

Supporting Statement for Paperwork Reduction Act Submissions A Reporting System for Pub. L. 102-477 Demonstration Project OMB Control Number 1076-0135

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

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.**

Public Law 102-477 authorizes tribal governments to integrate federally funded employment, training and related services programs into a single, coordinated, comprehensive delivery plan. The goal of the legislation is to reduce unemployment, improve services, and reduce administrative costs. The programs under the responsibility of the Secretary of the Interior, Secretary of Labor, and Secretary of Health and Human Services are all included within this authorization. The Bureau of Indian Affairs, (BIA) is legislatively required to serve as lead agency. A copy of the relevant statute is attached.

Section 11 of this Act, "Federal Responsibilities," and sub-parts (a)(1) and (2) require the Secretary of the Interior to make available a single universal report format which shall be used by a tribal government to report on integrated activities undertaken within their project. It also requires that the Secretary make available a single universal report format related to the projected expenditures for the individual project which shall be used by the tribal government to report on all project expenditures.

These universal single page, one-sided report forms and the narrative with a total of six pages, (due annually) replaces 166 pages of instructions and applications representing three (3)

different agencies and eleven (11) differently funded but related programs. Most of these eleven different program reports were completed quarterly. This 95% reduction in the number of reports and the reduced size of the required reports is consistent with the Paperwork Reduction Act and consistent with the National Performance Review.

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.]

(a.) The statistical report will be used to demonstrate how well a tribal plan was executed in comparison to its proposed goals. This one page, single sided, universal report form satisfies the very basic statutory requirements for the three participating federal agencies. It will help the funding agencies determine the quality of the employment, training, child care and related services provided to individual participants in the program. It will help determine the level of program activity in which the tribes are engaged. In accordance with standard regulations governing the administration of grants, the Common Rule, certain sanctions will be imposed on grantees if they do not report thoroughly and timely.

These reports are subdivided into three components. The statistical report identifies the number of participants enrolled in the program, the number that successfully completed the program, those that were not successful, the characteristics and barriers to employment faced by participants and the types of activities and services the participant received while enrolled. This information helps to determine the success of current employment and training programs.

(b) The financial status report is used to track cash flow, compare program activity with expenditures, compare general expenditures with approved intent and budget and to avoid over expenditures and identify savings. The form is a slightly modified SF-269A (short form). An addendum is added to the standard form to seek assurances required by the Job Training Partnership Act, as amended. This report will identify the tribes applying for grants, the period of operation, and total resources committed to the plan. The form includes a “previously reported” column, a “current expenditures” (this period) column and a “cumulative” column. This report is acceptable to all the participating federal agencies.

(c) The Narrative Report allows tribes to go beyond numbers and report goals and objectives against accomplishments and describe problems or unmet needs toward addressing employment and training issues.

We have deleted the requirement for grantees to report on child care during non-traditional hours, (e.g., nights, weekends and work related child care that is for 24 hours or more). The Administration for Children and Families, Child Care Bureau does not collect this data for other grantees and have determined that at this time, the extra information is not needed.

We have also clarified that grantees should report the type of child care provided (e.g., center-based care, group home care, family home care and care in the child's own home) by the number of children receiving care. Previously, some respondents were reporting this data by number of families and other respondents were reporting this data by number of children resulting in inconsistent data elements.

The forms were developed by all three participating Federal agencies and directly in collaborative efforts with tribes. The agencies use all of the above data collected to ensure statutory compliance, report to the Congress, the Office of Management and Budget, and to report to the respective agency administration. These reports may include a discussion of the use of funds, activities engaged in by tribes and the extent to which tribes are successful. The goal of the program is to find unsubsidized employment for Indians either through direct referrals or assisted through training, education and other supportive services such as child care.

- 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, Indian Affairs (IA) was forced to disconnect from the internet by a court order issued by the judge in the Cobell litigation. Hence, IA cannot implement GPEA until reconnection to the internet is completed.

The reports were designed to provide tribes the opportunity to collect, maintain and report the data using technological collection techniques. Some tribes have automated the data to such an extent that they are able to meet their own day-to-day needs, (i.e., identify candidates for employment meeting specific qualifications while meeting with prospective employers), as well as complete the annual reports. The use of technology at the tribal level depends upon the extent to which each tribe has developed an integrated intake and reporting system.

- 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.**

While three different federal agencies representing eleven different programs do collect the information, comprising an estimated 166 pages of reports and instructions annually, we have consolidated that into one set of forms including seven (7) pages annually through this reporting mechanism. Terms used in the reports have been standardized among the three federal agencies. Duplication has been eliminated.

