Tracking and OMB Number: (XX) 1840-0792

Revised: XX/XX/XXXX

# 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 purpose of Section 102(b)(6) of the Mutual Educational and Cultural Exchange Act of 1961 (Fulbright-Hays Act) is to promote and develop modern foreign language training and area studies throughout the educational structure of the United States. To help accomplish this objective, the Fulbright-Hays Group Projects Abroad Program is designed to contribute to the development and improvement of the study of modern foreign languages and area studies in the United States by providing opportunities for teachers, students, and faculty to study in foreign countries.

Under the Fulbright-Hays Group Projects Abroad (GPA) program, the Secretary awards grants to eligible institutions, departments, and organizations to conduct overseas group projects in research, training, and curriculum development. These institutions administer the program in cooperation with the US Department of Education (US/ED) as provided under the authority of Sections 102(b)(6) and 104(e)(1) of the Mutual Educational and Cultural Exchange Act of 1961, 34 CFR Parts 662, the Policy Statements of the J. William Fulbright Foreign Scholarship Board (FSB), and the Education Department General Administrative Regulations (EDGAR).

This is a revision to an existing collection, an application for grants. ED/IFLE is removing Competitive Preference Priority 6: Thematic Focus on Ukraine or Afghanistan because only 1 applicant out of 43 applications for FY 2023 applied for the priority. This applicant was not eligible for the points. No applications received points for this priority. This revision will have no affect on hour or cost burden.

This discretionary grant falls under the Streamlined Clearance Process for Discretionary Grant Information Collections, 1894-0001, which waives the 60-day comment period.

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

Eligible institutions of higher education, nonprofit educational organizations, and public and private nonprofit organizations use the information to develop and submit grant applications to the Department of Education (the Department). After grant applications are submitted, the Department determines the budgetary and human resources it needs to conduct competitions. Expert review panels use the information to identify high-quality applicants. The Department program officials and senior management consider the feedback from the expert review panels, in conjunction with the programs’ legislative purposes, when making funding recommendations. The data are also used by US Embassies and the Fulbright Scholarship Board to determine the suitability of the project, political sensitivity and feasibility of the project in terms of the host country reaction, political climate and the adequacy of the proposed budget. The Department also uses the information collection to develop monitoring plans, to inform strategic planning, and to align program assessment standards with Department performance goals and initiatives.

1. **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 applicants for grants under the GPA program to submit applications electronically using the Grants.gov system.

Regarding the use of other forms of information technology, we use the Department’s Website to inform prospective applicants about the programs’ funding opportunities and deadline dates. Application packages are posted on the Website making access to them more effective and efficient only after the competition is closed. Additionally, we post Frequently-Asked Questions about these programs on our Web page, which makes technical assistance more immediate. We also conduct pre-application technical assistance webinars to present information about the purpose of the program, the selection criteria, application content, submission procedures and reporting requirements.

Also, as a technical assistance tool, we post abstracts of currently funded projects on the Department’s Website to help prospective applicants better understand the kinds of activities and projects the program supports.

1. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication of the information collected via this application. No similar information is available.

1. **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 other small entities.

1. **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 meet its statutory and grant-making responsibilities, including the publication of closing date notices, providing technical assistance to potential applicants, conducting peer reviews of grant applications, transmitting slates with funding recommendations to Department officials for approval, and making grant awards.

The Department needs to make grant applications available to its constituencies to give eligible applicants at least 30 days to develop and submit applications by the closing date, and to enable IFLE to make new fiscal year grant awards in a timely manner.

1. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
* **requiring respondents to report information to the agency more often than quarterly;**
* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
* **requiring respondents to submit more than an original and two copies of any document;**
* **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
* **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
* **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
* **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
* **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

There are no special circumstances that would require the information collection to be conducted in any of the ways described.

1. **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.**

This discretionary grant falls under the streamlined grant process, 1894-0001. 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.

On a regular basis, we hold informal discussions with various constituents and potential respondents who have completed grant applications under this program to ascertain whether the instructions and forms are clear and applicant-friendly. These include project directors, foreign language professionals, fiscal representatives at institutions of higher education, and management analysts who are responsible for gathering the data needed to respond to the programs’ selection criteria.

Our day-to-day technical assistance and project monitoring are the primary mechanisms we use to answer specific questions about the grant application instructions and to gauge whether or not application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance includes phone conversations, emails, and office visits. We also conduct technical assistance webinars for project directors throughout the year.

In sum, these processes collectively inform IFLE about the viability of the application materials we use for our programs. The professionals, administrators, and organizations cited above do not have adverse comments about the information being requested or about the time it takes to complete a grant application under this program.

1. **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 provided to respondents.

1. **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]](#footnote-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 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.**

Each applicant is informed that their application is reviewed by staff of the Department, US Embassies and the Fulbright Foreign Scholarship Board (FFSB). Unclassified comments made by any entity or individual involved in the review process are made available to the applicant upon request. Assurances of confidentiality related to this information collection are covered under the Privacy Act. The application collects the names and contact information for the centers’ project directors. A Privacy Act Statement is included in the application.

1. **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 of respondents.

1. **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**](https://www.bls.gov/oes/current/oes_nat.html) **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.**

Eligible applicants are public and private non-profit institutions, organizations, and state departments of education. The program estimates that there will be 60 applicants, which is unchanged from the previous clearance. The burden hours of 110 per application also remain unchanged from the previous clearance and were estimated in consultation with the professionals, administrators, and organizations cited in the response to question #8 above. Sixty multiplied by 110 equals 6,600 annual burden hours for the program. The annual burden hours are multiplied by the estimated hourly wage of $75 for a Project Director of an institution, organization or department to equal the total hourly costs of $495,000. The GPA competition is held every year.

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) |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Institutions |  |  | 60 | 1 | 110 | 6,600 | $75 | $495,000 |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Annual Totals |  |  | 60 | 1 | 110 | 6,600 | $75 | $495,000 |

***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.***

1. **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

 Total Annual Costs (O&M) :0\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Total Annualized Costs Requested :0

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Operational or Programmatic Task** | **Wage per Hour ($)** | **Staff Resources (number)** | **Total Hours** | **Cost to Federal Government ($)** |
| ICC Package: Supporting Statement, Data Forms, and PRA statement  | 78 | 1 | 9 | $702 |
| 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 |

1. **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 |
| Total Burden |  |  |  |
| Total Responses |  |  |  |
| Total Costs (if applicable) |  |  |  |

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1. **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.

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

The expiration date for OMB approval of the information collection will be displayed as required.

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

No exceptions to the certification statement are sought

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) [↑](#footnote-ref-2)