Supporting Statement A

Bureau of Indian Affairs
Application for Admission to Haskell Indian Nations University and to Southwestern Indian Polytechnic Institute

OMB Control Number 1076-0114

Terms of Clearance: The next time this comes for OMB review in accordance with 5 CFR 1320, OMB suggests that DOI look for ways to improve upon this collection of information for both Haskell University AND SIPI. In particular SIPI requires subannual collection of medical PII. OMB suggests that SIPI could improve their collection of information through this application form to reduce burden.

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 purpose of the collection is to enroll students at Haskell Indian Nations University and Southwestern Indian Polytechnic Institute (SIPI) and to ensure recipients meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48th Congress, 48 Stat.180.

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.

Admissions forms are used to enroll students at the Southwestern Indian Polytechnic Institute (SIPI) and Haskell Indian Nations University. The completed admissions forms are electronically entered into SIPI and Haskell Admissions and Records to maintain current data on students. The collected data is used in responding to the Bureau of Indian Education's (BIE) budget information requests from the Department of the Interior, Office of Management and Budget, Congress and other entities as appropriate.

Haskell Indian Nations University Application
Below is a chart outlining the questions on the application:

Item on form	Rationale
I am applying as a: New Student Readmit Student Transfer Student Non-Degree-Seeking Student KS College & University fulltime/ Haskell part time	All applicants (new, transfer, readmit) fill out a single form. This saves time and effort for applicants who think they fall under one category but then discover they fit a different one.
Preferred name	This information allows the institution to populate rosters so that instructors know a student's preferred name before first roll call.
"Have you attended Haskell previously? If so what was the last semester/year attended?	This form is provided for new, transfer, and readmitted students.
Are you one of the following? Enrolled member of a U.S. federally recognized Tribe eligible for BIA/BIE education benefits; or One-fourth total degree Indian blood direct descendant of an enrolled member of a Tribe eligible for BIA/BIE education benefits. *Please provide official documentation to support the item you checked.* .	To align with BIA/BIE requirements on eligibility for education benefits
Have you ever been adjudicated guilty or convicted of a misdemeanor, felony or other crime? YES NO If YES, please explain on a separate sheet of paper the date, place, offense, and the outcome.	This question allows the institutions to make decisions about residence on campus.
Have you taken the ACT/SAT: (Required)	The use of ACT and SAT scores are widely used by many colleges and universities.
Credits Earned (under previous institutions)	This form is provided for new, transfer, and readmitted students.
What major are you interested in pursuing? (NOTE: You must have a minimum of 45 college credits to be admitted into a bachelor's degree program.)	An open-ended question may yield responses of majors that are not available at Haskell. The list invites students to choose from among existing majors.

Associate Degree (2-year) Majors:
    Communication Studies
    Natural Science
    Community Health
    Para-Professional Education
    Liberal Arts
    Recreation & Fitness Management
    Media Communication
    Social Work
Baccalaureate Degree (4-year) Majors:
    Business Administration
    Elementary Education
    Environmental Science
    Indigenous & American Indian
Studies	

Will you require student residential (on-campus) housing? YES NO	Haskell wants to find out what the applicant desires, if accepted.

What is your current marital status?
    SINGLE
    MARRIED
    SEPARATED
    DIVORCED
    WIDOWED
	This question has been deleted because it does not have any bearing on admission decisions.

Are you an enrolled member of a federally recognized tribe or at least one-fourth total Indian blood descendant of an enrolled member of a tribe eligible for BIA education benefits?	Previously, this question on specified enrolled members of federally recognized Tribes. Haskell has always accepted applications from descendants, but this version of the application makes that explicit.
What major are you interested in pursuing?	Haskell added a new major, Health, Sports & Exercise Science, for incoming students.

SIPI Application

The SIPI application has been updated for clarity and to provide additional guidance to applicants. An explanation is provided that questions regarding an applicant's family educational history will have a bearing on some scholarships and grants awarded to students. Another explanation has been added to the application to inform students that gender is requested in order to determine dormitory and housing assignments. Additionally, an explanation has been added to the form to clarify that financial aid will not be awarded until all transcripts have been submitted. SIPI has also clarified in the application instructions that continuing students do not need to submit additional applications or physical examination information each trimester they attend school.