- 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.

Tribal entities worked with the federal agencies to develop a streamlined plan that met everyone's needs and avoided duplication as cited in paragraph 3 of number 1 and reiterated in number 4.

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.

Grant funds are dependent upon filing the necessary reports. If the reports are not completed annually by the grantee, additional payments to the grantee will not be made. Once reports are submitted, payments will resume.

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.*

Not Applicable. Regulatory compliance indicates annual reports are sufficient; tribes control the content of the information and normally do not deal in sensitive information when compiling this report. Any copies needed by other agencies are made by the Bureau.

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.

The following Federal partners to this initiative were consulted on the review of these forms:

Ms. Ann Bowker, Native Employment Works Program Specialist,
Department of Health and Human Services, Administration of Children and Families
370 L'Enfant Promenade, Aerospace Bldg.
Washington, DC 20447
(202) 401-5308

Mr. Ray Apodaca and Mr. Ray Shelbourne
Temporary Assistance to Needy Families
Department of Health and Human Services, Administration for Children and Families
370 L'Enfant Promenade, Aerospace Bldg.
Washington, D.C. 20447

Ms. Evangeline Campbell, ICWA Specialist
DOI/OTS, Division of Human Services
1849 C. Street, NW, MS-4513-MIB
Washington, DC 20240
(202) 513-7623

Ms. Dawn Anderson
Department of Labor
Division of Indian and Native American Programs,
Washington, D.C.

Mr. Chris Redman
Office of Indian Education
Department of the Interior
Washington, D.C.

We have also met with and consulted with Pub. L. 102-477 Tribal Work Group during the past 12 months. The revised forms were on the agenda each time. The group consists of:

1. Aleutian Pribilof Island Association

Mr. Ken Selby

201 E. 3rd Avenue
Anchorage, Alaska 99501

Telephone: (907) 276-2700 Fax: 907-279-4351

2. Association of Village Council Presidents

Mr. John Owens

P.O. Box 219
Bethel, Alaska 99559
Telephone: (907) 543-7321 Fax: (907) 543-3569
1-800-478-3921 extension-7300

3. Bristol Bay Native Association

Mr. Mark Hiratsuka

P.O. Box 310
Dillingham, Alaska 99576
Telephone Number (907) 842-2262 Fax: (907) 842-5932

4. Chugachmiut

Mr. Tim Anderson
4201 Tudor Center Drive, Suite 210
Anchorage, Alaska 99508

Telephone: (907) 562-4155 Fax: (907)- 563-2891

5. Citizen Potawatomi Tribe

Ms. Carol Levi (Margaret Zientek)

1901 S. Gordon Cooper Drive
Shawnee, Oklahoma 74801

Telephone: (405) 275-5269 Fax: (405) 878-4668
E-mail: cclaylevi@potawatomi.org

6. Cherokee Nation of Oklahoma

Mr. Chad Smith, Principle Chief

Ms. Penny Norseworthy
P. O. Box 948
Tahlequah, Oklahoma 74465
Telephone: (918) 456-0671 x2375 Fax: (918) 458-7666

7. Cheyenne River Sioux Tribe

Mr. Harold Frazier, Chairman
P. O. Box 837
Eagle Butte, South Dakota 57625
Contact: Kathleen Lafferty
Telephone: (605) 964- 6415 Fax: (605) 964-6416

8. Chickasaw Nation

Mr. Bill Anoatubby, Governor
Ms. Angie Gilliam, Program Manager
P. O. Box 1548/ 520 E. Arlington
Ada, Oklahoma 74821-1548

Telephone: (580) 436-2603 x7512, Fax: (580) 436-7257
angieg@chickasaw.com

9. Confederated Tribes of the Colville Reservation

Ms. Sheilah Cleveland
State Hwy 155 & Cache Creek Road
Nespelem, Washington 99155
Telephone: (509) 634-8841/2730/2729 Fax: (509) 634-2734

10. Cook Inlet Tribal Council

Ms. Carrie McMillan
2700 Gambell Street, Suite 442

Anchorage, Alaska 99503

Telephone: (907) 793-3419 Fax: (907) 793-3422

11. Copper River Native Association

Mile 104 Richardson Highway, P. O. Box H
Copper Center, Alaska 99573

Contact: Susan Voyles

Telephone: (907) 822-8841, Fax (907) 822-8801

12. Eastern Shoshone Tribes

Mr. John Wadda

P.O. Box 538/ 647 Blue Sky Hwy.
Fort Washakie, Wyoming 82514
Telephone: (307) 332-8052, Fax: (307)332-8055

