

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, fellowships are awarded through US institutions of higher education to American faculty and dissertation students enabling them to conduct overseas research and enhance their foreign language proficiency.

Under the Fulbright-Hays Doctoral Dissertation Research Abroad (DDRA) and the Fulbright-Hays Faculty Research Abroad (FRA) programs, individual scholars apply through eligible institutions for an institutional grant to support the research fellowship. 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).

In order to judge all applications in a consistent manner at each stage of the complex review process, and to reduce the time required for it, it is necessary to collect the appropriate information from all individual applicants by means of a uniform application form.

This information collection is a revision, the purpose of which is to make changes to the DDRA and FRA applications to be consistent with an NPRM to amend the programs' regulations. The programs' applications must be updated to reflect the regulatory changes relating to the programs' selection criteria in CFR Part 662.21(c)(3) and 663.21(c)(3).

Currently, under both the DDRA regulations (§ 662.21(c)(3)) and the FRA regulations (§ 663.21(c)(3)), the Secretary awards points for an applicant's language proficiency in the countries or regions of research. Under the current regulations, however, the Secretary does not take into consideration the language proficiency of speakers of native languages who are seeking to conduct research in those languages. As a consequence, native speakers applying to the DDRA and FRA programs are not able to receive qualitative points for language proficiency if they propose to conduct research in a host country using their native language. The NPRM proposes to revise the DDRA and FRA regulations to award full points to projects conducted in

any language other than English, to establish equity in the application review process for all applicants, including native speakers of languages other than English.

The proposed amendments to the regulations would be consistent with the statutory framework for the DDRA and FRA programs. Allowing native speakers to conduct research projects in their native language would support the statutory goal of “promoting modern foreign language training and area studies in United States schools[.]” 22 U.S.C. 2452(b)(6). Furthermore, the proposed regulations would allow for greater diversity in projects and participants, recognize the existence and value of many different dialects, and foster an appreciation for languages other than English.

The proposed amendments to the regulations also would bring the DDRA and FRA programs into alignment with other comparable foreign language and international area studies grants, which do not exclude applicants who speak a native language other than English. The Fulbright U.S. Student and U.S. Scholar Programs managed by the Department of State, for example, require that an applicant’s language skills match the proposed host country’s requirements, and that the applicant demonstrate language proficiency commensurate with the nature of the proposed project.

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.

This information collection is a revision, the purpose of which is to make changes to the DDRA and FRA applications to be consistent with an NPRM to amend the programs’ regulations. The programs’ applications must be updated to reflect the regulatory changes relating to the programs’ selection criteria in CFR Part 662.21(c)(3) and 663.21(c)(3). The NPRM proposes to revise the DDRA and FRA regulations to award full points to projects conducted in any language other than English, to establish equity in the application review process for all applicants, including native speakers of languages other than English. The information collected from applicants will not change due to these amendments.

The data requested are used by ED, US foreign language and area studies specialists, the US Department of State, US Embassies, Fulbright Commissions, host country officials and scholars, and the Fulbright Foreign Scholarship Board (FFSB) in determining the academic qualifications and suitability of the individual applicant, potential political sensitivity and feasibility of the project in the host country, research climate, and adequacy of the proposed budget. Information gathered from the current collection is also used to compile program demographics and to generate informational lists for the public.

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 information collection requires the electronic submission of applications using the G5 e-application system. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple paper copies of grant applications to the Department.

The International and Foreign Language Education (IFLE) office uses ED's Web site to notify prospective applicants about the DDRA and FRA programs' competitions and deadline dates. IFLE posts the DDRA and FRA application packages (instructions and forms) on the Web site for more effective and efficient access. Additionally, we post Frequently-Asked Questions about the programs on the respective programmatic Web pages, which makes technical assistance to the public more immediate. Technical assistance is enhanced by posting a list of previously funded and currently funded projects on the Web site to help prospective applicants better understand the kinds of activities and projects supported by the DDRA and FRA programs.

- 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 collection and use of this information is not duplicated in ED.