Page One
The first part of the application asks for information about student enrollment, which trimester they are applying for, and student status (new student, readmit student, transfer student, etc.).

The second section requests for personal information such as the applicant's full name, permanent and commuter address, telephone numbers, date and place of birth, social security number, gender, tribal enrollment status, secondary school status, and veteran status. An explanation has been added to the application to inform students that gender is requested in order to determine dormitory and housing assignments. There is a special section for transfer or readmission students, which requests they list all previous institutions attended. An explanation has been added to the form to clarify that financial aid will not be awarded until all transcripts have been submitted. The last section asks general questions for the admissions committee to identify the needs and expectations of students while attending SIPI.

Page Two
The first part of the second page requests more personal information which may impact the applicant while at school, such as tribal language, and family history regarding post-secondary education. The next section seeks information on the applicant's parents' education history. These questions are asked because the information provided has a bearing on some scholarships and grants awarded to students. This explanation has been added to the application. The third section requests information about the applicant's objectives and reasons for attending SIPI. The last section is the certification the applicant must sign and date, and if the applicant is under 18 years of age, there is another section for the parent/legal guardian to sign on behalf of the applicant.

Page Three and Four
These pages consist of clinical records for applicants. SIPI requires a physical examination and immunizations for public health reasons. In response to the Terms of Clearance SIPI has now specified in the application instructions that the physical record will only be required for new students or readmitted students who have not attended SIPI for two consecutive trimesters. Once approved, these instructions will appear on SIPI's application webpage.

Page Five
This page contains the Paperwork Reduction Act and Privacy Act statements.

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 the burden and specifically how this collection meets GPEA requirements.**

The applications can be retrieved from each school's website at: (SIPI Application) https://www.sipi.edu/apps/pages/apply and (Haskell Application) https://www.haskell.edu/downloads/admission/Admissions%20Application_proof2_7-18-13.pdf. At this time, both applications must be submitted via mail.
Neither SIPI nor Haskell have the capability to accept digitally signed applications at this time, and an original signature is required on the application. Both schools currently working on implementing technology which will enable applicants to send in applications via e-mail with an electronic signature.

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 may be duplicated for students who have previously attended BIE secondary schools. For students seeking readmission at SIPI, if those students have not attended SIPI for more than two consecutive trimesters, they must submit an application for readmission.

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 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, Haskell and SIPI would not be able to ensure applicants meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48th Congress, 48 Stat.180,which could result in fewer eligible applicants attending the universities.

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 November 27, 2020, 85 FR 76100. There were no comments received in response to this notice.

> **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.**

Haskell received feedback from three students on the Haskell Application. The students were from Camp Verde, Arizona, Paguate, New Mexico, and Pleasant Hill, Missouri. All three students stated that the application took about 15 minutes to complete. None of the students had any objections to the questions asked and thought the information requested was necessary to provide for application purposes. All three students expressed difficulty with the design of the form. Specifically, the students stated that the spaces provided for the information requested were too small. As a result, Haskell is working with information technology leadership to review the form for electronic formatting issues. Haskell plans to place the revised application on a test website to check ease of completion before going live with a reformatted form.

SIPI received feedback from thee students on the SIPI application. The first respondent stated that it took about 20 minutes to complete the form, that they form was easy to fill out, and the information requested was relevant. This student stated that they would like to see a mechanism to submit the application online instead of submitting via mail. The second respondent stated that the application took about an hour to complete. This student said that the application was very easy to fill out and the information requested was appropriate. This student did not have any suggested changes to the application or the process and stated SIPI's staff was very helpful with any questions regarding the admissions process. The third student stated that the application was quick and easy to fill out. This student also suggested that it would be easier to submit the application online. SIPI's current Student Information System (SIS) is outdated and does not have the capability to accept online applications. Currently, this system receives regular updates, but SIPI will have to move to a new up to date system to fill our high need of online applications, and online SIS services.

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.**

SIPI requires a physical examination and immunizations for public health reasons. Criminal probation information is required due to dormitory requirements. Special services information is used to determine and implement any needed special services.

