

**1 Supporting Statement for Paperwork Reduction Act Submissions
Application for Admission to Haskell Indian Nations University and
to Southwestern Indian Polytechnic Institute
OMB Control Number 1076-0114**

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 purpose of the collection is to enroll students and to ensure program eligibility. These forms that are utilized ensure conformity to the requirements of the Blood Quantum Act, Public Law 99-228; the Snyder Act, Chapter 115, Public Law 67-85; and, the Indian Appropriations of the 48th Congress, Chapter 180, page 91, For Support of Schools, July 4, 1884. This official application request adheres to the Paperwork Reduction Act and the Privacy Act. Copies of the before mentioned laws are attached.

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.]

Admissions forms are used to enroll students at the Southwestern Indian Polytechnic Institute (SIPI) and Haskell Indian Nations University (HINU). The completed admissions forms are electronically entered into SIPI, and HINU Admissions and Records to maintain current data on students. The collected data is used in responding to the Bureau of Indian Education’s (BIE) budget information requests from the Department of the Interior, Office of Management and Budget, Congress and other entities as appropriate. The collected

information is used to supply needed information to counselors for student services and the information is used by health professionals to aid in the provision of health services.

The first section, page one, of the Haskell application asks for specific entry information. The second section asks for personal information. The third section seeks tribal affiliation information which is necessary to ensure the eligibility of the applicant for enrollment. The last section on page one is designed to see if the applicant falls into categories which affect federal or state aid.

The first section, page two of the Haskell application, asks for information about the applicant's high school record. The second section asks for information about any previous post-secondary education, and whether the family has a history of attending post-secondary educational institutions. The third section seeks information about extra-curricular activities that may interest the student. The fourth section asks for information about emergency contacts. The last section is for information certification by the applicant.

Page 3 of the application contains Paperwork Reduction Act and Privacy Act statements.

The first part of the application for SIPI asks for information about student enrollment: the particular semester, expected standing as a student: new, transfer, etc. The second section asks for personal information such as address, both permanent and while attending SIPI, age, gender, secondary school status, veteran status. There is a special section for transfer or readmission students. The last section concerns needs and expectations of student while attending SIPI.

The first part of page two asks for more personal information which may impact person while at school, such as marital status, tribal language, and family history regarding post-secondary education. The second section seeks information on educational history of parents. The third section asks for information about applicant's objectives and reasons for attending SIPI. The last section is for certification by applicant and also parent or guardian if applicant is under 18 years of age.

Page 3 of the application contains Paperwork Reduction Act and Privacy Act statements.

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.].

Because of a court order it was not possible for students to apply to either college from secondary school sites. Once the court order is lifted, and other problems are worked out in the system being developed, it is anticipated students will be able to apply to either college on line. The colleges enter the student data into an electronic system, and it is

available for the staff's use.

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.

Some information may be duplicated for students who attended Bureau of Indian Affairs' secondary schools. Due to possible changes in the student's information, it is necessary for SIPI applicants to complete a new admissions form at the beginning of each trimester. This requirement only applies to SIPI.

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

The universities and the students are not considered small businesses or small entities.

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.

Students are asked to provide information at each year and/or trimester they attend. After initial enrollment, it should be possible for only updates to be made with student review and input on needed changes.

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 that 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 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.

Students are not expected to submit original AND copies; the only records they retain are for their own use, such as birth certificates, ssn, tribal enrollment number, etc.; the only

confidential information requested and submitted is covered by the Privacy Act.

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.

The public consulted are the boards and institutions of higher learning that set standards for accreditation. We satisfied the institutions of higher learning, with the information needed for all schools and in the near future we anticipate the information will be entered and updated electronically. This collection was advertised in the Federal Register as a 60 day notice, and was published on Wednesday, September 10, 2008 (73 FR 52671). No comments were received. Copies of the 60-day and the 30-day notices are uploaded in ROCIS.

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.

These persons work with enrollment and admissions, and can put you in contact with a student if you want to talk to one. [SIPI; Joe Carpio (505) 346-2324, HINU; Ellen Allen (785) 749-8454.

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.

The Privacy Act is the basis for confidentiality for students providing personally identifiable information such as their address, social security number, phone number.

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.

SIPI requires a physical examination and immunizations for public health reasons. Criminal probation information is required due to dormitory requirements.

Special services information is used to determine and implement any needed special services.

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 13.

