

USDA 1994 Tribal Scholars Program Application  
**INFORMATION COLLECTION JUSTIFICATION**

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 the U.S. Department of Agriculture (USDA) 1994 Tribal Scholars Program is to strengthen the long-term partnership between USDA and the thirty-five 1994 Institutions to increase the number of students studying and graduating in food, agriculture, natural resources, and other related fields of study, and to develop the pool of scientists and professionals to annually fill jobs in the food, agricultural, and natural resources system.

The USDA 1994 Tribal Scholars Program, within the Office of the Secretary, Office of Partnerships and Public Engagement, is an annual, joint human capital initiative between USDA and the Nation's 1994 Land-Grant Institutions, also known as 1994 Institutions. This program offers a combination of paid work experience with a USDA sponsoring agency through an appointment under the Fellowship Experience Program (FEP). FEP will permit the recruitment and selection of exceptional students majoring in agriculture related fields of study at USDA partner Colleges and Universities. Under the FEP, students will fill Excepted Service positions, receive mentoring, and be provided developmental assignments. These temporary appointments will be made using the Schedule A in 5 CFR § 213.3102 ( r ) and may not exceed 4 years based on defined criteria.

When students graduate, they will be eligible for a non-competitive conversion into a permanent position. Additionally, the experience the students gain via classroom instruction in their respective degree paths, along with their USDA work experience, will make them strong candidates for opportunities in agriculture and agri-business related fields. The USDA 1994 Tribal Scholars Program is designed to integrate classroom study into a degreed college or university program such as agriculture and natural resources, which prepares the student for competing for positions in the sponsoring agency's future workforce and with paid tuition, fees, books, use of a laptop computer and Leadership training. The program is conducted in accordance with a planned schedule and a working agreement between USDA agencies and the student.

The USDA 1994 Tribal Scholars Program will offer scholarships and internships to U.S. citizens for a period of up to 4 years. The eligibility standards are:

- Must be at least 16 years old.
- Must be able to complete required occupation-related work experience (640 hours) prior to or concurrently with the completion of course requirements for the degree.
- Must be a United States citizen or national (resident of American Samoa or Swains Island). If you are not a citizen, you may participate if you are legally admitted to the United States as a permanent resident and are able to meet United States citizenship requirements prior to completion of your degree.
- Must be in good academic standing. Cannot be on academic probation. Must furnish course registration information at the start of each school term; must provide verification of academic status at the end of each academic term (grade report or transcript); must meet

academic standards as set forth by the school they are attending; maintain satisfactory progress in completing academic requirements; and demonstrate satisfactory performance and conduct.

- If selected, students must sign USDA Fellowship agreements.
- Must be enrolled in, accepted, or plan to seek a Bachelor's or Associate's degree in an accredited 1994 Tribal Land-Grant College or University as demonstrated by a declaration of a major course of study in agriculture and natural resource disciplines.
- Carry at a minimum, a half-time course load as defined by the institution.
- Be enrolled in an academic major related to the occupation being considered.

USDA Tribal Scholarship recipients are required to study in the food, and agricultural, and related sciences, as defined by the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3103 (8)) as: basic, applied, and developmental research, extension, and teaching activities in food, agricultural, renewable natural resources, forestry, and physical and social sciences, including activities relating to the following: a) animal health, production, and well-being; b) plant health and production; c) animal and plant germ-plasm collection and preservation; d) aquaculture; e) food safety; f) soil and water conservation and improvement; g) forestry, horticulture, and range management; h) nutritional sciences and promotion; i) farm enhancement, including financial management, input efficiency, and profitability; j) home economics; k) rural human ecology; l) youth development and agricultural education, including 4-H clubs; m) expansion of domestic and international markets for agricultural commodities and products, including agricultural trade barrier identification and analysis; n) information management and technology transfer related to agriculture; o) biotechnology related to agriculture; and p) the processing, distributing, marketing, and utilization of food and agricultural products.

The following are the statutory authorities for the USDA Tribal Scholars Program:  
5 CFR 213.3402(a)(b), and (c) excepted service to hire students and recent graduates.  
5 CFR Part 410—Training

Equity in Education Land-Grant Status of 1994

Executive Orders 12015, Executive Order 13562 and 13270

Food, Agriculture, Conservation and Trade Act of 1990; P.L. 101-624, Sec. 2501, Sec. 2830

Farm Security and Rural Investment Act of 2002; P.L. 107-171; H.R. 2646

Federal Agriculture Improvement and Reform Act of 1996

Executive Order Executive Order 13592 -- Improving American Indian and Alaska Native Educational Opportunities and Strengthening Tribal Colleges and Universities.

