

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Indian Education Formula 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 purpose of Indian Education Formula Grant to Local Agencies, as authorized under Title VII, Part A, Subpart 1 of the Elementary and Secondary Education Act (Sections 7111-7119 of the Elementary and Secondary Education Act, as amended, 20 U.S.C. §§7421-7429) is to assist applicants to provide Indian students with the opportunity to meet the same challenging state standards as all other students and meet the unique educational and culturally related academic needs of American Indian and Alaska Native students. The Indian Education Formula Grant (CFDA 84.060A) requires the annual submission of the application from the local education agency and or tribe. The amount of the award for each applicant is determined by a formula based on the reported number of American Indian/Alaska Native students identified in the application, the state per pupil expenditure, and the total appropriation available. Applicants provide the data required for applying for funding electronically, and the Office of Indian Education (OIE) is able to apply electronic tools to facilitate their review and analysis leading to grant awards. The system has been named Formula Grant Electronic Application System for Indian Education (Formula Grant EASIE), and is located in the ED*Facts* System (ESS) website. Submission of data through Formula Grant EASIE by applicants is divided into two parts, Part I and Part II, which occur in different timeframes. Part I relates to collecting student counts and Part II relates primarily to performance and budget information.

In order to be eligible for funding, the applicant must submit both Part I and Part II of the application by the published deadlines. The program adheres to 34 CFR 75.210 of EDGAR (Education Department General Administrative Regulations). The information collection is also necessary to meet the Government Performance and Results Act (GPRA) requirements.

Several small technical corrections have been made to the supporting documentation (sample consortium agreement, parent committee form, sample evidence of eligibility document and ED 506 form) previously approved under clearance number 1810-0021. These technical corrections provide clarity to submitters and no additional burden.

- 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.**

OIE collects information electronically through the EASIE system, and uses this information to determine each applicant's eligibility and allocation, as well as whether a proposed project meets the purpose of the legislation. This application is completed in two parts with two established deadlines. Based upon the information provided through this information collection, projects are funded annually for one budget year. OIE also uses the information for reporting under GPRA and OESE Leading Indicators.

- 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.**

Since 2006, ED has collected this information through an electronic system, Formula Grant EASIE. This web-based system includes the entire applicant submission process. A paper submission form is available to those applicants that request a waiver of the electronic system due to a lack of Internet access. However, in the years of implementation of EASIE, not a single applicant has requested paper submission.

The use of technology affords ED staff greater access to and use of data by (1) providing staff with completed applications more quickly; (2) aggregating and analyzing responses to specific questions more quickly; and (3) storing and managing the 1,300 applications and supporting documents received each year from applicants electronically.

Electronic collection affords greater efficiency for grantees by (1) eliminating the need to print and mail the application; (2) providing technical assistance from ED staff and a Partner Support Center who can view responses online; (3) ensuring that all questions are completed fully and correctly. Additionally, the web-based system pre-populates information collected during registration, so ED does not request duplicate information from applicants. The application also calculates tables and charts to reduce burden on the applicants.

- 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 Indian education programs authorized under section 7121-7122 of the Elementary and Secondary Education Act. Applicants will be required to provide information that addresses the statutory purpose and program requirements. 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.**

As described above, by using an electronic system, OIE minimizes the burden for all applicants. Additionally, OIE strives to limit the information collected through this system to that which is necessary to determine whether applicants can receive grant awards.

**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.**

The information provided by the applicants addresses all required documentation established by Title VII legislative requirements as authorized by Title VII, Part A, Subpart 1 of the Elementary and Secondary Education Act, as amended, in addition to 34 CFR 75.720, and 2 CFR part 200.301. If this information is not collected, the Department will be unable to make grant awards in a timely manner. Data is generated quickly and uniformly to facilitate data collection reducing burden on the applicants, increasing the quality of data that can be used for evaluation and make policy decisions to inform Congress.

