

**Supporting Statement for Paperwork Reduction Act Submissions
Adult Education, 25 CFR 46
OMB Control Number 1076-0120**

Terms of Clearance: None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When statistical methods are used, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Under the Tribal Priority Allocation activity of the Tribal Budget System, the Bureau of Indian Affairs (BIA) administers Adult Education programs for Indian adults under 25 CFR 46, Subpart C, Program Requirements of the Adult Education Program. The Bureau of Indian Education Programs (BIE) annually collects information data to determine eligibility of Indian applicants and to prioritize programs. The information helps utilize and manage the resources available to provide education opportunities for adult Indians and Alaska Natives to complete high school graduation requirements and to gain new skills and knowledge for their self-enhancement as parents, citizens, consumers, employees and employers. The attached form meets the requirements contained in the Code Federal Regulations (CFR) for this purpose.

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. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

The information being collected by Bureau or Tribal administrators is used to determine eligibility of Indian applicants, prioritize programs, monitor fiscal accountability, direct the appropriate service documentation, plan administrative steps, set long and short term goals, analyze and monitor the use of expended funds. The Bureau of Indian Education uses an information collection form in its preparation of an annual report available for congressional and planning requests.

- a) **The first three lines are requesting general correspondence information for the administrator.**
- b) **The next box identifies what entity is administering the program.**

- c) Section I lists the number of applicants receiving a benefit in the GED Program, showing the number enrolled, receiving a certificate, number still not finished, number who either enter college or the workforce after receiving a GED certificate.
- d) Section II lists the number of applicants, and their status in the Adult Basic Education (ABE) Program.
- e) Section III shows the gain in earnings for those completing the ABE Program by listing pre-program and post-program earnings. This does not include Post Secondary Education Placements.
- f) Section IV shows the Total Program Cost per Placement in a Job or in Post Secondary Education.
- g) Section V identifies Services Provided to Participants, such as employment counseling, educational counseling or referrals to other service organizations.
- h) Section VI identifies where the funds are spent for the program: Tribal Priority Allocations, Administrative Costs, or Direct Program Costs.
- i) Section VII requests narrative accomplishments of annual achievements.

Any omissions would adversely impact the Bureau from completing statutory requirements. For example, an omission of information requested in section 1 and 2 would reduce the effectiveness of measuring results of the program thereby reducing budget justifications to maintain funding levels that provide program services. The omission of section 4 would hinder the ability to identify funding levels needed to maintain or support existing programs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements.]

Data collected does not require the use of automated, electronic, mechanical or other technological collection techniques. We are developing an electronic system for the tribes to use. However, until we are allowed access to the Internet we will not use this system.

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 data collected describes the expenditures and activities only for the BIE adult education program. It collects only the data necessary to measure performance and the good use of funds received, and the number of participants in order to submit and support budget requests. The annual grant application is not similar to any other reported data during the performance year. There is no other data available that can replace this collection as activities through the performance period and are based upon academic objectives for a specific population.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection does not adversely impact small entities such as businesses, tribal governments or educational institutions.

6. Describe the consequence 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.

The information is needed once a year to monitor the use of funds and to support future budget requests. Without this annual data collection budget justifications can not be met. This will result in reduced appropriations for the program.

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;*
The data collected does not require information to be collected less than annually.
 - * *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
Respondents are not required to prepare a written response to a collection of information fewer than 30 days after receipt
 - * *requiring respondents to submit more than an original and two copies of any document;*
Respondents are not required to submit an original and two copies of any document requested.
 - * *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
Respondents are required to comply with records and management practices as identified by Bureau or Tribal policy.
 - * *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
The survey is not required in the annual data collection. The annual report is designed to provide an accounting of numbers of applicants in specific programs with a narrative to describe program accomplishments.
 - * *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
There are no statistical data classifications utilized in the annual collection of data that has not been 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use;*
There is no additional 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 which 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.*
or that requires 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.
8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in

response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A copy of the FR notice, published April 23, 2008 ,(73 FR 21982) is attached. No comments were received.

