

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Indian Education Discretionary Grant 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 Office of Indian Education (OIE) of the Department of Education (ED) requests clearance for the Indian Education Discretionary Grant Applications authorized under Title VII, Part A, of the Elementary and Secondary Education Act, as amended. The Demonstration Grants for Indian Children (CFDA 84.299A), referred to as Improving Educational Opportunities for Indian Children in the Act, and the Professional Development (CFDA 84.299B) programs are competitive discretionary grant programs. The grant applications submitted for these programs are evaluated on the basis of how well an applicant addresses the selection criteria, and are used to determine applicant eligibility and amount of award for projects selected for funding.

The selection criteria used for the Demonstration Grants for Indian Children programs are those in 34 CFR 75.210 of EDGAR (Education Department General Administrative Regulations).

The selection criteria used for the Professional Development Grant program are included in 34 CFR 263.6. Sections 263.7, 263.8, 263.9, and 263.10 also have information collection requirements addressed in this clearance request relating to statutory or regulatory requirements.

No changes to the regulations or the information collection in 34 CFR 263, previously approved under clearance number 1810-0580, have been made in this request for clearance.

This collection is for a Discretionary Grant that falls under the Streamlined Clearance Process for Discretionary Grants, #1890-0001.

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.

The type of information provided in the application includes: the purpose of the project; the objectives, activities, and timelines for the funding period requested, qualifications of key personnel; the evaluation procedures to be used to measure progress and effectiveness of the project; and a detailed budget and description of resources. The selection criteria used for the Demonstration Grants for Indian Children program are those in 34 CFR 75.210 of EDGAR (Education Department General Administrative Regulations). The selection criteria used for the Professional Development Grant program are included at 34 CFR 263.6.

Eligible applicants submit the information to describe the project for which funding is requested. The information provided by the applicant addresses the selection criteria for the program. The application is evaluated through a peer review process and an application's score is used to determine its ranking and selection for funding. Projects may be funded for up to five years.

Although this application covers two programs, the information collected from each program is the same except: specific components of the selection criteria must be addressed for each program due to the difference in program services that are to be provided.

Eligible applicants for the programs include:

- For Demonstration Grants -- an SEA, LEA, Indian tribe, Indian organization, federally supported elementary and secondary school, Indian institution, or a consortium of eligible entities.
- For Professional Development Grants – (1) an institution of higher education, including an Indian institution of higher education; (2) a State or local educational agency, in consortium with an institution of higher education; (3) an Indian tribe or organization, in consortium with an institution of higher education, and (4) schools funded by the Bureau of Indian Affairs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or 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 information technology to reduce burden.

For the prior two years, these grant programs have required electronic submission of applications through the grants.gov system. For those applicants that do not have the capability for on-line submissions through the Internet, the application may also be submitted in hard copy format if an exception is requested in writing at least two weeks prior to the closing date. Additionally, as of October 2005, all performance reports for these

grant programs must be submitted through the Department's e-reports system enabling on-line administration and review of the projects.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

No duplication of effort exists. This information collection requests information specifically for discretionary Indian education programs authorized under section 7121-7122 of the Elementary and Secondary Education Act. Applicants will be required to provide information that addresses the statutory purpose and requirements, as well as the selection criteria. Although there are other Indian education programs in the Department, they are authorized under different legislation and their purposes and requirements differ from those under this program.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

This information collection requirement does not place a significant burden on small businesses.

6. Describe the consequences 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 this information is not collected, the Department will be unable to make grant awards in a timely manner. Applications provide information describing the project for which funding is requested. The information collected is necessary to evaluate the applications and select projects for funding annually.

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;**

Only one grant competition for new awards is held annually. Respondents submit the information collection for each new grant they desire.

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

The time period from the date of availability of the information collection, as published in the Federal Register, to the date by which respondents must respond (i.e., the closing date which is also published in the Federal Register) is not be less than 30 days.

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

document;

Respondents are required to submit applications electronically (grants.gov) and performance reports (e-reports). Respondents that meet the exception to submitting an application via the grants.gov system are not be required 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;**

Respondents will not be required to retain 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 the study;**

The information collection is not connected with a statistical survey.

