

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.**

One of the core administrative activities of the U.S. Department of Education's (ED) office of International and Foreign Language Education (IFLE) is to award continuation grants under the fourteen discretionary programs cited in this information collection. Our capacity to conduct this activity, however, is contingent upon the availability of information that grant recipients submit in annual performance reports. The Education Department General Administrative Regulations (EDGAR) stipulates that a recipient that wants to receive a continuation award shall submit a performance report that provides the most current performance and financial expenditure information. The International Resource Information System (IRIS), the online reporting system described in this statement, provides grantee institutions with a centralized repository for inputting their performance report data and narrative information.

There are a number of additional legal or administrative requirements that make this collection necessary, including the program reporting and evaluation requirements in the Department of Education's Visual Performance Suite (VPS) and the Government Performance and Results Act (GPRA) of 1993. VPS is the Department's strategic planning performance data collection system. IRIS gathers and maintains the information that program managers use to help them align program operations level with the Department's overall strategic goals and objectives. The VPS contains the performance and efficiency measures for each of the 14 programs as well as the results of each measure, if available at this time. The GPRA requires all federal agencies to develop annual performance plans for their programs, in which the agencies specify the outcomes to be achieved, the indicators of success, and strategies to be followed to accomplish the plan. GPRA further requires the submission of an annual performance report to Congress. IRIS was initially designed and implemented to respond to the GPRA mandate, that by Fall 2002, all federal agencies would have demonstrated that they had developed consistent and effective annual data collections with systematized evaluation for their respective programs. In 1998, IFLE funded a project to meet this mandate. The development of IRIS made a fundamental change in how performance information and data for the fourteen IFLE programs, authorized under Title VI of the Higher Education Act and section 102(b)(6) of the Mutual Educational and Cultural Exchange Act, also known as Fulbright-Hays (F-H), was collected. IFLE used this project to replace the paper collection instruments with an online performance reporting instrument.

IRIS allows Title VI/A-C program grantee institutions to submit performance report information and data, including project abstracts, project status, GPRA information, and budget information that are more comprehensive, and comparable than the traditional paper reports. The reports provide IFLE management and program officers with valuable performance information to enable them to assess program effectiveness. The system also captures the data that is used for performance measurement.

This information collection package requests continued approval to collect data to support performance objectives and measures for all fourteen programs: (1) American Overseas Research Centers Program (AORC), (2) Business and International Education Program (BIE), (3) Centers for International Business Education (CIBE), (4) Foreign Language and Area Studies Fellowships Program (FLAS), (5) Institute for International Public Policy Program (IIPP), (6) International Research and Studies Program (IRS), (7) Language Resource Centers Program (LRC), (8) National Resource Centers Program (NRC), (9) Technological Innovation and Cooperation for Foreign Information Access Program (TICFIA), (10) Undergraduate International Studies and Foreign Language Program (UISFL), (11) Fulbright-Hays Doctoral Dissertation Research Abroad Program (DDRA), (12) Fulbright-Hays Faculty Research Abroad Program (FRA), (13) Fulbright-Hays Group Projects Abroad Program (GPA), and (14) Fulbright-Hays Seminars Abroad Program (SA).

The statutes and regulations that necessitate this collection include the following and appear in Attachment A:

- The Higher Education Act of 1965, as amended, Title VI Parts A, B and C;
- The Mutual Educational and Cultural Exchange Act of 1961 (The Fulbright-Hays Act), section 102 (b)(6);
- 34 CFR Parts 655, 656, 657, 658, 660, 661, 662, 663, 664, and 669; and
- Education Department General Administrative Regulations (EDGAR), Part 74, section 74.51 and Part 75, sections 75.118, 75.253, 75.720.

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.

IFLE management uses the data and information generated from the system to inform the Title VI/F-H program monitoring, evaluation, and budget processes. Management also uses the data to calculate the performance and efficiency measures required by OMB. Reports are run in response to high-level requests within the Department for program information and statistics. The data in the system is being used externally by grantees and contractors to assess program effectiveness and to make recommendations for program administration and technical (including system) improvements.

