

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

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 section¹. 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 International Research and Studies (IRS) program is authorized under Title VI of the Higher Education Act of 1965, as amended (20 U.S.C. Section 1125). The Office of Postsecondary Education (OPE), International and Foreign Language Education (IFLE) requests approval of this information collection as a “reinstatement with change”, in order to conduct fiscal year (FY) 2017 IRS program competition and related grant activities. We are requesting a “reinstatement with change” because IFLE made the decision to exclude instructional materials projects that were included in the previous collection.

No rule-making is involved.

The legislation and program regulations for the IRS program may be viewed at:

<https://www2.ed.gov/programs/iegpsirs/legislation.html>

Other administrative regulations relevant to this information collection include the following:

- Government Performance and Results Act
<https://www.whitehouse.gov/omb/mgmt-gpra/gplaw2m>
- Section 427 of the General Provisions Act
<https://www2.ed.gov/.../gepa427>
- Government Paperwork Elimination Act
<http://www2.ed.gov/policy/gen/leg/gpea/index.html>
- Education Department General Administrative Regulations
<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

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

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

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 applicants (institutions, public and private agencies, organizations, and individuals) use the approved information collection to prepare and submit grant applications in response to the notice inviting applications. Peer review panels use the selection criteria in the information collection to evaluate applications. Department officials take the peer reviewers evaluations under consideration when making recommendations for the funding slate. The information will also be used as a basis for project monitoring and performance reporting, among other grant administration activities.

Examples of actual use of current information is not applicable because we have not conducted a competition under this program since FY 2009.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

IFLE maximizes the use of technology in both its application and reporting processes to reduce burden. Applicants use this information collection to submit applications electronically using the Governmentwide Grants.gov site. Grantees use the International Resource Information System (IRIS), IFLE's web-based performance reporting system, to complete annual and final performance reports, which also reduces burden.

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

There is no duplication of information. The information collected in this application package is otherwise unavailable.

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

Application for the International Research and Studies (IRS) Program
Tracking and OMB Number: (XXXX) 1840-0795
Revised: XX/XX/XXXX
RIN Number: XXXX-XXXX (if applicable)

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.

This collection does not impact small businesses or 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 approved, we will not be able to conduct the program competition.

The information requested/collected is as minimal as possible in order to reduce burden on applicants while simultaneously collecting what is sufficient and necessary to ensure that all grant activities are conducted well, and that the recommended projects are of high quality, to the greatest extent possible. Grant activities include the publication of the competition notice, technical assistance to applicants, the peer review of applications, preparation of the funding slate for transmittal and approval, Congressional notifications, and making the grant awards in accordance with our approved schedules.

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

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

- 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 special circumstances that require the information to be collected in the ways described.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department will publish a 30-day Federal Register notice as required.

Nine former grantees were consulted by IFLE staff in an effort to collect accurate estimates of hour burden. Estimates range between 50 and 90 hours.

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

No payments or gifts are made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 –

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

A PIA was last conducted in 1999. The SORN was published June 4, 1999 in Vol. 64 No. 107 of the Federal Register. The Department makes no pledge about the confidentiality of the data.

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.

No questions of a sensitive nature are 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

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

activities should not be included here. Instead, this cost should be included in Item 14.

Nine former grantees were consulted by IFLE staff in an effort to collect accurate estimates of hour burden. Estimates range between 50 and 90 hours. The average estimated time per response is 80 hours.

Recordkeeping:	0
Reporting:	80
Third-Party Disclosure:	0
Estimated Hour Burden per Response:	80

We expect approximately 25 respondents, including individuals, non-profit organizationa, and non-profit institutions. **The estimated total hour burden for all respondents is 2000.**

Respondents	25
Frequency	Once (every three years)
Estimated Hour Burden	80 per response
25 X 1 X 80 =	<u>2000</u>

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost	:	\$0.00
<u>Total Annual Costs (O&M)</u>	:	<u>\$0.00</u>
Total Annualized Costs Requested	:	\$0.00

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.

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	\$65	1	30	\$1,950
Develop application forms and instructions	\$65	1	60	\$3,900
Develop and seek approval to publish Notice Inviting Applications	\$65	1	60	\$3,900
Post 1 application on the Department's website	\$65	1	20	\$1,300
Establish reader panels in G5 to evaluate 25 applications	\$65	1	10	\$650

Application for the International Research and Studies (IRS) Program
 Tracking and OMB Number: (XXXX) 1840-0795
 Revised: XX/XX/XXXX
 RIN Number: XXXX-XXXX (if applicable)

Conduct conference calls; monitor panels via e-mails; read reviewers' comments in G5	\$65	1	100	\$6,500
Compensate reviewers after certifying satisfactory completion	\$65	1	100	\$6,500
Develop slate memo and attachments	\$65	1	8	\$520
Enter and obligate awards in G5	\$65	1	3	\$195
Document monitoring activities weekly for 10 projects in compliance with OPE standards	\$65	1	45	\$2,925
TOTAL			436	\$28,340

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).

There is a burden change (increase in burden) because the information collection is currently discontinued and will be reinstated.

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

The results of the collection will not be published.

Application for the International Research and Studies (IRS) Program

Tracking and OMB Number: (XXXX) 1840-0795

Revised: XX/XX/XXXX

RIN Number: XXXX-XXXX (if applicable)

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

We will display the expiration date as required.

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

There are no exceptions to the certification statement.