

U.S. Department of Education

Indian Education Professional Development Grants Program: GPRAs and Service Payback Data Collection

Section A

*Office of Management and Budget
Clearance Package Supporting Statement
And Data Collection Instrument*

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**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

INTRODUCTION

The Indian Education Professional Development (IE PD) Grants program provides grants to prepare and train Indians (*i.e.*, *American Indians/Alaska Natives*) to serve as teachers and school administrators. The specific goals of the IE PD program are to: 1) increase the number of qualified individuals in professions that serve American Indians/Alaska Natives; 2) provide training to qualified American Indians/Alaska Natives to become teachers, administrators, teacher aides, social workers, and ancillary education personnel; and 3) improve the skills of those qualified American Indians/Alaska Natives who already serve in these capacities. Individuals trained under this program must perform work related to their training and that benefits American Indian/Alaska Native people, or repay all or a portion of the cash value of training costs.

The Office of Indian Education (OIE) is submitting this application to request approval to:

- collect from IE PD grantees contact and project service information for **all** IE PD participants;
- collect employment and continuing education information from IE PD participants who are not in an approved and active deferment once they have exited the program; and
- verify employment information on **all** IE PD participants who have exited the program and are working at a school in a target local educational agency (LEA), which is an LEA that enrolls 5 percent or more American Indian/Alaska Native students.¹

The proposed data collection serves three purposes. First, data from three sources (grantees, project participants, principals/LEA representatives²) are necessary to assess the performance of the IE PD program on its *Government Performance Results Act (GPRA)* measures (see Section A1, below). Second, data from all three sources are necessary to determine if IE PD participants are fulfilling the terms of their service/cash payback requirements. Finally, budget and project-specific performance data are collected from IE PD grantees for project-monitoring and compliance information.

This application contains the justification for this request. The proposed forms and protocols contained in this package include the Semi-Annual Participant Report (SAPR), the Participant Follow-Up Protocol and the Employment Verification Form. All are contained in the appendices.

A. JUSTIFICATION

A1. Circumstances Making the Collection of Information Necessary

Information in the SAPR, the Participant Follow-Up Protocol, and the Employment Verification Form is being collected in compliance with *Elementary and Secondary Education Act of 1965*, as amended by the *No Child Left Behind Act of 2001*, Title VII, Part A, Subpart 2, Secs. 7121-7122; 20 U.S.C. 7441 - 7442 (shown in appendix A), and the *Government Performance Results Act (GPRA) of 1993*, Section 4 (1115) (shown in appendix B).

¹ Service in a private school with a minimum American Indian and Alaska Native enrollment of 5 percent also counts as an approved setting.

² Participants who achieve employment as a teacher or vice principal will solicit employment verification from the principal at the school(s) of their employment. Participants who achieve employment as a principal will solicit employment verification from the appropriate representative at the LEA of their employment.

There are six *GPRA* performance measures for the IE PD program. They are:

Measure 1 of 6: The percentage of participants in administrator preparation projects who become principals, vice principals, or school administrators in local educational agencies (LEAs) that enroll 5 percent or more American Indian and Alaska Native students.

Measure 2 of 6: The percentage of participants in teacher preparation projects who become teachers in LEAs that enroll 5 percent or more American Indian and Alaska Native students.

Measure 3 of 6: The percentage of program participants who meet the definition of “Highly Qualified” in section 9101(23) of the ESEA.

Measure 4 of 6: The percentage of program participants who complete their service requirement on schedule.

Measure 5 of 6: The cost per individual who successfully completes an administrator preparation program, takes a position in a school district with at least 5 percent American Indian/Alaska Native enrollment, and completes the service requirement in such a school district.

Measure 6 of 6: The cost per individual who successfully completes a teacher preparation program, takes a position in a school district with at least 5 percent American Indian/Alaska Native enrollment, and completes the service requirement in such a school district.

Information also is collected to determine the value of each participant’s service or cash payback, which is a requirement of project participation. To determine this value, the IE PD program office must determine, for each project participant, the total training costs and number of months in training (information received from the grantee), and the status of service payback (information received from participants). These data cannot be collected from other sources. **Information must be received on all project participants.**

The SAPR collects detailed information on participants that will allow individual follow up by the IE PD program office. Participant contact information, participant alternative contact information, participant project status and participant placement status, along with budget information and project-specific objectives and performance measures, are reported by grantees in the SAPR at the close of the 2nd and 4th quarters of the project year. OIE also must receive follow up from individual participants and their principals or LEA representatives (if the participant is employed in a target LEA). Data from all three sources are required for *GPRA* reporting and service payback monitoring.

