

**1Supporting Statement for Paperwork Reduction Act Submissions  
Probate of Indian Estates, Except for Members of the Five Civilized  
Tribes, 25 CFR 15  
OMB Control Number 1076-0NEW**

**Terms of Clearance:** None  
**General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, 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 in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

NOTE: The Department requests a new collection number due to the extent of changes contained in this submission. Additionally, this regulation (25 CFR Part 15) was amended in March 2005; however, since DOI did not circulate it through normal BIA channels, no Paperwork Reduction Act (PRA) package for these revisions was submitted under OMB Control Number 1076-0156 or otherwise. As such, the section cross-references in Attachment A of the Supporting Statement refer to pre-March 2005 sections.

**A. Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Department is proposing to revise 25 CFR Part 15 to further fulfill the Secretary of the Department of the Interior's fiduciary responsibilities to federally recognized tribes and individual Indians and to meet the trust management policies articulated by Congress in the Indian Land Consolidation Act (ILCA), as amended by the American Indian Probate Reform Act of 2004 (AIPRA). ILCA, as amended by AIRPA, is attached. The Secretary has sole authority to probate estates of Indians under 25 U.S.C. § 372. Part 15 describes the Bureau of Indian Affairs (BIA) procedures before passing the file on to the Office of Hearing and Appeals (OHA) for disposition. The information collections included in Part 15 will allow the Secretary to obtain the information necessary to compile and make as complete as necessary each probate file for individual Indians before disposition.

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.]

The parties that submit information under the Part 15 are individual Indians and any persons having claims against an Indian decedent's estate. Subparts of the rule that contain information collection requirements are summarized below. Proposed sections that impose new information collection requirements are highlighted below.

The information provided through information collection requirements is used by the BIA to determine heirs and divide any funds held by the BIA for an Indian decedent and to divide the decedent's trust and restricted real property for distribution. OHA uses the information BIA provides in the probate file to determine how the assets of a decedent's estate should be distributed at probate. OHA distributes those assets in accordance with 43 CFR 4. The information is particularly used in instructing an individual in starting the probate process, preparing a probate package for review, filing claims, disbursing assets, and filing appeals for adverse decisions.

### New Information Collection Requirements

The revisions to Part 15 include **new** information collection requests from the public in four sections—Sections 15.4, 15.105, 15.106, and 15.505. No forms are associated with these items of information.

- Section 15.4 requires a testator who is self-proving his or her will to file a sworn statement establishing that the document is their last will and testament, that he or she declared the document to be their last will and testament and signed in the presence of two witnesses, that the will was read and explained before he or she signed it, that the will clearly and accurately reflects his or her interests, that he or she willingly made and executed the will as their free and voluntary act. This section also requires that two witnesses sign sworn statements that the testator declared the document to be his or her will, signed the document in the presence of the witness, was not acting under duress, menace, fraud, or undue influence of any person, and in the witness's opinion, is mentally capable of disposing his or her estate by will.
- Section 15.105 adds a requirement for persons unable to provide a death certificate to provide as much as they know about the deceased. If no death certificate exists, they must provide this information in an

affidavit. This information will ensure that BIA has the information it needs regarding the identity of the deceased to collect documents for the probate file.

- Section 15.106 lists the items that BIA needs to prepare a probate file. The public is the most likely respondent for this information. The proposed rule deletes the requirement for a birth certificate of the deceased, but adds several other items of information.
- Section 15.505 states that tribes must provide information related to a probate case that the Secretary requires of them, including enrollment and family history data. Completion of these information collection requests will ensure that the OHA receives the information it needs to probate each estate, allowing OHA to meet the needs of trust asset beneficiaries in the most accurate and timely manner possible.

Note also that Section 15.302 specifies certain documents that are necessary for a probate file to be considered complete so that BIA can forward the file to the Office of Hearings and Appeals (OHA). These documents will either already be provided by the public as a result of their compliance with Section 15.105, or they are within BIA's possession. The Federal Government, rather than the public, will bear the burden of ensuring that these documents are part of the probate package; therefore, the burden was attributable when first collected. Additionally, information on the OHA-7 was previously collected and therefore does not need OMB clearance.

