

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

#### A. Justification

- 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 National Resource Centers (NRC) program is authorized under Title VI, part A, section 602 of the Higher Education Act of 1965, as amended (HEA). The program provides grants to institutions of higher education (IHEs) or consortia of IHEs to establish, strengthen, and operate comprehensive and undergraduate centers that will be national resources for the teaching of modern foreign languages; instruction in fields needed to provide full understanding of world regions where modern foreign languages are used; research and training in international studies and international and foreign language aspects of professional and other fields of study; and instruction and research on issues in world affairs. NRC grants also support outreach activities to the K-16 education sectors and the business, media, and general public.

The Higher Education Opportunities Acts of 2008 (HEOA) amended section 602 by requiring all IHEs requesting a grant under the NRC program to include information in their applications that provide (1) an explanation of how the activities funded by the grant will reflect diverse perspectives and a wide range of views and generate debate on world regions and international affairs; and (2) a description of how the applicant will encourage government service in areas of national need, as identified by the Secretary, as well as in areas of need in the education, business, and non-profit sectors.

The International and Foreign Language Education (IFLE) division in the Office of Postsecondary Education administers the NRC program. To better facilitate its efforts in assessing the extent to which NRC proposed projects and subsequent grantee projects are meeting the HEOA requirements, IFLE awarded a contract to KEN Consulting, Inc.(KCI), to design a survey instrument that will be administered to 100 NRC grantee institutions. The

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survey/questionnaire will collect information about each NRC's foreign language training, area studies, international studies, and outreach programs, the key decisionmakers about the international education training projects, and project participants. The survey will also seek to ascertain the NRC institution's understanding of the HEOA requirements and their approach to meeting the requirements.

The purpose of this new data collection is to evaluate how NRC grantee institutions are meeting this "diverse perspectives" requirement through their projects, activities, procedures, and governance structures. This effort is a priority for the Department of Education (Department) because the Congress and the general public are interested in learning how the diverse perspectives mandate has been implemented by the NRCs.

**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.**

As mentioned in item 1., to meet the Departmental and congressional needs for information regarding the IHEs' implementation of the diverse perspectives' requirement, the Department of Education has contracted with KCI to conduct a one-time online survey of directors or associate directors of all 100 National Resource Centers being funded in the current grant cycle (2018-2022). This survey will provide ED with the necessary data to compare and contrast the methods that NRCs use to manage the decision making and oversight processes for grant-related projects and activities. Further, analysis of this data will highlight NRC best practices for ensuring that diverse perspectives are being presented in a balanced and transparent manner in all center-related teaching, faculty research activities, and other programming. It may also identify language in the statute that is unclear or missing that prevents applicants from fully understanding the diverse perspectives priority and shall make recommendations to improve the clarity of the requirements of the Higher Education Act.

In preparation for this survey, KCI has reviewed all 100 grant applications for the current NRCs, which were already publicly available and did not require the collection of new data. Each grantee provided in its application a statement explaining how the activities funded by the grant will reflect diverse perspectives and a wide range of views and generate debate on world regions and international affairs. Each of these statements

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were carefully reviewed along with other relevant application sections, such as performance measures, course lists, and descriptions of activities explicitly noted as being intended for promoting diverse perspectives or generating debate. Following this review, KCI conducted virtual site visits with five NRCs and spoke with directors and associate directors about their understanding of and concerns with the diverse perspectives' requirement.

The findings from the application reviews and site visits were then used to develop a survey questionnaire that will provide relevant data to evaluate how NRC grantee institutions are meeting the diverse perspectives requirement. KCI will analyze this data and develop a report for ED detailing the results.

This is a new data collection effort. The findings will provide ED with a previously unavailable level of detail on how the diverse perspectives requirement is being understood and responded to across NRCs. They will note differences in how the requirement is interpreted and the resulting impact on how projects and activities are planned and conducted. ED will use this information to clarify NRC grant application instructions and provide any further necessary guidance for program directors, which will improve and strengthen the overall NRC program. ED will also use the findings to inform department leadership, members of Congress, NRC directors, and other interested parties regarding the NRCs' current responses to the diverse perspectives' requirement of the Higher Education Opportunity Act of 2008.

- 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 data will be collected entirely through a web-based survey administered by KCI. The respondents will be university program staff (generally directors or associate directors of the NRC program) who should have adequate Internet access through their institutions. The questionnaire will be programmed into a sophisticated survey administration platform and will use features such as skip patterns to maximize user-friendliness and efficient use of time. Respondents will also have the option to

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complete the survey using a mobile device. Pretests conducted with directors from three NRCS indicate that the expected completion time for most respondents will be approximately 30 minutes.

**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.**

A survey of NRC grantees such as this one has not been conducted before, and there is no equivalent source for the specific information to be collected regarding the diverse perspectives requirement. By reviewing the publicly available grant applications and conducting a few virtual site visits, KCI has attained some relevant information, but more is needed to fully understand and compare the institutions' responses to this requirement. Survey data will provide insights into the different projects and activities used to promote diverse perspectives, the various understandings of program directors about the intended meaning of diversity in this context, their concerns with how it is addressed and evaluated, and details about their governance structure and decision-making processes. This information is not available in existing data sources. We will, however, minimize any unnecessary data collection by linking any relevant information from NRC grant applications (e.g., world region of study, grant amount, etc.) to the associated survey response rather than creating extra survey questions to collect those data.