A2. Purposes and Uses of the Data

There are three primary purposes for the data that are being collected. The first use is to fulfill *GPRA* reporting requirements. In 1993, *GPRA* was passed that requires federally funded agencies to develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program. However, IE PD needs data directly from participants and their principals/LEA representatives in addition to grantee data for *GPRA* reporting.

The second use of the data is to ensure participants complete a payback requirement that equals the number of months in training (for service payback) or the amount of training costs incurred (for cash payback). To fulfill service payback, participants are required to:

- a) achieve placement in a LEA with at least 5 percent American Indian/Alaska Native students;
- b) work in a subject area in which they received training through project services; and
- c) continue their placement for a duration of time equal to that of time owed for payback in months.

If the participant fails to complete the PD training or fails to complete the service payback requirement, the participant is required to pay back all or a portion of their training costs. Training costs are the total dollar amount the participant received in tuition, fees, books, childcare, or other expenses. Participants may defer their payback requirements if they are enrolled as full-time students in an approved education program at an accredited institution of higher education. The participant must submit a written request for deferment to the program office that includes the name of the institution, a copy of the admission letter, the degree being sought, and projected date of completion. After deferment has been granted, the participant must provide proof of ongoing full-time student status. The program office must receive information from the grantee that allows follow up with the participant. The program office also must receive information from the participant's principal or LEA representative with regard to placement, position, "Highly Qualified" status for those teaching, and post-project employment duration.

The third use of the data is to collect contact, budget and project-specific performance information from grantees for project monitoring. As multi-year award recipients, IE PD grantees must provide the most current performance and financial expenditure information to ED as directed by the Secretary under 34 CFR 75.118 for continued funding.

Data collection

To fulfill all of these purposes, the data collection involves grantee, participant, and principal/LEA representative components. In the grantee component, all IE PD grantees will submit semi-annually contact and service information for all IE PD participants using the SAPR, which is found in Appendix C. For the first SAPR submission, grantees will provide information on all IE PD participants ever enrolled in the project since the start of the grant. For subsequent SAPR submissions, grantees will update information on participants from the previous submission (including any leaves of absences or other exits) and add entries for new participants. Grantees will report this information on all participants for the length of the grant award. Grantees will report this information twice a year at the end of the 2nd and 4th project quarters. Grantees will also provide budget and project-specific performance information on the SAPR.

In the participant component, IE PD participants will initiate contact with IE PD staff within 6 months of exiting the PD program and every 6 months thereafter for the length of their service payback period to report their employment and continuing education information. Note that all participants are supposed to report their employment status to IE PD as part of their service payback requirement. IE PD staff will follow up with participants if they fail to contact OIE. We expect that participants may initiate contact with IE PD staff by phone or email, and IE PD staff will follow up primarily by phone or email. Regardless of how contact is established, the IE PD staff will use the Participant Follow-Up Protocol to obtain employment and continuing education information (see Appendix D).

Data from participants will be collected twice a year to reduce the possibility of losing contact with participants over time. Loss of contact can cause problems if a participant is supposed to enter cash payback but cannot be found or if the participant is actually fulfilling a service payback requirement without the program office's knowledge.

In the principal/LEA representative component, participants working in an LEA enrolling 5 percent or more of the target population will give the Employment Verification form to their principal or LEA representative to complete. Through this form, the principal/LEA representative will verify employment information and identify whether a participant who is teaching is Highly Qualified in the subject(s) taught. This information is required for *GPRA* measure 3 (see Section A1, above). The principal/LEA representative will send the completed Employment Verification Form directly to OIE. The participant must initiate the employment verification process every 6 months for the length of his or her service payback requirement. The Employment Verification Form is found in Appendix E.

The IE PD staff will use the data from all three components to create a database with participant contact, project service, continuing education, employment, and service payback information. The database will be updated as needed throughout the length of the participant's IE PD project training and service payback experience.

Uses of the data

The IE PD program office staff will use this database to report on the program's *GPRA* measures to the U.S. Department of Education's (ED's) Budget Service. The aggregated performance data will also be included in ED's Annual Program Performance Report.

IE PD program office staff also will use the database to determine whether participants fulfill their service payback requirements. If a participant does not fulfill his/her service payback requirement, the collected data will help IE PD staff determine the cash amount an individual must pay back. These are essential aspects of project oversight, such that the program office can ensure that project participants are fulfilling requirements stipulated in program application materials. Projects bear the responsibility of informing participants of their responsibilities and providing participants with adequate information such that participants can voluntarily contact the program office upon exiting project services. Without participant follow up, the program office can only determine if participants are fulfilling their service requirement **if the participants voluntarily maintain contact with the program office**. This approach will likely result in very poor data regarding the fulfillment of service requirements and program performance.