### Existing Information Collection Requirements

Subpart **A** contains provisions explaining the probate process. This subpart contains the requirement for testators seeking to "self prove" their wills to file an affidavit containing certain statements and the requirement for witnesses to sign certain statements regarding the testator's declaration and apparent fitness to dispose of his or her estate. OHA will use the affidavits in place of taking the testimony of witnesses when probating the estate.

**Subpart B** contains provisions relating to initiating the probate process. These items include a reporting requirement to the BIA notifying the agency of the circumstances of an Indian decedent and providing documentation of his death. The proposed revisions require persons unable to provide a death certificate to provide as much as they know about the deceased, including: the state, city, reservation, location, date and cause of death, the last known address of the deceased, names and addresses of others who may have information about the deceased. If no death certificate exists, they must provide this information in an affidavit. Subpart B also requires the production of certain records that identify the decedent, his heirs, his

creditors, and some additional documentation that will assist in compilation of a probate package. The new items to be provided to BIA for preparation of a probate file include: (1) adoption and guardianship papers concerning decedent's potential heirs or beneficiaries; (2) orders requiring payment of spousal support; (3) identification of person or entity to whom an interest is renounced; (4) court judgments regarding creditor claims; and (5) place of enrollment and tribal enrollment or census number of the decedent and potential heirs and beneficiaries. This subpart also provides directions for disclaiming an interest in restricted lands or trust funds. The reporting requirement for certain funeral expenses has been moved to Subpart C.

**Subpart C** now contains the reporting requirement for certain funeral expenses and provisions relating to filing claims against an Indian decedent's estates.

**Subpart D** contains provisions relating to BIA's preparation of a complete probate file.

One item describes the format for completing a probate package, including an heirship declaration form (OHA Form 7). The proposed section includes additional documents in a "complete" probate file. These additional documents ensure that OHA has the most accurate information regarding the property to be distributed; the manner in which it should be distributed through intestate succession, purchase, or consolidation; and the potential beneficiaries.

- The requirement to include accurate and adequate descriptions of all real property and appurtenances will ensure that OHA includes all the property in the estate and does not erroneously include other property during probate;
- The requirement to include all encumbrances on the real property, including leases, will ensure that the valuation and distribution of the estate will reflect all encumbrances;
- The requirement to include fair market value of each real property interest will ensure that the value of the estate to be distributed is accurate;
- The requirement to identify interests that represent less than 5% of the undivided interest will allow OHA to: (1) identify "fractional interests" and ensure that they follow the rules of intestate succession applicable to such interests under AIPRA and (2) determine from whom consent is required for a purchase at probate under AIPRA.
- The requirement for a copy of any statement or document concerning any wills, codicils, or revocations that have been released by BIA provides evidence of the existence of a will or codicil, and evidence that a will has been revoked. This requirement refers to the fact that, under previous regulations, trustees were able to provide their wills, codicils, and revocations to BIA for safekeeping. BIA would issue a

statement upon release of the will, codicil, or revocation back to the testator that it was releasing the will, codicil, or revocation and was no longer responsible for its safekeeping. OHA can consider these statements as proof that a will, codicil, or revocation existed;

