

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Indian Education Formula Grants to LEAs Annual Performance Report (APR)

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 section 6116 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA) is to assist grantees 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), is neither competitive nor discretionary and requires the annual submission of the application from either a local education agency, tribe, Indian organization or Indian community based organization. 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.

The Office of Indian Education (OIE) of The Department of Education (ED) collects annual performance data within the same system that collects the annual application. The application and the annual performance report are both be housed in the Education Data Exchange Network (EDEN) Submission System.

The 524B Annual Performance Report (APR) was designed for discretionary grants, however the title VI program is a formula grant program. The EASIE APR goes beyond the generic 524B APR and facilitates the collection of more specific and comprehensive data due to grantees entering project specific data into an online database. This will allow for a comparison of LEAs across objectives. By entering information into the EASIE APR database, data will be able to be generated quickly and uniformly to facilitate data collection, as required under 34 CFR 75.720, and 2 CFR part 200.327, .328. This APR will improve the overall quality of data collected, reduce burden on the grantees, increase the quality of data that can be used for evaluation and make policy decisions as well as to inform Congress.

OMB Reporting History and Legislative Authority

Clearance was granted for the EASIE Annual Performance Report (EASIE Part III) in a revised information collection by OIE under OMB No. 1810-0726 through July 31, 2018.

The information collected is in compliance with 34 CFR 75.720, and 2 CFR part 200.327, .328. Recipients must submit an APR demonstrating that progress has been made or met in meeting the approved objectives of the project. In addition, grantees are required to

report on their progress toward meeting the performance measures established for the ED grant program.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The OIE program staff will collect information via the APR submitted by formula grantees in compliance with 34 CFR 75.720, and 2 CFR part 200.327, .328. Grantees submit APRs once a year and OIE will use the APRs to monitor grantee progress toward performance objectives. We request an APR that goes beyond the generic 524B APR to facilitate the collection of more standardized and comprehensive GPRA data which grantees enter into a single format in an online database. The data will be generated into spreadsheets used to improve the overall quality of data collected, reduce burden on the grantees and program staff, increase the type of data that can be used for evaluation, make policy decisions, and inform Congress.

- 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.**

APR information will be collected electronically through a web-based system accessible only to grantees. The use of technology affords ED staff greater access to and use of data by (1) providing staff with completed APRs more quickly; (2) aggregating and analyzing grantee responses to specific questions more quickly; and (3) storing and managing the 1,300 APRs received each year from grantees electronically.

Electronic collection affords greater efficiency for grantees by (1) providing technical assistance from ED staff and a Partner Support Center who can view their responses online; (2) ensuring that all APR questions are completed fully and correctly. Grantees that do not have internet access are permitted to e-mail, fax or mail the APR.

Another feature of the web-based system is that it pre-populates information collected during EASIE Part II, so ED does not request duplicate information from grantees. Student performance information collected by *EDFacts*, such as State assessment results, and graduation rates, are pre-populated into EASIE so there is no additional burden to the applicant. The APR also calculates tables and charts to reduce burden on the grantees.

- 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 is no duplication of reporting on the APR. This information collection requests information specifically for Indian Education Formula Grant to Local Agencies authorized

under ESEA §§ 6111-6119. Although there are other Indian education programs in the Department, they are authorized under different legislation and their purposes and requirements differ from those under this program.

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

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

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent or no annual reporting risks waste, inefficiency and/or lack of progress on desired indicators due to insufficient oversight. Also, annual performance measurement is a requirement under 34 CFR 75.720 and 2 CFR Part 200.327, .328.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines as described.

- **requiring respondents to report information to the agency more often than quarterly;**

Respondents submit the information collection annually for each grant year.

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

The collection of information will not be less than 30 days.

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

Respondents are required to submit the APR electronically through a web-based system unless they have no Internet connection or inadequate Web access. Grantees that meet the exception to submitting the APR electronically 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-day and 30-day Federal Register Notice to solicit public comment on this collection. There were no public comments received during the 60-day comment 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.

Confidential information is not requested, 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.

None of the questions in the APR concern topics commonly considered private or sensitive, such as religious beliefs or sexual practices.

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.**

Grantees are required to submit APR information in a web-based format. The average respondent burden for the APR is estimated to be 16 hours. The estimate includes reading instruction; collecting information; making appropriate calculations; ensuring unduplicated counts of participants; answering all questions fully; completing the online forms and submitting these forms to ED.

APR Sections 1-9	Time	Comments
1. Project Director Name and Title and Authorized Representative Name and Title	20 minutes	
2. Participation Data By Objective and Activity/Service	12 months x 30 minutes=360 minutes	Collecting participation data by activity or service of each objective. (1 hour a month X 12 months)
2a. Comments	60 minutes	
3. Program Objective Results	60 minutes	The grantee will decide if the objective was met and will provide a description if objective was not met.
4a. Reading Assessments (All Students/Indian Students)	30 minutes	(Optional) This section is pre-populated with EdFacts information. A grantee can select to modify the data.
4b. Mathematics Assessments (All Students/Indian Students)	30 minutes	(Optional) This section is pre-populated with EdFacts information. A grantee can select to modify the data.
4c.. Summary of State Assessment Data	10 minutes	Chart summarizes Assessment Information.
5. Graduation Data (Indian students)	30 minutes	Note: only for programs with high school students.
6. Budget Data	10 minutes	This information will be prepopulated with budget information and budget information is calculated.
6a. Explanation if funds remain exceeding 10%.	40 minutes	(Optional) The grantee will only need to write an explanation if 10% or more remain.
6b. Budget/Program specific questions/Certification	10 minutes	Yes, No questions have been added to assist grantee in completing administrative tasks.
Total Burden	11 hours	

Burden Hours

Across all sites, the total hour burden is estimated as follows:

$$1,300 \text{ grantees} \times 11 \text{ hours per grantee} = 14,950$$

The estimate can vary depending on the amount of information provided by each grantee.

Respondent Costs

The program director of each grantee will complete the annual reporting forms and certify the APR. These tasks will take an average of two hours. Administrative staff is expected to collect all other information, and

make necessary calculations. These tasks are estimated to take an average of 14 hours.

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

Program director: (2 hours @ 30.47 per hour)	=	\$ 60.94
Administrative staff: (9 hours @ 13.87 per hour)	=	<u>\$124.83</u>
Average Cost per Grantee	=	\$185.77

Across all grantees, the total cost to respondents is as follows:

1,300 grantees per year x \$185.77	=	\$241,501
		<u>x 1 year</u>
Total for 2018	=	\$241,501

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.

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.

Additional cost estimates for maintenance, technical assistance and report review are as follows:

Tasks for 2018:

Review Reports:

1,300 grantee reports @ 1 per .30 hours = 650 hours

5 staff @ \$35/hour = \$175/hour Total = \$113,750

Total for 2018 = \$355,251

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

We developed a new form that collects program-specific data which support the mission of the Formula grant program. There is a program change decrease of -6500.

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

Results of the 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.