

# Supporting Statement A

## Student Transportation Form, 25 CFR 39

### OMB Control Number 1076-0134

**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.**

Title XI of Pub. L. 95-561, the Education Amendments of 1978, as amended, requires the Bureau of Indian Education (BIE) to administer elementary and secondary education programs for Indian children. The student transportation system is a major portion of this operation. During Student Count Week, the last full week of September, BIA-funded schools must report school transportation mileage data. This information is used to allocate the available transportation funds. 25 CFR 39, Subpart G, lists information that BIE has determined is necessary to make allocations.

- 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.**

Student Transportation Mileage Forms are collected from 183 schools during the annual Student Count Week. This information is used by BIE to allocate the funds received for student transportation, both on school bus routes and residential student miles.

Student Mileage Form

Page one through page three consists of explanations and instructions.

On page four, the first section asks for specific entry information for day students: school name, location code, vehicle identification number, vehicle transportation size, and morning bus routes, Monday through Friday, including number of miles. The second section on page four, asks for specific entry information for day students: afternoon/evening bus routes Monday through Friday, including number of miles. A separate sheet must be completed for each bus.

On page five, the first section asks for specific entry information for day student transportation: school name, location code, each vehicle identification number, each bus' average day's mileage, road conditions, and total mileage. The second section asks for certification from the school Principal, and the Education Line Officer.

On page six, the first section asks for specific entry information for boarding/dormitory students: school name, location code, vehicle identification number, average day's mileage, road conditions, and total mileage. The second section asks for certification information from the school Principal, and the Education Line Officer.

On page seven, the first section asks for specific entry information for boarding/dormitory students traveling by charter or commercial bus: beginning and ending points of travel, and cost. The second section, page seven of the Student Transportation Form asks for specific entry information for boarding/dormitory students traveling by air: student name, grade, beginning and ending points of travel, and one way fare. The third section asks for certification information from the school Principal, and the Education Line Officer.

- 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.**

Data is collected from odometers of individual buses, actual travel tickets, and charter contracts and entered into a web-based system, Office of Indian Education Program (OIEP) MultiWeb Intranet/WebET Intranet.

- 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 is used solely for the distribution of transportation funds to BIA funded schools. No other governmental entity collects this information and no similar information is collected at any level.

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

This collection effort does not adversely affect 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.**

Without the total mileage data, BIE would not be able to determine the per mile rate used to distribute the funds equitably in accordance with regulation, which will ultimately adversely impact students who rely on transportation funds to attend school.

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 June 10, 2015

(80 FR 32975). There were no comments received in response to this notice.

**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.**

The following persons were contacted 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:

- Donald Coffland, Principal, Tuba City Boarding School, Phone: (928) 283-2330 ext. 247.
- Frank Rogers, Principal, San Simon School, Phone: (520) 362-2231.
- Jon Claymore, Superintendent, Yakama Tribal School Transportation Office, Phone: (509) 865-5121.

In summary, these individuals felt this collection was necessary and appropriate for distributing transportation funds. They felt the instructions and forms were clear and easy to understand and concurred with the burden time to complete the forms.

**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.**

The data collected is not of a confidential nature. Therefore, no assurances are necessary.

**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.”**

Annual reporting and record keeping for this collection of information is estimated to average 2 hours for approximately 183 respondents, annually. This estimate includes the time to gather, input, certify, and review information. Therefore, the total annual estimated burden is 366 hours or equivalent to \$11,723.

The estimated total salary cost for each school is two hours (2) x \$32.03 per hour, which is an average of the hourly wages for civilian, as shown below.

	<b>Hourly Salary</b>	<b>Benefits Multiplier</b>	<b>Total Hourly Salary</b>	<b>Time to Complete</b>	<b>Total</b>
<b>Civilian*</b>	\$22.88	1.4	\$32.03	2 hours	<b>\$64.06</b>
<b>Number of Schools</b>					183
<b>Total</b>					<b>\$11,722.98</b>

\*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, March 2015.

We have used the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—March 2015 (released June 10, 2015), USDL 15-1132, as a guide for our estimates, including the benefits multiplier. See <http://www.bls.gov/news.release/pdf/ecec.pdf>.

**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.

There is no non-hour cost burden.

**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 total cost to the Federal Government to collect the information is \$12,491. This is based on school registrars, certification by Education Line Officers and their immediate staff, compiled and finalized by an Education Specialist and a Finance Specialist who collect the information. The table below explains how this amount was computed.

Employee Type	Average No. of Bureau Operated Schools	Burden Hour	Average Number of Buses	Annual Burden	Salary* per hour	Total cost per category

Mileage Reporter	57	10 min./day x 5 days = 50 min/per bus	6	57 schools x 6 buses x 50 min = 285 hours	GS-7/1: \$16.61/hr x 1.5 = \$24.92/hr	\$7,102.20
School Administrator	57	30 min. x 57 = 28.5 hrs		28.5 hrs	GS-13/1: \$35.03 x 1.5 = \$55.55/hr	\$1,583.18
Education Line Officer	57	30 min. x 57 = 28.5 hrs		28.5 hrs	GS-13/1: \$35.03 x 1.5 = \$55.55/hr	\$1,583.18
Finance Specialist	On average, the Finance Specialist uses 40 hours to compile the information from schools and develop the disbursement plan.			40 hrs	GS-13/1: \$35.03 x 1.5 = \$55.55/hr	\$2,222.00
<b>TOTAL</b>				382 hrs		<b>\$12,490.56</b>

\*The salary associated with this grade and step is based on the General Schedule 2015 (Incorporating the 1% General Schedule Increase). The hourly salary is multiplied by 1.5 to cover benefits. This benefits multiplier is inferred from the Bureau of Labor Statistics, Employer Costs for Employee Compensation – March 2015 (USDL 15-1132).

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

There are no program changes or adjustments in 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 information collection may be used to support budget requests, but individual persons will not be identifiable.

**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 expiration date.

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

No exceptions are necessary to the certification statement.