IFLE program officers use the system information and data since they need reliable, comparable information about their grantees' projects in order to determine whether grantees are completing grant-funded activities in compliance with the approved grant applications, and whether grantees

are expending grant funds for allowable and allocable costs. The program officers' assessments of substantial progress provide the basis for making continuation awards in subsequent budget periods for the grant cycle.

The Help Desk is the primary source for systems related questions and concerns. Program officers also provide technical assistance on how to access the system's screens. Grantee institutions use the IRIS reporting system to input program performance information, and to submit that information to ED as part of the annual report for obtaining continuation awards from ED. Currently, grantees are making a concerted effort to respond to reporting requirements by providing additional quantitative data through the IRIS reporting system. In doing so, grantees collectively make a powerful statement regarding the relevance of their projects and the importance of international education programs overall. In addition, the Congress and OMB use the information collected by the IFLE reporting system to determine the effectiveness of IFLE 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 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.**

The IRIS reporting system is web-based. Grantees funded under the 14 IFLE programs submit their performance reports using the online system. This is the most efficient way to collect and review grantee performance reports. It also allows for more rapid dissemination of the data collected as it is collected via the system and stored in a database. Select data elements from the reports are then made available to the general public on a contractor-maintained public web site.

This is the seventh clearance of this reporting system so the use of a web-based reporting system has been in practice for a number of years. It has worked well and continues to be improved. Continuing to collect information electronically in a system that is being enhanced provides additional reductions in burden on the grantees.

- 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 IRIS reporting systems collects performance report data from grantees and is the only mechanism by which this data is collected. The information is not available through any other means. Therefore, there is no duplication.

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 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.**

34 CFR § 74.51 and §75.118 require that grantees submit performance reports in order to provide the information required in §74.51(d)(1)-(3) and in order to provide program staff with enough information to determine that substantial progress has been made towards the project's goals (§75.118(a)) so that continuation funding may be awarded. The IRIS reporting system is the only mechanism for collecting the information needed to monitor and administer these grant programs. The system greatly facilitates much more efficient program monitoring than the earlier paper-based reporting process.

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.**

None of the special circumstances listed applies to this information collection clearance request.

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.

IFLE maintains an ongoing dialogue with the constituency regarding the use, improvements, and enhancements of the IRIS reporting system. Many of the suggestions are incorporated in the proposed screens, although not in this particular collection for OMB clearance.

Program officers receive queries from grantees on the system that are then shared with management and the contractor so that if there is a recurring question, it can be addressed. The help desk also tracks queries and again, if there is a recurrence, the contractor shares it with management and action is taken to improve the process.

Refer to [Part 2](#) for copies of the proposed IFLE reporting system screens.

We published the applicable 60 day Federal Register notice on September 28, 2021 (Vol. 86, No. 185, page 53645) allowing for public comment. No public comment was received. We will publish a 30 day Federal Register notice allowing for public comment, and will review and address these comments, and make changes to the information collection package as appropriate.

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

This is not applicable as no payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.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 ensure that your response per respondent matches the estimate provided in number 12.

The PII the 14 programs collect that is covered under the Privacy Act of 1975 is grantee names and email addresses. The rest of the data collected consists of quantitative data regarding individual program objectives and qualitative information relating to grantee status and accomplishment of program goals. IRIS was determined to have PII and is a Moderate Risk system.

ED assures the protection of fellow/participant data by using a password-protected system. Passwords will automatically be generated and assigned to authorized administrators at the FLAS, FRA, DDRA, and GPA grantee institutions upon creation of their IRIS reporting system account. When the grantee institutions submit the FLAS, FRA, DDRA, and GPA institutional lists, the IRIS reporting system will create a password for each fellow/participant on each institutional list. The fellow/participant uses the assigned password to complete and submit his or her performance reporting, including a language self-evaluation to ED. The self-evaluation portion of the report is available only to that fellow/participant and the ED program officers. Project directors will be able to view the academic portion of the fellow's reports.

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)

Similarly, information in the NRC, IIPP, UISFL, BIE, CIBE, AORC, LRC, IRS, TICFIA, SA and the institutional portion of FRA, DDRA, and GPA performance reports is password-protected. The IRIS reporting system will automatically generate and assign a password to the project director at the grantee institutions upon creation of their IRIS account. Using their passwords, these administrators will have access to the system to input the names of other authorized users (who will have data input rights but not the ability to submit any reports), as well as complete and submit the performance reports to ED. After the performance reports are electronically submitted, the system prohibits access by one grantee institution to another grantee institution's performance report.