2. **Indicate how, by whom, how frequently, 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 information that is collected is used by USDA agencies at least once yearly. The information collection serves as a tool for determining the eligibility of applicants to sponsored positions within the USDA Tribal Scholars Program. USDA 1994 Program staff collect the applications and submit these to agency human resource staff.

Applicants will apply by submitting their applications via email to the USDA 1994 Program. The applications will be reviewed for completeness and scanned, if necessary, and forwarded to the respective USDA Agency Human Resource Specialist.

USDA Agencies' Human Resources Specialists will review the applications received to determine if the applicants meet the qualification requirements outlined. Those candidates who do meet the minimum qualifications will then be reviewed to determine if they are among the "qualified" or "best qualified" candidates. Once the "best qualified candidates" are identified, a "certificate of eligible candidates" is prepared and sent to the supervisor (or selecting official) for the position. The supervisor will review the applications and determine who among the "best qualified" will be interviewed. Interviews are scheduled and conducted, reference checks are completed, and a final selection is made.

The USDA Tribal Scholars Program is an annual program. The recruitment cycle is continuous, and applications are due each year on February 1.

Previous collections were used to recruit for USDA Agencies.

- 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.**

The USDA 1994 Tribal Scholars Program utilizes an electronic fillable form that reflects Agency's sponsored positions. This form can be printed and mailed or sent to via email to the USDA 1994 Tribal Land-Grant Colleges and Universities Program. Any hardcopy form will be scanned into an electronic form to reduce burden.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

USDA is the only agency (Department) that collects this information.

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

This collection does not impact small businesses 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.**

The USDA 1994 Tribal Scholars Program would not be able to function consistently without this annual collection. The Equity in Education Land-Grant Status Act of 1994 requires the Department of Agriculture to establish programs ensuring equitable participation of students enrolled in Tribal Colleges and Universities in USDA sponsored employment programs and activities. Not engaging 1994 Land-Grant Institutions in USDA scholarship programs may result in an increase in future discrimination lawsuits against the Department.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner consistent with the guidelines in 5 CFR 1320.5.**

- 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;
- 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 secret, 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.

This information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1230.5.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

A public notice with request for comments for this application was published in the Federal Register regarding this information collection and program guidelines. The notice was published on August 27, 2019.

Two comments were received. The first was from the U.S. Equal Employment Opportunity Commission (EEOC), which recommended USDA add "genetic information" to the list of protected bases for the 1994 Tribal Scholars Service Agreement.

Response: USDA agrees.

The second comment was from a 1994 Institution, which notes that USDA's description of the 1994 Tribal Scholars Program includes only schools with bachelor's degrees in Agriculture, Science, Natural Resources, and related fields. The 1994 Institution notes that only 8 TCUs have bachelor degrees in these areas.

Response: USDA will engage the 1994 Institutions to ensure their equitable participation in the Department's employment, programs, services and resources per the Federal Agriculture Improvement and Reform Act of 1996, Pub. L. No. 104-127.

9. **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 form, and on the data elements to be recorded, disclosed, or reported.**

Roland Begaye (American Indian Higher Education Consortium Student Vice-President) reviewed the application and the process and made no comment.

Jayvion Chee (Navajo Technical University and University of Arizona Graduate) reviewed the

application and the process and made no comment.

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

This information collection activity involves no payments or gifts to respondents.

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

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 522a.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 activity will ask no questions of a personal or 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. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The following describes how the annualized costs were determined for the USDA Tribal Scholars Program for both high school and college applicants.

A total of 340 applicants are anticipated. The expectation is that 170 applicants will be from high school students and 170 applicants will be from existing college students.

The total annual hour burden for the two applications is 1326 hours, or 663 each.

High School Applicants:

Respondents: USDA Tribal Scholarship Program High Schools Applicants

Estimated number of Respondents to complete all sections of application..... 170

It is expected that approximately 170 people each year will submit an application. Each application will have three respondents, inclusive of the applicant and two references. This will

generate 510 responses.

