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Study of the ESEA Title VI Indian Education LEA Grants Program

Part A, Justification

Contract GS-10F-0554N/BPA Order ED-PEP-16-A-0005/TO02

SRI Project P24163

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Part A. Justification

1. Circumstances that make the collection of information necessary

Indigenous communities in the United States are confronted with significant challenges such as high poverty, rural isolation, limited economic opportunities, high suicide rates, and poor education and health outcomes.¹ Research has found that, in the absence of culturally responsive schooling, indigenous students are disadvantaged in reaching challenging standards.² The Title VI Indian Education Local Education Agency (LEA) Grants Program seeks to improve educational outcomes for American Indian and Alaska Native (AI/AN) children by supporting culturally appropriate services to help meet their unique cultural, language, and educational needs. The Title VI Indian Education LEA Grants Program requires the LEAs to collaborate with parents, teachers, and others and tribal organizations to shape grant-funded services. The program is the U.S. Department of Education's largest vehicle to support local efforts to address the particular academic needs of AI/AN children. Grants are to be used to supplement and enrich the regular school program, with the goal of meeting the unique cultural, language, and educational needs of AI/AN children, and ensuring they meet State academic standards.

This data collection request supports a national study of the Title VI LEA Grants Program that will describe how grantees identify eligible children and plan and implement services. The information will inform the U.S. Department of Education's Office of Indian Education (OIE) and the broader field about current practices. To gather consistent information, it is necessary to collect additional information beyond current federal data collections (e.g., Annual Performance Reports and EASIE Budget Reports provided by the OIE).

Purpose of the study

The U.S. Department of Education's Policy and Program Studies Services (PPSS) has commissioned a study to describe nationwide operations of the Title VI Grants Program and inform the field about the strategies grantees use to provide culturally responsive services and activities and help AI/AN students meet challenging state academic standards; align and leverage program-funded services with those funded by other federal, state, and local sources; identify eligible American Indian/Alaska Native (AI/AN) students; establish and implement program priorities with parent, community, and tribal involvement; and measure progress towards Title VI project objectives.

¹ National Center for Education Statistics (2012). *National Indian Education Study 2011* (NCES 2012-466). Institute of Education Sciences, U.S. Department of Education, Washington, D.C.; S. Nelson, R. Greenough, and N. Sage, 2009, *Achievement gap patterns of grade 8 American Indian and Alaska Native students in reading and math* (Issues & Answers Report, REL 2009-No. 073). Washington, DC: U.S. Department of Education, Institute of Education Sciences; National Education Association, 2010-2011, *American Indians and Alaska Natives: Charting a New Course for Native Education*. Available at <http://www.nea.org/assets/docs/AIANfocus2010-2011.pdf>.

² A. Castagno and B. Brayboy, 2008, "Culturally Responsive Schooling for Indigenous Youth: A Review of the Literature," *Review of Educational Research* 78(4), 941-993; K. Tsianina Lomawaima and Teresa L. McCarty, 2006, *To Remain an Indian: Lessons in Democracy from a Century of Native American Education*. New York: Teachers College Press.

The study methodology includes four components: an analysis of extant data, a review of relevant literature, a survey of Title VI Grants Program coordinators, and case studies of grantee projects. Exhibit 1 presents the study questions and sub-questions and the data sources that the study team will draw upon to address each question. The study is using existing data and information when available. The extant data analysis and literature review will facilitate the identification of gaps in research and inform original data collection. The original data collection activities are designed to be complementary. The survey will provide information on the full population of grantees while the case studies will provide detailed and nuanced data from a small subset of the grantees, enabling a more in-depth examination of how and why certain practices are used and the ways in which they tend to work well or be challenging.