A3. Use of Technology to Reduce Burden

The SAPR will be submitted through ED's e-Reports system at <http://e-grants.gov>, which allows grantees to submit this information over the Internet.

A4. Efforts to Identify Duplication

Participant information will be updated on a semi-annual basis but there will be no duplication of reporting efforts per participant, grantee or principal/LEA representative. The information requested for this reporting is not collected or reported elsewhere.

A5. Methods to Minimize Burden on Small Entities

The forms were designed to solicit only the information necessary to respond to program and *GPRA* requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet federal requirements for budget and program activity data.

A6. Consequences of Not Collecting Data

Annual or periodic performance reporting is stipulated in *GPRA* 1993, Section 4. The SAPR form will

provide a standardized means for grantees to report on the status of individual participants as is necessary for the program office to complete *GPRA* data collection and reporting. Without these data and the data from the Participant Follow-Up Protocol and Employment Verification Form, the program office does not have a reliable and consistent means of collecting *GPRA*-related data from individual participants. Participant contact, in turn, is necessary to collect data related to participant employment--without participant follow up, the program office may not know where participants are employed. The verification of employment and determination of Highly Qualified status for teachers is collected from the principal/representative of the schools/LEAs in which participants find employment.

In addition, participant follow-up is necessary for the program office to monitor service payback requirements. The only way that the program office can monitor completion of service requirements equal in value to that of the months in training is through systematic and on-going follow up with participants and their employers (i.e., the principal or LEA representative).

The consequence of not collecting the data, conducting follow up with participants, and receiving employment verification from principal/LEA representatives is a failure to ensure all participants are complying with statutory requirements.

A7. Special Circumstances

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

A8. Federal Register Comments and Persons Consulted Outside the Agency

We will publish the 60-day *Federal Register* notice and provide this document when available.

[INSERT FEDERAL REGISTER NOTICE HERE.]

2008 IE PD grantees were given the opportunity to review a draft of the SAPR and provide feedback on the availability of data, frequency of data collection, the clarity of instruction, and recordkeeping. The project directors/grantees represented were:

- Ms. Amy Burland, Salish Kootenai College, Montana
- Ms. Barbara Bacon, Stone Child College, Montana
- Mr. Art Fisher, Oglala Lakota College, South Dakota
- Dr. Eric Madsen, University of Alaska-Fairbanks
- Dr. John Tippeconnic, Pennsylvania State University

Further, all grantees will be encouraged to submit feedback during the 60-day public comment period.

A9. Payments or Gifts

There are no payments or gifts to grantees in support of the data collection.

A10. Assurances of Confidentiality

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the “Buckley Amendment,” Family Educational and Privacy Act of 1974, 20 USC

1232 g; The Freedom of Information Act, 5 USC 522; and related regulations, including but not limited to: 41 CFR Part 1-1 and 45 CFR Part 5b and, as appropriate, the Federal common rule or ED's final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations.

Materials received from grantees will contain participant name and contact information, participant social security number (SSN), participant date of birth, an alternate contact's name and contact information, and information on the participant's participation in project training. OIE strongly recommends that grantees a) inform participants that their information will be kept confidential and b) request a written release from participants to provide these data to OIE. However, participant follow up also is a condition of project participation; if participants fail to comply with requirements to initiate contact with OIE, OIE must have some recourse to initiate contact with all participants and thus acquire data relevant for *GPRA* reporting and project payback requirements. Personally Identifiable Information will not be collected until a System of Records Notice has published.

Project staff will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. OIE's digital database is limited to OIE staff members needing access for data entry or management purposes and limits access according to differing levels of permission. The database is operated under Microsoft ACCESS and is backed up daily via ED's default server practices. Should any issue arise, back up files may be accessed for recovery purposes. Payback files are maintained in a locked cabinet accessible by only those who have the authority to work with these files.

Information submitted using the Grants Administration Payment System (GAPS) is protected in two ways. First, all access to GAPS is password protected with passwords changed every three months. Second, access to passwords is selectively granted to individuals based on rank and responsibility.

A11. Justification of Sensitive Questions

Questions regarding SSN, employment status, and service payback status may be considered sensitive. However, the employment and service payback status questions are necessary to directly respond to *GPRA* measures and program requirements for service payback. SSN is needed to track individuals who fail to keep in contact with the IE PD program office and are turned over to ED's Debt Management Group. The Debt Management Group needs SSN to try to locate participants in other databases including Internal Revenue Service databases.