Estimated Average time to complete whole application.....4.0 hours  
Applicant section.....2.0 hours  
Teacher section.....1.0 hours  
Counselor section..... 1.0 hours  
Estimated Average time per respondent..... 1.3 hours  
Estimated number of respondents per application.....3  
Estimated total Annual Response..... 170  
Estimated total Collection Burden.....663 hours  
Respondent's Estimated Annual Cost for the hour  
Burdens for collections of information.....\$54,498.60  
(Basis: Estimated total Collection Burden (663 hours) x Burden cost for collection (\$82.20) = \$54,498.60.

Applicant (\$13.70/hr @ 2.0 hours).....\$27.40

(Basis: \$10/hr +\$3.70 fringe X 2 hours)

Reference 1 (\$27.40/hr @ 1 hours).....\$27.40

(Basis: \$27.40 ((\$20 hr + \$7.40 fringe)) hour in rural, tribal area secondary schools)

Reference 2 (\$20.00/hr @ 1.0 hours . \$27.40.

(Basis: \$27.40 ((\$20 hr + \$7.40 fringe)) hour in rural, tribal area secondary schools)

Total \$82.20

The applicant completes an essay, compiles a resume, and includes a transcript. Two staff write letters of recommendation. Electronic submissions are preferred. Applicant wages based on typical wages in Tribal areas. Teacher, counselor, 1994 land-grant reference wages are based on typical salaries in Tribal areas.

Total burden cost respondents' inclusive of applicants and two persons providing recommendations: teachers, counselors, Deans, Vice-presidents of schools, and others. The

total collection for high school applicants is \$54,580.20 (\$54,498.60+\$82.20).

College Applicants:

Respondents: USDA Tribal Scholarship Program College Applicants

Estimated number of Respondents to complete all sections of application..... 170

It is expected that approximately 170 people each year will submit an application. Each application will have three respondents, inclusive of the applicant and two references. This will generate 510 responses.

Estimated Average time to complete whole application.....4.0 hours

Applicant section.....2.0 hours

Teacher section.....1.0 hours

Counselor section..... 1.0 hours

Estimated Average time per respondent..... 1.3 hours

Estimated number of respondents per application.....3

Estimated total Annual Response.....170

Estimated total Collection Burden.....663 hours

Respondent's Estimated Annual Cost for the hour

Respondent's Estimated Annual Cost for the hour

Burdens for collections of information.....\$54,498.60

(Basis: Estimated total Collection Burden (663 hours) x Burden cost for collection (\$82.20) = \$54,498.60.

Applicant (\$13.70/hr @ 2.0 hours).....\$27.40

(Basis: \$10/hr +\$3.70 fringe X 2 hours)

Reference 1 (\$27.40/hr @ 1 hours).....\$27.40

(Basis: \$27.40 ((\$20 hr + \$7.40 fringe)) hour in rural, tribal area secondary schools)

Reference 2 (\$20.00/hr @ 1.0 hours .)\$27.40.

(Basis: \$27.40 ((\$20 hr + \$7.40 fringe)) hour in rural, tribal area secondary schools)

Total \$82.20

The applicant completes an essay, compiles a resume, and includes a transcript. Two staff write letters of recommendation. Electronic submissions are preferred. Applicant wages based on typical wages in Tribal areas. Teacher, counselor, 1994 land-grant reference wages are based on typical salaries in Tribal areas.

Total burden cost respondents' inclusive of applicants and two persons providing recommendations: teachers, counselors, Deans, Vice-presidents of schools, and others. The total collection for college applicants is \$54,580.20 (\$54,498.60+\$82.20).

The sum for the two applications (high school and college) of 170 respondents each for a total of 340 is \$109,160.

13. **Provide estimates 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). The cost estimates should be annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There is zero annual cost burden associated with capital or start-up costs.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The application is electronic and will require no printing or mailing costs. Ten positions per year are anticipated for recruitment.

#### **High School Application**

##### Position Development By Agencies

Position Creation:

Human Resource Staff, GS-13/Step 5, paid at an annual salary and benefits of \$153,978.41 (\$112,393 + \$41,585.41) or \$ 73.78 per hour creating positions for the program, 3 hours per position X 10 positions.

10 positions X 3 hours X \$73.78 = \$2213.40

##### Position Review:

Human Resource Policy Staff, GS-13/Step 5, paid at an annual salary and benefits of \$153,978.41 (\$112,393 + \$41,585.41) or \$ 73.78 per hour reviewing positions for the program, 1 hour per position X 10 positions.

