

## **DECISION MEMORANDUM FOR THE SECRETARY**

**THROUGH:** David Hayes, Deputy Secretary

**FROM:** Pam Haze, Deputy Assistant Secretary –Budget, Finance, Performance and Acquisition

**CC:** Laura Davis, Matt Lee-Ashley, Del Laverdure

**SUBJECT:** BIE Summer Institute Wavier

### **I. INTRODUCTION**

OMB guidance on conferences requires a Secretarial waiver on all conferences that are expected to cost in excess of \$500,000. This requests your approval on a waiver for the Bureau of Indian Education Summer Institute – a very large training event with costs estimated at \$810,267.

### **II. BACKGROUND**

Our conference approval process, which complies with the latest direction from the Office of Management and Budget, requires a line-by-line approval by the Deputy Secretary for all conferences that are estimated to cost in excess of \$100,000. David Hayes has been conducting line-by-line reviews since the most recent guidance was released on May 11, 2012.

OMB guidance also says that agencies are not to incur expenses from its own funds greater than \$500,000 for a single conference, but that the Secretary may provide a waiver from this policy if he determines that exceptional circumstances exist whereby spending in excess of \$500,000 is the most cost-effective option to achieve the program purpose. The basis for the waiver is to be documented.

### **III. SUMMER INSTITUTE**

The Summer Institute is a training event with registered attendance by over 1,600 participants including school administrators, teachers, school board members, parents and other staff at BIE schools and dormitories. The event provides five full days of training courses that allow the BIE to fulfill the requirements of the grants it receives from the Department of Education. The authority for BIE to utilize the grant funds require that BIE set aside 25 percent of the funds they receive from the Department of Education to support professional development. It is allowable to use the funds for travel, lodging, and per diem costs.

The estimated total cost of the conference is \$810,267 including \$706,675 to hold the conference at the Denver Convention Center and \$103,591 for 81 BIE program staff's travel, lodging and per diem. The balance of the participants to the conference will fund

their travel, lodging and per diem from training dollars that are budgeted by the schools – both BIE operated and tribal operated.

The event is funded almost exclusively from funding provided by the Department of Education – the uses for these funds are detailed in the chart below.

<b>BIE travel and per diem expenses 81 individuals</b>	<b>\$103,591</b>
<b>Facility Rental – 49 rooms per day Monday through Friday (half-day) and 3 rooms for Sunday for meeting preparation. Each room holds a minimum of 40 occupants with a maximum of 120 per session. Each room will be set up classroom style to accommodate maximum occupants. The ballroom will be set up for the general session.</b>	<b>86,262</b>
<b>Audiovisual – Monday through Thursday including equipment and technical support (labor costs) for set up and take down. Each room has a microphone, sound mixer, screen, LCD project, and hookups. Set up to take place on Sunday and Monday. If microphone and mixer are not needed they will be deducted from the bill.</b>	<b>128,190</b>
<b>Speakers/Trainers/Presenters – Includes four components:</b>	
<ul style="list-style-type: none"> <li>• <b>Trainers for five extended sessions (14 hours per session) including two sessions for school improvement for grant schools and three FOCUS sessions. Each session requires 50 staff.</b></li> </ul>	<b>45,000</b>
<ul style="list-style-type: none"> <li>• <b>Five keynote speakers estimated at \$2,500 each to present to the 1,500 participants during the general sessions Tuesday – Thursday.</b></li> </ul>	<b>7,500</b>
<ul style="list-style-type: none"> <li>• <b>150 sessions with trainers and presenters - \$2,112 per day for trainers and presenters for multiple 1-2 hour sessions over each of three days. Anticipate 40-120 participants per session.</b></li> </ul>	<b>405,000</b>
<ul style="list-style-type: none"> <li>• <b>25 BIE staff not included in these costs will be assisting in the training and presenting</b></li> </ul>	
<b>Pre-conference Site visit – Conduct a walkthrough of the facility and ensure space and accommodations are adequate</b>	<b>6,334</b>
<b>Internet – Connectivity for Native American Student Information System, Native Star, North West Evaluation Association.</b>	<b>17,390</b>
<b>5K Run/Walk – Paramedics, course block and city fees to hold a run/walk for participants and encourage physical exercise. Nike is contributing t-shirts.</b>	<b>3,500</b>
<b>Security – The Convention Center charges for the costs of two guards June 11-14</b>	<b>2,500</b>
<b>Layout and logistics – Arranging and organizing the facility to support the training event – chairs, tables, wastebaskets.</b>	<b>5,000</b>
<b>TOTAL</b>	<b>\$810,267</b>

