

**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.**

Information collection for the Centers for International Business Education (CIBE) program (CFDA Number 84.220) is necessary for institutions of higher education to receive grants. The last approval for the collection of information for this program (OMB number 1840-0616) will expire on May 31, 2017. We now request approval to allow the International and Foreign Language Education office (IFLE) to invite applications under the CIBE program in Fiscal Year 2018, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules in FY 2018.

The CIBE program is authorized under part B, Title VI of the Higher Education Opportunity Act of 2008 (HEOA), (P.L.110-315). Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; the Government Paperwork Elimination Act; and the Education Department General Administrative Regulations.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections. The type of collection is an **extension** of the previously-approved information collection (application).

The CIBE program provides federal assistance to Centers for International Business Education that serve as national centers for the teaching of improved international business techniques and develop regional resources to meet the international training needs of local businesses.

The authorizing legislation is included on pages 52-58 of the application package attached to this supporting statement. There are no program-specific regulations for this program.

- 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 to develop and submit grant applications to the Department of Education (ED). After grant applications are submitted, ED determines the budgetary and human resources it needs to conduct competitions. Expert review panels use the information to identify high-quality applicants. ED program officials consider the feedback from the expert review panels, in conjunction with the program's legislative purposes, when making funding recommendations. ED also uses the information collection to develop

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

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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 CIBE program to submit applications electronically using Grants.gov.

Program competitions are held every four years. The CIBE program will utilize the Grants.gov system for the third time in FY 2018. During competitions prior to FY 2010, the CIBE program used the Department's e-Grants system for submission of applications.

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

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 authority covered by this information collection is 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.

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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 carry out its grant making responsibilities, including the publication of notices inviting applications, providing technical assistance to new respondents, conducting peer reviews of grant applications, transmitting slates with funding recommendations to program 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 to protect the information's confidentiality to the extent permitted by law.**

There are no circumstances that would cause this information collection to be conducted in this manner.

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,

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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, language and area and international studies professors, fiscal representatives at institutions, and management analysts who are responsible for gathering the data needed to respond to the program's 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 technical assistance workshops at various conferences 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.

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. 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 the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with

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

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respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

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 is for the application form. 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. This exercise demonstrated to us that we had over-estimated the amount of time it took respondents to complete the official forms, develop the application narrative and budget, and submit completed applications through the Grants.gov system.

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The data in the table below adjusts the amount of time to complete this activity from 150 burden hours per respondent to 100 burden hours per respondent. This reduction of 2,500 burden hours is considered an adjustment.

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
Centers for International Business Education Program (CFDA 84.220)	50	100	5,000	Every 4 years	\$85	\$8,500

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, (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> :	\$0.00
Total Annualized Costs Requested :	\$0.00

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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.

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 CIBE program and requires the resources of one program officer, one branch chief to provide oversight, the occasional use of one administrative assistant, and external peer review panels to conduct the tasks.

Estimates of Annualized Cost to the Federal Government

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	\$50	1	20	\$1,000
Develop application forms and instructions	\$50	1	90	\$4,500
Develop Notice Inviting Applications	\$50	1	30	\$1,500
Enter approved collection into ICRAS	\$40	1	1	\$40
Enter application and forms into Grants.gov Application module for respondents to access	\$40	1	1	\$40
Post application on the Department's website	\$40	1	1	\$40
Establish reader panels in Field Reader System to evaluate 50 e-Applications	\$40	1	15	\$600
Send conflict of interest forms to reviewers; process certifications; mail Field Reader System manuals to reviewers	\$40	1	15	\$600
Conduct conference calls; monitor panels via e-mails; read reviewers' comments in G5	\$50	2	60	\$6,000
Download and print 50 applications and 200 technical review forms	\$40	1	70	\$2,800
Compensate 16 reviewers after certifying satisfactory completion of peer review to evaluate applications	\$1000 flat rate	16	60	\$16,000
Review applications in funding range; prepare slate memo and attachments for review by Branch Chief	\$50	1	100	\$5,000

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ED Program officials approve slate	\$150	3	3	\$1,350
Commit grants in G5	\$50	1	1	\$50
Team Leader obligates grants in G5	\$75	1	1	\$75
Review revised budgets; mail grant award documents	\$50	1	10	\$500
Document monitoring activities weekly for all projects in compliance with OPE standards	\$50	1	800	\$40,000
TOTAL			1278	\$80,095

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).

A sampling of respondents was contacted to collect input on the time and resources required to complete grant applications. Based on their responses, the program office recognized that they had overestimated the time necessary to complete this grant application. The time to respond has been adjusted from 150 hours per response to 100 hours per response. The total burden hours decrease by 2,500 hours is due to this updated information from respondents and is considered an adjustment.

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.

We will display the expiration date.

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

There are no exceptions to the certification statement.