- The requirement for records of disbursements from the account after the date of death is a clarification of an existing requirement for the balance as of the date of probate. The requirement for records of disbursements will ensure that OHA accounts for disbursements that have already been made in reviewing the estate inventory;
- The requirement for information necessary to identify the person receiving the renounced interest will allow OHA to determine whether the person receiving the renounced interest is an eligible recipient of a renounced interest under AIPRA
- The requirement for individual requests to purchase interests of a decedent will ensure that OHA can determine whether the individual is an “eligible purchaser” under AIPRA, and properly disburses the estate;
- The requirement for requests for consolidation agreements of any lands not part of the decedent’s estate will ensure that OHA can determine whether parties to the consolidation agreement are “eligible heirs” and devisees under AIPRA, and properly disburses the estate;
- The requirement for tribes to provide information on tribal enrollment and family history data will help OHA determine whether heirs and devisees meet AIPRA’s definition of an “eligible heir,” including whether the heir or devisee meets the definition of “Indian.”
- The requirement for an affidavit of a probate staff member describing efforts taken to locate missing heirs and beneficiaries will allow the probate process to move forward as long as certain steps are taken to locate missing heirs and beneficiaries.
- The requirement to include the enrollment number or other identifying number on the OHA-7 form will allow BIA to communicate with the appropriate tribe and ensure that information it receives relates to the decedent.

The reporting requirement for making a claim against an Indian decedent’s estate has been moved to Subpart C. The time line requirements for BIA to submit a probate package to OHA have been deleted. Priority claims for funeral expenses, medical and doctor expenses, and nursing home or other care facility expenses have been deleted.

**Subpart E** contains provisions relating to de novo reviews, rehearings, and appeals of a determination made by a deciding official. A proposed provision allows a written request for de novo review, rehearing, or appeal. The time period for appeals has been changed to within 30 days of the decision or mailing date, rather than 60 days. This Subpart also now describes the process for BIA to refer the probate file to OHA for assignment to a deciding official and provisions. Provisions regarding the basic form of

the appeal and the extraordinary appeal requirements that may apply after the appeal period has expired have been deleted.

**Subpart F** contains provisions regarding the preservation of records. A proposed provision also includes a requirement for tribes to provide enrollment and family history data pertaining to any probate matter where necessary to complete the probate file.

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.].

During December 2001, BIA was forced to disconnect from the internet by a court order issued by the judge in the Cobell litigation. Hence, BIA cannot implement GPEA until reconnection to the internet is permissible.

For this collection, we use limited automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

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 is not duplicated in any other data collection. The information required is unique to the probate of Indian decedents' estates and no similar information is found in any other collection. In keeping with the Paperwork Reduction Act and other statutory requirements, the information collected is the minimum needed for the intended purpose.

- With regard to the information required in the proposed Section 15.4 (affidavits for self-proving wills), the statements required are specific to the testator's intentions with respect to his or her will, and therefore are not available elsewhere.
- With regard to the information required in the proposed Section 15.105 (information to be provided when there is no death certificate) and 15.106 (documents BIA needs to prepare the probate file) this information is not available elsewhere.
- With regard to Section 15.302, the information in this section that is provided by the public is already required of the public by the proposed

Section 15.105 (current Section 15.104), so no new collection is necessary. For the remaining additional documents, BIA will obtain the information from already available sources. For example:

- BIA will obtain accurate and adequate descriptions of all real property and appurtenances from the Land Title and Records Office (LTRO);
  - BIA will obtain information on all encumbrances on the real property, including leases, from the LTRO;
  - BIA will obtain the fair market value of each real property interest from its Office of Appraisal Services;
  - BIA will identify interests that represent less than 5% of the undivided interest based on LTRO records and other information it receives;
  - BIA will obtain from itself any statements or documents it has released concerning wills, codicils, or revocations;
  - BIA will obtain information regarding disbursements made after the death of the account holder from the Office of Trust Fund Management (OTFM) within BIA's Office of Special Trustee (OST).
- With regard to the proposed Section 15.505, BIA will request tribal enrollment and family history data from tribes because they are the most accurate and up-to-date source for this information. While the public will provide enrollment information under Section 15.105, this information may not be the most current information available. To ensure that the proper disbursements are made, BIA must obtain the most accurate information possible, which is exclusively maintained by the tribes in their normal course of business. BIA estimates it will take tribes a total of 11,240 hours per year to provide this information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Tribes and tribal organizations are considered small governmental jurisdictions or small entities under the Small Business Regulatory Enforcement Fairness Act (SBREFA). The BIA consulted with the tribes and through various tribal-member non-governmental organizations to determine what information collection was necessary to ensure the fair and equitable administration of Indian decedents' estates. Through this consultation, the information collection burden has been minimized.

