

# 1 Supporting Statement A

## Bureau of Indian Affairs Application for Admission to Haskell Indian Nations University and to Southwestern Indian Polytechnic Institute

OMB Control Number 1076-0114

**Terms of Clearance:** ICR Reference No: 202103-1076-004  
[https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=202103-1076-004](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202103-1076-004).

### General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

#### Justification

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

The purpose of the collection is to enroll students at Haskell Indian Nations University and Southwestern Indian Polytechnic Institute (SIPI) and to ensure recipients meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48<sup>th</sup> Congress, 48 Stat.180.

This IC comports with, and furthers, the policy of the executive branch to restore common sense to the Federal Government and unleash the potential of the American citizen (Initial Rescissions of Harmful Executive Orders and Actions, Executive Order 14148).

- 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.**

Admissions forms are used to enroll students at the Southwestern Indian Polytechnic Institute (SIPI) and Haskell Indian Nations University. The completed admissions forms are electronically submitted and/or entered into SIPI and Haskell Admissions and Records to maintain current data on students. The collected data is used in responding to the Bureau of Indian Education's (BIE) budget information requests from the Department of the Interior, Office of Management and Budget, Congress and other entities as appropriate.

**PROPOSED REVISION**

**Terms of Clearance:** *ICR Reference No: 202103-1076-004.* OMB approves this information collection for 3 years, but with the request that DOI/BIA continue to work to make the entire application process available online. The public has requested the application be accepted through online submission and DOI/BIA should work to make both online and by mail to application available in order to meet the needs of their prospective students. At the next approval stage, progress toward online applications should clearly be explained in the supporting statement. In addition, OMB requests that DOI/BIA reevaluate the type of medical information/evaluation requested in the "Clinical Record – Report of Medical Examination of School Children" and develop a medical evaluation form and collection medical information that is appropriate for young adults entering college level education.

**BIE Proposed Revision:** BIE proposes to revise the information collection to utilize both online and by mail to applications.

Haskell Application Elements

Legal name, contact information, degree program, Social Security number, enrollment status, housing status, emergency contact information, minimal demographic information, Tribal information, High School information, College information, miscellaneous information, immunization information.

SIPI Application Elements

Legal name, contact information, degree program, Social Security number, enrollment status, housing status, emergency contact information, minimal demographic information, Tribal information, High School information, College information, miscellaneous information, physical examination, immunization information, parent/guardian information.

**PROPOSED REVISION**

**Terms of Clearance:** *ICR Reference No: 202103-1076-004.* OMB requests that DOI/BIA reevaluate the type of medical information/evaluation requested in the "Clinical Record – Report of Medical Examination of School Children" and develop a medical evaluation form and collection medical information that is appropriate for young adults entering college level

education.

**BIE Proposed Revision:** SIPI requests a minimal medical evaluation form for health safety.

- 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 the burden and specifically how this collection meets GPEA requirements.**

**PROPOSED REVISION**

**Terms of Clearance:** *ICR Reference No: 202103-1076-004.* OMB approves this information collection for 3 years, but with the request that DOI/BIA continue to work to make the entire application process available online. The public has requested the application be accepted through online submission and DOI/BIA should work to make both online and by mail to application available in order to meet the needs of their prospective students.

**BIE Proposed Revision:** We are proposing to revise the information collection to facilitate the digital submission of the student's application.

The applications can be retrieved from each school's website at <https://www.sipi.edu/apps/pages/apply> and <https://haskell.edu/admissions>; as well as <https://www.bia.gov/policy-forms/online-forms/paperwork-reduction-act>.

- 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.**

This information may be duplicated for students who have previously attended BIE secondary schools. For students seeking readmission at SIPI, if those students have not attended SIPI for more than two consecutive trimesters, they must submit an application for readmission.

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

This collection does not impact small business 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.**

Without collecting this information, Haskell and SIPI would not be able to ensure applicants

meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48th Congress, 48 Stat.180, which could result in fewer eligible applicants attending the universities.

- 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 special circumstances that will apply to this collection.

- 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.**

A 60-day notice for public comments was published in the Federal Register on June 21, 2024 (89 FR 52076). There were no comments received in response to this notice.

We requested feedback from 9 individuals. Users indicated the information collection was straight-forward and easily understood. All nine commentors were amenable to the options of a digital application process and a paper application process.

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

Respondents will not receive any payment, gift, or other remuneration for providing the information collection requirements.

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

The Privacy Act, BIA-22 Indian Student Records published in the Federal Register on July 15, 2008 (73 FR 40605), provides protection for confidential information. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of information.

**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.**

SIPI requires a physical examination and immunizations for public health reasons. Criminal probation information is required due to dormitory requirements. Special services information is used to determine and implement any needed special services.

**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.**

SIPI receives approximately 1,100 applications annually (SIPI requires students to apply for each trimester) and the application takes about 30 minutes to complete. Haskell receives approximately 1,000 applications annually with each application taking an estimated 15 minutes to complete. Therefore, the total annual estimated burden is 800 hours or equivalent to **\$37,472**.

To obtain the hourly rate, we used \$46.84, the wages and salaries including benefits figure for civilian workers from BLS Release USDL-24-2561, Employer Costs for Employee Compensation—December 2024, Table 2. Civilian workers, at <https://www.bls.gov/news.release/pdf/ecec.pdf>. This wage includes a multiplier for benefits.

No. of Applications (Annually)	Time	Burden Hours	Salary (including 1.5 Benefits Multiplier)	Total
SIPI 1,100	30 minutes	550	\$46.84	\$25,762
Haskell Application 1,000	15 minutes	250	\$46.84	\$11,710
<b>Total: 2,100</b>		<b>800 hours</b>		<b>\$37,472</b>

**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 administer this information collection to be **\$101,124**. Salary estimates were based on the General Schedule 2025, located at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/RUS_h.aspx) and multiplied by 1.6 to cover benefits.

Program	Grade, Step	Loaded Rate	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden (Hours)	Value of Annual Burden Hours
<b>Information Collection Clearance</b>						
DOI staff	GS-14, Step 6	\$111.38 (\$69.61 x 1.6)	N/A	N/A	20	\$2,228
<b>BIE Administration of Information Collection</b>						
SIPI:	GS-5, Step 6	\$36.06 (\$22.54 x 1.6)	1,100	.25	275	\$9,917
SIPI:	GS-6, Step 6	\$40.21 (\$25.13 x 1.6)	1,100	.25	275	\$13,756
SIPI:	GS-11, Step 6	\$66.13 (\$41.33 x 1.6)	1,100	.25	275	\$20,358
Haskell:	GS-6, Step 6	\$40.21 (\$25.13 x 1.6)	1,000	.5	500	\$22,505
Haskell:	GS-12, Step 6	\$79.26 (\$49.54 x 1.6)	1,000	.5	500	\$44,360
<b>TOTAL</b>					<b>1,845</b>	<b>\$101,124</b>

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

Updates were made to the Bureau of Labor Statistics (BLS) and Office of Personnel Management (OPM) compensation data contained in Sections 12 and 14.

**PROPOSED REVISION**

**BIE Proposed Revision:** We are proposing to revise the information collection to facilitate the digital submission of the student’s application.

**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.**

The information collection may be used for budget and planning purposes, but individual persons will not be identifiable.

**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 the expiration date on all relevant forms.

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

No exceptions to the certification statement are being sought.