

1Supporting Statement A

Bureau of Indian Affairs Adult Education 25 CFR 46

OMB Control Number 1076-0120

Terms of Clearance: None.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

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

The Bureau of Indian Education (BIE) is authorized by 25 U.S.C. 452, Johnson-O’Malley, 25 U.S.C. 13, Authorizing Funds for Basic Education, and 43 U.S.C. 1457, Duties of the Secretary of the Interior, to administer the Adult Education program. BIE annually collects information to prioritize programs and measure the success of the program. The information helps manage the resources available to provide education opportunities for adult Indians and Alaska Natives to complete high school graduation requirements and to gain new skills and knowledge for their self-enhancement as parents, citizens, consumers, employees and employers.

- 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 BIE and Tribes who have contracted or compacted the Adult Education program conduct this information collection annually to prioritize programs, monitor fiscal accountability, direct the appropriate service documentation, and analyze and monitor the use of expended funds. The information collection for the annual report is available for congressional requests. The following information is requested on the form:

- The first three lines are requesting general correspondence information for the administrator.
- The next box below identifies what entity is administering the program.
- Section I shows the number of students receiving benefits in the GED program
 1. Number enrolled;
 2. Number receiving GED certificates
 3. Number of students enrolled but not finished;
 4. Number of students entering college upon completion of GED program;
 5. Number of students entering the workforce after completion of GED program.
- Section II shows the number of students receiving benefits in the Adult Basic Education (ABE) program:
 1. Number of ABE courses offered;
 2. Number of students enrolled in an ABE course;
 3. Number of students who have completed an ABE course;
 4. Number of students in GED, training, or employment resulting from ABE course
- Section III shows earnings resulted from completion of ABE program
 1. The average annual earnings prior to enrolling in the ABE course of all students who completed the ABE program during the reporting period;
 2. The average annual earnings after completing the ABE program of all students who completed the ABE program during the reporting period;
- Section IV shows the total program cost per placement in a job or in post secondary education
- Section V identifies the amount of services provided to participants:
 1. Number of students receiving employment counseling;
 2. Number of students receiving education-related counseling;
 3. Number of student referred to other service organizations.
- Section VI identifies where the sources of funds spent on the program: Tribal Priority Allocations, Contract/Compact Funds for Administrative Costs, or Contract/Compact Funds for Direct Program Costs.
- Section VII requests a narrative of annual achievements.

The annual report form and instructions have been slightly modified to provide respondents with clear and concise instructions.

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 form is made available to Tribes, who have contracted or compacted the program, by e-mail on an annual basis. Tribes may also submit the form to BIE electronically by e-mail.

- 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.**

The data collected describes the expenditures and activities exclusively for the BIE Adult Education program. The annual report is not similar to any other reported data during the performance year. There is no other data available that can replace this collection.

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

The collection of this information does not impact small businesses or other small entities. Tribes are not considered to be small entities by the federal government for these purposes.

- 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 this collection is not collected on an annual basis, the Bureau would not be able to fulfill statutory requirements. The information collection is required on an annual basis to monitor the use of funds and to inform future budget requests.

- 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.**

There are no special circumstances that will apply to this collection.

- 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.**

A 60-day notice for public comments was published in the Federal Register on July 21, 2011 (76 FR 43702-43703). BIE did not receive any public comments.

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.

BIE contacted Joy Martin, Education Line Officer, Oklahoma Education Line Office, 200 NW 4th Street, Suite 4049, Oklahoma City, Oklahoma, 73102, phone: (405) 605-6051, to obtain her opinion on the availability of the form, the frequency in which it is collected, the format and clarity of instructions. She found the collection to be necessary to carry out the function of the program, and the information requested was the minimum as stated in the regulations, with clear formatting and easily accessible as it is e-mailed. She concurred with the burden hours, taking approximately 4 hours to complete and submit, based on her previous experience with this information collection.

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

Respondents will not receive any payment, gift, or other remuneration for providing the information collection requirements.

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

There is no assurance of confidentiality provided to respondents in connection with the information collection requirements.

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 request any information of 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 receive approximately 70 reports annually, with each report taking an estimated 4 hours to complete. Therefore, the total annual estimated burden is 280 hours.

The estimated total salary cost for each applicant is 1 hour x \$29.12 per hour, which is an average of the hourly wages for civilian, as shown below.

	Salary per hour	Benefits Multiplier	Total
Civilian*	20.80	1.4	29.12

Total	29.12
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*Table 1, Wages & Salaries – All Workers, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, June 2011.

We have used the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—June 2011 (released September 8, 2011), USDL 11-1305, as a guide for our estimates, including the benefits multiplier. See <http://www.bls.gov/news.release/pdf/ecec.pdf>.

Therefore, the total cost burden on the public is \$29.12 x 280, which totals \$8,154.

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.**

The estimated total annual cost burden to respondents or record keepers for this information collection is \$200, for supplies, materials, telephonic/electronic communication devices, and computer software programs that Tribes may use to monitor this 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.

The estimated hourly salary cost to the tribal contractors, on behalf of the federal government, is \$27.68. The Higher Education grant review by employees will require 4 hours for each application.

Position	Hourly Base Rate	Benefits Multiplier	Hourly Total (includes Benefits Multiplier, rounded to the nearest cent)	Time to Complete (Hours)	Total
Application Reviewer (GS-7/5)	\$18.45	1.5	\$27.68	4	\$110.70
				Applications	70
				Total	\$7,749

The total estimated annualized cost to the Federal government is \$7,749.

We have estimated the average salary for Federal government and tribal compacting employees performing these duties at the GS-7, Step 5 (\$18.45) level. The salary associated with this grade and step is based on the General Schedule 2011. The salary, multiplied by 1.5 to cover benefits, equals a rate of \$27.68/hour. This benefits multiplier is inferred from the Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2011; USDL 11-1305.

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

There are no changes to hour or cost burden.

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 annual data collection will only be published as part of budget justifications.

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.

We intend to display the OMB Control Number and the expiration date.

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

We are not seeking any exceptions to the certification statement.