The proposed change in information collection requirements most likely to impact tribes would be the requirement to provide tribal enrollment and family data history, where requested, under Section 15.505. Tribes generally have this information readily available, as they generally maintain it in the normal course of business, and likely will not need to provide this information

very often. The Department has estimated that each of the 562 tribes will, on the average, provide information on about 10 decedents per year—totaling 5,620 responses. For each of these decedents, BIA may require the tribe to provide enrollment and family history data for heirs and/or devisees of the decedent. The Department estimates that collecting this information for each decedent's estate will average two hours, for a total burden of 11,240 hours per year. The Department obtains all the other information needed for a probate file from other sources to minimize the burden on tribes and has restricted its collection on tribes to that information for which tribes are the exclusive holders of the most accurate and current information.

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.

The information collection burden cannot be reduced any further without the integrity of the probate Indian decedent's estate being compromised. If BIA is not able to ensure that each of the items of information is present in a probate file, OHA will not be able to accurately capture what assets are part of the estate, and to whom the assets should be distributed. Likewise, if BIA is not able to collect tribal enrollment and family history data from tribes, it will potentially make decisions concerning who are eligible heirs, purchasers, and devisees based on erroneous and/or out-of-date information. Both of these situations could result in erroneous distributions of assets, depriving heirs or devisees of their rightful claim to property. The frequency established by the regulations—once per probate estate—is necessary because each estate contains unique assets.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

The one circumstance formerly requiring an exception to 5 CFR 1320.5(d)(2) has been deleted. This circumstance required interested parties to request the probate package to be sent to OHA rather than an attorney decision maker within 20 days. The revised regulations delete this requirement and provide, instead, that all probate packages are sent to OHA for assignment to a deciding official. Proposed sections of the regulations do not require any exceptions to 5 CFR 1320.5(d)(2), as explained below.

- \* *requiring respondents to report information to the agency more often than quarterly;* The proposed revisions may require tribes to report certain information, such as enrollment and family history data, to BIA more often than quarterly; however, each report of information will most likely be with regard to different tribal members, as they will relate to potential heirs and devisees of a specific estate

- \* *requiring respondents to prepare a written response to a collection of information in fewer*

*than 30 days after receipt of it;*

No proposed provision requires a respondent to prepare a written response to a collection in fewer than 30 days after receipt of it.

- \* *requiring respondents to submit more than an original and two copies of any document;*
- No proposed provision requires any respondent 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;*  
No proposed provision requires any respondent to retain 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;*  
No proposed provision requires a statistical survey.
- \* *requiring the use of a **statistical data classification that has not been reviewed and approved by OMB;***  
No proposed provision requires use of a statistical data classification.
- \* *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*  
No proposed provision includes a pledge of confidentiality. While some sensitive information may be submitted for contribution to a probate file, such information becomes public record when the estate is probated. However, there is a system of records which protects the information when not part of the public record. Interior/BIA-27: BIA Probate Files was published in the Federal Register February 27, 2007 (72 FR 8767). Additionally, under this regulation, tribes may provide information to the BIA that it received from individual Indians. Tribes are not subject to the Privacy Act.
- \* *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.*  
No proposed provision requires respondents to submit proprietary trade secrets or other confidential information.

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. [Please list here the names, titles, addresses, and phone numbers of persons contacted. One or two should be sufficient.]

