

Information Collection Justification – USDA/1994 Tribal Scholars Program Application

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 USDA/1994 Tribal Scholars Program, a new program modeled after the USDA/1890 National Scholars Program under the Office of the Assistant Secretary for Civil Rights, Office of Outreach and Diversity, will be an annual recruiting effort by USDA/1994 Tribal College and University Liaison Specialists and the participating thirty-two 1994 Land-Grant Tribal Colleges and Universities Institutions (TCUs). This human capital initiative will be a collective effort geared toward attracting entering freshmen through rising junior students at 1994 TCUs into pursuing disciplines in the food, agriculture, natural resources, and related sciences at any of the 1994 TCUs. Our intention is to launch the USDA/1994 Tribal Scholars Program in 2009 but request emergency approval of this information collection package by January 12, 2009, to allow for the necessary and proper public announcement and distribution of application materials. The 1994 Program has just hired the first two 1994 Tribal College and University Liaison Specialists to be based at Little Big Horn College in Montana (Western Region) and Sitting Bull College in North Dakota (Central Region) to recruit students at 1994 TCUs in the West and Central United States, west of the Mississippi River, for the new USDA/1994 Tribal Scholars Program and conduct USDA outreach in Indian Country. The USDA 1994 Program Analyst in the 1994 Program Office at USDA Headquarters in Washington, D.C. will serve 1994 TCUs east of the Mississippi River, in the role of the Eastern Region 1994 Tribal College and University Liaison Specialist. Emergency approval of the Information Collection Justification by OMB for the next 180 days upon approval will allow 1994 Tribal College and University Liaison Specialists to begin recruiting scholars for the USDA/1994 Tribal Scholars Program for the spring 2009 semester. The 1994 Program will submit a full package for 3-year funding.

The USDA/1994 Tribal Scholars Program will offer scholarships to U.S. citizens at the freshman level who are seeking a bachelor's degree at one of the thirty-two 1994 TCUs. Tribal Scholars are required to study in the food and agricultural and related sciences, as defined by the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3103 (8)) which means: basic, applied, and developmental research, extension, and teaching activities in food, agricultural, renewable natural resources, forestry, and physical and social sciences, including activities relating to the following: a) animal health, production, and well-being; b) plant health and production; c) animal and plant germ-plasm collection and preservation; d) aquaculture; e) food safety; f) soil and water conservation and improvement; g) forestry, horticulture, and range management; h) nutritional sciences and promotion; i) farm enhancement, including financial management, input efficiency, and profitability; j) home economics; k) rural human

ecology; l) youth development and agricultural education, including 4-H clubs; m) expansion of domestic and international markets for agricultural commodities and products, including agricultural trade barrier identification and analysis; n) information management and technology transfer related to agriculture; o) biotechnology related to agriculture; and p) the processing, distributing, marketing, and utilization of food and agricultural products.

Each applicant will be required to submit either a hard copy of a USDA/1994 Tribal Scholars Program Application Form or apply on-line electronically (to be set up in the future) to their respective regional 1994 Tribal College and University Liaison Specialist assigned to the 1994 TCU to which they want to apply. The hard copy USDA/1994 Tribal Scholars Program application does not request Personally Identifiable Information (PII) in the form of a Social Security Number or date of birth, but does ask for a permanent address, which is PII. The 1994 Tribal College and University Liaison Specialist verifies applicant information, sanitizes (by whiting out) applications of Personally Identifiable Information (PII), sets up an applicant review committee and sends forward to USDA/1994 Program Director the top 10 applications per college. The 1994 Program does not keep PII on applicants, only very generalized information that does not contain PII. The USDA/1994 Program Director forwards sanitized applications to USDA/Agency selecting managers, whose agencies have pledged committed funds to support a scholar(s), for evaluation, interview and final selection. The USDA Human Resources Department of the Agency sponsoring each scholar will prepare the Student Career Experience Program (SCEP) paperwork needed by each selected scholar and requires students to fill out a U.S. Office of Personnel Management Optional Application for Federal Employment (OF-612).

