

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Indian Education Demonstration Grant Program Application

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.**

The Office of Indian Education (OIE) of the Department of Education (ED) requests clearance for the Indian Education Demonstration Grant Application authorized under Title VII, Part A, of the Elementary and Secondary Education Act, as amended. The Demonstration (CFDA 84.299A) program is a competitive discretionary grant program. The grant applications submitted for this program are evaluated on the basis of how well an applicant addresses the selection criteria, and are used to determine applicant eligibility and amount of award for projects selected for funding.

The selection criteria used for the Demonstration Grant program include general selection criteria from 34 CFR 75.210 and selection criteria based on regulatory requirements in 34 CFR part 263, including the recent amendments of the NFR published in the Federal Register on April 22, 2015 (80 FR 22403), in accordance with 34 CFR 75.209(a). Proposed Section 263.22 also has information collection requirements addressed in this clearance request relating to statutory or regulatory requirements.

- 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.**

The type of information provided in the application includes: the purpose of the project; the objectives, activities, and timelines for the funding period requested, qualifications of key personnel; the evaluation procedures to be used to measure progress and effectiveness of the project; and a detailed budget and description of resources.

Eligible applicants submit the information to describe the project for which funding is requested. The information provided by the applicant addresses the selection criteria for the program. The application is evaluated through a peer review process and an application's score is used to determine its ranking and selection for funding.

The information collected reflects the specific components of the selection criteria and program services that are to be provided.

Eligible applicants for the Demonstration program include:

- (1) a State educational agency,
- (2) a local educational agency,
- (3) an Indian tribe,
- (4) an Indian organization,
- (5) a federally supported elementary school or secondary school for Indian students,
- (6) an Indian institution (including an Indian institution of higher education), or
- (7) a consortium of such entities.

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

This grant program will require electronic submission of applications through the grants.gov system. For those applicants that do not have the capability for on-line submissions through the Internet, the application may also be submitted in hard copy format if an exception is requested in writing at least two weeks prior to the closing date. All performance reports for this grant program must be submitted through the Department's e-reports system enabling on-line administration and review of the projects.

- 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.**

No duplication of effort exists. This information collection requests information specifically for discretionary Indian education programs authorized under section 7121 of the Elementary and Secondary Education Act. Applicants will be required to provide information that addresses the statutory purpose and requirements, as well as the selection criteria. Although there are other Indian education programs in the Department, they are authorized under different legislation and their purposes and requirements differ from those under this program.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

This information collection requirement impacts small entities, but the Department will limit the collection to only that information necessary to make grant awards, in order to minimize the burden on 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.**

If this information is not collected, the Department will be unable to make grant awards in a timely manner. Applications provide information describing the project for which funding is requested. The information collected is necessary to evaluate the applications and select projects for funding annually.

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;**

Only one grant competition for new awards is held annually. Respondents submit the information collection for each new grant they desire.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

The time period from the date of availability of the information collection, as published in the Federal Register, to the date by which respondents must respond (i.e., the closing date which is also published in the Federal Register) is not less than 30 days.

- **requiring respondents to submit more than an original and two copies of any document;**

Respondents are required to submit applications electronically (grants.gov) and annual performance reports (e-reports). Respondents that meet the exception to submitting an application via the grants.gov system are not be required 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;**

Respondents will not be required to retain 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 the study;**

The information collection is not connected with a statistical survey.

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**

The information collection is not connected with a statistical survey or statistical data classification.

- **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**

The information collection does not request data that is confidential.

- **requiring respondents to submit proprietary trade secrets, or other confidential information the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information collection does not request data that is of a proprietary nature or confidential.

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 any 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 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 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.**

This is a discretionary grant application and the Department published a 30 day Federal Register Notice inviting comment on the application package.

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

No payments or gifts to respondents will be provided.

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

Confidential information is not requested. However, some applicants may include information within an application that is personally identifiable. Such information, which

may include resumes of staff with home addresses, home telephone numbers, or similar personal information, is not released under the exemptions of 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.

Information of a sensitive nature is not requested.

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.**

The estimated total number of applications anticipated is based on past experience with these programs. It is estimated that a total of 80 applications will be received annually for the grant competition. The estimated burden includes development and typing for all applicants, and recordkeeping and maintenance of evaluation information by actual grantees.

Respondent Type	Number of Responses	Estimated Burden Hours per Respondent	Total Hours
New Applicants	80	40	3,200 hours
		Total:	3,200 hours

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

The application can be addressed by one information collection. The information to be provided for the program is in the program selection criteria that must be addressed by the applicant based on the type of services to be provided.

- **Provide estimates of annualized costs 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 the cost should be included in Item 14.**

The cost per applicant for compilation of the information and completion of the application is estimated to take 40 hours. Estimates are based on the basic hourly rate of a GS 13/1 for

development of the application and the basic hourly salary of a GS 4/1 for clerical support.

Annual Cost to Respondents for the hour burden associated with the collection of information:

Estimated GS Level	Number of Hours	Pay/Hour	Cost/Application	Total Cost for all 50 applications
13/1	35	49	1715	85,750
4/1	5	15	75	3,750

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is no additional annual cost burden to respondents and recordkeepers from this collection of 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

We estimate it will take 4 staff at the GS 13 level 40 hours to review applications for eligibility. This will result in a total cost to the federal government of 4 Staff at \$43/hour X 40 hours each staff person must work = \$6,880. In addition, the Department has contractor support to conduct the peer review process; the Department can use up to 1 percent of the discretionary budget for peer review costs. In FY 2014, the budget was \$17,993,000, and we estimate similar funding levels for FY 2015. Accordingly, the peer review costs are expected to be \$179,993. Overall, the cost to the Federal government is estimated at \$186,873.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new data collection. Therefore, there is a program change increase of 3,200 annual burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Results of the individual information collected will not be published.

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.

Such approval is not being requested.

18. Explain each exception to the certification statement identified in Item 20, “Certification of Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the certifications.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.