**BIE will use minimal amounts of their own appropriated funds for transportation of senior managers and some education line offices and staff.**

**The Education grants funds are provided from the No Child Left Behind program, specifically according to provisions of Title-I Improving Basic Program, Title-II-A Highly Qualified/Highly Effective Teachers, and Title-IV Safe and Drug Free School. These grants require a set amount of technical assistance, training and professional development for educators, school staff, and board members. The Summer Institute will meet these requirements, including:**

- **BIE has a requirement imposed by the Department of Education to provide technical assistance to schools to ensure they are able to measure student performance. This training will ensure consistency in the approach used by BIE schools.**
- **Training requirements in the grant explicitly include skills development in a wide range of skills. These include curriculum development and implementation, teaching strategies, classroom and behavioral management, and intervention techniques. This is not an exclusive list.**
- **There are specific requirements in the grant to encourage schools to use resources for staff development and parent involvement, which are met by this training.**
- **The training will provide knowledge on how to attract, retain and motivate highly qualified staff and improve the skill levels of existing staff. This is particularly relevant for high needs schools such as those in Indian Country.**
- **Schools must spend 10 percent of funds available from the Department of Education on professional development. This training provides professional development and directly addresses the academic achievement problems that cause schools to be identified as low performing.**
- **To fulfill the requirement for technical assistance, this event will provide demonstrations of methods, techniques and tools that could be adopted by the schools.**
- **New school board members are required to have 40 hours of training and this would fulfill these needs.**

**BIE has led the process to plan for this training event in order to structure the training to meet the requirements of its educators and others in the most cost effective manner and ensure high quality training. The alternative to this event is seeking training from commercial entities or holding smaller sessions, which would result in disparate and less robust training that each school and dormitory would have to seek on its own. With 1,600 participants, the cost for training for the five and half days is about \$500,000 for each participant. This is slightly less than \$13.00 per hour for the 64,000 hours of training that will be provided. The location, Denver, Colorado, was selected to minimize the travel costs. Denver is a hub city for flights and in most cases the attendees can take direct flights, reducing travel costs and avoiding additional per diem costs. The dates for the event were selected in order to avoid taking educators away from their duties during the school year.**

#### IV. DISCUSSION OF OPTIONS

When the proposal for the Summer Institute was first received from BIE, discussions were held with the Deputy Secretary, Chief of Staff, AS-PMB and AS-IA. It was decided that the planning should proceed for the event, based on the mission-critical need for the training and the likely results of canceling the Institute. Canceling the event would result in additional costs for schools and BIE to arrange for alternative training. BIE would not be able to assure that it met the requirements of its Department of Education grant as it would be difficult to find adequate training and ensure the outcomes of training provided through other venues.

#### V. POSITIONS OF INTERESTED PARTIES

There is the challenge of justifying the high cost of this event with the current OMB guidance to limit conference spending to less than \$500,000 per event. However, the mission critical nature of this training, the lack of feasible alternatives to meet grant requirements, and the almost exclusive use of Department of Education funds provide a sound rationale for approval.

We recommend your approval of this waiver.

#### VI. SECRETARY'S DECISION

APPROVE *by phone 6-6-12*  
 DISAPPROVE  
 OTHER:

Comments: