Application the Foreign Language and Area Studies (FLAS) Fellowships Program
Tracking and OMB Number: (XXXX) 1840-0867
Revised: XX/XX/XXXX
RIN Number: 1840-AD94

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.

This information collection (OMB 1840-0867) includes application instructions and forms for the Foreign Language and Area Studies (FLAS) Fellowship Program (ALN Number 84.015B), authorized under Title VI of the Higher Education Act of 1965, as amended (20 U.S.C. Section 1122).

The FLAS Fellowship Program awards allocations of fellowships, through institutions of higher education and consortia of institutions of higher education, to meritorious students enrolled in programs that offer performance-based instruction in world languages in combination with area studies, international studies, or the international aspects of professional studies.

With the National Resource Centers (NRC) program, the FLAS program responds to the ongoing national need for individuals with expertise and competence in world languages and area or international studies; advance national security by developing a pipeline of highly proficient linguists and experts in critical world regions; and contribute to developing a globally competent workforce able to engage with a multilingual/multicultural clientele at home and abroad.

This **new collection** is the result of the division of 1840-0807 into two separate applications: one for NRC and one for FLAS, which is how the applications appear in Grants.gov. Previously, both applications were combined into one information collection: the Application for the NRC and FLAS Fellowships Programs. The NRC application will maintain the OMB control number of 1840-0807, while the FLAS application will get a new OMB control (1840-0867).

This new collection is related to a Final Rule to amend the regulations of the NRC and FLAS programs. The FLAS application and technical review forms will include the changes to the FLAS selection criteria (CFR §§ 657.21), which clarify interpretations of statutory language and redesign the selection criteria. The regulations remove ambiguity and redundancy in the selection criteria and definitions of key terms, improve the application process, and align the administration of the FLAS program with the developments in modern foreign languages and area studies education.

Approval of this collection is necessary in order to conduct future program competitions.

The legislation and program regulations for the FLAS Programs may be viewed at:

https://www2.ed.gov/programs/iegpsflasf/legislation.html

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

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 **new collection** divides 1840-0807 into two separate applications: one for NRC and one for FLAS. The division of the applications is to be consistent with a Final Rule to amend the regulations of the NRC and FLAS programs. The Final Rule changes the FLAS selection criteria (§ 657.21) and technical review forms, and clarifies interpretations of statutory language and redesign the selection criteria. The regulations remove ambiguity and redundancy in the selection criteria and definitions of key terms, improve the application process, and align the administration of the programs with the developments in modern foreign languages and area studies education.

Eligible institutions of higher education use the information collection to submit applications to the Department of Education (ED) to request funding in response to the competition announcement. After grant applications are submitted, the Department determines the budget and staff resources it needs to conduct the peer review of applications and post award activities. External review panels use the information to evaluate grant applications and to identify high-quality applications. When developing funding slates, ED program officials consider the evaluations from the expert review panels, in conjunction with the FLAS legislative purposes and any Administration priorities. ED program officials also use the collection to inform strategic planning; to establish goals, performance measures and objectives; to develop monitoring plans; or to align program assessment standards with Department performance goals and initiatives.

ED's Office of Postsecondary Education, International and Foreign Language Education (OPE-IFLE) has used the information received for the current collection to develop technical assistance materials for grantees, such as program administration manuals and technical assistance Webinars, to inform the performance reporting requirements for this program, and to demonstrate the impact of this program.

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.

IFLE maximizes the use of technology in both its application and reporting processes to reduce burden. The information collection requires the electronic submission of applications using the

Grants.gov website. Submitting applications electronically reduces burden because applicants are not required to prepare and mail multiple hard copies of grant applications to the Department.

IFLE uses the Department's website to notify prospective applicants about the FLAS program competition and deadline date. We post the FLAS application package (instructions and forms) on the site for more effective and efficient access. Additionally, we post Frequently-Asked Questions and webinars about the program on the FLAS program web page, which makes technical assistance to the public more immediate. Technical assistance is enhanced by posting the narratives of currently funded projects on the web site to help prospective applicants better understand the kinds of activities and projects that the FLAS program supports.

Grantees use the International Resource Information System (IRIS), IFLE's web-based performance reporting system, to complete annual and final performance reports, which also reduces burden.

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.**

   There are no information collections available that duplicate the information that the FLAS program application requests. In regard to the uses listed in Item 2 above, there is no duplication elsewhere in the Federal Government of IFLE program planning and oversight activities associated with this program.

   The legislation, program regulations, and respondents covered by this information collection are unique to the FLAS 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 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.**

   If the collection is not conducted, ED 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 grant activities are conducted well, and that the recommended projects are of high quality, to the greatest extent possible. Grant activities include the publication of the competition notice, technical assistance to applicants, the peer review of applications, preparation of the funding slate

for transmittal and approval, Congressional notifications, and making the grant awards in accordance with our 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 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.

IFLE periodically meets with representatives from institutions of higher education and professional organizations (e.g., area studies associations) to solicit feedback on the clarity of the instructions and forms, and whether the application forms and instructions collect information that meets the purposes of the Title VI legislation, program regulations, and announced priorities.

Ongoing technical assistance (e.g., webinars), project monitoring, and site visits are the primary mechanisms we use to answer questions about the FLAS 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 is conducted by phone conversations, e-mails, and office visits.

These consultations and activities collectively inform IFLE about the viability of the application materials we use for the FLAS program. 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.

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.

This information collection is related to rulemaking. Here is a brief summary of comments relating to this ICR received in response to the NPRM:

Several commenters expressed concern that the proposed changes are likely to increase the overall burden of submitting applications to the NRC Program and FLAS Fellowships Program because the proposed regulations would eliminate the ability to submit a single application to both programs. One commenter suggested revisions to the burden hour calculations for these applications. The Department responded that the changes to the application process will not significantly increase the burden associated with the submission of applications to both programs. Accordingly, we have not changed the burden estimates associated with the applications based on this change. However, we have changed the calculation of burden hours based on a commenter's assertion that our previous calculations severely underestimated the burden hours and costs associated with these applications.

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.[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.

This information collection is subject to the Privacy Act. The FLAS application collects the names and contact information for the centers' project directors. A Privacy Act Statement is included in the application. The Privacy Act Statement included was reviewed and approved by Privacy Safeguards.

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.

No questions of a sensitive nature are asked.

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.**

[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)

- **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 respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Grants.gov system.

The burden associated with the FLAS application is derived from the burden associated with the current Application for the NRC and FLAS Fellowships Programs (1840-0807), which was 27 burden hours. Based on a commenter's assertion that our previous calculations severely underestimated the burden hours and costs of this collection, the application now is estimated to have a burden of 420 hours. When multiplied by 165 respondents, this results in Total Annual Burden hours of 69,300. The Total Annual Costs for the application is determined to be $2,286,900 when the burden hours are multiplied by the commenter's recommended hourly wage of $33.

The NRC and FLAS programs compete only once every four years. The application packages are cleared with OMB once every three years. For every three-year clearance period, the competitions are run once. Because of the separation of the two information collections, the Total Annual Burden Hours and Total Annual Costs are halved. For both the NRC Program and the FLAS Fellowships Program, 420 hours to complete both applications is reduced to 210 hours each. When multiplied by 165 respondents this yields Total Annual Burden Hours of 34,650 and Total Annual Costs of $1,143,450. Averaged over three years, the Total Annual Burden Hours are reduced to 11,550 and the Total Annual Costs are reduced to $381,150 for each program.

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	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Averaged Annualized Totals*			165	210	11,550	$33	$381,150

*This total is averaged over three years, since the collection is cleared for three years, and used only once every four years.

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

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

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.

