

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Indian Education Professional Development Program

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 Indian Education Professional Development (IEPD) Grants program provides grants to prepare and train Indians (*i.e., American Indians/Alaska Natives*) to serve as teachers and administrators. The specific goals of the IEPD program are to: 1) increase the number of qualified individuals in professions that serve American Indians/Alaska Natives; 2) provide training to qualified American Indians/Alaska Natives to become teachers, administrators, teacher aides, social workers, and ancillary education personnel; and 3) improve the skills of those qualified American Indians/Alaska Natives who already serve in these capacities. Individuals trained under this program must perform work related to their training and that benefits American Indian/Alaska Native people, or repay all or a prorated portion of the assistance received under the program.

The Office of Indian Education (OIE) is submitting this application to request extension approval to:

- Collect contact and training information for all IEPD participants from IEPD grantees;
- Collect employment information from IEPD participants who are not in an approved and active deferment once they have exited the program; and
- Verify employment information with employers for all participants who are in service Payback.

This data collection serves three purposes: First, data from three sources (grantees, project participants, and employers) are necessary to assess the performance of the IEPD program on its *Government Performance Results Act (GPRA)* measures (see below). Second, data from all three sources are necessary to determine if IEPD participants are fulfilling the terms of their service/cash payback requirements. Finally, budget and project-specific performance data are collected from IEPD grantees for project-monitoring and compliance information.

The forms and protocols contained in this package include the Grantee Reporting Form, the Participant Training Information and Employment Reporting Form, and the Employment Verification Form.

Information in the Grantee Reporting Form, the Participant Training Information and Employment Reporting Form, and the Employment Verification Form is being collected under the authority of section 7122 of the *Elementary and Secondary Education Act of 1965*, as amended; 20 U.S.C. 7442, and the implementing regulations at 34 CFR Part 263, Subpart A, as well as with the *Government Performance and Results Act of 1993 (GPRA)*, Section 4.

The second use of the data is to ensure participants complete a payback requirement that equals the number of months in training (for service payback) or the amount of allowable training costs incurred (for cash payback). To fulfill service payback, participants are required to:

- a) Sign an agreement, at the time of selection for training, to meet the provisions of the payback requirement;
- b) Perform work related to the training received and that benefits Indian people; or
- c) Repay all or a prorated part of the assistance received.

The IEPD statute and regulations (ESEA 7122, 34 CFR 263.8) require that if a participant fails to complete the service payback requirement, the participant is required to repay all or a prorated portion of their training costs. For service payback, the period of time required for a work-related payback is equivalent to the total period of time for which training was actually received under the professional development program on a month-for-month basis. For cash payback, the cash payback required shall be equivalent to the total amount of funds received and expended for training received under the PD program and may be prorated based on any approved work-related service the participant performs.

To ensure participants complete their payback requirement, the program office must collect information from the grantee that allows follow up with the participant and documents the length of time participants are actually in training and the total allowable training costs incurred such as tuition, books, fees, stipend, dependent allowance, supplies, technology, and required program travel. These data cannot be collected from other sources. The electronic system reduces the amount of time and effort required to collect this information.

IEPD must also collect employment information from the participant to ensure employment is related to the training received, benefits Native people, and is equivalent in length of time to the training received. Employment information is provided by the participant and then reviewed and verified by the employer to ensure its accuracy. In the electronic system, participants enter their employment information into the Professional Development Program's Data Collection System (DCS). The DCS then sends an email to the employer using contact information entered by the participant requesting employment verification using the Employment Verification Form. The employer then reviews the information and either approves the information or provides revised information that is then reviewed and approved by the participant. The electronic system reduces the burden on employers. This information is necessary for the IEPD program to ascertain whether participants are fulfilling their work payback requirements.

The third use of the data is for grant monitoring and project and program performance reporting. The data collection system will be used to collect budget and project-specific performance data from grantees. Reports generated from this information collection will be used by OIE to document information on the characteristics of participants supported in these training programs and the outcomes of the programs (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing project and program performance and compliance with applicable laws and regulations.

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.

There are three primary purposes for the data that are being collected. The first use is to fulfill *GPRA* reporting requirements. In 1993, *GPRA* was passed, requiring federally funded agencies to develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each U.S. Department of Education (ED) grant program. However, in addition to grantee data, IEPD needs data directly from participants and their employers for *GPRA* reporting.