We are including a Privacy Statement, which will be accessible to all users from the footer area of the website.

A Privacy Impact Assessment (PIA) was last completed on 8/31/2020. IRIS last underwent ED Security Assessment procedures (ATO) on 11/3/2020, and is in compliance with ED's security requirements.

- 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.**

This collection does not ask questions of a sensitive nature.

- 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.

Estimated Annual Burden and Respondent Costs Table

Program	Number of Respondents	Freq. Reports/Year	Number of Responses	Est. Avg. Hours /Response	Est. Number of Total Hours	Est. Hourly Wage of Respondent	Est. Cost per Respondent	Est. Total Cost
AORC	10	2	20	7.5	150	\$45	\$675	\$6,750
BIE	50	2	100	10	1000	\$45	\$900	\$45,000
CIBE	17	2	34	100	3400	\$45	\$9,000	\$153,000
DDRA Fellow	150	2	300	1	300	\$20	\$40	\$6,000
DDRA Director	98	1	98	2	196	\$40	\$80	\$7,840
DDRA Language Instructor	150	1	150	0.5	75	\$30	\$15	\$2,250
FLAS Fellow	1809	1	1809	1	1809	\$20	\$20	\$36,180
FLAS Director	108	4	432	6	2592	\$35	\$840	\$90,720
FLAS Language Instructor	1809	1	1809	0.5	905	\$30	\$15	\$27,135
FRA Fellow	20	2	40	2	80	\$50	\$200	\$4,000
FRA Director	18	1	18	1	18	\$40	\$40	\$720
FRA Language Instructor	20	1	20	0.5	10	\$30	\$15	\$300
GPA Participant Annual	365	2	730	0.5	365	\$35	\$35	\$12,775
GPA Director Annual	16	2	32	8	256	\$45	\$720	\$11,520
GPA Participant Language	165	2	330	0.5	165	\$20	\$20	\$3,300
GPA Director Language	11	2	22	6	132	\$45	\$540	\$5,940

GPA Language Instructor	165	1	165	0.5	82.5	\$30	\$15	\$2,475
IIPP	1	2	2	6	12	\$45	\$540	\$540
IRS	30	2	60	5	300	\$45	\$450	\$13,500
LRC	15	2	30	100	3000	\$45	\$9,000	\$135,000
NRC	100	2	200	100	20000	\$45	\$9,000	\$900,000
SA Participant	45	2	90	0.5	45	\$35	\$35	\$1,575
SA Admin Agency	6	1	6	2	12	\$30	\$60	\$360
SA Domestic	3	1	3	1	3	\$30	\$30	\$90
TICFIA	13	2	26	4	104	\$45	\$360	\$4,680
UISFL	35	2	70	10	700	\$45	\$900	\$31,500
TOTALS	5229	45	6596		35711	970		\$1,503,150

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 :
 Total Annual Costs (O&M) : _____
 Total Annualized Costs Requested :

The total annual cost burden to respondents is shown in the Table in Item 12 above.

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.

IFLE Staff Task	Hourly Cost	Hours per Task	Number of Reports	Total Hours for Task	Cost to Federal Government
Request OMB Clearance	\$51	80	1	80	\$4,080
Prepare New and Continuation Grant Awards Notifications	\$44	2	604	1208	\$53,152
Technical Assistance to Grantees	\$44	1200			\$52,800
Compilation, Analysis and Distribution of IRIS Data	\$48	624			\$29,952
Contractor Support	\$111	5238			\$581,418
Overhead					\$26,400
Total					\$747,802

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.

This extension does not change the burden hours.

IRIS allows Title VI/F – H program grantee institutions to submit performance report information and data, including project abstracts, project status, GPRA information, and budget information that are more comprehensive, and comparable than the traditional paper reports. The reports provide IFLE management and program officers with valuable performance information to enable them to assess program effectiveness. The system also captures the data that is used for performance measurement.

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

- 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.**

IFLE does not plan to publish the information collection 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.**

IFLE will display the OMB expiration date.

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

IFLE does not have exceptions to this statement.