13. Fort Belknap Community Council

Mr. Ben Speakthunder, President
Ms. Tesha Hawley, (406) 353-8382
Mr. Ken Shawl, Finance
RR 1, Box 66,
Harlem, Montana 59526
Telephone: (406) 353-2205 Ext. 427 or 1-800 859-2794 Ext. 382

**14. Confederated Tribes of the
Grand Ronde Community**

Ms. Kathryn Harrison, Chairperson

9615 Grand Ronde Rd
Grand Ronde, OR 97347
Contact: David Fullerton
Telephone: (503) 879-2036 Fax: (503) 879-5127

15. Ho Chunk Nation

Mr. Kenneth LeMieux

P.O. Box 667, W. 9814 Airport Rd.

Black River Falls, Wisconsin 54615
Telephone: (715) 284-5877 Ext. 1137, Fax: (715)-284-1520

16. Kawerak, Inc.

Ms. Dawn Salesky
Contact: Jerry Trainor, Vice President
P.O. Box 948
Nome, Alaska 99762

Telephone: (907) 443-4351 Fax: (907) 443-4452

17. Knik Tribal Council

Mr. Michael Tucker

477 Contact: Christina Flowers

P.O. Box 871565
Wasilla, Alaska 99687
Telephone: (907) 373-7991 Fax: (907) 373-2161

18. Kodiak Area Native Association

Ms. Margie Bezona
3449 Rezanof Drive, East
Kodiak, Alaska 99615
Telephone: (907) 486-9816 Fax: (907) 486-9898

19. Pueblo of Laguna Tribe of Indians

Mr. Roland E. Johnson, Governor
P.O. Box 207

I-40 West, Exit 114, Bldg. 1125
Laguna, NM 87026

Telephone: (505) 552-6008 x 17/ 7242
Marilyn Johnson, (505)-552-6008 x 11, Fax :(505) 552-6398
E-mail: gsan021998@aol.com

20. Menominee Indian Tribe of Wisconsin

Lisa Waukau, Chairwoman
P.O. Box 910, Tribal Office Loop Rd., Hwy 47-55
Keshena, WI 54135
Contact: Ann Marie Johnson, 477 Coordinator
Telephone: (715) 799-4419, Fax 715-799-4525

21. Metlakatla

Ms. Mae Williams and Frankie Nelson
P.O. Box 8

Metlakatla, Alaska 99926
Telephone: (907) 886-5872, Fax: (907) 886-4469

22. Miami Tribe of Oklahoma

Mr. Floyd E. Leonard, Chief

477 Contact: Ms. Barbra Mullin
P. O. Box 1326
Miami, Oklahoma 74355
Telephone: (918) 542-1445, Fax: (918) 542-7260

23. Mille Lacs Band of Chippewa Indians

477 Contact: Don Novak
43408 Oodena Drive
HRC-67, Box 194
Onamia, Minnesota 56539
Telephone: (320) 532-4181, Fax: (320) 532-3785

24. Nez Perce Tribe

Samuel N. Penny, Chairman
Contact: Ronald T. Halfmoon or Kay Kidder
Main Street & Beaver Grade
P.O. Box 365
Lapwai, ID 83540

Telephone: (208) 843-7363 x 2320, (208) 843-7365: Fax: (208) 843-7365

25. Orutsaramuit Native Council (ONC)

Ms. Bing Santamore
P.O. Box 927, 835 Richcrest Dr.
Bethel, Alaska 99559
Telephone: (907) 543-2608 Fax: (907) 543-2639
jayde@gci.net

26. Osage Nation

Mr. Ted Moore
1333 Grandview
Pawhuska, OK 74056
Telephone: 1-800-390-6724, (918) 287-4525 or 5302 (Ted), Fax: (918) 287-5567

27. Pawnee Nation of Oklahoma

Robert L. Chapman, President
Pawnee Business Council
P. O. Box 470
Pawnee, Oklahoma 74058

Debra Echohawk, Director of Education
Telephone: (918)-762-2541, Fax: (918)-762-6446

28. Port Gamble

Ms. Marilyn Olson
31912 Little Boston Road, NE

Kingston, WA 98346
Telephone: (360) 297-2646/9636 Fax: (360) 297-7097

29. Red Lake Band of Chippewa Indians

Mr. Darrell Seki, Tribal administrator

Contact: Mr. Ronald Turney

P.O. Box 550
Red Lake, Minnesota 56671
Telephone: (218) 679-3341/3350 Fax: (218) 679-3367