10 positions X 0.5 hours X \$73.78 = \$368.90

##### Recruitment



1994 Program Staff at GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, hosting recruitment webinars for 4 Agencies hosting positions for the USDA 1994 Tribal Scholars Program.

4 Webinars X 1.5 hours X \$62.05= \$372.30

Agency Staff at GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, hosting a recruitment webinar for the USDA 1994 Tribal Scholars Program.

1 Webinar X 1.5 hours X \$62.05= \$93.08; 4 Total Webinars X \$93.08= \$372.32

USDA Presentations About Scholarship Opportunities:

4 Webinars X 1.5 hours X \$62.05= \$372.30

USDA Agency Review of Applications

A USDA 1994 Program staff member, GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, reviewing 170 applications for completeness and eligibility:

\$62.05 x .5 hours per application x 170 applications = \$5274.25

A USDA Human Resources Specialist, GS-11/Step 5 paid at an annual salary and benefits of \$111,217.97 (\$81,181 + \$30,036.9), or \$53.29 per hour, reviewing 170 applications received for 10 position announcements.

\$53.29x .5 hours per application x 170 applications = \$4529.65

Totals:	\$2213.40
	\$2213.40
	\$ 372.30
	\$ 372.30
	\$ 372.30
	\$5274.25
	<u>\$4529.65</u>
Total:	\$14,975.30

**College Application**

The application is electronic and will require no printing or mailing costs. Ten positions per year are anticipated for recruitment.

Position Development By Agencies

Position Creation:

Human Resource Staff, GS-13/Step 5, paid at an annual salary and benefits of \$153,978.41 (\$112,393 + \$41,585.41) or \$ 73.78 per hour creating positions for the program, 3 hours per position X 10 positions.

10 positions X 3 hours X \$73.78 = \$2213.40

Position Review:

Human Resource Policy Staff, GS-13/Step 5, paid at an annual salary and benefits of \$153,978.41 (\$112,393 + \$41,585.41) or \$ 73.78 per hour reviewing positions for the program, 1 hour per position X 10 positions.

10 positions X 0.5 hours X \$73.78 = \$368.90

Recruitment

1994 Program Staff at GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, hosting recruitment webinars for 4 Agencies hosting positions for the USDA 1994 Tribal Scholars Program.

4 Webinars X 1.5 hours X \$62.05= \$372.30

Agency Staff at GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, hosting a recruitment webinar for the USDA 1994 Tribal Scholars Program.

1 Webinar X 1.5 hours X \$62.05= \$93.08; 4 Total Webinars X \$93.08= \$372.32

USDA Presentations About Scholarship Opportunities:

4 Webinars X 1.5 hours X \$62.05= \$372.30

USDA Agency Review of Applications

A USDA 1994 Program staff member, GS-12/Step 5 paid at an annual salary and benefits of \$129,492.40 (\$94,520 + 34,972.40) or \$62.05 per hour, reviewing 170 applications for completeness and eligibility:

\$62.05 x .5 hours per application x 170 applications = \$5274.25

A USDA Human Resources Specialist, GS-11/Step 5 paid at an annual salary and benefits of \$111,217.97 (\$81,181 +\$30,036.9), or \$53.29per hour, reviewing 170 applications received for 10 position announcements.

\$53.29x .5 hours per application x 170 applications = \$4529.65

Totals:	\$2213.40
	\$2213.40
	\$ 372.30
	\$ 372.30
	\$ 372.30
	\$5274.25
	<u>\$4529.65</u>
Total:	\$14,975.30

Total for high school and college applications: \$29,950.60

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

Previously, there was one application for both high school and college applicants. There are now two separate applications. One is for high school applicants and the other is for college

applicants.

The burdened hours required for all the documentation to be compiled was increased by 30 minutes to reflect reviewer's recommendations.

The number of respondents were increased to reflect greater involvement of Agency human resource professionals in the vetting of applicants.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The Office of Partnerships and Public Engagement has no plans to publish information it collects in connection with this program.

**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 Office of Partnerships and Public Engagement will display the date and OMB control number.

**18. Explain each exception to the certification statement identified in item 19 "Certification for Paperwork Reduction Act."**

The Office of Partnerships and Public Engagement can certify compliance with all provisions in the Act.