Exhibit 1. Study questions and data sources

	Literature review	Extant data review	Grantee survey	Case study
(SQ1) What services do Indian Education LEA Grants fund?				
1.1. What are typical services supported through these grants?		✓	✓	✓
1.2. What are examples of grantees implementing culturally responsive practices (e.g., heritage language instruction)?	✓	✓	✓	✓
1.3. How do grantees coordinate Title VI services with those funded by other federal, state, and local sources?	✓		✓	✓
(SQ2) How do grantees work with stakeholders to identify program-eligible children and plan services to meet the needs of those children?				
2.1. How do grantees engage with tribes, parents, and communities to identify and count program-eligible children?	✓		✓	✓
2.2. How do grantees ensure that ED 506 forms are timely, accurate, and complete?			✓	✓
2.3. How do grantees engage with tribes, parent committees, and communities in planning services?	✓		✓	✓
2.4. What information do grantees use in selecting services (e.g., needs assessment, information about promising practices)?	✓		✓	✓
(SQ3) How do grantees measure progress towards meeting their Title VI service objectives?		✓	✓	✓

OIE will provide the study team with contact information for its Title VI grantees. To carry out the study, the research team from SRI Education, Policy Studies Associates (PSA), Arizona State University's (ASU's) Center for Indian Education, and the University of Alaska Anchorage's (UAA's) Center for Alaska Education Policy Research will notify grantees about the study and associated data collection, which will include surveys of all local grant coordinators and case studies of 9 grantee sites. The survey and case study interview protocols can be found in Appendices C—G.

Authorizing legislation

Authorizing legislation for this study is provided by the Consolidated Appropriations Act, 2012); and the Consolidated and Further Continuing Appropriations Act, 2013 (Pub. L. 113-6). The Indian Education LEA Grants program is authorized by the *Elementary and Secondary Education Act* (ESEA) as reauthorized by the *Every Student Succeeds Act* (ESSA), Public Law 114-95 (12/10/2015), section 6111.

2. Indicate how, by whom, and for what purpose the information is to be used

The study will result in a summary of key findings and a final report designed to describe nationwide operations of and strategies used by Title VI grantees to provide culturally responsive services and activities and help Native students meet challenging State academic standards; align and leverage program-funded services with those funded by other federal, state, and local sources; identify AI/AN students; establish and implement project priorities with parent, community, and tribal involvement; and measure progress towards Title VI project objectives. The final report will also include data interpretation and conclusions, as well as a description of program goals, the study methodology employed, and study limitations. This report will inform the U.S. Department of Education's OIE and will be available to educators, policymakers, parents, tribes, and other stakeholders to help them learn about strategies to identify eligible children and plan and implement services for them.

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

The study team will use a variety of technologies and methods to maximize data collection efficiency and minimize respondent burden. To collect information about Title VI Grants Programs, including each grantee organization's name, address, primary point of contact, email address, and phone number, the study team will request that OIE submit information via email in the format they have readily accessible (Excel is preferred when multiple formats are available).

To conduct the survey, the study team will use Qualtrics, a secure online survey system. The survey will allow for multiple skip patterns that will save respondents time by presenting them only with the questions that are relevant to them. This approach also will minimize data entry error and the need to follow up with respondents.

To inform the selection of case study sites, the study team will use extant grantee data available from OIE and online (e.g., the Common Core of Data, state departments of education website). To inform

case study interviews and minimize the number of questions asked of interview respondents, the study team will also gather and review publicly available documents from grantee websites and during site visits (although grantees and other grant staff may choose to send documents via email if it is more convenient).

During data collection periods, a toll-free phone number and an email address will be available to permit respondents to contact the survey administrator and case study site leads with questions or requests for assistance.

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 Study of the ESEA Title VI Indian Education LEA Grants Program, for which clearance is requested, is the only national study of the program currently funded. The study team completed an analysis of extant data, and a review of academic literature and public reports to identify existing information to answer the study questions. The study team identified some existing information that contributed to the design of the study instruments and will contribute to study findings, but found that information is not available to answer most of the study questions. All information collected for this study aligns directly with the study questions, and all survey and interview protocols focus on critical information not available from other sources.

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

Title VI grantees are LEAs, Bureau of Indian Education (BIE)-operated schools, BIE grant and contract schools, as well as Tribes applying in lieu of LEA/LEAs, some of which are small entities. To minimize burden on these entities, the survey will be administered only once, is brief (requiring approximately 30 minutes for program staff to complete), is free of jargon and assumptions about respondents' background knowledge and experience, and includes primarily closed-response questions. To minimize burden on any small entities involved in the case studies, the study team will only travel to each site once to conduct interviews and focus groups. Similar to the survey, the protocols are free of jargon and inappropriate assumptions about respondents' background knowledge and experience. They will be tailored to individual roles, as well as based on terminology and background knowledge gleaned from review of site-specific documents. The study team will be careful to develop protocols of a reasonable length (i.e., that can be completed in 30 to 60 minutes, depending on the respondent type).

