

## 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 section<sup>1</sup>. 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 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.

The Fulbright-Hays Group Projects Abroad (GPA) 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.

Information collection for the Fulbright-Hays GPA program is necessary for institutions of higher education, nonprofit educational organizations, and public and private nonprofit organizations. We request approval of this revised collection solely for the application of the GPA program 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.

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

Information Collection	CFDA No.	Estimated Date Respondents Submit Applications	Information Collection Required for Fiscal Year Awards (New)
Fulbright-Hays, Group Projects Abroad	84.021A	05/2018	FY 2018

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

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**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 (the Department). 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. The Department 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. The Department 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 given to using technology to reduce burden.**

The information collection requires applicants for grants under the GPA program to submit applications electronically using the 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. We also conduct pre-application technical assistance webinars to present information about the purpose of the program, the selection criteria, application content, submission procedures and reporting requirements. 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 for the purposes described in Item 2 above.**

The collection and use of this information is not duplicated in the Department.

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- 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, the Department 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 closing date, 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;**

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- **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 to protect the information's confidentiality to the extent permitted by law.**

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

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.**

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, foreign language professionals, fiscal representatives at institutions of higher education, and management analysts who are responsible for gathering the data needed to respond to the programs' selection criteria.

Our day-to-day technical assistance and project monitoring 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

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on respondents. Day-to-day technical assistance includes phone conversations, e-mails, and office visits. We also conduct technical assistance webinars for project directors throughout the year.

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 with meaningful justification.**

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. 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.<sup>2</sup> If 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.**

Each applicant is informed that their application is reviewed by staff of the Department, US Embassies and the Fulbright Foreign Scholarship Board (FFSB). 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.

The citation for the Privacy Act Systems of Records Notice is as follows:

Title: Fulbright-Hays – Group Projects Abroad Program

Citation: Vol. 64

FR: 107

Citation Date: 06/04/1999

**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**

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<sup>2</sup> 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 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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**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 hours and cost for the data form.

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.

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**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)	130	110	14,000	Annual	\$75	\$1,050,000

**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 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 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,**

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**(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 : \_\_\_\_\_**  
**Total Annual Costs (O&M) : \_\_\_\_\_**  
**Total Annualized Costs Requested : \_\_\_\_\_**

The program in this information collection does 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.**

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

The federal costs of \$76,550 are described in the table provided.

<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 application and forms into grants.gov module for respondents to access	\$60	2	50	\$6000
Post application, pre-application webinar and FAQs on the Department's website	\$60	2	20	\$2400
Establish reader panels in G5 to evaluate 100 Applications	\$60	1	10	\$600
Send conflict of interest forms to reviewers; process certifications; consult with Executive Office for approvals	\$50	1	25	\$1250
Conduct conference calls; monitor panels and read reviewers' comments in G5	\$60	2	100	\$12,000
Prepare and present competition materials such as the technical review form and	\$60	1	20	\$1200



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technical assistance webinars				
Certify that 24 reviewers have satisfactory completed the peer review for issuance of honoraria	\$1000 flat rate	24	100	\$24,000
Review applications in funding range, revise budget requests, prepare slate memo and attachments for approval; enter grants into G5	\$65	1	3	\$195
Develop slate memo and attachments for programs	\$65	1	8	\$520
Program officials approves slates	\$85	3	15	\$3,825
Commit 25 grants in G5	\$65	1	3	\$195
Obligate 25 grants in G5	\$65	1	1	\$65
Review revised budgets; mail 25 grant award documents	\$60	1	40	\$2,400
Document monitoring activities weekly for 25 projects in compliance with OPE and IFLE standards	\$60	2	45	\$5,400
<b>TOTAL</b>			<b>590</b>	<b>\$76,550</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).**

We are not making any program changes or adjustments to the currently approved application package. In FY 2016, IFLE submitted a change worksheet to combine the Fulbright-Hays Group Projects Abroad Long-Term and Short-Term application packages to streamline the application submission process for prospective applications. The number of respondents (130) and the burden hours (14,000) remain unchanged from the data reported in the FY 2016 change worksheet.

**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.**

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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.