

1 Supporting Statement A

Bureau of Indian Affairs Data Elements for Student Enrollment in Bureau-operated Schools

OMB Control Number 1076-0122

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Secretary of the Interior, through the Bureau of Indian Education (BIE), is required by the Snyder Act (25 U.S.C. 13), the Indian Self-Determination and Education Assistance Act of 1975 (25 U.S.C. 5301), the Education Amendments of 1978 (25 U.S.C. 2001), Augustus F. Hawkins-Robert T. Stafford Elementary and Secondary School Improvement Amendments of 1988 (20 U.S.C. 6301 et seq.), to provide educational services to federally recognized Indians and Alaska Natives. This Student Enrollment Application is utilized by schools operated or funded by BIE. The form addresses criteria for attendance that was set forth by the Amendment to Title 25 USC - Indian Education Programs (99 STAT. 1747), which allows for tuition-free attendance of any Indian student who is a member of a federally recognized tribe, or has $\frac{1}{4}$ degree blood quantum of a member of such tribes, as well as dependents of the Bureau, Indian Health Services, or tribal government employees who live on or near the school site. 25 CFR 32, Indian Education Policies and 25 CFR 39, Indian School Equalization Program, lists information that BIE has determined is necessary for this information collection.

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

a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The information is collected by school registrars to determine the student's eligibility for enrollment in a bureau-operated school, and if eligible, is shared with appropriate school officials to identify the student's base and supplemental educational and/or residential program needs. The information is compiled into a national database by the Bureau of Indian Education to facilitate budget requests and the allocation of congressionally appropriated funds.

Page One

Schools will place their name in the header of the form, providing the school and funding type. Box 1 requests identification information which includes the student's full name, address, distance between home and school, date and place of birth, sex, tribal affiliation, degree of Indian blood, enrollment number, home agency, and the dominant language at home. This information helps the school with decisions about student placement.

Box 2 requests for family information, which includes the mother and father's address, tribal affiliation, home agency, enrollment number, whether they are alive or deceased, occupational information, phone number, work number, and an emergency contact number. This information helps the school to ensure someone will be responsible for working with the school, if necessary, and what arrangements the parents have made regarding emergencies.

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Continues with Box 2, with legal guardian and other (such as group home) in lieu of family information, and requests the same information as family information.

Box 3 requests information on school(s) previously attended, which includes the school name and address, dates of attendance, grades completed, and reason(s) for leaving. At the bottom of this page, there is a statement regarding acknowledging legal responsibility for the student and possibility of submitting additional information if requested, with space for the parent/legal guardian to sign and date. Below, there is space for the principal to document if the child is accepted into the school and space for the principal's signature and date.

Page Three

Box 4 contains the criteria for boarding or out-of-boundary enrollment, with lists of educational and social factors. The required approvals are also listed. The Privacy Act Statement appears on this page.

Page Four

The Paperwork Reduction Act Statement is on the top of the page. It also contains instructions for completing the Student Enrollment Application.

Page Five

Continues the instructions for completing the Student Enrollment Application.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how**

this collection meets GPEA requirements.

BIE collects this information through paper forms and enters the data into a web-based system called NASIS (Native American Student Information System). This customized school administrative software program streamlines the process and time to collect, retrieve, and compile the information to determine enrollment eligibility and the allocation of funds.

- 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.**

This information is not collected or duplicated by any other Federal agency. We are the only bureau authorized to collect the information needed for our school system.

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

This information collection does not impact small business or other small entities.

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

Without collecting this information, BIE would not be able to meet the requirements set forth in the Snyder Act and Public Laws 93-638, 95-561, and 100-297, to provide educational services to Federally recognized Indians and Alaska Natives, and would negatively impact the planning for and distributing the appropriated funds.

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

- * requiring respondents to report information to the agency more often than quarterly;**
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * requiring respondents to submit more than an original and two copies of any document;**
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that will apply to this collection.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day notice for public comments was published in the Federal Register on April 9, 2018 (83 FR 15174).