2. Indicate how, by whom, how frequently, 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.

The Purpose of the USDA/1994 Tribal Scholars Program is to:

- (1) strengthen the long-term partnership between USDA and the 1994 Land-Grant Tribal Colleges and Universities Institutions;
- (2) increase the number of students studying agriculture, food, natural resource sciences, or other related disciplines; and
- (3) offer career opportunities to USDA/1994 Tribal Scholars at the U.S. Department of Agriculture.

The USDA/1994 Program Office will provide each of the thirty-two 1994 TCUs with applications and brochures about the USDA/1994 Tribal Scholars Program for distribution in their respective recruiting area and events, as well as for individual requests. The USDA/1994 Program will also distribute applications through its network and at the request of individuals and organizations. The recruitment cycle for the USDA/1994 Tribal Scholars Program will start the first week of September and end by February 1st.

- A. Applicant completes the application packet by established deadline and mails to the 1994 Tribal College and University Liaison Specialists in their respective region.
- B. 1994 Tribal College and University Liaison Specialists verify information on applications submitted to their regions, including official transcript, to ensure applicants meet minimum eligibility requirements, that transcript is official, sanitizes application of Personally Identifiable Information (PII) and forwards student profiles to USDA/1994 Program Director.
- C. The 1994 Tribal College and University Liaison Specialists facilitate peer review panels at the 1994 TCUs to review applications. Each screening committee selects up to 10 eligible finalists from each Region, each of whose hard copy sanitized application is forwarded to the USDA/1994 Program Director.
- D. USDA/1994 Staff Assistant enters for the USDA/1994 Program Office records general information (name, hometown, university(s) attending, major, grade point average, and test scores) on each finalist to establish a profile which does not contain PII and ensures that this information is carefully protected. USDA Human Resources personnel are responsible for scholars' PII in paperwork required for each scholar selected by a sponsoring agency, not the USDA/1994 Program.
- E. USDA/1994 Director distributes the sanitized profiles to USDA Agency Coordinators who review the applicant material and communicate with their USDA Agency Heads for final scholar selection and scholarship funding commitment in a particular area of the food and agricultural and related natural resources sciences needed by the USDA Agency. Upon request from Agency Coordinators, USDA/1994 Program Director provides actual copies of the requested candidates' sanitized application and sanitized official transcript as a means of gaining insight into potential candidates for scholarship consideration.
- F. USDA Agency Coordinator(s) is responsible for safeguarding the privacy of the information contained in the candidates' sanitized applications.
- G. For each scholar selected, the USDA sponsoring agency, student, and student's 1994 Tribal College sign a USDA/1994 Tribal Scholars Program Student Career Experience Program/Service Agreement. Each sponsoring Agency's USDA Human Resources representative handles required scholar paperwork, PII, and System of Records pertaining to the scholars they sponsor. Students are required to fill out an OF-612.
- H. The USDA/1994 Tribal Scholars Program will provide a Scholars Orientation, while USDA Sponsoring Agencies provide the student scholar full tuition, employment, housing during summer employment, employee benefits, fees, books, loan of a laptop computer, a printer, and software while on scholarship, each year for up to 4 years, to student pursuing a bachelor's degree in the food, agriculture, natural resources and related sciences at the following universities:

