

**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 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 Undergraduate International Studies and Foreign Language (UISFL) program provides grants to institutions of higher education, partnerships between nonprofit educational organizations and institutions of higher education, and public and private nonprofit organizations, to implement programs to strengthen and improve undergraduate instruction in international studies and foreign languages. This information collection is also associated with a notice or proposed priorities.

The application for the UISFL program is necessary for institutions of higher education, nonprofit educational organizations, and public and private nonprofit organizations to apply for and receive grants. The Office of Management and Budget (OMB) number 1840-0796 that indicates approval for the collection of information for this program was discontinued on April, 30, 2017 to allow for revisions to the collection due to new GPRA measures. We request a reinstatement with change to allow International and Foreign Language Education (IFLE) to invite applications under the UISFL program, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules.

The UISFL program is authorized under part A, Title VI of the Higher Education Act of 1965 (HEA), as amended (P.L. 96-374). 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; the Education Department General Administrative Regulations; and program specific regulations.

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

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

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 UISFL legislative purposes and any Administration priorities. ED program officials also may 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 given to using 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.

IFLE uses the Department's Web site to notify prospective applicants about the UISFL program competition and deadline date. We post the UISFL 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 UISFL 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 UISFL 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.

There are no information collections available that duplicate the information that the UISFL 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.

The legislation, program regulations, and the respondents covered by this information collection are unique to the Undergraduate International Studies Foreign Language 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, 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, ED cannot carry out its grant making activities as specified in the legislation and in accordance with 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 2018. Allowing this application due date will give IFLE sufficient time to make new fiscal year 2018 grant awards before September 30, 2018.

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.

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.

The International and Foreign Language Education (IFLE) office hosted a Technical Assistance Workshop in September 2017 for prospective applicants. During that time we met with various representatives from private and public institutions of higher education to discuss the UISFL 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 UISFL grant application. Workshop attendees also included postsecondary faculty and administrators who are recipients of the training materials and instructional services that the Undergraduate International Studies Foreign Language program provides.

Ongoing technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer questions about the UISFL 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.

These consultations and activities collectively inform IFLE about the viability of the application materials we use for the UISFL 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.

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

Other than 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. 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 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

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)

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.

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 Grants.gov 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
Undergraduate	100	110	11,000	Annual	\$75	\$825,000

International Studies Foreign Language – 84.016A						
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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
Total Annual Costs (O&M)	:	\$0.00
Total Annualized Costs Requested	:	\$0.00

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 UISFL program and requires the resources of 1 senior program officer, 1 director to provide oversight, 1 management analyst, and 30 external peer reviewers (27 primary and 3 alternates).

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	\$62	1	25	\$1550
Develop application forms and instructions	\$57	1	10	\$570
Develop Notices of Inviting Application (NIA)	\$62	1	10	\$620
Enter approved collection into ICRAS	\$62	1	1	\$62
Pre-Award and Post-Award Program Tasks	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Publish application guidelines and technical review forms in G5 e- Application module	\$57	1	2	\$114
Assign reader panels in G5 e-Reader	\$62	1	3	\$186
Conduct orientation for G5 e-Reading	\$57	1	4	\$228
Schedule regular peer review conference calls; review readers'	\$57	1	80	\$4560

comments in e-Reader; provide follow-up via e-mail and phone communications				
Certify that the 30 reviewers have completed the e-Reading for issuance of honoraria (27 Primary and 4 alternates)	\$1000 (ED flat rate – Primary \$100 ED flat rate - alternates	2	27 Primary and 4 alternates	\$27,400
Review applications in funding range, revise budget requests, prepare slate memo and attachments for approval; enter grants into G5	\$62	1	200	\$12,400
ED program official reviews and approves slate	\$75	3	9	675
Executive officer commits grants	\$75	1	1	\$75
Obligate grants in G5 and signs Grant Award Notifications (GANs)	\$62	1	1	\$62
Program officers provides technical assistance to grantees; reviews performance and evaluation reports; conducts ongoing monitoring activities in compliance with OPE , IFLE requirements	\$62	1	800 (15 hrs. /wk. x 52 wks.)	\$49,600
Total			1146 hours	\$98,102

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, with change, 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 2016 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 the FY 2018 competition cycle and beyond. It will take applicants additional time to review this new guidance, and to develop more comprehensive evaluation plans. The application also asks new applicants to include project-specific measures in their grant proposal, which is a new requirement.

Since this collection is a reinstatement, the burden increases as a result of a program change due to agency discretion. The collection had been discontinued, so the previous burden was zero.

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.