

**1 SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**BIE Distance Learning Household Survey
OMB Control Number 1076-NEW**

Terms of Clearance: New Collection.

Justification

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

There are 183 Bureau of Indian Education (BIE) elementary and secondary schools on 64 Indian reservations. Of these, 58 are BIE-operated and 125 are tribally operated under BIE contracts or grants. Due to the pandemic, these schools have had to convert to distance learning or hybrid in-person/distance learning approaches. To obtain an understanding of how well these approaches have served the students and families, BIE is requesting an emergency, one-time collection to collect from families of students at BIE schools information on their experiences with these approaches over the past 2020-2021 school year. This survey is needed to help BIE shape whether and how to best provide distance learning and hybrid approaches in the future, in accordance with its mission, as stated in 25 CFR 32.3, to provide quality education opportunities from early childhood through life in accordance with a Tribe's needs for cultural and economic well-being, in keeping with the wide diversity of Indian Tribes and Alaska Native villages as distinct cultural and governmental entities. The statutory authority under which this survey is being conducted is 25 USC 2000, which provides authority for BIE to operate and financially support BIE funded schools. BIE is seeking approval for this collection by June 18 in order to actively plan for the next school year, which begins as early as July for some schools.

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.

BIE will use the data collected through this survey to inform BIE efforts and school decisions to improve family satisfaction with any future remote or online learning. The survey contains 41 questions:

- Questions 1 and 2 are to determine whether the respondent is eligible for the survey, having a child who attends a BIE school (BIE-operated or tribally controlled). Question 1 also assists in informing BIE whether the family has multiple school-aged children, which we ask because parents' attitudes or experiences may be different if they have more than one child in school. Subsequent survey questions (Q12 and after) request the respondent to focus on one of their children. Q1 will be used to weight the survey data.
- Question 3 is a threshold question to allow respondents without internet access to skip questions 4 and 5. This item will be used to weight the survey data.
- Questions 4 and 5 provide BIE with information on the reliability and speed of the family's home internet.
- Question 6 is a threshold question to allow respondents to skip question 7 if not applicable.
- Question 7 provides BIE with information, for those who do not access the internet at

- home, on how far away the internet is from their home
- Question 8 is an open-ended question that allows respondents to share other information about their internet access not captured in previous questions.
 - Question 9 provides BIE with information about what devices the family uses at home.
 - Question 10 provides BIE with information about respondents' comfort with their electronic devices.
 - Question 11 is an open-ended question that allows respondents to provide additional information about home technology use.
 - The rest of the survey is oriented toward questions about respondents' satisfaction with schooling for one of their children (respondents' choice if they have more than one school-aged child at home). Question 12 clarifies the grade of the referent child.
 - Question 13 clarifies the school of the referent child.
 - Question 14 clarifies whether the referent child attends a boarding school.
 - Question 15 is a filter question that provides BIE with information about whether the referent child had remote learning, in person learning, or hybrid learning. Respondents whose children experienced in-person learning can skip questions 16-34.
 - Question 16 provides BIE with information about respondent satisfaction in various aspects of the remote learning experience, such as the education provided, communication with the school, and getting the support they needed.
 - Question 17 provides BIE with information about respondent satisfaction about access to school-provided services, such as a counselor or nutritional services, during remote learning.
 - Question 18 provides BIE with comparative information about the child's experience with remote learning, compared with their pre-pandemic school experience.
 - Question 19 provides BIE with information about supplies provided by the school for remote learning,
 - Question 20 provides BIE with information about the magnitude of challenges to learning associated with distance education.
 - Question 21 is an open-ended question that allows respondents to provide additional information about remote learning challenges they may have faced, not captured by other items.
 - Question 22 clarifies the types of remote learning the referent child experienced this school year.
 - Question 23 is a filter question that clarifies the types of online schooling the referent child experienced this school year. If not applicable, it allows respondents to skip questions 24-34.
 - Question 24 provides BIE with information about respondent satisfaction with technical features of online schooling.
 - Question 25, provides BIE with information about respondent satisfaction with aspects related with online classroom instruction.
 - Question 26 provides BIE with information about the magnitude of challenges to learning associated with technology and remote access.
 - Question 27 is an open-ended question that allows respondents to provide additional information about other challenges to online schooling, not captured by other items.
 - Question 28 is an open-ended question that allows respondents to discuss perceived strengths of online schooling.
 - Question 29 provides BIE with information about the ease of use of technology for remote learning.
 - Question 30 provides BIE with information about parent's awareness of content features of the referent child's learning platform.
 - Question 31 clarifies what type of device the referent child used most often for online

schooling.