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

The information collection is not connected with a statistical survey or statistical data classification.

- **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 information collection does not request data that is confidential.

- **requiring respondents to submit proprietary trade secrets, or other confidential information the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information collection does not request data that is of a proprietary nature or confidential.

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 any public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

- **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.

- **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.**

A copy of the proposed selection criteria for each program has been provided to the Department's National Advisory Council on Indian Education for review and comment. No comments or suggestions have been received on the information collection.

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

No payments or gifts to respondents will be provided.

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

Confidential information is not requested. However, some applicants may include information within an application that is personally identifiable. Such information, which may include resumes of staff with home addresses, home telephone numbers, or similar personal information, is not released under the exemptions of the Freedom of Information Act.

- 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.**

Information of a sensitive nature is not requested.

- 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.**

The estimated total number of applications anticipated is based on past experience with these programs. Although the information collection covers two discretionary grant programs, the burden for each program is approximately the same as only the selection criteria to be addressed are different based on the specific program services to be provided.

It is estimated that a total of 175 applications will be received annually for the grant competitions.

<u>Respondent Type</u>	<u>Number</u>	<u>Est. or Av. Person Hours Per Respondent</u>	<u>Total Hours</u>
New Applicants:			
Demonstration Prog.	125	30 hrs.	3,750
Prof. Dev. Program	50	30 hrs.	<u>1,500</u>
			5,250

The estimated burden includes development and typing for all applicants, and recordkeeping and maintenance of evaluation information by actual grantees.

<u>Respondent Type</u>	<u>Number</u>	<u>Est. or Av. Person Hours Per Respondent</u>	<u>Total Hours</u>
Recordkeeping Burden	16*	15 hrs.	240

*For FY 2007, approximately 12-16 awards (total) are anticipated based on the level of funds available for new awards. This number has been typical for new awards over the last few years.

Total annual burden hour estimates:

Respondents	5,250
Recordkeeping	<u>240</u>
	5,490

The total annual burden for the two programs is estimated to be 5,490 hours.

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

The application covers two programs that can both be addressed by one information collection. As the information to be provided for each program is similar in content and burden, only one application package has been developed. The only difference in the programs is the selection criteria that must be addressed by the applicant based on the type of services to be provided under each program.

- **Provide estimates of annualized costs 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 the cost should be included in Item 14.**

As the burden for each program is the same, the cost per applicant for compilation of the information and completion of the application is estimated to take 30 hours for each program. Estimates are based on the basic hourly rate of a GS 13/1 for development of the application and the basic hourly salary of a GS 4/1 for clerical support.

Annual Cost to Respondents for the hour burden associated with the collection of information:

27 hrs. x \$31.54 @ hr. = \$851.58 Development
3 hrs. x \$ 10.79 @ hr. = \$ 32.37 Clerical support
\$883.95 x 175 = \$154,691

13. Provide an estimate of the total annual 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).

There is no additional annual cost burden to respondents and recordkeepers from this collection of information.

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 cost to the government includes initial printing costs of the application, postage and staff time for distribution to applicants. Costs are estimated as follows:

300 copies x \$1.00 = \$300.00 printing
300 x \$1.00 = 300.00 postage
7 ½ x \$10.79 = 80.93* distribution
\$680.93

*Calculated at the hourly wage of a GS-4/1 for 2 minutes per form for mailing (300 copies x 1 ½ min. each = 450 min. or 7 ½ hours)

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

An adjustment of –350 hours to 5,490 hours is requested due to electronic submissions of the application streamlining the submission process for respondents.

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

Results of the individual information collected will not be published.

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.

Such approval is not being requested.

18. Explain each exception to the certification statement identified in Item 20, “Certification of Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the certifications.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on Form 83-I is checked “yes,” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.
2. Describe the procedures for the collection of information, including:
 - Statistical methodology for stratification and sample selection.
 - Estimation procedure.
 - Degree of accuracy needed for the purpose described in the justification.
 - Unusual problems requiring specialized sampling procedures, and
 - Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.
4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.
5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.