This information collection is part of the proposed revisions to 25 CFR 15, published August 8, 2006 (71 FR 45174). The comment period was extended by notice published in the Federal Register November 1, 2006 (71 FR 64181) and again January 25, 2007 (72 FR 3377). The extensions allowed time for more comments as the systems of records were published. BIA has consulted with the following person outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions, and reporting format, and the data elements to be recorded, disclosed or reported:

Fannie Armstrong  
Enrollment Specialist Flandreau-Santee Sioux Tribe  
P.O. Box 283  
603 West Broad Avenue  
Flandreau, South Dakota 57028

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

The respondents will not receive any payment or gift in connection with 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.

There is no assurance of confidentiality provided to respondents in connection with the information collection requirements. Much of the information requested under this CFR Part is part of the public record (e.g., death certificate) and is related to the decedent and therefore no longer protected by the Privacy Act. With respect to information requested that is related to live people (e.g., heirs, devisees, legatees), the Department complies with the Privacy Act, and has a system of records related to probate cases, but does not provide an assurance of confidentiality to the respondents when files are made public. The system of records is attached.

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.

The information required by the proposed provisions may include information of a sensitive nature, including enrollment and family history data. This

information is necessary to determine whether heirs and devisees meet the definitions of “eligible heir,” “eligible purchaser,” and “Indian,” under the AIPRA provisions. There is a system of records which offers protection except when the information is part of a public record. Interior/BIA-27: BIA Probate Files was published in the Federal Register February 27, 2007 (72 FR 8767).

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 in Item 13 of OMB Form 83-I.
- \* 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 in Item 13.

Attachment A provides estimates of the hour burden collection of information.

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 shown in Items 12 and 14).

- \* 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]. 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.

The estimated total annual cost burden to respondents or record keepers for capital and start-up cost components (annualized over the expected useful life) for this information collection is zero. The information collection will not require the purchase of any capital equipment nor create any start-up costs because no equipment is involved with the administration of Indian decedents' estates. Any computers and software used to complete this information collection are part of the respondents' customary and usual business practices and, therefore, are not included in the estimate.

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.

Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated total annualized cost burden to the Federal Government with respect to operations and maintenance costs such as equipment, overhead, and printing is zero. Attachment A, Table 2 provides a quantification of hours.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Overall, the hourly burden on the public decreased by 57,081. This decrease is comprised of both program changes and adjustments.

### Program Changes

Program changes have been made to the following sections, resulting in a net program change decrease of 18,813 hours. These programmatic changes increase the documents that the public, including tribes, must provide in support of a complete probate package (add expenses). These increases are the result of program changes that are necessary to comply with AIPRA provisions restricting the eligibility of persons to inherit, receive as a devisee, or purchase interests.

Section 15.4	+ 500
Section 15.4	+ 1,000
Section 15.105	+ 5,850

Section 15.106	+26,543.75
Former Section 15.109	- 7,887
Former Section 15.203	- 2,972.2
Section 15.403	-53,087.5
Section 15.505	<u>+11,240</u>
TOTAL	-18,812.95 (~-18,813)

### Adjustments

Two adjustments were made, netting -38,268:

- Adjustment to account for miscalculation in adding hours in last PRA submission: sum was represented as 1,094,513, while the true sum was 1,102,400—requiring an adjustment increase of 7,887.
- Adjustment decreasing hours by 46,155 to reflect six claims per probate (former section 15.303, new section 15.202)

### Summary

The total net change in Total Hourly Burden is -57,081 (1,094,513 - 1,037,433). The following provides a breakdown.

1,094,513	Current OMB Inventory Hours as stated in last PRA submission
<u>+ 7,887</u>	Adjustment to account for miscalculation to Current OMB Inv. Hours
1,102,400	
<u>- 46,155</u>	Adjustment for Section 15.202 to account for 6 creditor claims per probate
1,056,245	
<u>- 18,813</u>	Program change decrease
1,037,433	Total Hourly Burden (Annual)

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 Department does not plan to publish the collection of information.

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.

The Department intends to display the expiration date with the OMB Control Number

18. Explain each exception to the certification statement identified in Item 19, "Certification for

Paperwork Reduction Act Submissions," of OMB Form 83-I.  
The certification statement does not include any exceptions.