- 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 of information 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.**

Since the grants awarded under these programs are made annually and are not renewable, data must be collected for each new competition cycle. If the competitions are not conducted, ED cannot meet its grant making activities in accordance with the approved schedule. These activities include publication of the closing date notices, providing technical assistance to new respondents, conducting the peer reviews, transmitting the funding slates to ED program officials and the FFSB for approval, making grant awards, and notifying the Congress in a timely manner about successful applicants in the competitions.

Failure to gather sufficient information on each individual applicant's academic background, language proficiency, extent of overseas experience, health, and ability to adapt to a foreign culture would make it impossible to properly evaluate his or her chances of successfully carrying out and completing the proposed research project. The data requested are the minimum necessary to administer the grant in compliance with program regulations.

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 information collection does not involve any special circumstances that would impose these requirements and conditions on respondents.

- 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.

A 30-day notice inviting public comment on this information collection will be published in the Federal Register, in accordance with 5 CFR 1320.8(d). The Department will summarize public comments and respond to them. The NPRM was published on March 21, 2023 (Vol.88, No.64 pages 16924-16932). Since the ICR was not submitted to OMB at the time of the NPRM, the Department is providing a separate 30 day notice for comment on the information collection. The information collection will be sent to OMB when the NFRM that is associated with this information collection is sent to OMB.

Institutional program directors and peer reviewers are consulted every three years regarding availability of data and clarity of instructions of the application form. Overseas diplomatic personnel and/or foreign affairs agencies are consulted regarding any American or host country requirements that may need to be addressed by new data elements. Student and faculty suggestions are retained and used during the revision of forms. Several DDRA and FRA project directors have been consulted as well. Data from all of these sources have been used to calculate hour and cost burden to respondents.

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.

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

No payment 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.

Each respondent is informed that his or her application is reviewed by staff of ED, the US Department of State, US Embassies, Fulbright commissions, host country officials and scholars, the FSB and American scholars. Comments made by any entity or individual involved in the review process are made available to the applicant. Applicants and their referees are informed that in accordance with Section 552a(d) of the Privacy Act, the content of a reference form is subject to review by the applicant.

The DDRA Program has a SORN. We are currently in the process of adding FRA to the already approved DDRA SORN. The DDRA SORN adding FRA is with Privacy Safeguards under review.

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)

- 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.**

The FFBSB, which has statutory responsibilities for all Fulbright programs, requires that “applicants must be of sound physical and mental health”. Therefore we include a medical certification in the application. This certification does not require the attachment of test results and is the most effective and least burdensome method of meeting the FFBSB’s requirement.

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

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

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

The data in the table is an estimate of the time it takes for both institutional project directors and individual respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Department's G5 e-Application system.

We estimate that the changes to the regulations will result in a small increase in the number of DDRA student respondents from 310 to 325. When multiplied by 25 hours, this results in an increase in DDRA student burden hours from 7750 to 8125. We estimate that costs would not increase for individuals in 1840-0005 as a result of these minor burden changes. The annual burden hours for institutions remains at 2000, and the annual burden hours for individuals increases to 9,875, for a total of 11,875 annual burden hours under OMB Control Number 1840-0005. The annual cost burden remains at \$157,978.

Estimate of Annualized Burden Hours and Cost to Respondents

DDRA Program	Number of Respondents	Average Burden Hours per Response	Total Burden Hours	Estimated Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Student Respondent	325	25	8,125	\$0	\$0
DDRA Project	50	25	1,250	\$47.20	\$59,000

Director					
Annualized Totals	375	25	9,375		\$59,000
FRA Program	Number of Respondents	Average Burden Hours per Response	Total Burden Hours	Estimated Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Faculty Respondent	70	25	1750	\$36.33	\$63,578
FRA Project Director	50	15	750	\$47.20	\$35,400
Annualized Totals	120		2,500		\$98,978
DDRA and FRA Totals	495		11,875		\$157,978

The burden of individual respondents is estimated at an average of 25 hours for each student. These estimates are based on feedback from the respondents during the last three years. The annual respondent burden of the 50 institutional project directors is estimated at 25 hours for each DDRA application. These estimates incorporate the completion of the following tasks:

- Registration in the G5 e-Application system
- Screening individual completed applications
- Transmitting completed individual applications to US/ED in a single submission

Estimated total annual hour burden to DDRA respondents: 9,375

Estimated total annual cost burden to DDRA respondents: \$59,000

The burden of individual respondents is estimated at an average of 25 hours for each faculty member. These estimates are based on feedback from the respondents during the last three years. The annual respondent burden of the 50 institutional project directors is estimated at 15 hours for each FRA application. These estimates incorporate the completion of the following tasks:

- Registration in the G5 e-Application system
- Screening individual completed applications
- Transmitting completed individual applications to US/ED in a single submission

Estimated total annual hour burden to FRA respondents: 2,500

Estimated total annual cost burden to FRA respondents: \$98,978

The total requested burden hours for both the DDRA and FRA programs: 11,875

The total requested cost burden for both the DDRA and FRA programs: \$157,978

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
 - **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

Total Annualized Capital/Startup Cost	:	0
Total Annual Costs (O&M)	:	0
Total Annualized Costs Requested	:	0

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.**

The federal costs of \$151,042 are described in the table provided. The first item, Gather Data and Develop OMB Supporting Statement, occurs once every three years, as shown in the table. The total hour burden for this task is 1,250, but it is divided by 3 for an average of 417, since it only occurs once every three years. All other tasks are annual.

Pre-Award and Post-Award Program Tasks	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB Supporting statement (every 3 years)	50	1	25	1250/3 = 417
Develop application forms and instructions	50	2	5	500
Develop Notices of Closing Date (CDN)	50	1	5	250
Publish application guidelines and technical review forms in G5 e- Application module	50	2	2	200
Assign reader panels in G5 e-Reader	50	1	2	100
Conduct orientation for G5 e- Reading	50	2	4	400
Schedule regular peer review conference calls; review readers' comments in e-Reader; provide follow-up via e-mail and phone communications	45	5	80	18,000
Certify that the 35 reviewers have completed the e-Reading for issuance of honoraria	1000 (ED flat rate)	2	n/a	35,000
Review applications in funding range, revise budget requests, prepare slate memos and attachments for approval; enter grants into G5	45	2	200	18,000
Review of forms by US Embassies and binational commissions	45	2	80	7,200
ED program official reviews and approves slates	75	3	3	675

Executive officer commits grants	50	1	1	50
Obligate grants in G5 and sign Grant Award Notifications (GANs)	50	1	1	50
Program officer provides technical assistance to grantees; reviews performance and evaluation reports; conducts ongoing monitoring activities in compliance with OPE , IFLE requirements	45	2	780 (15 hrs/wk x 52 wks)	70,200
TOTAL			1,188	151,042

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 information collection is a revision, the purpose of which is to make changes to the DDRA and FRA applications to be consistent with an NPRM to amend the programs' regulations. The programs' applications must be updated to reflect the regulatory changes relating to the programs' selection criteria in CFR Part 662.21(c)(3) and 663.21(c)(3). The NPRM proposes to revise the DDRA and FRA regulations to award full points to projects conducted in any language other than English, to establish equity in the application review process for all applicants, including native speakers of languages other than English. The change in regulations requires only minor adjustments to the application package.

We estimate that the changes to the regulations will result in a small increase in the number of DDRA student respondents from 310 to 325. When multiplied by 25 hours, this results in an increase in DDRA student burden hours from 7750 to 8125. We estimate that costs would not increase for individuals in 1840-0005 as a result of these minor burden changes. The annual burden hours for institutions remains at 2000, and the annual burden hours for individuals increases to 9875, for a total of 11875 annual burden hours under OMB Control Number 1840-0005. The annual cost burden remains at \$157,978.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		375	
Total Responses		15	
Total Costs (if applicable)		0	

- 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.**

Not applicable. The expiration date for OMB approval will be displayed on the information collection.

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

Not applicable. No exceptions are being requested.