A12. Estimates of Hour Burden

Table A-1 presents **maximum** annual burden estimates for grantees and participants. The program office estimated that 36 active grantees and 1,020 participants would be affected.

At each semi-annual data collection, the number of participants followed up and the number of principals/LEA representatives verifying employment will vary depending on when participants exit project training. For the purposes of estimating burden, we present the maximum burden estimate by assuming that all of the estimated 1020 participants will be contacted semi-annually and all participants will be employed in target LEAs.

The burden for grantees of completing the portion of the SAPR without participant data is estimated at 20 hours per grantee per semi-annual collection. We anticipate that grantees will require at least 2 hours per participant to complete the portion of the SAPR with participant data.

For participants, follow up begins within 6 months of completing or exiting project services. The number of participants requiring follow up in any given project year may range from zero per project (if all participants are still enrolled in project services) to as many as 1020 participants across all projects. We anticipate that participant burden for follow up will be 30 minutes every 6 months.

For principals/LEA representatives, the participant will initiate employment verification within 6 months of a participant's completion of project services and placement with the LEA. Some participants either do not stay employed in education or enter deferment due to approved on-going education. Therefore the number of principals/LEA representatives asked to provide verification may be lower than the number of participants that exited the IE PD training. We anticipate the principal/LEA representative burden to be one hour per participant every 6 months.

For burden estimates, we assume that grantee administrators and principals/LEA representatives have an hourly rate of \$50. We assume an average hourly rate of \$37.50 for participants, understanding that some participants may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is \$416,250 across all grantees, participants, and principals/LEA representatives.

Table A-1. Maximum Annual Burden Estimates, by Data Source

Data Source	Estimated Number of Participants	Estimated Semi-Annual Burden per Participant (in Hours)	Estimated Semi-Annual Burden (in Hours)	Estimated Semi-Annual Cost (in Dollars)	Estimated Total Annual Cost (in Dollars)
Grantees: Budget & project-specific performance data for SAPR	36 grantees	20	720	\$36,000 ¹	\$72,000 ¹
Participants: follow up with IE program office	1,020 participants	.5	510	\$19,125 ²	\$38,250 ²
Principals/LEA representatives: completion of Employment Verification Form	1,020 participants employed in schools ³	1	1,020	\$51,000 ¹	\$102,000 ¹
Totals	2076		2250	\$208,125	\$416,250

¹ Based on an estimated hourly rate of \$50 for grantee administrators and principals/LEA representatives.

² Based on an estimated average hourly rate of \$37.50 for participants.

³ Assumes that all participants are employed in schools in target LEAs

A13. Estimate of Cost Burden to Respondents

We do not anticipate additional costs to respondents or record-keepers resulting from each collection other than that already reported in A12 and A14, including capital or start-up costs, or operation, maintenance, or purchase of services.

It is a participant requirement to contact OIE upon completion or exit from training. Those participants who comply with this requirement also bear the cost of instigating communication with OIE. Some participants, depending on the technology used, may continue to bear the cost of communication (e.g., cell phone or email service costs).

A14. Estimate of Annual Cost to the Federal Government

The IE PD program office staff will receive data from grantees, participants and principals or LEA representatives. The IE PD program office also will enter and manage all data related to IE PD *GPRA* measures and service payback status.

The IE PD program office maintains appropriate staff whose function is to acquire and maintain *GPRA* data for this program from all three sources. This staff position is a GS 5 position, which, in 2009, ranges from \$33,269 to \$43,251 in annual salary for the Washington D.C. locality.

A15. Program Changes or Adjustments

This request does not constitute a change or adjustment; an old burden is not being revised. Rather, this is a request for a new program requirement.

A16. Plans for Tabulation and Publication of Results

OIE will maintain and update participant information in an ED database. The function of this database is to facilitate the tracking and follow up with individual IE PD participants. Data will be entered by IE PD program staff and maintained by the same staff. Follow up also will be performed by IE PD program staff with the results of follow up entered into the database. The database will be used on, at least, an annual basis to create *GPRA* reports and to monitor the fulfillment of participant service payback.

There currently are no plans for publication beyond reporting results to ED's Budget Service for compliance with *GPRA* and publication in ED's Annual Program Performance Report. Should this opportunity arise, the program office will follow OMB recommended steps to ensure information quality. Following this, the program office will engage in peer review by ED colleagues as well as experts in the field for any publication of analyses resulting from the data collection instruments proposed herein.

A17. Approval to Not Display the OMB Expiration Date

The OMB number and expiration date will be displayed on the data collection form.

A18. Explanation of Exceptions

There are no exceptions to the certification statement.