

MEMORANDUM

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TO: Rachel F. Potter
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Office of Management and Budget

THROUGH: James Hyler
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SUBJECT: Response to Questions, re: Three-Year Reinstatement of OMB
#1810-0021, Formula Grants to Local Educational Agencies Program

1. Why is Part I of the application submitted via EDFacts (and cleared under that OMB number) and Part II submitted via the Eden survey tool (and a different OMB number)? This seems confusing for respondents - why not incorporate the whole package under one OMB number?

The bifurcation of the Office of Indian Education's (OIE) grant application is a result of timing during this transition year. OIE's strategy to streamline the application process was to separate the application into two parts; Part I is the student count information and Part II consists of the program and budget information. To ensure that Part I of the application would be approved and ready for collection in December, we decided to incorporate Part I into the 2006-07 EDEN clearance. During the fall we needed additional time to solicit input from grantees to inform and develop the electronic application design for Part II, which we submitted under the old Office of Indian Education clearance number.

After this transition clearance, we intend to submit both Part I and Part II as a single clearance. Our plan is to bring OIE's whole formula grant collection into the EDEN clearance package; alternatively, we would consider pulling our Part I from the EDEN clearance into the OIE clearance.

2. OMB certainly agrees that prepopulation, streamlined questioning and electronic submission reduce the burden and response time for applicants. However, this submission is requesting an 89% reduction -- from 45 hours to 5 hours. This is a substantial reduction; what evidence do you have to suggest that 5 hours is a reasonable estimate for this collection? Have you included time for reading instructions, gathering materials, and having supervisors review the submission?

The total OIE application has reduced the burden from 45 to 7.77 hours. The burden for Part I, 2.77 hours, is included in the EDEN clearance. The Part II burden, 5 hours, includes the time for reading instructions, gathering materials, and having supervisors review the submission. For further detail on this estimation, please refer to page 7 of the supporting statement. The preparation time for grantees is low because they have already received in-person training at workshops and the application requires less of them than in the past, described in part below.

The single greatest reason for the vast reduction in burden hours is the change in the application process. In previous years, when applicants submitted their budget and proposed educational programs (Part II) they had to do so with an estimated dollar amount. When the actual grant amount was determined, all applicants had to revise and resubmit the entirety of the Part II equivalent application. The new Formula Grant Electronic Application System for Indian Education (EASIE) enables OIE to expediently determine the actual grant allocations before the Part II collection so applicants only have to submit this information once.

In addition to the one-time submission of Part II data, grantees will notice the significant burden reduction when they are filling out the application online. For many grantees, the most cumbersome part of the application has been providing disaggregated performance data. Prepopulating this data from EDEN is a huge time-saver for applicants. OIE ensured that all required performance data is part of the EDEN data set. All other non-prepopulated assessment data is optional. OIE also eliminated the Behavioral data table, which was also typically difficult and time-consuming for applicants to populate. And, finally, OIE provided drop down menus for non-numerical entries, further reducing the necessary effort.

After applicants prepare their Part II applications, they will also experience less follow-up work. We project that there will seldom be a need to ask applicants for additional information post-submission because the prepopulation and drop-down menu options will greatly reduce errors. Furthermore, Formula Grant EASIE can instantly create a PDF version of the filled-out application, making it far easier than the paper forms for applicants to share the document with their supervisors and to fulfill all of their reporting and documentation needs.

3. How will you alert applicants of the availability of paper applications? Will you send a letter? If so, this should be included as part of the clearance package.

The Office of Indian Education will notify applicants of the availability of paper applications in the Part II closing notice in the *Federal Register*. ED does not plan to send a letter in this regard. Due to significant outreach and training, 99.3 percent of prior-year grantees have registered in the Formula Grant EASIE system. In this entire group, not a single person requested a paper application for Part I in lieu of the electronic one. Our potential grantees know to contact our Partner Support Center if they have any technical problems. Additionally, we will offer Part II online training sessions for all interested applicants, as we did for Part I. For Part II, we have a specific pool of eligible applicants (those who completed Part I of the application). We will track them closely and contact any who fail to log in and work on their Part II submission to determine whether the electronic system is a barrier.