The second use of the data is to ensure participants complete a payback requirement that equals the number of months in training (for service payback) or the amount of training costs incurred (for cash payback). To fulfill service payback, participants are required to:

- a) Sign an agreement, at the time of selection for training, to meet the provisions of the payback requirement;
- b) Perform work related to the training received and that benefits Indian people; or
- c) Repay all or a prorated part of the assistance received.

If the participant fails to complete the IEPD training or fails to complete the service payback requirement, the participant is required to pay back all or a portion of their training costs. Training costs are the total dollar amount the participant received in tuition, fees, books, childcare, or other expenses. Participants may defer their payback requirements if they are enrolled as full-time students in an approved education program at an accredited institution of higher education. The participant must submit a written request for deferment to the program office that includes the name of the institution, a copy of the admission letter, the degree being sought, and projected date of completion. After deferment has been granted, the participant must provide proof of ongoing full-time student status. The program office must receive information from the grantee that allows follow up with the participant. The program office also must receive information from the participant's employer with regard to placement, position, state licensure status for those teaching, and post-project employment duration.

The third use of the data is to collect contact, budget and project-specific performance information from grantees for project monitoring. As multi-year award recipients, IEPD grantees must provide the most current performance and financial expenditure information to ED as directed by the Secretary under 34 CFR 75.118 for continued funding.

Data Collection

To fulfill all of these purposes, the data collection involves grantee, participant, and employer representative components. The information is being collected on a mandatory basis from all grantees (the Grantee Reporting Form) and participants (the Participant Training Information and Employment Reporting Form) and on a voluntary basis from employers (the Employment Verification Form).

The DCS collects data directly from grantees, participants, and employers. The electronic system is easy to use and contains user training modules and system checks that will ensure data integrity. Another advantage is the linking of employment information with data from the Common Core of Data (CCD) to capture employer demographics for GPRA reporting which will eliminate the need for employers to provide this information. Eligible employment for service payback is any employment that is in the participant's field of study and benefits Indian people (ESEA 7122, 34 CFR 263.8(b)).

Grantee Data Collection

In the grantee component, all IEPD grantees submit contact and training information for all participants using the Grantee Reporting Form. For the first submission, grantees will provide information on all participants enrolled in the project since the start of the grant and will upload a copy of each participant's payback agreement. Grantees will review and update information on participants and add entries and upload payback agreements for new participants as needed. All changes in participant status (e.g., recruitment, leave of absence, military deployment, training completion, exiting without completion) must be entered in the DCS within 7 business days of the change in status or by the end of the month in which the change occurred, whichever is later.

Grantees must also enter the cumulative total number of months the participant has been in the IEPD training program along with the cumulative total allowable training costs incurred at the end of each semester. Final totals must be entered when the participant leaves the program. Semester and final training information must be entered into the DCS within 7 business days after the semester ends. This information will be visible to the participant so he/she can see their payback obligation amounts as they are incurred. Grantees will report this information on all participants for the length of the grant award.

Participant Data Collection

In the participant component, participants have access to the participant section of the system as soon as the grantee creates an account by entering in the participant's information into the system and uploading a payback agreement. Participants are encouraged via email to log into the DCS at the end of each semester to review the training and cost information reported by the grantee and to update their contact information if it has changed. This benefits participants by allowing them to log into the system and see the total amount of funding received and the payback obligation as it is incurred. This permits participants to make informed decisions regarding the amount of financial burden they want to assume while in the IEPD program. It also helps prevent participants from amassing large payback obligations without their knowledge.

IEPD participants are required to log into the online system within 1 month of exiting the IEPD program to complete a notice of intent to complete service or cash payback and update their system profile. Thereafter, participants must log in again every 6 months for the length of their service payback obligation period to report their employment and continuing education information using the Participant Training Information and Employment Reporting Form. All participants must report their employment status to IEPD as part of their service payback requirement. For service payback, eligible employment is any employment in the participant's field of study and that benefits Native people. IEPD contacts participants if they fail to report employment information every 6 months. Participants who select a cash payback or who fail to provide employment verification within the required timeframe are referred to the Debt & Payment Management Group (DPMG) within ED for fiscal repayment. Participants are also able to review and contest information entered about their funding and training entered by their grantees.

Employer Data Collection

In the employer component, employers are asked to review and verify the information entered by the participant documenting their service payback and licensure status. Through the Employment Verification Form, the employer review the employment information and either submit confirmation of its accuracy or provide revisions.

