

TO: Office of Information and Regulatory Affairs
Office of Management and Budget

FROM: Office of Elementary and Secondary Education
U.S. Department of Education

RE: Nonmaterial and Non-substantive Edits to 1810-0021

We are requesting edits to this ICR that we believe will not overall increase or decrease the burden on respondents. The proposed instruction clarifications and additional edits will decrease both pre- and post-award burden for the applicant and program officers because of the reduced amount of time required to follow up with applicants due to incorrect information, and/or participate in targeted technical assistance and/or monitoring due to incorrect completion and resolving potential data integrity issues as a result of the unclear survey instructions and data quality edits. The proposed edits are on the EASIE Part I: pages 3, 4, 5, 7, 8, and 9, the ED 506: pages 1 and 2, and EASIE Part II: pages 3, 5, 6, 9, 12, 13, 14, 15.

Part I Page 3

- Updated “Current Contact Information” with additional instruction clarification. This clarifying guidance will support data integrity and statutory compliance.

Part I Page 4

- Updated “Applicant Identification” from DUNS to UEI to align with new federal requirements.

Part I Page 5

- Updated “Partner Identification (for Consortiums)” instructions to align with the addition of Indian Student Count (ISC) column updates on Part I Page 8. This clarifying guidance will support data integrity and statutory compliance.
- Updated Project Director and Authorized Official Representative instructions to remove fax fields. This update will remove burden on applicants to provide fax contact information.
- Updated “Indian Student Count Form” instructions. This clarifying guidance will support data integrity, while increasing comprehensibility and reducing future monitoring burden.

Part I Page 7

- Updated “Mailing Address” field with updated instructions and included a checkbox to select if mailing address updates are entered. This clarifying guidance and additional checkbox will support data integrity and compliance burden.

Part I Page 8

- Updated Applicant Type options to remove “Bureau of Indian Education (BIE Funded). This reduces burden of BIE applicants to select their applicant type without additional redundant selections, and supports data integrity via the increased specificity.

- Updated “Consortium Partner Identification” table to include an additional column for Indian Student Count (ISC) responses per participating LEA to support data integrity of ISC responses for consortium applicants and avoid additional burden on applicants and program officers to follow up with applicants after certification.
 - Per [EASIE Part I FAQ](#) Section 6.2: “Each participating LEA within a consortium is eligible to apply for a grant if the LEA meets the required minimum enrollment criteria and the LEA provides a free public education. The minimum number of eligible students must be at least 10; or Indian children constitute not less than 25 percent of the total enrollment of the LEA. The minimum enrollment requirement does not apply in Alaska, California, and Oklahoma, or with respect to LEAs located on, or in proximity to, a reservation....Consortium applications must identify the number of Indian students being counted.”
- Added “Indian Student Count (ISC) Data Quality Comment” to appear if entities have a year-to-year change of 15% or more compared to last year to support data integrity of ISC responses and avoid additional burden on applicants and program officers to follow up with applicants after certification.

ED 506 Page 1

- Added “Expected Graduation Year” to ED 506 form to support data integrity of ED 506 forms by more explicit notation of when to retire the forms to ensure the entity’s ISC, as well as reduced monitoring burden for OIE.

ED 506 Page 2

- Added “Helpful resources to consider using” with links to ED 506 form to support data integrity and comprehensibility of ED 506 forms, and reduce technical assistance burden.

Part II Page 3

- Updated “Current Contact Information” with additional instruction clarification. This clarifying guidance will support data integrity and reduce response burden.

Part II Page 5

- Updated “Project Information” from DUNS to UEI to align with new federal requirements.

Part II Page 6

- Updated Project Director, Authorized Official Representative, and Budget Representative sections to remove fax fields. This update will remove burden on applicants to provide fax contact information.

Part II Page 9

- Added additional guidance to “Description of Meaningful Collaboration with Tribes” question #2, “Please provide, in your narrative response below, the names of each of the Tribes located in the community and/or those you collaborated with, and date the meaningful

collaboration was completed.” This clarifying guidance will support data integrity of narrative responses and avoid additional burden on applicants and program officers to follow up with applicants after certification.

- o Per [EASIE Part II FAQ](#) Section 6.1: “ESEA Section 6114(b)(7) requires applicants that are LEAs, LEAs in Consortium, BIE-funded schools, or a consortium of BIE grant and contract schools to conduct meaningful collaboration with Tribes. Applicants complete at least one annual, documented good faith/due diligence meaningful collaboration effort in EASIE Application Part II OMB MAX Survey. Typically, entities will initiate/invite Tribes to a meaningful consultation in ~ October of the year preceding the spring application; then, applicants often actually hold the MC at least one month prior to the close of EASIE Part II, which would be – at the latest – approximately mid-April. These timelines will allow for adequate notification, processing, and reporting by the EASIE Part II deadline (typically mid-May)”
- o Per [EASIE Part II FAQ](#) Section 6.2: “Applicants must describe the process used to meaningfully collaborate with Indian tribes located in the community in a timely, active, and ongoing manner in the development of the comprehensive program and the actions taken as a result of such collaboration (ESEA 6114(b)(7)).”

Part II Page 12-15

- Added additional instructions regarding allowability of administrative costs for all budget sections. This clarifying guidance will support data integrity and grant compliance.