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

Although the Title VI Federal Grants Program is the U.S. Department of Education's largest vehicle to support local efforts to address the particular academic needs of AI/AN children, there has been no comprehensive, national study of the Title VI Grant Program since 1997. Failure to collect information on

implementation of the Title VI LEA Grants Program will prevent the Department of Education, Congress, and other stakeholders from learning about the strategies grantees use to provide culturally responsive services and activities and help AI/AN students meet challenging State academic standards; align and leverage program-funded services with those funded by other federal, state, and local sources; accurately identify AI/AN students; establish and implement program priorities with parent, community, and tribal involvement; and measure progress towards Title VI project objectives. Without this information, the Department and key stakeholders will lack essential information needed to judge whether the program is being implemented as intended and how it could be improved, and to determine how to guide grantees as they implement Title VI requirements under ESSA.

7. Special circumstances

None of the special circumstances listed apply to this data 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

The 60-day Federal Register notice was published on 6/13/17, Vol. 82., page 27054.

The following is a response to comments from the National Indian Education Association (NIEA).

NIEA asked why the study is being conducted.

- The U.S. Department of Education's Policy and Program Studies Services (PPSS) commissioned the study to describe the nationwide operations of the Title VI LEA Grants Program, which has not been studied since 1997. The study was initially planned in 2015, and a contract was awarded in 2016.
- The study is intended to provide information about the strategies that grantees use to provide culturally responsive services to American Indian and Alaska Native (AI/AN) students by sharing information about the strategies that grantees use to provide culturally responsive services to AI/AN students and help these students meet state standards. In addition to collecting descriptive information on the nature of program-funded services, the study will also examine how grantees align and leverage supplemental Title VI-funded services with those funded by other federal, state, and local sources; how they identify AI/AN students who are eligible for these services; how they establish and implement program priorities with parent, community, and tribal involvement; and how grantees measure progress toward their Title VI project objectives.

NIEA expressed concern that the study would examine the impact of Title VI on the academic achievement of Indian students. More specifically, NIEA commented that summative assessments are inappropriate for the evaluation of Title VI and noted that the native students served under Title VI are not the same as those tested under Title I.

- The study will neither examine nor report on student assessment results or other student outcomes.

NIEA expressed concern that the Department had not followed its Tribal Consultation Policy (TCP) and had not consulted with tribes prior to launching the study.

- Because this study is a collection of information and not an action or policy initiative that affects Tribes, it is not covered under the TCP or the broader federal Executive Order 13175 on Consultation and Coordination with Indian Tribal Governments. However, the Department has solicited input on the draft study design from a variety of stakeholders, practitioners, and researchers, including at a meeting of Title VI grantees, at the 2017 convention of the National Indian Education Association, and a meeting of a technical working group of independent expert researchers and practitioners identified for the study. The revised study design and data collection instruments reflect changes that were made to address comments from these stakeholders, which we believe have strengthened and improved the study.

9. Payment or gift

The study team will provide no payment or gift to state, district, school, or project staff who participate in this study.

10. Assurances of confidentiality

Study participants will provide informed consent before responding to the survey or case study interview. The consent form will indicate that the study team will keep all responses confidential and aggregate data in all reports to minimize the risk that any individual may be identified through a deductive reasoning process. The consent form will also inform respondents that the study team may include direct quotes in the study report, but that no personally or grantee identifiable information will accompany these quotes. The study team plans to report results in aggregate to describe Title VI Indian Education LEA Grants Program implementation practices. Grantees will be grouped by factors such as geographic region, grant size, and grantee type to minimize the risk of revealing the identity of an LEA, Tribe, BIE-operated school, BIE grant or contract schools, or individual through deductive reasoning. Before each individual interview, the site visitors will explain the purpose of the study, the topics to be covered in the interview, and the confidentiality assurances discussed above. (See Appendix B for consent forms.)

The study team has extensive experience in protecting the privacy and confidentiality of interview respondents. Safeguards to protect the privacy and confidentiality of all respondents—in addition to the ones discussed above—include the following:

- All team members will participate in data collection training that includes a focus on methods to maintain participant confidentiality and data security.
- The study team will provide secure environments for all data collected for the study.
- The study team will immediately de-identify all data collected during the study that can potentially be linked to an individual and will delete temporary files that are stored on encrypted hard drives during on-site data collection activities.
- Only authorized members of the study team will have direct access to de-identified study databases. Study team members will maintain a high level of focus on ensuring the confidentiality of both quantitative and qualitative data.
- After completion of the study, the study team will destroy all data files with personally identifiable information.
- The team will not share data obtained in this research with any entity or individual other than the Department and will not use the data for purposes other than this study.