Bay Mills Community College, Brimley, Michigan

Blackfeet Community College, Browning, Montana
Cankdeska Cikana Community College, Fort Totten, North Dakota
Chief Dull Knife College, Lame Deer, Montana
College of the Menominee Nation, Keshena, Wisconsin
Diné College, Tsaile, Arizona
Fond du Lac Tribal and Community College, Cloquet, Minnesota
Fort Belknap College, Harlem, Montana
Fort Berthold Community College, New Town, North Dakota
Fort Peck Community College, Poplar, Montana
Haskell Indian Nations University, Lawrence, Kansas
Institute of American Indian Arts, Santa Fe, New Mexico
Ilisagvik College, Barrow, Alaska
Lac Courte Oreilles Ojibwa Community College, Hayward, Wisconsin
Leech Lake Tribal College, Cass Lake, Minnesota
Little Big Horn College, Crow Agency, Montana
Little Priest Tribal College, Winnebago, Nebraska
Navajo Technical College, Crownpoint, New Mexico
Nebraska Indian Community College, Macy, Nebraska
Northwest Indian College, Bellingham, Washington
Oglala Lakota College, Kyle, South Dakota
Saginaw Chippewa Tribal College, Mount Pleasant, Michigan
Salish Kootenai College, Pablo, Montana
Sinte Gleska University, Mission, North Dakota
Sisseton Wahpeton College, Sisseton, South Dakota
Sitting Bull College, Fort Yates, North Dakota
Southwestern Indian Polytechnic Institute, Albuquerque, New Mexico
Stone Child College, Box Elder, Montana
Tohono O'odham Community College, Sells, Arizona
Turtle Mountain Community College, Belcourt, North Dakota
United Tribes Technical College, Bismarck, North Dakota
White Earth Tribal and Community College, Mahanomen, Minnesota

- 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.

At the time of this submission, the USDA/1994 Tribal Scholars Program does not have an on-line application process. As a new scholarship program, the USDA/1994 Tribal Scholars Program will begin its first year using hard copy versions of the application, brochure, and instructions.

We will seek the counsel of the Office of the Assistant Secretary for Civil Rights' (OASCR) Webmaster about setting up an electronic submission of the application process for the USDA/1994 Tribal Scholars Program. The USDA/1994 Program will request internet approval to post the application and information about the new USDA/1994 Tribal Scholars Program on the Office of the Assistant Secretary for Civil Rights' (OASCR) website starting in 2009.

The USDA/1994 Program has consulted with Directors of other established USDA scholarship programs about how they handle their information collection as the new USDA/1994 Tribal Scholars Program was developed. The Director of the 1890 Program has offered invaluable advice. The Director of the USDA Hispanic Serving Institutions National Program has offered the expertise of their Webmaster to recommend how the new USDA/1994 Tribal Scholars Program can best utilize the most current information technology for electronic submission of applications and most efficiently communicate with applicants and their 1994 Tribal College Tribal College Liaison Specialists in the field, who help recruit and review applications.

The USDA/1994 Tribal Scholars Program application includes a section for Secondary School Assessment of the applicant by a counselor, teacher or Principal. The USDA/1994 Tribal Scholars Program is requesting two recommendation letters, like the USDA/1890 National Scholars Program requirement.

Additional recommendations include making the application an on-line process and utilizing a one-page application/resume with an essay of up to 1000 words and requiring 2 recommendation letters.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

USDA is the only agency (Department) that collects this information.

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

This collection does not affect small businesses or other 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.

If the program did not exist, USDA would be unable to award scholarship to the applicants.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

The information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1230.5.

- **requiring respondents to report information to the agency more often than quarterly;**

Respondents are not required to respond quarterly.

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

The USDA/1994 Program will investigate setting up an on-line application process to reduce the burden on respondents, in this case, USDA/1994 Tribal Scholars Program applicants, teachers, and counselors, when they are asked to prepare a written response to a collection of information in fewer than 30 days after receipt of it to help these respondents comply with time-sensitive application requirements of the USDA/1994 Tribal Scholars. The USDA/1994 Program will need to investigate how best to do this given the varying infrastructure and equipment of the Nation's thirty-two 1994 Tribal Colleges and Universities and where feasible, as most 1994 Tribal Colleges are in remote locations and may experience internet connectivity and service problems.

