

Supporting Statement A

Let's Move in Indian Country – School Survey

OMB Control Number 1076-XXXX

Terms of Clearance: None.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Given the magnitude of the crisis of childhood obesity and related diseases among American Indians and Alaska Natives, an interagency collaboration between the First Lady's *Let's Move!* Initiative, the White House Domestic Policy Council, the Departments of the Interior, Agriculture, Health and Human Services, and Education has been formed to reduce disproportionately high obesity rates and improve the health of Native youth. The Youth in the Great Outdoors Office and Bureau of Indian Education, both in the Department of the Interior, are conducting this survey to establish a baseline of activity and infrastructure in support of an interagency collaboration, *Let's Move! in Indian Country*, to reduce disproportionately high obesity rates and improve the health of Native youth. Through concrete policy changes called for in the President's [Childhood Obesity Task Force Report](#) targeted actions will be taken to address prenatal and early childhood care in the IHS hospital system and to improve access to healthier foods and increase physical activity in Bureau of Indian Education (BIE)-funded schools and public schools as well as address prenatal and very early childhood care in the Indian Health Service operated facilities.

The *Let's Move! in Indian Country Initiative* is essential to the mission of the Department of the Interior, as Congress granted it the authority to address matters relating to Indian affairs in 25 U.S.C. 2 and, is essential to the Bureau of Indian Education's mission as stated below:

As stated in Title 25 CFR Part 32.3, BIE's mission is to provide quality education opportunities from early childhood through life in accordance with a tribe's needs for cultural and economic well-being, in keeping with the wide diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities. Further, the BIE is to manifest consideration of the whole person by taking into account the spiritual, mental, physical, and cultural aspects of the individual within his or her family and tribal or village context.

The survey is an integral part of the process to develop the *Let's Move! In Indian Country*

Initiative in a way that builds off of existing efforts at BIE-funded schools and public schools serving high Native student populations. The survey will be administered to BIE schools, Tribal schools, and public schools serving high populations of Native students. This survey is designed to determine what resources are already available at schools in Indian Country and those serving significant populations of Native youth and will establish the baseline to determine what further resources are needed in order to create healthy school environments for all students. The results will enable us to move forward with the initiative, ensuring that BIE-funded and public schools are receiving the aid that is most needed. Administratively, we do not have compiled data on the needs of all the schools, so the data collected in this survey will be a great resource.

We are seeking emergency approval of this one-time survey to allow us to implement the concrete policy changes called for in the President's [Childhood Obesity Task Force Report](#), as soon as possible. The survey is the first step in a 3-month process to develop the framework for the Initiative, with an anticipated launch date of late-March 2011. If we are not able to conduct this survey in the next week, the Initiative will be unable to launch on time, we will not be able to take the action to address the urgent public health matter of disproportionately high obesity rates among Native youth. For example, a study of four year-olds found that obesity is more than two times more common among American Indian/Alaska Native children (31%) than among white (16%) or Asian (13%) children. This rate is higher than any other racial or ethnic group studied. In 2008, Indian Health Service (IHS) determined that 16.3% of American Indian/Alaska Native adults have been diagnosed with diabetes. Because of this urgency, public harm, in the form of continued disproportionate obesity rates and obesity-related illnesses, is reasonably likely to result if the normal clearance is followed.

Although we would not be soliciting public comment via the Federal Register if this emergency request is approved, we have consulted with several stakeholder groups on the development of the survey. Specifically, we consulted with Amy Martin, Director of Communications, National Indian Education Association (NIEA), 202.544.7290. All comments received from NIEA were taken into consideration and the requested amendments were made to the survey. We also consulted our interagency work group, including staff from USDA/Food and Nutrition Services, HHS/Indian Health Services, Department of Education, as well as the Domestic Policy Council for the proper wording in relevant sections of the survey. The broader Let's Move in Indian Country Initiative is facilitating several collaborative efforts with Tribes and Tribal leaders providing ample opportunities for comment and input on the Initiative as it is developed, including goals and strategies for implementation.

- 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.**

The information gathered by the survey will be used by the members of the Let's Move in Indian Country team to best examine which areas the initiative can be used to have the largest impact. For this purpose it is necessary to ask questions that deal with a variety of topics including, information on the schools use of Federal Nutrition Programs, the President's Active Lifestyle Award, Carol M. White Physical Education Program, Diabetes Education in Tribal Schools, Corporation for National Community Service, and the Safe Routes to Schools program.