11. Justification for questions of a sensitive nature

The survey and interview protocols will not include questions of a sensitive nature.

12. Estimates of the hour burden

The study team estimates that survey will take approximately 30 minutes to complete. Surveys will be sent to the entire population of current Title VI grantees (about 1,300). Case study interviews will take no more than 60 minutes to complete and will be conducted with individuals associated with nine grantees, selected in rough proportion to distribution of grantees by grant award size, grantee type, and geographic region.

Exhibit 2 provides estimates of the number of surveys and interviews and the amount of time required to conduct them; it also includes estimates for case study sites to assist in providing documents and scheduling the case study interviews. The total number of estimated annual burden hours needed to collect information for this study will be 289 hours per year.

The overall cost burden for the estimated annual 289 hours needed for this information collection is \$11,721 per year. There are no monetary costs to respondents for this information collection activity.

Exhibit 2. Estimated number of annual respondents and labor hours for each information collection

Respondent category	Number of respondents, by type	Average time burden per respondent (in hours)	Total time burden (in hours)	Hourly wage rate (estimated \$) ¹	Total respondent cost (estimated \$)
Survey participants					
Title VI Grant Coordinator (1 per site)	434 ²	½	217	\$45	\$9,765
Case study participants					
Title VI Grant Coordinator (1 per site)	3	1	3	\$45	\$135
Other grantee staff (5 per site)	15	1	15	\$31	\$465
Tribal leader (2 per site)	6	1	6	\$34	\$204
Parents (16 parents per site)	48	1	48	\$24	\$1,152
Total			289		\$11,721

All wage estimates are from the Bureau of Labor Statistics (BLS), <https://www.bls.gov/data/>, retrieved on April 14, 2017. The hourly wages of Title VI Grant Coordinators was derived from BLS occupation code 11-9030 – “Education Administrators.” The hourly wages for grantee staff were derived from BLS occupation code 25-9031 – “Instructional Coordinators.” The hourly wages of tribal leaders was derived from BLS occupation code 11-9150 – “Social and Community Service Managers.” The hourly wages of parents was derived from BLS occupation code 00-0000 – “All occupations.” The hourly wages of individuals providing administrative assistance were derived from BLS occupation code 43-6014 – “Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.”

² Estimated based on 2015 grant awards

13. Total annual cost burden for this activity

There is no capital or start-up cost component to these data collection activities, nor is there any operations, maintenance, or purchase cost associated with the study.

14. Annualized costs to the federal government

The estimated annualized cost of the study to the federal government is \$418,544. This estimate is based on the total contract cost of \$941,724, amortized over a 27-month performance period. This total includes costs already invoiced, plus budgeted future costs charged to the government for contractual services from SRI, PSA, ASU’s Center for Indian Education, and UAA’s Center for Alaska Education Policy

Research to finalize the study design, site selection, data collection (including travel for site visits), data analysis, and reporting.

15. Program changes in burden/cost estimates

This request is for a new information collection, therefore, no changes apply.

16. Plans for tabulation and publication

The study will result in a summary of key findings and a final report designed to describe nationwide operations of the Title VI Indian Education LEA Grants Program, including how grantees: identify AI/AN students; establish and implement program priorities with parent, community, and tribal involvement; help AI/AN students meet state standards through culturally responsive services and resources; and align and leverage program-funded services with those funded by other federal, state, and local sources. The final report will also include data interpretation and conclusions, as well as a description of program goals, the study methodology employed, and study limitations. The report will be made publicly available to educators, policymakers, parents, and other stakeholders via the U.S. Department of Education, SRI, and PSA web sites.

Data collection is tentatively scheduled to begin in October 2017 and end in January 2018. The analysis will begin in February 2018, and the final report is scheduled for completion in December 2018.

17. Expiration date omission approval

Not applicable. All data collection instruments will include the OMB data control number and data collection expiration date.

18. Exceptions to the certification statement

Not applicable. There are no exceptions requested.