

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Alaska Native and Native Hawaiian-Serving Institutions (ANNH) Program is authorized by Title III, Part A, Section 317 of the Higher Education Act of 1965, as amended (HEA) and Title III, Part F, Section 371 of the HEA of 1965, as amended. Both programs award discretionary grants to eligible institutions of higher education so that they might increase their self-sufficiency by improving academic programs, institutional management, and fiscal stability.

Information is collected under authority of the program statute, Part F, General Provisions, Section 391. (This Part F, General Provisions statement is not a reference to the ANNH Part F “title” used throughout this document). This application was part of a previously approved collection, OMB number 1840-0810. We are requesting a reinstatement with changes of the ANNH application. The application now consists of two separate applications for Title III, Part A of this program and Title III, Part F of this program. Both applications will be under the same OMB number 1840-0810, but will be defined by the separate Title III, Parts A and F. The information collection of this discretionary grant application package falls under the Streamlining Plan OMB No. 1894-0001.

Legislation governing this program is located on the web at <http://www2.ed.gov/programs/idadesannh/legislation.html>.

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 decisions based on the authorizing statute and the published selection criteria.

¹ Please limit pasted text to no longer than 3 paragraphs.

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 given to using technology to reduce burden.

The Office of Postsecondary Education is committed to the reduction of paperwork and has been collecting this information electronically since 2000. Electronic submission has reduced the burden for 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 for 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, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

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.

Because the data collected from each institution reports annual statistics unique to the applicant and these figures change annually, collection on a less frequent basis would not be beneficial to the applicants or in compliance with the regulations.

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 that 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. *As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

A 30 day notice for public comment will be published in the Federal Register as required. Title III staff will respond to any questions or comments resulting from the publication of the information collection in the Federal Register as required by 5 CFR 1320.8(d).

The Department has consulted with higher education associations, potential grantees, and current grantees regarding their concerns, including the revision of the application package to clarify the

mandatory page limit requirements and simplification of the instructions for submitting the application electronically.

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

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. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

The Department's disclosure policies adhere to the provisions of the Privacy Act. No personally identifiable information is collected.

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 by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to*

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)*

- *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 be included in Item 14.*

The Department estimates the following average time for the completion of the application for:

ANNH Part A

| | INDIVIDUAL DEV. GRANTS | COOPERATIVE ARRANGEMENT DEV. GRANTS | RENOVATION GRANTS | TOTAL |
|---|-----------------------------------|--|------------------------------|--------------|
| # of Respondents | 10 | 4 | 9 | 23 |
| Frequency of Response | 1 | 1 | 1 | 1 |
| Burden Hour Per Response | 40 | 40 | 40 | 40 |
| Annual Burden Hr. | 400 | 160 | 360 | 920 |
| Estimated Costs to Respondents | \$18,000 | \$7,200 | \$16,200 | \$41,400 |

ANNH Part F

| | INDIVIDUAL DEV. GRANTS | COOPERATIVE ARRANGEMENT DEV. GRANTS | RENOVATION GRANTS | TOTAL |
|----------------------------------|-----------------------------------|--|------------------------------|--------------|
| # of Respondents | 10 | 4 | 9 | 23 |
| Frequency of Response | 1 | 1 | 1 | 1 |
| Burden Hour Per | 40 | 40 | 40 | 40 |

| | | | | |
|---------------------------------------|----------|---------|----------|----------|
| Response | | | | |
| Annual Burden Hr. | 400 | 160 | 360 | 920 |
| Estimated Costs to Respondents | \$18,000 | \$7,200 | \$16,200 | \$41,400 |

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 acquiring and maintaining 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost : 0
 Total Annual Costs (O&M) : 0

Total Annualized Costs Requested : 0

There are no annual burden 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.

| | |
|---|------------------|
| Cost to the Federal Government | |
| A professional staff to develop and revise clearance package (GS-12 employee: 80 hrs. @ \$43.05 per hour). | \$3,444 |
| Other Department staff to review and approve the request. | N/A |
| GS-15/1 (x16 hours) employee for final review and approval. | \$948 |
| Estimated TOTAL | \$4,392 |
| | |
| Cost for Federally-supervised review of applications | |
| Readers Part A (6@ \$750) | \$4,500 |
| Readers Part F (9 @ \$750) | \$6,750 |
| Processing applications – staff. (1 staff x 40 hours x \$43.05 per hour = \$1,722) | \$1,722 |
| Contractor logistical support for workshops, application processing, field reading and slate preparation. | \$139,938 |
| Staff time for conducting supervised review. (2 weeks x 1 control reviews, and 2 panel chairpersons) (1 staff x 80 hours x \$48.35 per hour = \$3,868) (1 staff x 80 hours x \$43.05 per hour = \$3,444) = (\$7,312) | \$7,312 |
| Staff time to review and approve funding recommendation. (4 hours per grant award x 46 grant applications) (46 awards x 4 hours per award x \$43.05 per hour = \$7,921) | \$7,921 |
| Staff time to generate, approve, and issue grant awards for Part A. (6 hours per award x 3 awards = 18 hours) (1 staff x \$43.05 x 18 hours = \$775) | \$775 |
| Staff time to generate, approve, and issue grant awards for Part F. (6 hours per award x 12 awards = 72 hours) (1 staff x \$43.05 x 72 hours = \$3,100) | \$3,100 |
| TOTAL Estimated Cost to Government (competition year) | \$172,018 |
| | |
| Annual Monitoring Cost | |
| (10 hours per award x 3 awards = 30 hours for Part A) (1 staff x \$43.05 x 30 hours = \$1,292) | \$1,292 |
| (10 hours per award x 12 awards = 120 hours for Part F) (1 staff x \$43.05 x 120 hours = \$5,166) | \$5,166 |
| TOTAL Estimated Monitoring Cost | \$6,458 |
| | |
| TOTAL Estimated Cost to Government | \$182,868 |

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

The program change is a result of the reinstatement of a previously discontinued collection and an increase in the number of expected respondents.

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 certification statement.