- Question 32 provides BIE with information about how often the referent child was able to access technology needed to complete online schoolwork.
- Question 33 provides BIE with information about how quickly a child's technological issues were resolved.
- Question 34 is an open-ended question that allows respondents to share other information about online schooling not captured in previous questions.
- The remainder of the survey are demographic questions used for classification purposes. Question 35 clarifies the gender of the referent child. This item will be used to weight the survey data.
- Question 36 clarifies the primary language spoken at home. This item will be used to weight the survey data.
- Question 37 clarifies whether the referent child participated in any extracurricular activities.
- Question 38 clarifies whether the referent child received any Individualized Education Plan (IEP) services through school. This question is a filter question; respondents who do not have a child with an Individualized Education Plan (IEP) may skip to question 41.
- Question 39 provides BIE with information about whether the lessons and activities helped the child reach their IEP goals.
- Question 40 is an open-ended question that allows respondents of children with IEPs to provide additional comments about online learning platforms and the delivery of special services.
- Question 41 clarifies whether the referent child received any special services through school.

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

The survey will be sent to parents/guardians of students through the mail because not all respondents have stable access to electronic devices. Participants will be offered a choice of completing the survey online or on paper. The first mail contact will include a cover letter, paper survey, and business reply envelope. The cover letter provide instructions on how to complete the online or paper survey and will request that participants return the survey by a specific date, which will be set at two weeks after the mailout date. After the initial mailout, potential respondents will be sent a postcard reminder with instructions on how to complete the online version. Sample language will also be provided to schools so they can promote the survey via text message or email if they choose.

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.

Information about distance learning is not collected through any other means for families of BIE-funded school students. Information such as child's gender, language spoken at home, special services, and activities are included on this survey for weighting purposes and because they may be important covariates with families' distance learning education experience.

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

This information collection does not impact small 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.

Due to the diversity of tribes and regional experiences, it is important that BIE include multiple perspectives in their efforts to understand the impacts of distance learning in tribal communities. If BIE does not collect this information, it will need to make decisions about upcoming school year without knowing roughly how many families are without internet that is stable enough to allow for consistent distance learning, and BIE will need to rely on third-party sources to understand perceptions and experiences of the ultimate end-user: the families and their children.

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.

BIE will request that families respond within two weeks of mailout date (a specific date will be provided in the mailout). Rapid response is necessary in order to actively plan for the next school year, which begins as early as July for some schools.

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.

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.

This is an emergency, one-time collection.

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

We will not provide 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.

We do not provide an assurance of confidentiality, however, the survey does not request any personal identifying information and the responses to the survey will be grouped with all other responses and summarized for BIE use.

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

We do not ask questions of a sensitive nature. The methods for collecting the data are designed to collect only the information requested, eliminating the need for receiving, storing, processing, or reporting sensitive data including Personally Identifiable Information (PII).

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.

We estimate that there will be approximately **1,300 respondents** and approximately 1,300 responses. We estimate that it will take each respondent 0.25 hour to complete the form, including time to read and respond to the form's questions, and transmit the form to BIE, totaling **325 annual burden hours**.

We estimate the total dollar value of the annual burden hours for this collection to be **\$18,818** (325 hours x \$57.90 rounded). To obtain the hourly rate, BIA used \$57.90 (\$38.60 and a 1.5 benefits multiplier), the wages and salaries figure for civilian workers from BLS Release USDL-21-0437, Employer Costs for Employee Compensation—December 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, 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.**

We have not identified any non-hour cost burden associated with this collection; BIE will provide return envelopes with postage included for families to return the surveys by mail.

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 BIE contractor is administering this survey as part of a broader effort to develop a learning management system. Contractor costs are estimated to be \$118,500 to field the survey and analyze the results. There is no additional cost to the federal government.

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

This is a new collection for emergency use.

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.

We will not publish the results of this collection.

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

We will display the OMB Control Number and expiration date on appropriate materials.

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

There are no exceptions to the certification statement.