Uses of the data

The IEPD program office staff use this database to report on the program's *GPRA* measures to ED's Budget Service. The aggregated performance data will also be included in ED's Annual Program Performance Report.

IEPD program office staff also use the database to determine whether participants fulfill their service payback requirements. If a participant does not fulfill his/her service payback requirement, the collected data helps IEPD staff determine the cash amount an individual must pay back. These are essential aspects of project oversight, such that the program office can ensure that project participants are fulfilling requirements stipulated in program application

materials. Projects bear the responsibility of informing participants of their responsibilities and providing participants with adequate information such that participants can voluntarily contact the program office upon exiting project services. Without participant follow up, the program office can only determine if participants are fulfilling their service requirement if the participants voluntarily maintain contact with the program office.

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.

All data are collected online and maintained on a secured server. The DCS uses automated and electronic technology to reduce the cost and burden of information collection and eliminate the need to maintain paper files. Grantees, participants and employers receive emails and phone calls prompting them to log into the online system and report data. The data collection instruments and frequently asked questions are available online to respondents.

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.

There will be no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere. Data to determine American Indian/Alaska Native enrollment in schools where participants are employed, which is necessary for compliance with the requirement that the work benefits Indian people, is not collected from any respondents and reduces respondent burden. This Indian enrollment data is gathered from ED's Common Core of Data by the contractor.

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.

The forms were designed to solicit only the information necessary to respond to program and GPRA requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet federal requirements for budget and program activity data.

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.

Participant follow-up is necessary for the program office to monitor service payback requirements. The only way that the program office can monitor completion of service requirements equal in value to that of the months in training is through systematic and ongoing

follow up with participants and their employers (i.e., the principal or LEA representative). As noted in the Office of the Inspector General (OIG) 2010 Audit (ED-OIG/A19I0002), previous paper-based systems were insufficient in assisting OIE in meeting its program requirements and ensuring all participants are compliant with the statute and 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 that can be generalized to the universe of the study;**
- **requiring the use of 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 the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Grantees must report all changes in participant status (e.g., recruitment, leave of absence, military deployment, training completion, exiting without completion) by entering the information in the DCS within 7 business days of the change in status or by the end of the month in which the change occurred, whichever is later. Thus, if a grantee were to experience a special circumstance in which participant statuses changed more often than quarterly, the grantee would report more than quarterly. However, most training programs are divided into semesters, making this special circumstance unlikely.

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.**

We will publish the appropriate 60- and 30-day revised Federal Register notices to allow for public comment. All grantees will be encouraged to submit feedback during the public comment period. There were no, public comments received during the 60-day FRN period.

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

There are no payments or gifts to grantees in support of the data collection.

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

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the “Buckley Amendment,” Family Educational and Privacy Act of 1974, 20 USC 1232 g; The Freedom of Information Act, 5 USC 522; and related regulations, including but not limited to: 41 CFR Part 1-1 and 45 CFR Part 5b and, as appropriate, the Federal common rule or ED’s final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of personally identifiable information (PII). In addition, the DCS was reviewed by ED’s Office of the Chief Information Officer for compliance with the Federal Information Security Management Act, Office of Management and Budget Circulars, and the National Institute of Standards and Technology standards and guidance. The system was granted an Authority to operate on March 8, 2013.

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.

This information collection does not contain any questions of a sensitive nature such as those described above. Questions regarding SSN, employment status, and service payback status may be considered PII. However, the employment and service payback status questions are necessary to directly respond to *GPRA* measures and program requirements for service payback. SSNs are needed to track individuals who fail to keep in contact with the IEPD program office and are turned over to ED's Debt Management Group. The Debt Management Group needs SSNs to try to locate participants in other databases including Internal Revenue Service databases.

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.**
- **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.**
- **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.**

Table A-1 presents the maximum annual burden estimates for grantees, participants, and employers. The program office estimates that 46 active grantees, 847 participants, and 847 employers will respond to this collection. Given that participants and employers are only required to respond once a participant has completed or exited a grant training program, it is possible that not all participants/employers in the counts above will respond in any given year; however, for the purposes of estimating burden, we present the maximum burden estimate by assuming that all of the estimated 847 participants will enter employment data twice per year, and all participants will be employed. The actual number of grantees, participants and employers may vary due to the availability of federal appropriations, number of grant awards made, and the number of participants recruited by each project. This is our best estimate taking these variables into consideration.