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

The USDA/1994 Program will investigate a procedure for requiring just one original of any document required to apply for the USDA/1994 Tribal Scholars Program and scanning needed copies at USDA Headquarters in Washington, D.C. and also setting up an on-line application process to reduce the burden on respondents, in this case, USDA/1994 Tribal Scholars Program applicants, teachers, and counselors, when they are asked to submit more than an original and two copies of any document, to help these respondents comply with time-sensitive application requirements of the USDA/1994 Tribal Scholars. The USDA/1994 Program will need to investigate how best to do this given the varying infrastructure and equipment of the Nation's thirty-two 1994 TCUs and where feasible, as most 1994 Tribal Colleges are in remote locations and may experience internet connectivity and service problems.

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

The 1994 Program will keep only general profile information on each applicant. The USDA Human Resources staff contact for each sponsoring agency will maintain files on all of the applicants selected by participating USDA agencies.

- **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;**

This is not a survey.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **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 secret, 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.**

Respondents are not required to submit because it does not infringe upon this area.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

We are requesting emergency approval for this collection. A public notice with request for comments for this application will be published in the Federal Register regarding this information collection and program guidelines. In addition, the USDA/1994 Program will contact representatives of the 1994 Community to provide their inputs on this program. The inputs will be used when establishing program guidelines.

- 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 form, and on the data elements to be recorded, disclosed, or reported.**

A USDA/1994 Tribal Scholars Working Group, made up of both USDA and Tribal College and University members of the USDA/American Indian Higher Education Consortium, a USDA advisory group to the Secretary of Agriculture, developed the USDA/1994 Tribal Scholars Program Handbook with particular attention to developing an application form with information elements requested and instructions that were clear.

Daphne Littlebear (505-514-7679)

Ashley Roseboro (202-260-1517)

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

This information collection activity involves no payments or gifts to respondents.

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

No additional assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

- 11. Provide additional justification for any questions of a sensitive nature, such**

as sexual behavior or 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.

This information collection activity will ask no questions of a personal or sensitive nature.

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. 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.**

Respondents: USDA/1994 Tribal Scholars Program Applicants

Estimated number of Respondents to complete all sections of application..... 1440

(Burden Estimation Explanation: Per Larry Holmes/Linda Oliphant, USDA Natural Resources Conservation Service pilot Tribal Scholars Program in 2005: Basis: average 15 applicants per Tribal College and University (TCU) x 32 1994 TCUs = 480 applications annually with Student/Counselor/Teacher filling out application sections = 1,440 total respondents completing all sections of application. Information Collection burden average: 1.2 hours per response. Teacher: 30 minutes; Counselor-1 hour; Student 2 hours = 3.5 hours/3 persons = 1.2 hours per response)

Estimated Average time to complete whole application.....3.50 hours

Applicant section.....2.0 hours

Teacher section.....0.5 hours

Counselor section.....1.0 hours

Estimated Average time per respondent.....1.2 hours

Estimated number of respondents per application.....3

Estimated total Annual Response.....1440
 Estimated total Collection Burden.....4,320 hours

Respondent's Estimated Annual Cost for the hour

Burdens for collections of information.....\$149,040

(Basis: Estimated total Collection Burden (4,320 hours) x Burden cost for collection (\$34.50) = \$149,040.00)

Hourly Wage Burden of Collection from three 1994 TCU Liaisons..... \$1,798

(Basis:

USDA/ 1994 Program Analyst/Eastern Region 1994 TCU Liaison Specialist's hourly wage (\$47 hourly wage x 2 hours x 5 1994 Tribal Colleges and Universities served \$470

Western Region 1994 TCU Liaison Specialist hourly wage (\$26 hourly wage x 2 hours x 14 1994 Tribal Colleges and Universities served..... \$756

Central Region 1994 Tribal College Liaison Specialist's hourly wage (\$22 hourly wage x 2 hours x 13 1994 Tribal Colleges and Universities served\$572)

Applicant section (\$6/hr @ 2.0 hours).....\$12.00

Teacher section (\$15/hr @ 0.50 hours).....7.50

(Basis: \$15 hour in rural area secondary schools)

Counselor section (\$15.00/hr @ 1.0 hours..15.00

Burden cost for collection \$34.50

Applicant completes his/her section of application and forwards the other two sections to teacher and counselor for completion. Applicant wages based on minimum wages and general mailing cost associated with mailing documents. Teacher and counselor average salary. Applicant spends two hours completing their required section while counselor utilizes one hour and teacher utilizes less than an hour (30 minutes) to complete their sections.