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.**

SIPI receives approximately 1,100 applications annually (SIPI requires students to apply for each trimester) and the application takes about 30 minutes to complete. Haskell receives approximately 1,000 applications annually with each application taking an estimated 15 minutes

to complete. Therefore, the total annual estimated burden is 800 hours or equivalent to **$30,608**.

No. of Applications (Annually)	Time	Burden Hours	Salary (including 1.5 Benefits Multiplier)	Total
SIPI 1,100	30 minutes	550	$38.26	$21,043
Haskell Application 1,000	15 minutes	250	$38.26	$9,565
Total: 2,100		**800 hours**		**$30,608**

To obtain the hourly rate, BIA used $38.26 (this includes a 1.5 benefits multiplier), the wages and salaries figure for civilian workers from BLS Release USDL-20-2266, Employer Costs for Employee Compensation—September 2020, Table 2, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, at https://www.bls.gov/news.release/pdf/ecec.pdf.

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.**

Haskell requires applicants to pay an application fee of $10 per application, which totals

$10,000, for 1,000 applicants. SIPI does not require an application fee. The total annual non-hour cost burden to respondents is $10,000. Additionally, both schools require that applications be mailed in to be considered. At a rate of $0.55 for each first-class stamp for 2,100 applications, the total mail in cost is $1,155. This results in a total non-salary cost burden of **$11,155**.

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 review for the SIPI applications takes about 15 minutes to complete. Each of the 1,100 SIPI applications will be reviewed by a GS-5, Step 5, a GS-7, Step 5, and a GS-11, Step 5.   All of the hourly salaries, obtained at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/RUS_h.aspx.

$8426	No. of applications reviewed	Hourly Rate (including 1.6 benefits multiplier)	Time to review each application	TOTAL
Clerk (GS-5/5)	1,100	$30.64	0.25 hours	$8,426
Technician (GS 7/5)	1,100	$37.95	0.25 hours	$10,436
Analyst (GS 11/5)	1,100	$56.18	0.25 hours	$15,550
Total				**$34,412**

The review for the Haskell applications takes approximately 30 minutes to complete. Each of the 1,000 Haskell applications will be reviewed by a GS-6, Step 7, and a GS-12, Step 7. All of the hourly salaries, obtained at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/RUS_h.aspx.

Haskell	No. of applications reviewed	Hourly Rate (including 1.6 benefits multiplier)	Time to review each application	TOTAL
Clerk (GS 6/7)	1,000	$36.16	0.5 hour	$18,080
Analyst (GS 12/7)	1,000	$71.30	0.5 hour	$35,650
Total				**$53,730**

The total estimated annualized cost to the Federal government is **$88,142**.

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

As both schools require original signatures and do not yet have the capability to accept digital signatures, the cost of postage has been added to the non-hour cost burden estimate.

The "Marital Status" field was eliminated from the Haskell application because it does not have any bearing on admission decisions. Haskell also added the option of a new major for incoming students and clarified that they accept applications from descendants of enrolled members of federally recognized tribes. Haskell also developed instructions to provide to prospective students.

The SIPI application has been updated for clarity and to provide additional guidance to applicants. An explanation is provided that questions regarding an applicant's family educational history will have a bearing on some scholarships and grants awarded to students. Another explanation has been added to the application to inform students that gender is requested in order to determine dormitory and housing assignments. Additionally, an explanation has been added to the form to clarify that financial aid will not be awarded until all transcripts have been submitted.

In response to the OMB Terms of Clearance, SIPI has also clarified in the application instructions that continuing students do not need to submit additional applications or physical examination information each trimester they attend school. It was also clarified in the supporting statement that the applications are submitted on a trimester basis. It was previously erroneously stated that the applications were submitted on a semester basis. Previously, the amount of applications received annually was incorrectly reported due to calculation mistakes. The current burden estimates accurately reflect the amount of applications SIPI receives yearly. This recalculation also affected the cost to the Federal government for processing those applications.

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 for budget and planning purposes, 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.**

BIE will display the OMB Control Number and the expiration date on all relevant forms.

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

No exceptions to the certification statement are being sought.