials and senior management consider the feedback from the expert review panels, in conjunction with the programs' legislative purposes, when making funding recommendations. The data are also used by US Embassies and the Fulbright Scholarship Board to determine the suitability of the project, political sensitivity and feasibility of the project in terms of the host country reaction, political climate and the adequacy of the proposed budget. US/ED also uses the information collection to develop monitoring plans, to inform strategic planning, and 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 applicants for grants under the GPA program to submit applications electronically using US/ED's Grants.gov system.

Regarding the use of other forms of information technology, we use the Department's Web site to inform prospective applicants about the programs' funding opportunities and deadline dates. Application packages are posted on the Web site making access to them more effective and efficient only after the competition is closed. Additionally, we post Frequently-Asked Questions about these programs on our Web page, which makes technical assistance more immediate. Also as a technical assistance tool, we post abstracts of currently funded projects on the Department's Web site to help prospective applicants better understand the kinds of activities and projects the 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.**

No other information collections duplicate what is being requested under this collection. Likewise, there is no duplication elsewhere in the Federal government of IFLE program planning and oversight activities associated with this program.

The legislative authorities and program regulations covered by this information collection are unique to the program. Because of these inherently unique programmatic characteristics, 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, 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.**

If the collection is not conducted, US/ED cannot meet its grant making responsibilities, including the publication of closing date notices, providing technical assistance to potential applicants, conducting peer reviews of grant applications, transmitting slates with funding recommendations to Department officials for approval, and making grant awards.

The Department needs to make grant applications available to its constituencies to give eligible applicants at least 30 days to develop and submit applications by the dates specified in Item 1, and to enable IFLE to make new fiscal year grant awards in a timely manner.

**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.**

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.**

A notice regarding this information collection will be submitted for publication in the Federal Register. OMB will be apprised of public comments received, if any.

On a regular basis, we hold informal discussions with various constituents and potential respondents who have completed grant applications under this program to ascertain whether the instructions and forms are clear and applicant-friendly. These include project directors, deans, chairs of academic departments, foreign language professionals, fiscal representatives at institutions, and management analysts who are responsible for gathering the data needed to respond to the programs' selection criteria.

Our day-to-day technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer specific questions about the grant 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 includes phone conversations, e-mails, faxes, and office visits. We also conduct project director's meetings at various conferences throughout the year as well as periodic webinars.

In sum, these processes collectively inform IFLE about the viability of the application materials we use for our programs. 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 under this program.

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

Other than remuneration of grantees via 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.**

Each applicant is informed that their application is reviewed by staff of US/ED, US Embassies and the Fulbright Scholarship Board. Unclassified comments made by any entity or individual involved in the review process are made available to the applicant upon request. 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 14.**

This request for approval covers information collections (application forms). Using the communication mechanisms described in Item 8, we contacted a sampling of respondents to get their input on the time and resources they require to complete grant applications. The table below presents the burden hour and cost for each form separately, as instructed. The aggregate burden for the forms appears in item 13 of OMB Form 83-1.

The data in the table are estimates of the time it takes for respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Grants.gov system that responds to individual selection criteria.

**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 Program (CFDA 84.021A)	100	110	11,000	Annual	\$75	\$825,000

**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 program that requires the resources of one program officer, one team leader, one administrative assistant, 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	3	30	\$5400
Develop application forms and instructions	\$60	2	60	\$7200
Develop and seek approval to publish Notice of Closing Date	\$65	1	60	\$3900
Enter approved collection into EDICS	\$60	1	10	\$600
Enter application and forms into e-GRANTS	\$60	1	40	\$2400

module for respondents to access				
Post 1 application on the Department's website	\$60	2	20	\$2400
Establish reader panels in e-READER to evaluate 100 e-Applications	\$60	1	10	\$600
Send conflict of interest forms to reviewers; process certifications; consult with Executive Office for approvals; mail e-READER manuals to reviewers	\$50	1	25	\$1250
Conduct e-READING conference calls; monitor panels via e-mails; read reviewers' comments in e-READER	\$60	2	100	\$12,000
Download and print 100 applications and 300 technical review forms	\$60	1	20	\$1200
Compensate 24 reviewers after certifying satisfactory completion of e-READING to evaluate 100 e-Applications	\$1000 flat rate	24	100	\$24,000
Submit funding recommendations for program to Team Leader	\$65	1	3	\$195
Team Leader develop slate memo and attachments for programs	\$65	1	8	\$520
Program officials approves slates	\$85	3	15	\$3,825
Commit 30 grants in GAPS	\$65	1	3	\$195
Team Leader obligate 30 grants in GAPS	\$65	1	1	\$65
Review revised budgets; mail 30 grant award documents	\$60	1	40	\$2,400
Document monitoring activities weekly for 30 projects in compliance with OPE standards	\$60	2	45	\$5,400
<b>TOTAL</b>			<b>590</b>	<b>\$73,550</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).**

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 provide program-specific guidance to applicants on completing GPRA measures for use in the FY 2014 competition cycle and beyond.

**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.