

Supporting Statement A

Native Language Immersion Grant

OMB Control Number

Terms of Clearance: None.

Justification

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

The Bureau of Indian Education (BIE) supports efforts to revitalize and maintain Native languages and expand the use of language immersion programs in its schools. The BIE is providing capacity-building grants for BIE-funded schools to expand existing language immersion programs or create new programs that will lead to Native language oral proficiency. The funding opportunity is offered under the authority of the Snyder Act, 25 USC 13-1, to expend funds appropriated by Congress on Indian education programming.

Furthermore, BIE's Strategic Direction incorporates goals that support Native language and culture throughout BIE programs. The Strategic Direction is based on the collaborative work of BIE staff, educators, Tribes, and stakeholders across the country. BIE's Strategic Direction provides a sound framework for improving student achievement, maximizing resources, providing targeted technical assistance to bureau operated and tribally controlled schools, and establishing a means for supporting educators and staff while improving oversight and accountability through performance management.

- 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 solicits the information using a Federal Register notice as its information collection instrument. BIE uses the information provided by BIE-funded schools in their application to determine whether they are eligible for the Native language immersion grant and to determine whether the school is using the funding for the stated purpose of promoting Native language immersion programs.

A complete application must contain the following elements:

- Approving signature from a Tribal governing body or local school board resolution and school administrator.

- A proposal describing the planned activities and deliverable products – BIE will use this information to ensure that the proposed project falls within the scope of what the funds are to be used for.
- A detailed budget estimate, including contracted personnel costs, travel estimates, and other expenses – BIE will use this information to ensure that the funds will be used for the authorized purposes.

The project proposal must include information about the applicant sufficient to allow BIE to evaluate the proposal based on the following criteria:

(1) School Information

This should include: school name, school address, school representative(s) and their contact information such as phone number and email address, Tribal languages, geographic location, amount requested, and estimated number of students served.

(2) Project Narrative:

The narrative must include: A) overview of project goals and activities, data collection, collaboration initiatives, and policy and procedure performance information; B) description of how Native language immersion program grant funds will be uniquely utilized to continue or initiate an immersion classroom in the school that is not available through other programs; C) description of how the school will lend support to ensure the maintenance or creation of an immersion program is sustained beyond the grant funding; D) description of a professional development plan, in collaboration with Tribes, Tribal colleges/universities, local, State or national organizations that expands the learning of staff, parents, families, and organizations about the implementation of a language immersion program; E) description of a proposed partnership with Tribes, Tribal colleges/universities, local, State or national organizations; F) description of the school's efforts to develop policy and procedures to support parent and community involvement in the maintenance or development of an immersion program; and G) evaluation plan that describes how quantitative and qualitative data will be collected and used to assess a student's Native language proficiency and growth, provide evidence to demonstrate the need of an immersion program, and illustrate the success of an immersion program.

(3) Budget Narrative: Provide a budget of items/costs, including justifications.

(4) Assurances: Provide signed assurances.

During the course of the grant, BIE requires that project directors from the BIE-funded schools participate in scheduled calls, submit quarterly budget updates (Tribally-Controlled Schools SF-424A), and ensure an annual financial and narrative report is submitted at the end of the project year. BIE requires this information to ensure the project is progressing and the funds are being used for appropriate purposes.

The final annual narrative report should include a description of the status of the school's Native

language immersion program, and progress the program has made. The final annual narrative report should also include number of students served (and their grade levels) in Native language immersion programs, instructional time (hours per week) of Native language instruction, description of Native language immersion teaching curriculum, guides and materials, number of staff who have participated in Native language immersion professional development including related professional development hours, description of community outreach conducted in the area of Native language immersion programs, types of Native language assessments utilized, description of student Native language fluency and/or growth in Native language fluency, and general successes and challenges experienced during the implementation of the Native language immersion grant. BIE requires this information to ensure the project is progressing.

- 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.**

BIE accepts applications by regular mail and electronically (e-mail).

