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[1]. 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 1840-0795) includes application instructions and forms for the International Research and Studies (IRS) Program (CFDA Number 84.017), authorized under Title VI of the Higher Education Act of 1965, as amended (20 U.S.C. Section 1125). The program provides 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.

   The type of collection is an **extension** of the previously approved information collection (application). There is no change to the form or instructions, although the burden decreases due to a different way of calculating burden hours.

   This discretionary grant falls under the streamlined grant process, 1894-0001, which waives the 60-day comment period.

   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:

   - GPRA Modernization Act of 2010
     https://www.congress.gov/111/plaws/publ352/PLAW-111publ352.pdf
   - Section 427 of the General Provisions Act
     https://sites.ed.gov/idea/files/Grants-General-Education-Provisions-Act-Section-427.pdf
   - Government Paperwork Elimination Act
     https://digital.gov/resources/paperwork-reduction-act-44-u-s-c-3501-et-seq/
   - Education Department General Administrative Regulations
     http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html

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

- 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. https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

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. IFLE program officers rank applications based on peer reviewer evaluations to prepare 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 technical assistance provided.

   The information collected in IRS grant applications provides the basis for the 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 performance 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. Also describe any consideration given to using technology to reduce burden.**

   The information collection requires the electronic submission of applications using the governmentwide Grants.gov site. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple hard copies of grant applications to the Department.

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.

The legislation, program regulations, and the respondents covered by this information collection are unique to the IRS program. No other similar programs exist in the Department, and no similar programs exist in other Federal agencies.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

   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 conducted, the Department cannot carry out its grant making activities in accordance with approved schedules.

   The information requested/collected is as minimal as possible in order to reduce burden on applicants while simultaneously collecting what is sufficient and necessary to ensure that all discretionary grant making steps are conducted well, and that the recommended projects are of high quality. Discretionary grantmaking steps include the publication of the competition Notice Inviting Applications (NIA), technical assistance to applicants, the peer review of applications, preparation of the funding slate for transmittal and approval, Congressional notifications and the notification of successful and unsuccessful applications, and the commitment, obligation and awarding of funds for the grants in accordance with the 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.**

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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

After the 2017 competition, IFLE 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. Grantees recalled that it took between 200 hours and 960 hours to review and complete their FY 2017 grant applications (information collections). Based on an 8-hr business day, 200 hours is the equivalent of 25 days; and 960 hours is the equivalent of 120 days.

As required by 5 CFR 1320.8(d) and the Streamlined Clearance Process for Discretionary Grant Applications (1894-0001), the Department will publish a 30-day notice in the

Federal Register to solicit public comments on this information collection. The Department will summarize and respond to public comments.

This process allows the 60-day to be waived for discretionary grants and that a 30-day comment period will be issued in conjunction with the OMB review.

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.[2] If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentially of the data.

The SORN (18-12-04) was published on March 28, 2018, of the Federal Register. A privacy notice is included in the application package.

The 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.

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

[2] Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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 of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The 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.

There is a change in burden due to a change in agency estimate resulting from the increase in the number of applications and the change in calculation of burden that averages the totals over three years. We estimate IFLE receives 50 applications, up from the previously approved umber of 25. If we estimate that each application requires an estimated 200 hours to complete, this results in a total of 10,000 burden hours. In the table below, this total estimated burden hours are divided by 3 to calculate the Total

Annual Burden Hours, reflecting that the competition is held only once every three years. The Total Annual Burden Hours (3 ,333) multiplied by the estimated wage rate of $75/hour, results in a total burden cost of $249,975.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Respondent Response Rate	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.	Once, every three years	50	1	200	10,000	$75	$750,000
Annualized Totals averaged over 3 Years		50	1		3,333		$249,975

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.**
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Total Annualized Capital/Startup Cost : $0.00
Total Annual Costs (O&M) : $0.00
Total Annualized Costs Requested : $0.00

The program in this information collection does not have costs that meet the criteria for inclusion in Item 13.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized cost to the Federal Government.
The information in the table below was calculated based on the hourly wages for GS 14 and GS 12 employees. The total on the last line of the table is averaged over three years, since the competition is held only once every three years.

Operational or Programmatic Task	**Wage per Hour ($)**	**Staff Resources (number)**	**Total Hours**	**Cost to Federal Government ($)**
ICC Package: Supporting	78	1	9	$702

Statement, Data Forms, and PRA statement				
Develop application forms and instructions for OMB clearance	49	1	27	$1,323
Prepare Notice Inviting Applications	49	1	18	$637
Conduct (2) technical assistance webinars, one for prospective applicants and one panel orientation webinar for peer reviewers.	49	1	8	$392
Pre-screen all submitted applications for eligibility, completeness, and type, e.g., instructional materials or survey project.	49	1	7	$343
Create peer review panels and assign applications in G5 e-Reader	49	1	5	$245
Conduct two-week panel review of applications (discussions with peer reviewers, review technical review forms in G5)	49	1	100	$4,900
Compensate 12 peer reviewers @1000 flat rate	1000 flat rate		17 reviewers*	$1,700
Develop slate memo and attachments	49	1	27	$1,323
Prepare awards in G5	49	1	3	$147
TOTAL			204	$11,712
Annualized Total Averaged over 3 Years			68	3,904

*Not included in Total Hours

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 is no change to the form or instructions. There is a change in burden hours due to an adjustment in agency estimate. The number of respondents has doubled, increasing from 25 to 50. In addition, the calculation of burden hours has changed from estimating the total for one year to averaging over three years. This change was made to reflect that the program competition is conducted only once every three years. This resulted in a decrease in total burden hours, in that the total burden hours of 10,000 have been divided by three and reduced to 3,333. The previously approved burden hours, 5,000, have been decreased by 1,667, as shown in the chart below, to update the burden hours to 3,333.

		Program Change Due to New Statute	**Program Change Due to Agency Discretion**	**Change Due to Adjustment in Agency Estimate**
Total Burden				**-1,667**
Total Responses				**25**
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.**

There are no plans for publication of results.

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

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.