

## **SUPPORTING STATEMENT**

### **FOR PAPERWORK REDUCTION ACT SUBMISSION**

**(CFDA# 84.031X)**

#### **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.**

Collection of information is necessary in order for the Secretary of Education to award grants under the Native American-Serving Nontribal Institutions Program (NASNTI), Title III, Part A of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act (HEOA) of 2008 Section 319, provides grants and related assistance to NASNTI awardees to enable such institutions to improve and expand their capacity to serve Native Americans and low-income individuals. The HEOA defines a NASNTI as an institution of higher education that is an eligible institution under section 312(b) of the HEA, has an enrollment of undergraduate students that is not less than 10 percent Native American students and is not a Tribal College or University (as defined in section 316 of the HEA).

The NASNTI program authorized under HEOA under Part A of Title III of the HEA is different than the NASNTI program authorized under the College Cost Reduction and Access Act of 2007 (CCRAA) and moved to Part F of Title III of HEA. The part F NASNTI program is a competitive grant program with mandatory funding through FY 2009. This program is not currently funded. Other program changes reflected in this application package are also as a result of the HEOA of 2008 which are:

- An application must include a five-year plan for improving the assistance provided by the NASNTI to Native Americans and low-income individuals, and other information and assurances required by the Secretary;
- The Wait-out period in section 313(d) does not apply;

- The NASNTI may not concurrently receive grants under other provisions of Part A or B of Title III, or Part A of Title V of the HEA.

Information is collected under authority of Title III, Part A, of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act (HEOA) of 2008. The information collection of this discretionary grant application package falls under the Streamlining Plan OMB No. 1894-0001 and was previously approved under OMB No. 1840-0798. This application package is now being separated as a new collection based on programs changes that differ from OMB No. 1840-0798 as a result of HEOA of 2008.

**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.**

This collection of information is gathered electronically by the Department for the purpose of obtaining programmatic and budgetary information needed to evaluate applications and to make funding decision based on the authorizing statute and the published selection criteria.

**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 of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The Office of Postsecondary is committed to the reduction of paperwork and has been collecting this information electronically since 2000. Electronic submission has reduced the burden of both the applicants and Department staff.

**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.**

Since the information submitted in this application is unique to each respondent and to the authorization legislation, no duplication exists.

**5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.**

This collection of information does not involve small businesses or other small entities.

**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.**

The Department uses this information to make new multi-year grant awards. If this information is not collected or collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions of the authorizing statute. Data is only collected when the program appropriation amount is enough to fund new awards.

**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 than 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.**

There are no special circumstances as outlined in #7 of the instructions.

- 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 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 instruction and record keeping, 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.**

The applicable Federal Register notice inviting public comment was published.

The Department has consulted with higher education associations including the Council for Resource Development regarding the revision of the application package to clarify the mandatory page limit requirements as well as simplify the instructions for submitting

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

The Department will not provide 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.**

The Department's disclosure policies adhere to the provisions of the Privacy 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. The 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.**

Questions of a sensitive nature are not included in this information collection.

**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 aggregate the hour burdens in item 16 of IC Data Part 1.**

- Provide estimates of annualized cost to respondents of 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 not be included in Item 14.

The Department estimates the following average time for the completion of the application at an average rate of \$45 an hour.

	<b>Individual Dev. Grants</b>	<b>Cooperative Arrangement Dev. Grants</b>	<b>Total</b>
<b>No. of Respondents</b>	49	1	50
<b>Frequency of Response</b>	1	1	
<b>Burden Hour per Respondent</b>	40	40	
<b>Annual Burden Hour</b>	1,960	40	2,000
<b>Estimated Costs to Respondents</b>	\$88,200	\$1,800	\$90,000

13. Provide an estimate 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 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. 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 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.

Total Annualized Capital/Startup Cost:

Total Annual Costs (O&M):

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Total Annualized Costs Requested:

There are no annual burden start-up costs to respondents.

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.**

<b>Cost to the Federal Government</b>	
A professional staff to develop and revise clearance package (GS-12 employee: 80 hrs. @ \$42.00 per hour	\$3,360
Other Department staff to review and approve request.	N/A
GS-15/1 (\$59.00 x 16 hours) employee for final review and approval.	\$944
<b>Estimated Total</b>	
<b>\$4,304</b>	
Cost for Federally-supervised review of applications - Estimate of 40 applications	
Readers Reviewing application @10 apps. per reader 3 readers per panel, 4 panels (Total of 12 readers @\$1,100)	\$13,200
Forms and Web site development costs for E-Reader Process.	\$0
Processing applications - staff. (1 staff x 40 hours x \$42.00 per hour = \$1,680) (Overhead cost: \$1,680 x 50 percent = \$840)	\$2,520
Contractor logistical support for workshops, application processing, field reading and slate preparation. (Field Reader Cost)	\$36,000
Staff time for conducting supervised review. (2 week review x 1 control review, 1 staff for 4 panels and 1 staff to chair panels) (5 staff x 80 hours= 400 hours x \$40 per hour = \$16,000) (Overhead cost: \$16,000 x 50 percent = \$8,000)	\$24,000
Staff time to review and approve funding recommendation. (1 hours per grant award x 9 awards) (9 awards x 1 hour per award x \$42 per hour = \$378) (Overhead cost: \$378 x 50 percent = \$189)	\$567
Staff time to generate, approve, and issue grant awards. (2 hours per award x 9 awards = 18/2=9 (1 staff x \$42.00 x 18 hours = \$756.00	\$1,134

(Overhead cost: \$756 x 50 percent = \$378)	
<b>Total Estimated Cost to Government (competition year)</b>	<b>\$81,725</b>
<b>Annual Monitoring Cost</b>	
(2 hours per award x 9 awards = 18/9=2 hours per person) (1 staff x \$42.00 x 18 hours = \$756)	\$756
Overhead cost: (\$756 x 50 percent = \$378)	\$378
<b>Total Estimated Cost to Government</b>	<b>\$1,134</b>
<b>Total Annual Government Estimated Cost</b>	<b>\$82,859</b>

**15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.**

By definition, since this is technically a new collection, all burden is new and considered a program change.

**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.**

There are no plans to publish the results. The information collected will be used for internal purposes only.

**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.**

There is no request to omit the OMB expiration date.

**18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

There are no exceptions to the certificate statement.