- 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.**

The survey will be distributed to BIE-funded and public schools through the website surveymonkey.com. We have decided to use this system to reduce the burden in administrative duties as well as comply with the Government Paperwork Elimination Act since everything is administered on-line. Surveymonkey is the easiest, fastest, and most cost effective way to distribute our survey as well as analyze our respondents' answers.

- 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.**

Duplication of previously gathered information is not an issue in this survey, since data on this subject matter has not been compiled before. We also have made sure that duplication of answers within the respondents will not happen, as they need to identify what school they are speaking on behalf of, which we will only count once.

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

The information collected in the survey will not impact 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.**

The consequence if this survey is not completed is that we will not have a baseline to understand where to best use our time, funding and other resources.

- 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.**

Since the information gathered from the survey will be used for the Let's Move in Indian Country campaign, it is time sensitive to the initiative's launch date, and we would therefore be asking the respondents to reply in a timely fashion (approximately 2 weeks)

- 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.**

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 three 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.

Consultation for the survey was done through conference calls with our many stakeholders in the Let's Move in Indian Country initiative. We also consulted our interagency work group, including staff from USDA/Food and Nutrition Services, HHS/Indian Health Services, Department of Education, as well as the Domestic Policy Council for the proper wording in relevant sections of the survey.

We consulted with Amy Martin, Director of Communications, National Indian Education Association (NIEA), 202.544.7290. Comments from NIEA included requests to add additional questions that 1) Identify the role of the individual completing the survey; 2) Provide a means for schools to request additional information in a specific area; 3) Define the survey's use of the phrase "wellness/prevention services"; 4) Add an option to include future help opportunities for community/parental involvement in health promotion programs; and 5) Add an open ended dialogue box at the end for any additional questions. All comments received from NIEA were taken into consideration and the requested amendments were made to the document.

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

We do not provide gifts or payments to respondents.

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

We do not provide any assurance of confidentiality. The information that we collect is subject to the requirements of the Privacy Act and 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.

We do not ask questions of a 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. 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.
- * 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 under “Annual Cost to Federal Government.”

We anticipate getting responses from 284 schools (184 BIE funded and 100 public schools serving high American Indian/Alaska Native populations) at 1 hour per response rate, totaling 284 annual burden hours for this information collection. We estimate the total dollar value of the burden hours to be \$12,303. (Rounded)

*To obtain the hourly rate for our respondents we use the 2010 GS-Scale at a GS-12 level since most of our respondents will be school principals or administrators. The GS-12 hourly rate is \$28.88. To account for benefits, we then multiplied this rate by 1.5 to obtain a total rate of \$43.32

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 already reflected in item 12.)

- * 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 for form processing). 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.

We have not identified any non-hour costs associated with this information collection.

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.

We estimate the annual cost to the Federal Government to create, administer, and compile the results of this information collection to be \$110,834.

Position	Hourly Rate	Hourly Rate w/1.5 multiplier for benefits*	Hours per Response	Responses	Total
Intern (GS-05/8)	\$16.21	\$24.32	0.5	284	\$3,453
Program Analyst (GS-09/6)	\$23.23	\$34.85	2	284	\$19,795
Program Analyst (GS-14/9)	\$51.40	\$77.10	2	284	\$43,793
Program Analyst (Dept. of Ed) (GS-14/9)	\$51.40	\$77.10	2	284	\$43,793
TOTAL					\$110,834

*These hourly salary figures are based on the *Salary Table 2011-GS Rates Frozen at 2010 Levels*. See, 2010 General Schedule (Base) www.opm.gov/oca/10tables/indexGS.asp. The 1.5 multiplier for benefits is based on the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— June 2010 (released September 8, 2010), USDL 10-1241. See www.bls.gov/news.release/pdf/ecec.pdf.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a program change because this is a one-time survey.

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.

The results will not be published. We will compile the results into an Excel spreadsheet for informational purposes in making future decisions regarding the Let's Move initiative. We plan to compile the results within two weeks of receiving the responses. The compilation will cumulatively tally responses; no complex analytical techniques will be used.

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 OMB control number and expiration date will be displayed on the Title Page of the survey.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.