13. Provide estimates 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 estimates should be annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There is not capital or start up cost.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Annual Federal Government Cost

Estimated Mailing Cost + Shipping/Handling for USDA/1994 Tribal Scholars Program Manager to send applications to Tribal Colleges & others..... \$10,304.00

(Basis: \$322 mailing/shipping x 32 1994 Tribal Colleges)

Estimated Printing Cost of 10,000 Applications.....\$18,000.00

(We are printing in bulk to save on printing costs. 1400 applications will be mailed out the first year and other copies used in subsequent years)

Estimated Mailing cost/university to mail applications to candidates (Basis: \$100.00 x 32 Tribal Colleges/Universities).....\$3,200.00

Estimated Travel Time for Recruiting.....\$49,769.00
(Basis: Forty percent of the 1994 TCU Liaison Specialists' salary (Western Region), GS-11/Step 1 \$54,494.....\$21,798.00

Forty percent of the 1994 TCU Liaison Specialist's salary (Central Region), GS-9/Step 1 \$45,040.....\$18,016.00

Ten percent of the 1994 Program Analyst's salary (serving as 1994 TCU Liaison Specialist for the Eastern Region), GS-13/Step 7 \$99,557.....\$9,955.00)

Note: In the first year start-up phase, more travel time will be needed for publicizing the new USDA/1994 Tribal Scholars Program and recruiting. 1994 TCU Liaison Specialists based in the Western and Central Regions west of the Mississippi will each be recruiting (40% of their time). The 1994 TCU Liaison Specialist based in the Western Region is assigned to serve fourteen 1994 Tribal Colleges and Universities, the 1994 Tribal College Liaison Specialist based in the Central Region is assigned to serve thirteen 1994 Tribal Colleges and Universities, while the 1994 Program Analyst at USDA Headquarters in Washington, D.C. will be spending 10% recruiting time at five 1994 Tribal Colleges and Universities east of the Mississippi and interacting with 1994 Tribal College Liaison Specialists at recruiting events in the field at Western and Central Region 1994 Tribal College locations.

Estimated time for 1994 TCU Liaison Specialist to screen applications upon receipt (Hourly rate Liaisons = Western Region Liaison \$26 hour; Central Region Liaison \$22 hour; hourly rate 1994 Program Analyst = \$47; av= \$32 hr)

15 applications averaged/university (top 10 will be sent to USDA)

30 minutes each = 7.5 hours x \$32/hr = \$285/University.....	\$9,120.00
Hours preparing applications for screening by Tribal College selection committee (Basis: 3 hours @ \$29/hr = \$86.00 x 32 Tribal Colleges =	\$2,784.00
Mailing cost per university (\$50) to mail applications to 1994 Program Director at USDA Headquarters in Washington, D.C. =	\$1,600.00
1994 Tribal Scholars Program development of profiles for distribution to USDA Agencies and Preparation (\$45/hr x 2 hours x 32 Tribal Colleges)	\$2,880.00
<hr/>	
Total Annual Federal Government Cost.....	\$97,657.00

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

This is a new program collection of information.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The Office of the Assistant Secretary for Civil Rights has no plans to publish information it collects in connection with this program.

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.

The Office of the Assistant Secretary for Civil Rights requests not to display the date but will display OMB control number due to printing costs.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

The Office of the Assistant Secretary for Civil Rights can certify compliance with all provisions in the Act.