The burden for grantees of completing the Grantee Reporting Form is estimated at 2 hours per participant per year; on average, each grantee has 22 participants. We expect most of the time to be used updating the cumulative total number of months of training the participants received and the cumulative total allowable training cost for participants. However, it should be noted the actual burden to the grantee will be much less because these costs are usually funded by the federal grant award as administrative wages.

For participants, reporting begins within 1 month of completing or exiting project services when they select the type of payback they will complete. Across all projects, as many as 847 participants may be required to report their service status in a year. We anticipate that the participant reporting burden will be 15 minutes every 6 months.

For employers, the participant will initiate employment verification within 6 months of a participant’s completion of project services. Some participants either do not stay employed or enter deferment due to approved full-time education. Therefore the number of employer representatives asked to provide verification may be lower than the number of participants that exited the IEPD training. We anticipate the employer representative burden to be 10 minutes per participant every 6 months.

Table A-1. Maximum Annual Burden Estimates, by Data Source

Data Source	Estimated Number of Participants	Estimated Semi-Annual Burden per Participant (in Hours)	Estimated Annual Burden (in Hours)	Estimated Hourly Wage	Estimated Annual Cost(in Dollars)
Grantees: Participant Record Form (Monthly)	46 grantees	44	2,024	\$50.00	\$101,200
Participants: Participant Training and Employment Information Form (Twice/year)	847 participants	0.5	424	\$24.69	\$10,469
Employer representatives : Employment	847 participants employed in	0.33	280	\$50.00	\$14,000

Verification Form (Twice/year)	schools				
Totals	1,740		2,728		\$125,669

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).

There are no start-up costs or annual operational costs associated with this application.

For burden estimates, we assume that grantee administrators and employer representatives have an hourly rate of \$50. We assume an average hourly rate of \$24.69 for participants, understanding that some participants may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is \$125,669 across all grantees, participants, and employer representatives. However, the actual burden will be less because the grantee costs estimated in Table A-1 are usually funded by the federal grant award as administrative wages.

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in A12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondent reliable access to support services. This Help Desk could assist a respondent that does not have reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

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.

The total annual cost to the federal government reflects the combined costs for OIE to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

The OIE has price contract with and Westat to the online data To reduce costs for

Type of Cost	Cost
OIE Staff (salaries)	\$175,650
Contractor Data Services (Fixed price)	\$136,153
Total	\$311,803

secured a fixed EPI International create and manage collection system. the federal

government, OIE has worked collaboratively with the another ED office, Office of Special Education Programs (OSEP), to create an online system that both program offices will use to track service obligation payback. By combining resources, OIE is able to offer respondents a secure, online portal for entering data and a Help Desk to answer questions and resolve problems. The annual fixed costs for this contract are \$136,153. These costs include the development of the system, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic; however, participants who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The IEPD program office maintains a full-time staff person whose function is to manage the contract and tasks related to ensuring service payback compliance. The need for this staff person was identified in the OIG 2010 Audit. This staff position is a GS-14, which, in January 2016, ranges from \$108,887 to 141,555 in annual salary for the Washington D.C. locality. The OIE staff salaries category also includes the estimated cost of program oversight by OIE management.

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

There is an adjustments decrease of -336 respondents with an increase of 478 annual burden hours; based upon changes in costs over time, as well as revised estimates regarding the number of participants.

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

The data will be used on an annual basis to report results to ED’s Budget Service for compliance with *GPRA* and publication in ED’s Annual Program Performance Report. A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected and will monitor the fulfillment of participant service payback and grantee and participant compliance with the program regulations. The number of participants and percentages, as well as measures of central tendency when appropriate, will be presented by grant in table format. Charts will be prepared to illustrate changes in frequencies across FYs.

Bulleted text and an executive summary will be provided to highlight key findings. All data will be in an aggregate form to protect PII and no PII information will be published.

Table A-3 below summarizes the data collection and reporting timeline. Respondents will have continuous access to the online data collection system; however analyses will be conducted on a snapshot of the data to document the previous fiscal year (FY).

Table A-3. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Draft reports for previous FY	June-July
GPRA reporting for previous FY	July-August
Final report for previous FY	August

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 number and expiration date will be displayed on the data collection form.

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 certification statement.