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

Since this program is operated almost completely by Self-Determination contracts and the tribal administrators contact field personnel, we requested feedback through the field offices. If you wish to contact or speak with a student please contact one of the following service providers:

1. **AVCP – John Owens P. O. Box 219, Bethel Alaska 99559 (907) 543-7481**
2. **Tlingit and Haida – Robin Frank, 320 West Willoughby Ave., Suite 300, Juneau, Alaska 99801, (907) 586-1432**
3. **Colville Tribes – Angie Davis, State Hwy 155 & Cach Creek Rd., Nespelem, Washington, (509) 634-2730**
4. **Laguna Pueblo – Marilyn Johnson, P. O. Box 207, Laguna, New Mexico 87026 (505) 552-7182**
5. **Miami Tribe – Barbra Mullin, P. O. Box 1326, Miami, Oklahoma 74354, (918) 542-1445**
6. **Mille Lacs Band of Chippewa, Claire Boyd, 43408 Oodena Drive, Onamia, Minnesota, (320) 532-7579**
7. **Port Gamble – Marilyn Olson, 31912 Little Boston Rd., NE, Kingston, Washington 98346, (360) 297-2646**
8. **Seneca Nation – Debbie Cooper, 12885 Route 438, Irving, New York 14081, (716) 532-1033**
9. **Shoshone Bannock – Donner Ellsworth, P. O. 306, Fort Hall, Idaho 83203, (208) 478-3737**

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.

The Bureau of Indian Education has contacted a representative group of providers to obtain information concerning their views about clarity, availability and use of the annual reporting form. Additionally, some citizen groups, including parents and students, have worked with the schools to develop requirements for education that may impact how the school staff uses the information. Comments were solicited from the various Adult Education programs. Adult Education programs are considered non-traditional educational programs and the experiences are broad. However, comments received indicated the burden of the collection is sufficient in scope and the instructions are easily understood.

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

No gifts or payments are provided for reporting this information.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Because the data is a compilation of numbers, unrelated to an individual, no assurance of confidentiality is needed

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. This 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.

We are not asking for any sensitive information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and then aggregate the hour burdens.

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

An estimate of annualized cost to respondents for the hour burdens for collections of information is as follows: 4 hr X 70 respondents = 280 Hrs @ \$15.904/hr = \$4453.12. Since there will be variance among applicants academic levels, we are using the GS-3 rate as an average for salary/benefits.

**From the table that incorporates the 2.50% General Schedule Increase 2008:
GS - 3 step 5 - \$11.36 (salary) x 1.4 (benefits) = \$15.904/hr.**

**This method is based on BLS news release USDL: 07-1883 dated December 11, 2007.
https://www.opm.gov/oca/08tables/html/gs_h.asp**

13. Provide an estimate of the total annual [non-hour] 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 [including filing fees paid]. 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 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 purchasing or 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.

Equipment use for supplies, materials, telephonic/electronic communication devices, computer time, etc. is considered minimal. The estimated cost of support services is \$200.00.

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 tribal contract employees are acting on our behalf and providing the function of federal employees by collecting the information from the students. The adult education grant review by the employees will require approximately 4 hours to review the yearly information: 4 hr x 70 respondents = 280 hrs @ \$21.826/hr = \$6,111.28. We are using GS 7 step 5 as tribal employees base pay and using 1.4 as the multiplier to show benefits.

**From the table that incorporates the 2.50% General Schedule Increase 2008:
GS 7 step 5 - \$15.59 (salary) x 1.4 (benefits) = \$21.826/hr**

**This method is based on BLS news release USDL: 07-1883 dated December 11, 2007.
https://www.opm.gov/oca/08tables/html/gs_h.asp**

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The estimated cost of support services is \$200.00. This non-wage cost burden estimate was inadvertently omitted in prior collection requests. Therefore, there is a slight program change in the cost estimate.

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.

The annual data collection will only be published as part of budget justifications.

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

BIE intends to display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in 5 CFR 1320.9 (hourly and cost burden) and 5 CFR 1320,8 (b) (3) (the questions we ask commenters to address).

There are no exceptions to the certification requirements.