

## 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.

This information collection (OMB 1840-0807) includes application instructions and forms for the National Resource Centers (NRC) Program (CFDA Number 84.015A) and the Foreign Language and Area Studies (FLAS) Fellowships Program (CFDA Number 84.015B), authorized under Title VI of the Higher Education Act of 1965, as amended (20 U.S.C. Section 1122). The type of collection is an extension of the previously-approved information collection (application).

The NRC Program provides grants to institutions of higher education (IHE) or consortia of IHEs to establish, strengthen, and operate comprehensive and undergraduate foreign language and area or international studies centers. These centers serve as centers of excellence for world language training and teaching, research, and instruction in fields needed to provide full understanding of areas, regions, or countries where the languages are commonly used.

The FLAS Fellowship Program awards allocations of fellowships, through institutions of higher education, to meritorious students enrolled in programs that offer performance-based instruction in world languages in combination with area studies, international studies, or the international aspects of professional studies.

Together, these programs respond to the ongoing national need for individuals with expertise and competence in world languages and area or international studies; advance national security by developing a pipeline of highly proficient linguists and experts in critical world regions; and contribute to developing a globally competent workforce able to engage with a multilingual/multicultural clientele at home and abroad.

Approval of this collection is necessary in order to conduct fiscal year (FY) 18 program competitions.

No rule-making is involved.

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

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The legislation and program regulations for the NRC and FLAS Programs may be viewed at:

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

Additional regulations that are applicable to this 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.-

- 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>

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 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 into consideration when making funding recommendations. The information will also be used as a basis for project monitoring and performance reporting, among other grant administration activities.

OPE/IFLE has used the information received for the current collection to develop technical assistance materials for grantees, such as program administration manuals and technical assistance Webinars, to inform the performance reporting requirements for these programs, and to demonstrate the impact of these programs,

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

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basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

The electronic submission of NRC and FLAS applications is currently not a viable option for these programs, despite our ongoing efforts to transition from a hard copy application process to an electronic submission application process. The Department's G5 system is not designed to support the submission and the peer review of joint NRC and FLAS applications. For FY 18, applicants will submit hard copy applications to the Department's Application Control Center.

We are implementing the electronic peer review of the submitted applications, however, which will greatly reduce the burden hours for evaluating applications. For FY 18, peer reviewers will be able to access electronic versions of the NRC/FLAS technical review forms via IFLE's International Resource Information System (IRIS) site to record their scores and comments. Previously, peer reviewers were required to record their scores and comments manually.

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 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 competition for these programs.

The information that OPE/IFLE is requesting via this information collection 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 successfully, and that the recommended projects are of high quality, to the greatest extent

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possible. Grant activities include the publication of the competition notice, technical assistance to applicants, the peer review of applications, preparation of funding slates for transmittal to ED officials for review 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
  - 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.

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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 grantees were consulted by IFLE staff in an effort to collect accurate estimates of hour burden. Estimates ranged between 100 and 123 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.<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.

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

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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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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 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 ranged between 100 and 123 hours. The average estimated time per response is 105 hours.

Recordkeeping:	0
Reporting:	105
Third-Party Disclosure:	0
<b>Estimated Hour Burden per Response:</b>	<b>105</b>

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We expect approximately 165 respondents from institutions of higher education. **The estimated total hour burden for all respondents is 17,325.**

Respondents	165
Frequency	Once (every four years)
Estimated Hour Burden	105 per response
165 x 1 x 105 =	<u>17,325</u>

The estimated hour burden for the FY 2018 application (17,325 total hours) is smaller than the estimate provided in the FY 2014 application (75,650 hours) for the following reasons:

- Decrease in number of estimated respondents to 165 for FY 2018. This estimate is based on the 165 actual applications received for the 2014 competition. The reduction in number of respondents and responses will be considered an adjustment.
- Decrease in number of estimated burden hours per response: While developing the collection for the FY 2018 competition, we realized that we had previously been miscalculating the number of burden hours per response by including meetings and other preparatory activities in the burden estimate. For this FY 2018 collection we have made a more accurate calculation of the response time that only includes 105 burden hours per response to prepare the actual application package. This resulting reduction in burden hours will be considered an adjustment.

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

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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

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; develop competition technical review plan	\$65	1	60	\$3,900
Make available (post) application instructions on ED's Website	\$50	1	27	\$1,350
Process 165 hard copy applications ED Application Control Center support staff (date stamp applications, mail receipt acknowledgements, assign PR award numbers, input data into G5, transfer hard copy applications to OPE/IFLE)	\$50	1	120	\$6,000



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Establish reader panels to evaluate applications on the IRIS site	\$50	4	8	\$1,600
Contractual support for electronic peer review (application screening, put the technical review form (TRF) on the IRIS site, provide technical support, pay peer reviewers, send TRFs to all applicants post-competition )				\$5,300
Conduct peer review conference calls; monitor panels via e-mails; check reviewers' comments scores for accuracy and compliance during a two-week panel review	\$50	5	80	\$16,000
Develop NRC slate memo and FLAS slate memo and attachments	\$50	2	18	\$1,800
Review recommended applications and revised budgets	\$50	4	80	\$16,000
Enter NRC slate and FLAS slate information into G5 and obligate awards	\$50	2	20	\$2,000
Four program officers document monitoring activities weekly for 10 projects in their respective world area portfolios in compliance with OPE standards	\$50	4	104 (2 hrs./wk. @ 52 weeks)	\$20,800
<b>TOTAL</b>			<b>607</b>	<b>80,600</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).

There has been a more accurate calculation of the number of respondents/responses as well as the burden time per response and therefore the burden hours have been corrected. The resulting reduction in burden hours is considered an adjustment.

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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.

16. 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.

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

There are no exceptions to the certification statement.