Because this collection is used only once every four years, this cost of $89,650 hours is averaged over three years, to $29,883, since the collection is approved by OMB for three years. The hours are reduced from 516 to 172 using the same method.

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	$65	1	30	$1,950
Develop application forms and instructions	$50	1	60	$3,000
Develop and seek approval to publish Notice Inviting Applications; develop competition technical review plan	$65	1	60	$3,900
Create application package in Grants.gov and link to the Department's G5 electronic application system	$50	1	10	$500
Make available (post) application instructions on Department website	$50	1	5	$250
Recruit approximately 60 panel reviewers, provide technical assistance for registering in SAM.gov and obtaining a Unique Entity Identification number, prepare and transmit slate of reviewers to Executive Office	$50	6	20	$6,000
Upload Technical Review Form (TRF) to G5	$50	1	5	250
Set up electronic peer review process (process 165 applications submitted electronically in G5, screen applications for eligibility)	$50	5	20	$5,000
Establish reader panels to evaluate applications in G5	$50	5	6	$1,500
Hold orientation/training for panel reviewers; conduct peer review conference calls; monitor panels; check reviewers' scores and comments for accuracy and compliance during a two-week panel review	$50	5	80	$20,000
Process payments for peer reviewers	50	1	10	$500
Develop FLAS slate memo and attachments	$50	2	18	$1,800
Review recommended applications and revised budgets	$50	5	60	$15,000
Enter NRC slate and FLAS slate information into G5 and obligate awards	$50	2	20	$2,000
Notify applicants of results and send TRFs to all applicants post-competition	$50	5	8	$2,000

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Five program officers document monitoring activities weekly for 10 projects in their respective world area portfolios in compliance with OPE standards	$50	5	104 (2 hrs./wk. @ 52 weeks)	$26,000
TOTAL			**516**	**89,650**
Total Averaged Cost*			**172**	**$29,883**

*The total hours and cost are averaged over three years, since the competition is only conducted once every four 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.

This information collection is a **new collection,** as the result of a **program change due to agency discretion** to be consistent with a Final Rule to amend the NRC and FLAS programs' regulations. This new collection is the result of the division of 1840-0807 into two separate applications: one for NRC and one for FLAS, which is how the applications appear in Grants.gov. The NRC application will maintain the OMB control number of 1840-0807, while the FLAS application will get a new OMB control (1840-0867).

The NFRM establishes changes to the FLAS selection criteria (§ 657.21) and technical review forms, which would clarify interpretations of statutory language and redesign the selection criteria. The new regulations will remove ambiguity and redundancy in the selection criteria and definitions of key terms, improve the application process, and align the administration of the programs with the developments in modern foreign languages and area studies education.

The burden associated with the FLAS application is derived from the burden associated with the current Application for the NRC and FLAS Fellowships Programs (1840-0807). Based on a commenter's assertion that our previous calculations severely underestimated the burden hours and costs of this collection, the proposed selection criteria changes would increase the original hour burden per response by 393 hours, from 27 to 420. When multiplied by 165 respondents, this change would result in an increase in Total Annual Burden hours from 4,455 to 69,300.

Because of the separation of the two information collections, the Total Annual Burden Hours are halved. For the FLAS Program, 69,300 hours are reduced to 34,650 hours.

The FLAS program competes only once every four years. The application package is cleared with OMB once every three years. For every three-year clearance period, the competition is run once. Averaged over three years, the Total Annual Burden Hours of the FLAS application are 11,550. Since the FLAS application is a new application, the burden hours of 11,550 are new.

	Program Change Due to New Statute	**Program Change Due to Agency Discretion**	**Change Due to Adjustment in Agency Estimate**
Total Burden	**0**	**11,550**	**0**
Total Responses	**0**	**165**	**0**
Total Costs (if applicable)	**0**	**0**	**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.

Project abstracts as well as Project Director names and email addresses for institutions selected to receive funding will be shared on the Department's website. There are no other 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.