For the **Total Annual Responses:**

(Number of students x the number of times the student completes the form = Total annual responses.) For Example: (831 students x 3 times a year the forms are completed = 2493)

SIPI requires students to apply each trimester. Haskell Indian Nations University (HINU) requires only the initial annual application. In order to standardize the monetary cost to students we use GS - 4 step 1 from the table that incorporates the 2.50% General Schedule Increase 2008:

\$11.25 (salary) x 1.4 (benefits) = \$15.75/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

For the Total Annual Hours Requested:

3,000 applications (SIPI) x .5 hour = 1,500 hours x (\$11.25 x 1.4) \$15.75 = \$23,625.00

1,000 applications (HINU) x .5 hour = 500 hours x (\$11.25 x 1.4) \$15.75 = \$7,875.00

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers 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.

SIPI charges \$280. per trimester for full-time dormitory students for an annual charge of \$840.00; it charges \$225. per trimester for full-time commuter students for an annual charge of \$675.00; it charges \$150. per trimester for part-time students for an annual charge of \$450.00. Of the 650 students, 65 would be part-time, 195 would be commuter, and 390 would be dormitory students. Although SIPI does not separate a filing fee from the tuition/dorm fees, we are estimating it to be \$10.00 per year.

HINU charges a \$10. initial enrollment fee + \$215.00 full-time student fee per semester which includes dormitory for an annual cost of \$440.00 per student. Commuter students are charged the \$10 fee plus \$110. per semester for an annual cost of \$230.00.

We estimate that the filing fee for both institutions for a year to be \$16,500.00.

Institution	Full-time Residents (dorm & \$10. fee) \$840.00 (SIPI) \$ 440.00 (HINU)	Full-time Commuter (includes \$10.fee) \$675.00 (SIPI) \$110.00 (HINU)	Part-time (includes \$10.fee) \$230.00
SIPI**	390 x \$840. = \$327,600.00	195 x \$675. = \$131,625.00	65 x \$230. = \$ 14,950.00
HINU	750 x \$440.00 = \$330,000.00	250 x \$110.00 = \$27,500.00	
Subtotals	\$657,600.00	\$41,125.00	\$14,950.00
Total	\$7,136,750.00		

** There are an additional 350 applicants who do not complete the application process; since SIPI does not break out the application fee, we are not including them in this part.

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.

Equipment + Support Staff + Printing + Mailing = Total Estimated Cost \$103,519.25

Equipment: 1 Computers for each school site entry = \$ 2,000.00. The ANNUAL cost, divide \$2,000.00 by 3 (the number of years we expect to use the computers before replacement or upgrade.) = \$667. annual cost

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Support Staff: SIPI: 2 GS employees
HINU: 2 GS employees

Institution	# of applications reviewed @ 15 min. each	Clerk GS-5/5 @ \$14.26/hour x 1/5 = \$21.39/hour	# of applications reviewed @ 15 min. each	GS 7/5 technician @ \$17.67/hour x 1.5 = \$26.51/hr	# of applications reviewed @ 15 min. each	GS 11/5 analyst @ \$26.15/hour x 1.5 = \$39.23/hour
SIPI	3000 x 15 min = 750 hrs	750 x hourly rate = \$16,042.50	3000 x 15 min = 750 hrs	750 x hourly rate = \$19,882.50	**4300 x 15 min = 1075 hrs	325 x hourly rate = \$42,172.25
Total		\$16,042.50 + \$19,882.50 + \$42,172.25 = \$78,097.25				

** The analyst spends additional time to ensure that re-enrollment data is accurate.

Institution	# of applications reviewed @ 30 min. each	GS -6/7 Clerk @ \$16.83/hour x 1.5 = \$25.25/hour	# of applications reviewed @ 30 min. each	GS -12/7 Analyst @ \$33.18/hour x 1.5 = \$49.77/hour
HINU	500 x .5 hour = 250 hours	250 hours x \$25.25 = \$ 6,312.50	500 x .5 hour = 250 hours	250 hours x \$49.77 = \$12,442.50
Total	\$ 6,312.50 + \$12,442.50 = \$ 18,755.00			

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Printing: \$ 3000.00
Mailing: \$ 3000.00
Equipment: \$ 667.00
SIPI staff: \$78,097.25
HINU staff: \$18,755.00

Govt. Total: \$103,519.25

**From the table that incorporates the 2.50% General Schedule Increase 2008:
This method is based on BLS news release USDL: 07-1883 dated December 11, 2007.
https://www.opm.gov/oaca/08tables/html/g_s_h.asp**

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

While the program hasn't changed, the only adjustment is to the number of applications. SIPI receives more applications than students admitted because some applicants do not supply all the necessary documents; the process used was reviewed and produced different data, in part because of details required in ROCIS.

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.

A summary may be published with no identifiable information. The summary may be used for budget and planning purposes.

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 have the OMB Control Number and 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).

No exceptions are necessary to the certification statement.