

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The U.S. Department of Education, Office of Postsecondary Education, International and Foreign Language Education (IFLE) is scheduled to conduct a competition for Fiscal Year (FY) 2020 new awards under the International Research and Studies (IRS) program in early July 2020. We use this information collection to invite applications under the IRS program every three years. The last competition was conducted in August 2017.

An extension of the application instructions and forms is necessary for IFLE to conduct the FY 20 competition and complete the Department's required grant-making activities before August 30, 2020. The program is authorized under Title VI of the Higher Education Act of 1965, as amended (20 U.S.C. Section 1125) to provide grants to institutions, public and private agencies, organizations, and individuals to conduct research and studies to improve and strengthen instruction in modern foreign languages, area studies, and other international fields.

No rulemaking is involved.

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

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

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

- Government Performance and Results Act (GPRA)
<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>

- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200, as adopted and amended as regulations of the Department in 2 CFR part 3474.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Eligible applicants, including institutions, public and private agencies, organizations, and individuals, use the OMB approved information collection to prepare and submit grant applications in response to the Department's notice inviting applications. Peer review panels use the selection criteria in the information collection to evaluate the competitive quality of submitted applications in a comparative context. IFLE program officers take the peer reviewers' evaluations into consideration when preparing the IRS new awards funding memorandum and funding slate for review and approval by Department officials. We also use the information collection to inform post-award activities such as project monitoring and reviewing annual performance reports to assess grantees' progress towards meeting the goals and objectives of their approved projects. Throughout the grant award cycle, the information collection is a resource for the kinds of technical assistance activities we provide to ensure that what we are providing continues to be effective and relevant to customers' needs.

The information that we collect in grant applications for the IRS program provides the basis for the kind of information we collect in annual performance reports. We use the performance reports to determine substantial progress, to assess risk, and to make recommendations for non-competing continuation funding. We also use the outcomes reported collectively for the program to determine the extent to which program outcomes meet GPRA measures.

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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.

IFLE leverages technology in conducting pre- award and post- award activities tangential to this information collection to reduce burden. Applicants submit grant applications electronically using the governmentwide Grants.gov www.grants.gov site. We use the Department's G5 e-Reader system www.g5.gov for setting up the review panels and assigning applications. Grantees use our web-based grant administration and performance report system (International Resource Information System (IRIS)) to submit annual performance reports, and we use IRIS to conduct post-award grant activities, such as approving grantees' project-related travel requests.

- 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 International Research and Studies program is a discretionary grant program unique to the U.S. Department of Education. There is no duplication of information elsewhere.

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.

- 5. 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 FY 2020 IRS competition on time or at all, depending on how long it will take to obtain OMB approval of this application package. With \$900,000 allocated for a FY 2020 competition for new grant awards, not holding a competition and making new grant awards will have an exponentially negative impact on both our external and internal stakeholders. Eligible applicants would not be provided the opportunity to submit potentially innovative grant applications to propose projects that could strengthen and expand the body of knowledge and research regarding modern foreign language proficiency, area studies, and other international fields. Also, a delay in the clearance process would seriously compromise our capacity to issue new grant awards early in the fiscal year. Effective with FY 2020, the Department implemented a policy that requires all grant-making units to conduct their competitions and award grants by July 1, to give grantee institutions more time to prepare project implementation and fiscal oversight activities and internal controls for the upcoming academic year. Meeting our grant schedules is our highest priority and we need this information collection in order to keep moving towards our grant-making goals.

There are no technical or legal obstacles to reducing burden.

- 6. 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 special circumstances listed above are not applicable to this information collection.

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.

Include a citation for the 60-day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60-day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30-day notice, indicate that a notice will be published.

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.

Given the loss of operations impacting potential applicants due to the COVID-19 crisis, we will publish a 70-day Federal Register notice, per the advice we received from the Department’s Office of the General Counsel, Division of Regulatory Services and the approval from the Assistant Secretary for Postsecondary Education.

We held a consultation with six current grantees to get their feedback about the clarity of the application instructions and forms and the time it takes to prepare a grant application for this program. Reflecting on their efforts three years ago, they recalled that it took them between 200 hours and 960 hours to review and complete their FY 2017 grant applications (information collections). Based on an 8-hour business day, 200 hours is the equivalent of 25 days; and, 960 hours is the equivalent of 120 days.

A 30-day notice will be published in the Federal Register to solicit public comments.

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.¹ 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please

¹ 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)

ensure that your response per respondent matches the estimate provided in number 12.

A Private Impact Assessment (PIA) was last conducted in 1999. The Systems of Record Notice (SORN) was published June 4, 1999 in Vol. 64 No. 30179 of the Federal Register. The Department makes no pledge about the confidentiality of the data.

The only PII that is collected regarding this program is the applicant's contact information that we will need for creating and issuing Grant Award Notifications, if the application is recommended for funding and to create the performance report template in our performance reporting system. The contact information includes the name, address, telephone number, and email address. We do not collect any SSNs.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are asked.

- 12. Provide estimates of the hour burden for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

The information provided in the table below is based on IFLE's consultation with six current grantees, which included a state higher education system, a non-profit international education organization, and four institutions of higher education.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Application instructions and forms completed by institutions, public and private agencies, organizations, and individuals.	6	Once, every three years	25	1	200	5000	34.79	173950
Annualized Totals	6		25	1		5000		173950

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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

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.

Annualized cost to the Federal Government.

The information in the table below was calculated based on the hourly wages for GS 15 and GS 12 employees.

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government

ICC Package: Supporting Statement, Data Forms, and PRA statement	75	1	9	675
Develop FY 20 application forms and instructions for OMB clearance	75	1	27	2025
Prepare FY 20 Notice Inviting Applications	75	1	18	1350
Conduct (2) technical assistance webinars, one for prospective applicants and one panel orientation webinar for peer reviewers.	75	1	4	300
Pre-screen all submitted applications for eligibility, completeness, and type, e.g., instructional materials or survey project.	50	1	7	350
Create peer review panels and assign applications in G5 e-Reader	50	1	5	250
Conduct two-week panel review of applications (discussions with peer reviewers, review technical review forms in G5)	75	1	100	7500
Compensate nine peer reviewers @1000 flat rate via OPE/IFLE logistics contract				9000
Develop slate memo and attachments	75	1	27	2025
Prepare awards in G5	75	1	3	225
TOTAL			200	23700

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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

In item 12 above, the estimated average burden hours per response is 200 hours. This is an adjusted increase of 120 hours above the 80 hours per response that the Department indicated for the FY 2017 information collection. The adjustment of 200 average burden hours for the FY 2020 information collection is based on our consultation with six current grantees (see item 8.) and the realization that 80 hours (ten, 8-hour business days) was not enough time complete this information collection.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			3000
Total Responses			0
Total Costs (if applicable)			N/A

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

The results of the collection will not be published.

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

We will display the expiration date as required.

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

There are no exceptions to the certification statement.