30. Reno-Sparks Indian Colony Tribal Council

Mr. Arlan D. Melendez, Tribal Chairman
1900 Prosperity Street
Reno. NV 89502

Contact: Mr. Michael Hill, Education Director
Telephone: (775) 329-6114, Fax: (775) 785-9161

31. Rosebud Sioux Tribe

Mr. William Kindle, Chairman

P.O. Box 430: Tribe
Legion 1 Ave., Red Log Bldg.
Rosebud, South Dakota 57570

Contact: Laurie Bordeaux
Telephone: (605) 747-2393, Fax: (605) 747-5177

**32. Confederated Salish and Kootenai Tribes
of the Flathead Nation**

Ms. Anna Whiting-Sorrell or Teresa Wall-McDonald
P.O. Box 278

Pablo, Montana 59855
Telephone: (406) 675-2700 Ext. 1026 or 1049 Fax: (406) 675-2806

33. Seneca Nation of New York

Ms. Debbie Cooper
1530 Route 438
Irving, New York 14081

Telephone: (716) 532-1033 Fax: (716) 532-6178

34. Shonaq' Tribe of Alaska

Mr. Robert L. Polasky
312 W. Marine Way
Kodiak, Alaska 99615

Contact: Arlene ?
Telephone: (907) 486-4449, Fax: (907) 486-3361
Plan Dates: **July 1, 2004 to June 30 2007**

35. Shoshone-Bannock Tribe

Ms. Ida Hidalgo
P.O. Box 306, Pima Dr.
Fort Hall, Idaho 83203
Telephone: (208) 478-3737, Fax: (208) 478- 3852

36. Shoshone-Paiute Tribes of Duck Valley

Mr. Marvin Cota, Chairman

P.O. Box 219

Owyhee, Nevada 89832-0219

Contact: Carol Jones

Telephone: (775) 757-3211 x 224, Fax: (775) 757-2219

37. Confederated Tribes of the Siletz Indians

Mr. Bob Jensen / contact: Nancy McCrary

P.O. Box 549

Siletz, Oregon 97380

Telephone: 1-800-922-1399 Fax: (541) 444-2307

38. Sisseton-Wahpeton Sioux Tribe

Mr. Richard Keeble

Lake Traverse Reservation

P.O. Box 509, Veteran Memorial Dr.

Agency Village, South Dakota 57262

Telephone: (605) 698-3911, Fax: (605) 698-7907

39. Spirit Lake Sioux Tribe

Ms. Jolene Crosswhite

Community Center, Main Street

Fort Totten, North Dakota 58335

Telephone: (701) 766-1200 Fax: (701) 766-1236

40. Spokane Tribe of Indians

Gregory Abrahamson, Tribal Chairman

Luanne Ferguson, Employment and Training

6195 Ford/Wellpinit Rd.

P. O. Box 100

Wellpinit, Washington 99040

Telephone: (509) 533-1360, Fax: (509) 533-0899

Stockbridge-Munsee Community

477 Contact: Ms. Misty Cook

P.O. Box 70

N8476 MohHeConNuck Rd.

Bowler, Wisconsin 54416

Telephone: (715) 793-4060, Fax: 715-793-4083

41. Tanana Chiefs Conference, Inc

Ms. Deborah McCarter or Mr. Don Shircel

122 First Ave., Suite 600

Fairbanks, Alaska 99701

Telephone: (907) 452-8251 Ext. 3229 Fax: (907) 459-3883

42. Three Affiliated Tribes

Mr. Leo Cummings

P.O. Box 220, 304 Main St.

New Town, North Dakota 58763

Telephone: (701) 627-2520 Fax: (701) 627-4496

43. Tulalip Tribes of Washington

Stanley G. Jones, Chairman
Ed Parris or Charlene James, TANF
6700 Totem Beach Road
Tulalip, Washington 98271
Telephone: (360) 651-4381, Fax: (360) 651-3920

44. Central Council of Tlingit & Haida Indians

Ms. Sharon Olsen
320 West Willoughby, Suite 300
Juneau, Alaska 99801
Telephone: (907) 463-7134, Fax: (907) 463-7312

45. White Earth Reservation Tribe

Mr. Robert C. Goodwin
P.O. Box 70

2531 310th Avenue
Naytahwaush, Minnesota 56566
Telephone: (218) 935-5554, ext.3213 Fax: (218) 935-2593

46. Winnebago Tribe of Nebraska

Mr. Matt Cleveland
Accounting: Cheryl Painter: (402)-878-3140
P.O. Box 723 or P.O. Box 687
St. Augustine Mission Hill Dr.
Hwy. 77 North
Winnebago, Nebraska 68071
Telephone: (402) 878-2379 Fax: (402) 878-2228

