

# **Rural, Insular, and Native Achievement Programs Progress Update Protocol**

## **Supporting Statement Part A**

**OMB No.**

***Submitted by:***

Rural, Insular, and Native Achievement Programs  
U.S. Department of Education

April 2021

## Summary

The Rural, Insular, and Native Achievement Program (RINAP), within the Office of Elementary and Secondary Education (OESE), part of the U.S. Department of Education (ED), seeks approval from OMB for its progress update protocol. We are requesting a clearance for the 2021-22, 2022-23, and 2023-24 school years to enable us to support grantees as they implement American Rescue Plan (ARP) Act of 2021 and Elementary and Secondary Education Act of 1965 (ESEA) programs.

### 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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. 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, make note of the sections or changed sections, if applicable.**

The is a request for a new information collection. The Rural, Insular, and Native Achievement Programs (RINAP) administers Section 1121 of Title I, Part A of the ESEA; Title II of Public Law 108-118 (Supplemental Education Grant (SEG)), CARES Act – Outlying Areas; Title III of CRRSA – Outlying Areas, Sections 2005 and 11006(2-3) of the ARP; Title V, Part B of the ESEA (Rural Education Achievement Program), Title VI, Part B of the ESEA (Native Hawaiian Education); and Title VI, Part C of the ESEA (Alaska Native Education). Periodic progress updates, phone, virtual, or in-person conversations during a fiscal year with authorized representatives and project directors help ensure grantees are making progress toward meeting program goals and objectives. The information shared with RINAP helps inform the selection and delivery of technical assistance to grantees and aligns structures, processes, and routines so RINAP can monitor the connection between grant administration and intended outcomes. Progress updates also allow RINAP to proactively engage with grantees to identify potential compliance issues ahead of more comprehensive monitoring, decreasing the need for enforcement action and minimizing burden for grantees.

- 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 primary customers for this information will be the program managers and officers at ED. Information collected through these periodic progress updates will be used to evaluate the effectiveness and efficiency of the programs that RINAP oversees. Based on the information collected, RINAP will improve program management and focus technical assistance resources where they are needed most in order to provide the best educational outcomes for students and their families.

- 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. Also describe any consideration given to using technology to reduce burden.**

Grantees submit written responses electronically through an online survey.

- 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 Question 2 above.**

Not applicable.

- 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 collection will not impact small businesses or other 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.**

Progress updates will be conducted periodically for Alaska Native Education, Native Hawaiian Education, and Rural Education Achievement Program grantees. If ED did not collect this information, it would greatly diminish the ability of program managers and analysts to use the information to measure education progress in support of federal legislation.

- 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.**

None of the special circumstances apply to this collection.

- 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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of 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 April 26, 2021, a Federal Register Notice requesting public comment was published (Vol. 86, No. 78, page 22041). One off-topic comment was received during the 60-day comment period. The Department is publishing the applicable 30-day Federal Register notice. No consultations outside of ED were conducted for this collection.

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

These data are collected from grantees. No remuneration, outside of grant funds allocated to the grantees, is made.

- 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 ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. 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). 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.**

There has been no assurance of confidentiality provided to the respondents.

- 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.**

Not applicable. This collection contains no questions of a sensitive nature.

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

- 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, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in Question 12. 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. (The table should at minimum include Respondent types, Number of Respondents and Responses, Hours/Response, and Total Hours)**
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Question 14.**

Implementation of a purposeful sampling methodology to select RINAP grantees for annual Progress Update participation will result in up to 50 grantees interacting with RINAP annually during this information collection. The list of potential respondents includes: 4,200 small, rural local educational agencies, 46 State educational agencies, 27 specially qualified agencies, 63 Native Hawaiian Education program grantees, and 38 Alaska Native Education program grantees. The burden differences across reporting entities are limited, so all entities are assigned the same estimated reporting burden of one full-time equivalent (FTE) per reporting entity.

The annualized cost related to the respondent burden time is estimated to be \$2,500 (50 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with the professionals that participate in RINAP Progress Updates, making this estimation approximate.

Collection	Respondents	Responses	Hours per Respondent (52 weeks/year; 40 hours/week)	Total Hours Annually	Total Annual Cost (\$50 an hour)
84.356A Alaska Native Education	5	5 (annual response)	1/year	5	\$250
84.362A Native Hawaiian Education	5	5 (annual response)	1/year	5	\$250
84.362B Native Hawaiian Education Council	1	1 (annual response)	1/year	1	\$50
84.358A Small, Rural School Achievement	33	1 (annual response)	1/year	33	\$1,650
84.358B Rural and Low-Income Schools	5	5 (annual response)	1/year	5	\$250
84.358C Rural and Low-Income Schools Specially Qualified Agencies	1	1 (annual response)	1/year	1	\$50
Total	50			50	\$2,500

**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 Questions 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 Question 12.

**Total Annualized Capital/Startup Cost:**

**Total Annual Costs (O&M):**

**Total Annualized Costs Requested:**

The RINAP Progress Updates for the foreseeable future will require no additional systems development efforts by grantees. There are no capital or startup costs associated with this Progress Update.

- 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 Questions 12, 13, and 14 in a single table.**

Collection	Number of Annual Interviews	Hours of work per year (52 weeks/year; 40 hours/week)	Total Interview Hours
84.356A Alaska Native Education	5	(1 per call, 1 time annually)	5
84.362A Native Hawaiian Education	5	(1 per call, 1 time annually)	5
84.362B Native Hawaiian Education Council	1	(1 per call, 1 time annually)	1
84.358A Small, Rural School Achievement	33	(1 per call, 1 time annually)	33
84.358B Rural and Low-Income Schools	5	(1 per call, 1 time annually)	5
84.358C Rural and Low-Income Schools Specially Qualified Agencies	1	(1 per call, 1 time annually)	1
<b>Total</b>	<b>50</b>		<b>50</b>

The annualized cost for the Federal Government is estimated to be \$2,500 (50 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with RINAP Program Officers, making this estimation approximate.

- 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).

This is a new data collection; there is a total program change increase of 50 annual burden hours, 50 responses and a cost \$2,500.

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>		<b>50 hours</b>	
<b>Total Responses</b>		<b>50 responses</b>	
<b>Total Costs (if applicable)</b>		<b>\$2,500</b>	

**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.**

Not applicable

**17. 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.**

Annual collection for Alaska Native Education, Native Hawaiian Education, and Rural Education Achievement Program grantees starting October 2021.

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

Not applicable

**19. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

Not applicable