**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 application per fiscal year is awarded. Respondents submit the information collection annually for each new grant year.

- **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) will not be less than 30 days for Part I or Part II.

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

Respondents are required to submit applications electronically through the web-based EASIE system unless they have no Internet connection or inadequate Web access. Applicants that meet the exception to submitting an application via EASIE are not 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.**

OIE published a 60-and 30-day Federal Register Notice to solicit public comment on this collection. OIE received two public comments which are attached with response to comments.

**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.**

There are no assurances of confidentiality.

**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.**
- **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.**

Summary

	Respondents	Hours/ response	Total Hours	Total Cost	Cost calculation
EASIE Part I Student Form (ED 506)	10,000	0.309	3,090	\$27,161	10000 x 0.309 x \$8.79/hr = \$27,161. Note that only Indian students who were NOT previously in the applicant's LEA need to fill out this form. Additionally, applicants must maintain ED 506 forms, but do not submit these forms to ED.
EASIE Part I Student Count and Part II Project and Budget Information	1,300	5	6,500	\$118,309	1300 x 4.66 hours x \$16.90/hr = \$102,380 1300 x .33 hours x \$37.13/hour = \$15,929. Total = \$118,309

<b>TOTAL BURDEN</b>	<b>11,300</b>		<b>9,590</b>	<b>\$145,470</b>	
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**Burden Hours**

Estimates are based on the following:

OIE calculated the burden hours for completing EASIE Part I and II based on an average 1,300 yearly applications at 5 hours per submission for a total of 6,500 burden hours. During any given grant cycle, approximately 10,000 new ED 506 forms are filled out annually and maintained by LEAs. Since ED 506 forms only need to be completed once during a child’s K-12 career these forms reflect the entry of new students into any Indian formula grant program. The burden hours associated with each new form is .309 hours x 10,000 new forms annually, for a total 3,090 burden hours.

Applicants can maintain project objectives for up to four years, which reduces the amount of time applicants devote to completing EASIE Part I and Part II. OIE estimates that in years 2-4 of any cycle, one half of the applicants will retain their project objectives, and require 3 hours to complete EASIE Parts I and II, and the other half of the applicants will require 6 hours to complete EASIE Parts I and II.

Year 1: 3,090 hours (student forms) + (1,300 respondents \* 5 hours (Part I and II))= 9,590 hours

Year 2-4: 3,090 hours (student forms) + [(650 respondents \* 3 hours) + (650 respondents \*6 hours)]= 8,940 hours

With these variations, on average across a four year period, applicants devote 9103 hours annually to completing these forms ((9,590 + 8,940 + 8,940 + 8,940)/4)

Average number of hours per respondent annually = 9102.50/1,300 = 7.001 hours

**Respondent Costs**

The respondent cost estimates are computed using the hourly rates of a GS 5/1 and GS 12/1. These hourly rates are comparable to salaries of staff that will perform these functions for the respondent (data entry and review and certification).

The cost to respondents for compilation of the information and completion of the application is based on the estimated average per year for each type of respondent. Of this time, review of instructions, data compilation and entry, and review are included at an average of 4 hours 40 minutes (= 4.66 hours) and 20 minutes (= .33 hours) for review and certification. See the following calculations.

Student forms: (10,000 x .309 hrs) x \$8.79/hr =	\$ 27,161
Data entry for Part I & II (1300 x 4.66 hrs) x \$16.90/hr =	\$102,380
Review and certification for Part II (1300 x .33 hrs) x \$37.13/hr =	<u>\$ 15,929</u>
	\$ 145,470

**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.**

The EASIE software that collects the applications for the Title VII Indian Education Formula Grants is operated and supported under a contract that is a task order under the master ED*Facts* contract. The estimated annual cost of support for the EASIE software is \$350,000. This includes operations and maintenance and a partner support center that assists applicants in the process of submitting.

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

There are no program changes or adjustments in this request for approval to extend this data collection.

- 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.