47. Yakutat Tlingt Tribe

Mr. Bert Adams, Sr., Council President
P.O. Box 418
Yakutat, AK 99689
Contact: Ms. Shelly Bremner
Telephone: (907) 784-3401, Fax: (907) 784-3595

48. Pueblo of Zuni

Mr. Arlen Quetawki, Sr., Governor
P.O. Box 339

Zuni, NM 87327
Contact: Joan Shocky

Telephone: (505) 782-7186, Fax: (505) 782-7223

The Federal Register notice requesting comments on the reporting requirements for Public Law 102-477 grantees was published on October 18, 2006 (71 FR 61505). No comments were received; The Bureau of Indian Affairs meets with the grantees once each quarter. We have discussed these specific reporting requirements and the forms presented here are a product of those discussions. There are minor modifications to reflect legislation creating new Federal employment and training programs, including the Welfare to Work and Temporary Assistance to

Needy Families programs. We met with the federal and tribal stakeholders on April 11, 2006 to discuss Government wide common performance measures for all employment and training programs which standardizes measures that the White House has implemented for FY 2004.

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

No payments or gifts are made to respondents.

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

Not applicable; the annual report deals with totals and summaries, not with individual applicants.

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.

Questions of a sensitive nature are not collected and, therefore, not applicable to this collection.

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 14.**

The collection of data necessary to complete the forms is completed by administrators of the

grant to determine eligibility and to report to tribal councils. No additional data collection is required to complete the P.L. 102-477 forms. These reports will be retained for the life of the grant.

The reporting requirements currently used will affect approximately fifty-one grantees. We estimate that fewer hours are needed to complete the forms than previously estimated in previous years. This estimate is based upon three years of experience implementing the P.L. 102-477 program and working directly with respondents on the completion of forms. Many of the grantees state that their reporting requirement to their respective tribal councils is more stringent than the reports required by this program, is reported more frequently and the data is already collected. This allows easier completion of the forms for respondents.

The “Financial Status Report” requires an estimated two (2) hours to complete. Estimating the salary costs at \$35/hour, this report costs $35 \times 2 \times 51$ equals an annual sum of \$3,570.00.

The “P.L. 102-477 Demonstration Project Statistical Report,” requires approximately sixteen (16) hours to complete. The estimated salary cost is \$35/hour for each grantee, times sixteen (16) hours per grantee or \$560. All 51 grantees cost will be \$28,560 to complete the statistical form.

We estimate it requires 40 hours to complete the program narrative for each grantee or \$35.00 per hour \times 40 hours = \$1,400 each grantee. There are 51 grantees \times \$1,400 equals \$71,400. The total cost for the Statistical Report and the Narrative totals \$99,960.

Not all 51 grantees include TANF funds in their Pub. L. 102-477 grants. We estimate 30 grantees will participate in TANF resulting in 2 hours per grantee to complete the forms at \$35.00 per hour or \$70.00 per grantee times 30 grants equal \$2,100 for all grantees. The following table explains the burden.

Form Information	Number of Respondents	Hourly Burden	Total Annual Burden Hours	Total Annual Cost: HrX\$35	O&M annual cost: \$5X51	Total Federal Cost: HrX\$40
Financial Report	51	2	102	\$3570.		160 hours
Statistical Report & Narrative	51	56	2856	\$99,960.	\$255.	
TANF	30	2	60	\$2,100.00		
Totals			3018	\$105,630	\$255.	\$6400.00

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or

record keepers 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.

There are no additional costs to grantees reported in #12 above; any automation has probably been done by grantees for use in managing the tribal government and would have occurred regardless of this report. An estimated \$5.00 per grantee for the cost of paper and file maintenance, times 51 grantees equals \$255.00 for all.

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.

Approximately 160 hours annually is spent on the collection, verification of forms, summarizing data, printing and distribution of data to other federal agencies and to bureau management for policy decisions. This estimated does not include cost to the Department of Labor Department of Health and Human Services which receives copies of the data.

The estimated annual cost is based on \$40/hour X 160 hours per year or \$6,400. per year. This estimate is based on five (5) years of experience implementing the program.

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

There are an additional 2 new tribes that were added since 2003 from 49 tribal grantees to 51 tribal grantees. We are reporting 6762 hours to reinstate and an adjustment downwards of 3744 hours based on improved estimates.

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 Bureau of Indian Affairs does not intend to publish the annual reports; we will distribute the summary to each of the other two Federal agencies involved in the project.

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.

We will display the OMB Control number and expiration date on the forms.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

The requirements for certification for the Paperwork Reduction Act submissions are fully met with no exceptions requested.