Tracking and OMB Number: 1810-0726

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

1. **Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

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 August 31, 2021. This is a request for extension of this collection.

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 of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.

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 (PSC) 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 ED*Facts*, such as available State assessment results, and graduation rates, are pre-populated into EASIE so there is no additional burden to the applicant. Grantees have the option of entering their localized benchmark data into a provided table, but that component is not a requirement to complete the application. The APR also auto-calculates quantitative data populated into the tables and charts to reduce grantee burden.

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.**

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 non-Title VI 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, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This information collection requirement will impact small entities, but the Department will limit the collection to only that information necessary to make grant awards 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:**

    - **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 than 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 that 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 require the collection to be conducted in a manner inconsistent with OMB guidelines as described.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published.
Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, 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.

On December 29, 2020, a Federal Register Notice requesting public comment was published (Vol. 85, No. 249, page 85625). No comments were received during the 60-day comment period. The Department is publishing the applicable 30-day Federal Register notice to request public comment.

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

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. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.[1] If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

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. The 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.

[1] Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

12. Provide estimates of the hour burden for this current information collection request. The statement should:

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. Use this site to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

Grantees are required to submit APR information in a web-based format. The average respondent burden for the APR is estimated to be 11 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 Information Collection		
APR Sections 1-9	**Time**	**Comments**
1. Project Director Name and Title and Authorized Representative Name and Title	10 minutes	This section is pre-populated with relevant current FY EASIE PART II information.
2. Participation Data By Objective and Activity/Service	12 months x 25 minutes=300 minutes	A portion of this section is pre-populated with current FY EASIE information. Collecting

		participation data by activity or service of each objective.
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 State Assessments (All Students/Indian Students)	10 minutes	This section is pre-populated with Ed*Facts* information.
4b. Mathematics State Assessments (All Students/Indian Students)	10 minutes	This section is pre-populated with Ed*Facts* information.
4c. Summary of State Assessment Data	50 minutes	Chart summarizes Assessment Information.
4d. Reading Local Benchmark Assessments (All Students/Indian Students)	30 minutes	(Optional) A grantee select to enter the data.
4e. Mathematics Local Benchmark Assessments (All Students/Indian Students)	30 minutes	(Optional) A grantee select to enter the data.
4f. Summary of Local Benchmark Assessment Data	10 minutes	(Optional) A grantee select to enter the data.
5. Graduation Data (Indian students)	30 minutes	Note: Only for programs with high school students. This section is pre-populated with Ed*Facts* information.
6. Budget Data	10 minutes	This information will be prepopulated with budget information and budget information is auto-calculated.
6a. Explanation if remaining funds exceed 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	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 grantees x 11 hours per grantee = 14,300

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 11hours.

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) = $124.83

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

x 1 year

Total = $241,501

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
EASIE APR	1300	1300	11 hours	14300 hours	$16.89	$241,501
Annualized Totals	1300	1300	11 hours	14300 hours	$16.89	$241,501

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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.)**

- **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. 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 acquiring and maintaining 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 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :____________________
Total Annualized Costs Requested :

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:

Review Reports:
1,300 grantee reports @ 1 per .30 hours = 650 hours
5 staff @ $35/hour = $175/hour Total= $113,750

Total = $355,251

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

While we have updated our APR to more effectively collect program-specific data which support the mission of the Formula grant program, there are no changes resulting in a decrease of reporting burden for the grantee on this effort.

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.

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 the Certification of Paperwork Reduction Act.

There are no exceptions to the certifications.