



March 23, 2026

Steven Mullen  
Information Collection Clearance Officer  
Office of Regulatory Affairs and Collaborative Action—Indian Affairs  
U.S. Department of the Interior  
1001 Indian School Road NW, Suite 229  
Albuquerque, New Mexico 87104

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Dear Steven Mullen:

The Wisconsin Department of Public Instruction (WDPI) appreciates the opportunity to submit feedback in response to the Department of the Interior's Bureau of Indian Affairs (BIA) request for comments regarding Education Contracts under the Johnson-O'Malley Act.

The WDPI is dedicated to improving educational outcomes for all students in Wisconsin, including American Indian students attending schools across the state. While the WDPI does not have any supervisory responsibilities for programs such as those funded by the Johnson-O'Malley Act, it supports efforts to meet the educational needs of Tribal Nations and communities.

The Johnson O'Malley Act is vital in strengthening education services and expanding access to learning resources for students, families, and communities in federally recognized American Indian Nations. Many Tribal Nations in Wisconsin have benefited from this program when it comes to ensuring that students have the materials and resources they need to be able to access education in both public and tribal schools, having student enrichment opportunities, including but not limited to seeing that education can go beyond the K-12 range. Recognizing its significant impact, the WDPI strongly supports the continuation of this program and its role in enhancing education for American Indian students, families, and communities.

In response to the BIA's request for public input on the proposed extension of Office of Management and Budget clearance for federally required data collections necessary to comply with the Paperwork Reduction Act of 1995, WDPI offers the following comments below.

**(1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility?**

The WDPI views the proposed information collection as a valuable resource for Tribal education departments of Wisconsin and across the United States. We believe the data gathered through this process can meaningfully support efforts to improve educational outcomes for American Indian Nations and tribal communities. By streamlining reporting requirements, the proposed approach enables grantees to devote more time and attention to delivering critical educational services rather than navigating complex administrative processes. At the same time, it promotes accountability by ensuring that services provided align with submitted budgets and proposed educational plans.

The requirement to develop an educational plan is of particular importance. When the Secretary of the Interior enters into contracts under the Johnson-O'Malley Act to support the education of American Indian and Alaska Native students, there is a significant opportunity to foster innovation and targeted support at the Tribal Nation and community levels. Effective, efficient, and culturally authentic educational programming depends on Tribal Nations and their tribal education departments having a clear understanding of their students' needs, as well as incorporating the input and expertise of their Johnson-O'Malley parent committees.

When appropriate, the WDPI stands ready to collaborate with each of the federally recognized Tribal Nations of Wisconsin to develop memoranda of understanding (MOUs) that allow for the appropriate sharing of collected data related to students served by their Nation and through the Johnson-O'Malley Act

**(2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used?**

As the WDPI is not an eligible grant recipient, we are unable to provide feedback on the BIA's estimated burden for this information collection or on the validity of the methodology and assumptions used.

**(3) Ways to enhance the quality, utility, and clarity of the information to be collected?**

To further enhance this grant program, the WDPI encourages the BIA to track how the collected information is used, both at the grantee level and within the Bureau, in order to identify any data elements that may be unnecessary. By improving the accuracy, relevance, and clarity of the data, and by adopting more efficient technological solutions, the agency can reduce administrative burdens for grantees. This approach not only streamlines program management but also strengthens the program's overall impact,

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ensuring it continues to meet the evolving needs of Tribal Nations and their communities.

**(4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response?**

The WDPI values the collection and use of current, relevant information to guide the management and improvement of grant programs and educational initiatives. However, gathering this data efficiently can be challenging. Simplifying data entry portals or sites to be clear, straightforward, and user-friendly could help streamline the data collection process.

Thank you for the opportunity to comment. If you have any additional questions, please contact David O'Connor, WDPI Education Consultant, American Indian Studies Program, at (608) 267- 2283 or at [David.OConnor@dpi.wi.gov](mailto:David.OConnor@dpi.wi.gov),

Sincerely,

*Carl J. Bryan*

Carl J. Bryan, MPPA  
Legislative Policy Coordinator  
Office of Policy and Budget  
Wisconsin Department of Public Instruction  
P.O. Box 7841  
201 West Washington Avenue  
Madison, WI 53703

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