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The following persons were contacted to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported:

- Secretary, Flandreau Indian School in Flandreau, South Dakota
- Principal, Blackwater Community School in Coolidge, Arizona
- Superintendent, Standing Rock Community School in Fort Yates, North Dakota
- Business Specialist, Sherman Indian High School in Riverside, California

In summary, these four individuals believe this information collection is necessary. Each reported that the instructions were clear. Respondents reported that the applications took between 5 and 20 minutes to complete, with one respondent estimating a maximum of 40 minutes to complete.

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

Respondents will not receive any payment, gift, or other remuneration for providing the

information collection requirements.

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

The Privacy Act, BIA-22 Indian Student Records published in the Federal Register at 73 Fed. Reg. 40605 (July 15, 2008), provides protection for confidential information. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not request any information of sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

Annual reporting and record keeping for this collection of information is estimated to average 15 minutes for approximately 48,000 respondents, annually. This estimate includes the time for completing the application and gathering any supporting documentation. Therefore, the total annual estimated burden is 12,000 hours or equivalent to \$434,640.

The estimated total salary cost for each applicant is 15 minutes (.25 hours) x \$36.22 per hour, which is an average of the hourly wages for civilian, as shown below.

Hourly	Number of	Frequency of	Time to	Total Hourly	Total Cost
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Salary	Applications	Application	Complete	Burden	Burden
\$36.22	48,000	Once per year	.25 (15 minutes)	12,000	\$434,640

* To obtain the hourly rate, the BIA used \$36.22, the wages and salaries figure for civilian works from BLS Release USDL-18-1499, Employer Costs for Employee Compensation – June 2018, Table 1, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian works, by major occupational and industry group, at <https://www.bls.gov/news.release/pdf/ecec.pdf>. This wage includes a multiplier for benefits.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no non-hour cost burden.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated total cost to the Federal Government to collect the information is \$551,560. This is based on school registrars, certification by Education Resource Centers and their immediate staff, compiled and finalized by an Education Specialist and a Finance Specialist who collect the information. The table below explains how this amount was computed.

The school registrar retrieves a student’s historical, biographical, family, educational, and health history for the purpose of determining eligibility and identifying the student’s educational and/or residential program needs.

In their respective agency/area, the Education Resource Centers and immediate staff review and certify the accuracy and eligibility of students. The Education Resource Center’s priority review and certification is of new students, whereas the immediate staff focuses on returning students.

The Education Specialist – ISEP compiles, summarizes, and finalizes the certified enrollment count for the allocation of congressionally appropriated funds for each school.

Employee Type	No. of employees	Time per student	No. of applications reviewed	No. of hours	Salary* per hour	Total cost per category
School Registrar	183	15 minutes	48,000	12,000 hr.	GS-4/3: \$13.22/hr x 1.6 = \$21.15 /hr	\$253,800
Education Resource Center (ERC)	15	10 minutes	11,000 (733 per ERC)	1,833 hr.	GS-13/5: \$41.07 x 1.6 = \$65.71/hr	\$120,468
ERC Staff	75	10 minutes	37,000 (approx. 493 per staff)	6,167 hr.	GS-7/2: \$17.75 x 1.6 = \$28.40/hr	\$175,133
Education Specialist ISEP	1	10 minutes per school	183 schools	31 hr.	GS-14/2: \$44.25 x 1.6 = \$70.80/hr.	\$2,159
TOTAL				9,231 hrs		\$551,560

* The salary associated with this grade and step is based on the General Schedule 2018. The hourly salary is multiplied by 1.6 to cover benefits. See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx.

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

The program changes or adjustments in hour and cost burden are due to proper calculations and changes in hourly salaries for the general public and government employees.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collection may be used to support budget requests and to report on the status of Indian education, but individual persons will not be identifiable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We intend to display the OMB control number and the expiration date.

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

We are not seeking any exceptions to the certification statement.