**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.**

None of the respondents for this survey are 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.**

This survey will provide unique data not previously available to ED. Since the passage of the Higher Education Act of 2008, concerns about the diverse perspective requirement have been raised - both by members of Congress, the public, and by

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grantees – regarding the meaning of this requirement and the related expectations for grantees for addressing it in their applications and meeting it in their program implementations. The language of the requirement and the associated application instructions for grantees are currently perceived by many as being broad and vague. The data collected through this survey will provide useful information for clarifying the requirement.

If this collection (survey) is not conducted, the result will be a continued lack of clarity around a key aspect of the NRC program. Future applicants will continue to be unsure about how to address it, potentially resulting in applications being rejected due to unclear evaluation standards, grants being awarded for programs that do not fully meet the requirement as intended, and/or grantees being unable (despite being willing) to adjust their programming to better address the requirement.

**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**

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**instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the special circumstances apply to this data 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.**

As part of the data collection development, KCI conducted virtual site visits with five NRCs and a pretest of the draft questionnaire with directors from three other NRCs. Minor revisions were made to the final questionnaire based on feedback received through these means. The estimated burden of completing the survey was based on feedback from the pretest respondents.

Both a 60 day and a 30-day Federal Register Notice inviting public comment will be published as required. All resulting public comments will be reviewed and any appropriate changes to the collection will be made.

A 60-day notice was published which required by 5 CFR 1320.8(d) to solicit public comments on the regular information collection. A Federal Register was published on January 25, 2022 (Vol.87, No. 16, page 3787) requesting public comment. There was one non-substantive public comment as a result of the notice.

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The Department will publish a 30-day Federal Register notice for public comment.

**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 will be made to any of the survey 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>1</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. 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.**

KCI will protect the confidentiality of the survey respondents. The names and email addresses of desired survey respondents will be collected from the "project director" information contained in the grant applications, which are publicly available. This person indicated as the project director will be our initial point of contact, but in some cases, they will refer us to someone else (e.g., a new director or associate director) who will complete the questionnaire. The actual survey responses will be linked with institutional information, but not with the individual identifying information of the people who complete the survey. Collected data will be used for statistical purposes only. Results for each survey item will be shown at the aggregate level in the final report provided to ED. The specific responses from each institution will not be detailed. No data will be connected to an individual institution or person in the report. We will provide assurance of confidentiality in all of these aspects to respondents prior to survey completion.

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<sup>1</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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- 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.**

There are no questions of a sensitive nature in the survey. There are no questions about information generally considered private and no questions are specific to the individual respondents. The survey questions are focused on the NRC institution: projects, activities, policies, procedures, structures, and general experience with the program and application.

- 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.**

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This survey will be a one-time data collection effort of 100 NRC directors or associate directors. The survey questions are fairly general and do not ask for detailed metrics or other information that would be likely to require time-consuming information gathering activities by respondents. Based on our experience with NRC personnel through the site visits and pretests already conducted, we fully expect that each of the survey respondents will be highly knowledgeable about the survey topics and will be able to complete the survey in about 30 minutes. Therefore, assuming a 100 percent response rate, we estimate a 3,000 minute or 50 hours total respondent burden. Assuming a \$44 labor hour<sup>2</sup>, this results in an overall cost burden to respondents of \$2,200.

**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)
One-time survey of NRC Directors	100	100%	100	100	.5	50	\$44.00	\$2,200.00
Annualized Totals	100	100%	100	100	.5	50	\$44.00	\$2,200.00

*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**

<sup>2</sup> The mean annual wage for area, ethnic, and cultural studies postsecondary teachers employed by colleges, universities, and professional schools is \$90,160, or an estimated hourly wage of \$43.34. See: <https://www.bls.gov/oes/current/oes251062.htm>.

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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 :

Participating in this data collection will not cause respondents to incur a total capital and start-up cost or any operation and maintenance and purchase of services costs. Respondents will not incur any additional costs beyond those identified in the previous section.

- 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 amount for the planning, design, implementation, and analysis of this data collection effort is \$624,205.04. This cost entails the full value of contractor services over the course of the contract, which includes the previously completed grant

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application reviews and virtual site visits. The annualized cost to the Federal government is \$208,068.35 over 3 years.

- 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.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
<b>Total Burden</b>		50	
<b>Total Responses</b>		100	
<b>Total Costs (if applicable)</b>		\$2,200	

This is a new information collection. Therefore, all hour burden is new.

- 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 survey will be launched in July 2022 and should be completed within five weeks. Respondent follow-up by email will be initiated periodically throughout the data collection period. KCI will analyze the data in early fall of 2022 and will work with ED through the end of the year to develop a final report for publication. The final report is scheduled to be complete by January 2023.

- 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. All data collection instruments will include the OMB data collection expiration date.

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

We are not requesting an exception to the certification statement.