

Supporting Statement for Paperwork Reduction Act Submissions Data Elements for Student Enrollment in Bureau-funded Schools OMB Control Number 1076-0122

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 “Collection of Information Employing Statistical Methods” 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.

The Secretary of the Interior, through the Bureau of Indian Education, is required to provide educational services to federally recognized Indians and Alaska natives. Beginning with the Snyder Act and continuing with Public Laws 93-638, 95-561, and 100-297, Congress has enacted legislation to ensure Indians receive educational opportunities. The enrollment form is for attendance in schools operated or funded by the Bureau of Indian Education and to address the criteria for attendance that was changed by the passage of Public Law 99-228. This Act allows for the tuition free attendance of any Indian student who is a member of a federally recognized tribe, or is ¼ degree blood quantum descendant of a member of such tribes, as well as for dependents of Bureau, Indian Health Service or tribal government employees who live on or near the school site. The two regulations that cover this collection are 25 CFR 32, Indian Education Policies and 25 CFR 39, The Indian School Equalization Program.

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 is collected by school registrars to determine the student's eligibility for enrollment in a bureau-funded school, and if eligible, is shared with appropriate school officials to identify the student's base and supplemental educational and/or residential program needs. The information is compiled into a national database by the Bureau of Indian Education to facilitate budget requests and the allocation of congressionally appropriated funds.

PAGE ONE

It is assumed that schools will place their name in the header of their developed form. The first item of information is the name and type of school. This information is necessary to accurately count students in a given school and to ensure that the proper funding decision is made.

Block 1, IDENTIFICATION, gives personal information about the student, such as name, address, distance from school, DOB, place of birth, and sex. This information helps the school with decisions about placement. The optional use of SSN was deleted because the Native American Student Information System (NASIS) will assign each student an identifying number.

Block 2, FAMILY INFORMATION, identifies family information, including emergency contact for the child. This information helps the school to ensure someone will be responsible for working with the school, if necessary, and what arrangements the parents have made regarding emergencies.

PAGE TWO

Block 3, SCHOOL(S) PREVIOUSLY ATTENDED, requests information about the student's scholastic history which helps to properly place the student. This section also has the required signatures listed. There is also space for the principal to document if the child is accepted into the school.

PAGE THREE

Block 4 contains the criteria for boarding or out-of-boundary enrollment. Both education and social factors are listed. The required approvals are also listed. The Privacy Act Statement appears on this page.

PAGE FOUR

The Paperwork Reduction Act Statement is on this page. It also contains instructions for completing Block 1.

PAGE FIVE

Instructions for completing Blocks 2 - 3 are included. It also explains that Block 4 is for schools to complete.

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.].

The Bureau of Indian Education has entered into a contract to develop a customized school administrative software program to streamline the process and time to collect,

retrieve, and compile the information to determine enrollment eligibility and the allocation of appropriated funds. This technology will provide school registrars with the capability to immediately open a record, and enable parents to view their child's record for verification and, if necessary, update the information, eliminating the need for forms or paperwork. The new system is called NASIS (Native American Student Information 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.

This information is not collected or duplicated by any other Federal agency. Occasionally, we receive information from the State or local public schools about a transferring student. We are the only ones authorized to collect the information needed for our school system.

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

Individuals complete the form -- does not apply to small entities. Indian tribes are not considered small entities. We do not require information that parents would not have about their children, or could not obtain.

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.

There are no technical or legal obstacles to reducing the burden. This information is collected only once a year. Not collecting the information, or collecting it less frequently, would negatively impact the planning for and distributing of appropriated funds.

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 information is collected and reported annually.

* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Respondents provide the information requested at enrollment.

* requiring respondents to submit more than an original and two copies of any document;

Only an original information submission is required.

- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

The schools maintain student records, making the records available as allowed by law, which relieves the families from maintaining records other than those they would keep regardless of the school's requirements.

- * 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;

No statistical survey is required for the uses of this collection.

- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

The data is not collected for statistical uses.

- * 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; or

The Privacy Act covers any confidential information. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of information.

- * 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.

No confidential information is requested; the information about the child being enrolled would not involve proprietary information nor any confidential information that would not be covered by the Privacy Act. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of information.

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 Federal Register Notice requesting comments was published September 10, 2008 (73 FR 52671). 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.

Although students have not been consulted, a representative group of school registrars have been instrumental in developing the requirements for information collected by the Bureau of Indian Education. Additionally, some citizen groups, including parents, have worked with the schools to develop requirements for education that may impact how the school staff uses the information.

The following list represents a cross-section of the kinds of schools we have, from large to small, day to boarding, as well as location.

1. Gloria Long, Leupp Community School, Leupp, AZ 928-686-6211
2. Carmen Nez, Shiprock Alternative Schools, Inc., Shiprock, NM 505-368-2157
3. Cheryl Yazzie, Lukachukai Community School, Lukachukai, AZ 928-787-4405
4. Kathy Renville, Flandreau Indian School, Flandreau, SD 605-997-3773
5. Elsie Begay, Tohaali Community School, Toadlena, NM 505-789-3201
6. Iris Garcia, San Felipe Pueblo Elementary School, San Felipe Pueblo, NM 505-867-3364
7. Shelly Honena, Shoshone-Bannock School, Fort Hall, ID 208-238-4300
8. Carla Colpitts, Sequoyah High School, Tahlequah, OK 918-456-0631
9. Shavonne Wilkie, Circle of Nations School, Wahpeton, ND 218-983-4180

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

No 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.

The Privacy Act provides for the protection of confidential information. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of 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. 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.

No questions of a sensitive nature are asked; however, if a parent and/or student reveals information of a sensitive nature, the information is covered by the Privacy Act and the Federal Education Rights and Privacy Act.

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.

We estimate that the total annual burden for this collection to be 12,000 hours, based on an average of 15 minutes per response. Bureau-funded schools are identified by one of three categories: day, boarding, and peripheral dormitory.

Responses for day school will take 10 – 29 minutes to complete.

Responses for boarding school will take 20 – 30 minutes to complete.

Responses for peripheral dormitory will take 10 – 20 minutes to complete.

For each type of school, the burden time is dependent on whether the student is new or a returnee. Thus, some collections will require less time based upon the history that the student already has in the bureau school system, but others will require more time because it is a first collection, or changes are made to the initial information. An additional 20 minutes per collection for each type of school may occur if interpretation or use of a native language is required. We consider 15 minutes to be the average completion time based on the relative size of the three categories.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- 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.

We used the tables from the Occupational Employment Statistics survey of May 2007. We looked at several occupations which might reflect the parents' work. They were child care (\$9.46/hr), school bus driver (\$12.59/hr), jeweler (\$16.35/hr), sewer (\$10.70/hr), and farm worker (\$10.51). The average hourly wage for these is \$11.92. We multiplied this hourly wage by 1.4 to arrive at the salary and benefits: \$16.69/hour. We estimate 15 minutes for each student for a cost of \$4.17. At 15 minutes per student and an enrollment of 48,000, the total annual hours are 12,000. At \$16.69 X 12,000 hours = \$200,280.00

This method comes from the BLS news release USDL: 07-1883 of December 11, 2007.

https://www.opm.gov/oaca/08tables/html/g_s_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.

There is no non-hour cost burden for the students or family.

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 estimated total cost to the Federal Government to collect the information is \$436,057.98. This is based on school registrars, certification by Education Line Officers and their immediate staff, compiled and finalized by an Education Specialist and a Finance Specialist who collect the information. The table below explains how this amount was computed.

The school registrar retrieves a student's historical, biographical, family, educational, and health history for the purpose of determining eligibility and identifying the student's educational and/or residential program needs.

In their respective agency/area, the Education Line Officer and immediate staff review

and certify the accuracy and eligibility of students. The Education Line Officer's priority review and certification is of new students, whereas the immediate staff focuses on returning students.

The Education Specialist – ISEP compiles, summarizes, and finalizes the certified enrollment count for the allocation of congressionally appropriated funds.

The Finance Specialist assists the Education Specialist – ISEP and proceeds with the finalized enrollment count by entering the number into the ISEP formula for a base weighted student unit for final allocation of appropriated congressional funds.

Although not included in the chart below, a Computer Specialist receives the final enrollment count and develops the BIE national database.

The estimated cost to the government is calculated by:

Minutes X Responses = Total Number of Minutes

Total Number of Minutes ÷ 60 (1 hour) = Total Number of Burden Hours

Total Number of Burden Hours X Hourly Wage = Cost.

Employee Type	No. of employee type	Time per student	No. of students	No. of hours	Salary per hour	Total cost per category
School Registrar	187	15 minute	48,000	12,000 hr.	GS-4/3: \$12/hr x 1.5 = \$18.00/hr	\$216,000.00
Educ. Line Off'r	25	10 minute	12,500 (500 per ELO)	2,083 hr.	GS-13/5: \$37.27 x 1.5 = \$55.91/hr	\$116,460.53
ELO staff	75	5 min.	35,500 (473 per staff)	2,958 hr.	GS-7/2: \$16.11 x 1.5 = \$24.17/hr	\$71,494.86
Ed.Spec.ISEP	1	.5 min.	48,000	400 hr.	GS-14/2: \$40.15 x 1.5 = \$60.23/hr.	\$24,092.00
Finance Spec.	1	.5 min.	16,000	133 hr.	GS-14/2: \$60.23/hr.	\$8,010.59
TOTALS				17,574 hrs		\$436,057.98 \$436058 (ROCIS)

We used the Salary Table 2008-GS for computing salaries. This method comes from the BLS news release USDL: 07-1883 of December 11, 2007.

http://www.opm.gov/oca/08tables/html/gs_h.asp

15. Explain the reasons for any program changes or adjustments.

There are no program changes or adjustments.

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 sum total of registration at various schools will be used to support budget requests and to report on the status of Indian education, but individual persons will not be identifiable.

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.

We will display the OMB Control Number and the expiration date on the forms.

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 statement.