- 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.**

The information that BIE is requesting is not available from any other source. The information collected is unique to each school's plan.

- 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.**

If BIE is unable to conduct this information collection, the applicants would be deprived of funding that will provide them the opportunity to improve Native language immersion programs at BIE-funded schools.

- 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 circumstances that require BIE to collect the information in a manner inconsistent with OMB guidelines.

- 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 April 16, 2018 (83 FR 16380). 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.

BIE staff reached out to the following three individuals who may potentially assist with

completing the application for their input on the application process.

1. Native Language & Culture Specialist
Bureau Operated Schools
1011 Indian School Road, Suite 332
Albuquerque, New Mexico 87104

2. Education Program Administrator
Tribally Controlled Schools
1011 Indian School Road, Suite 332
Albuquerque, New Mexico 87104

3. Teacher
San Felipe Elementary School
P.O. Box 4343
San Felipe Pueblo, NM 87001

Instructions:

The first respondent stated they understood the directions and that having an application as a guide was helpful. The second respondent stated the instructions were clear and the guidance and background information was good information. The third respondent expressed the application was written in a way that was easily understandable with main headings, sections and point value.

Burden Hours:

The first respondent estimated it would take about a week, or 40 hours to complete the application. The second respondent expressed it could take two weeks or 80 hours to complete. The third respondent said the application would take approximately 80 hours, or two weeks, to complete.

The average of the three responses will be used to estimate burden hours. ($40 + 80 + 80/3=67$ hours). The burden hours to complete the application is estimated to be 67 hours.

Suggestions to improve the process:

All three respondents stated they did not have any suggestions on how to improve the application process. Given this is the first year of implementation, it is anticipated that there will be more comments for the next feedback cycle.

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

BIE does not provide gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

BIE does not provide any assurance of confidentiality. The information that we collect is subject to the requirements of the Freedom of Information Act.

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.

This collection does not ask 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, 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. Instead, this cost should be included under “Annual Cost to Federal Government.”**

BIE anticipates receiving responses from 15 schools per year, totaling 1,335 annual burden hours for this information collection or the amount equivalent to **\$48,488**.

Task	No. Respondents	No. of Responses per Year	Total Responses	Burden Hours per Response	Annual Burden Hours	Cost to Respondents*
Preparing and submitting	15	1	15	67 hours	1,005	\$36,502

the Proposal						
Monthly Meeting	15	12	180	1 hour	180	\$6,538
Budget Reports (Quarterly Submission)	15	4	60	2 hours	120	\$4,358
Annual Reports	15	1	15	2 hours	30	\$1,090
Totals	60		270		1,335	\$48,488

*To obtain the hourly rate for tribal government employees, we used the wages and salaries figure for all workers from BLS Release USDL-19-0449, *Employer Costs for Employee Compensation—December 2019 (released March 19, 2019)* Table 1, *Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by occupational and industry group, December 2018*. To account for benefits, we then multiplied this rate by 1.5, to obtain a total rate of **\$36.32**. See <http://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.

There is no non-hour cost burden associated with this collection.

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.

We estimate the annual cost to the Federal government to implement this information collection to be **\$24,428**.

Task	No. Respondents	No. of Responses per Year	Total Annual Responses	Federal Burden Hours per Response	Annual Burden Hours	Cost to Respondents*
Reviewing Proposals	15	1	15	2 hours	30	\$2,571
Monthly Meeting	15	12	180	1 hour	180	\$15,428
Budget Reports (Quarterly Submission)	15	4	60	1 hour	60	\$5,143
Annual Reports	15	1	15	1 hour	15	\$1,286
Totals	60		270		285	\$24,428

*We used an average salary of \$85.71 per hour (\$53.57 (GS-14/3) x 1.6 for benefits), based on the Salary Table 2019-GS. (See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx).

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

There are no program changes or adjustments in the hour or cost burden for the first year of implementation.

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.

BIE will not publish the results of this information 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.

BIE will display the OMB control number and expiration date on the solicitation for proposals as well as on other 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.