

**Supporting Statement for Paperwork Reduction Act Submissions
Request for Certificate of Degree of Indian or Alaska Native Blood
(CDIB), 25 CFR 70
OMB Control Number 1076-0153**

Note: Please see attached statement.

Terms of Clearance:

In accordance with 5 CFR 1320, we are requesting a one year renewal of the form. . In its next request for extension, [BIA] should provide an updated form to include any new or revised procedures established under the new rules and regulations for 25 CFR Part 70. The regulations will be on next year's priority list to be ready for final publication by November 2009. . Such documents will assist OMB in determining the need and practical utility of the collection, as specified in 5 CFR 1320.4(e). (Further information concerning legal impact is a separate attachment.)

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 statistical methods are used, Section B "Information Collection Employing Statistical Methods" 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.**

Congress has enacted numerous legislation authorizing program services to Indians, provided that the individual possess a minimum degree of Indian blood. Thus, when applying for program services, the individual applicant must include acceptable documentation to prove that he or she meets the minimum required degree of Indian blood. The BIA will certify an

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individual's degree of Indian blood if the individual can provide sufficient information to prove his or her identity and prove his or her descent from an Indian ancestor(s) listed on historic documents approved by the Secretary of the Interior that include blood degree information. The programs include education, loans, housing, land acquisition and preference in employment. The laws and federal regulations that include a minimum Indian blood degree requirement include:

1. The Act of August 4, 1947, 61 Stat. 731, Relative to restrictions applicable to Indians of the Five Civilized Tribe of Oklahoma, and for other purposes.
2. The Indian Reorganization Act of June 18, 1934, 48 Stat. 984 - 988, 25 U.S.C. 479
3. The Alaska Native Claims Settlement Act of December 18, 1971, 85 Stat. 688
4. The Indian Child Welfare Act of November 8, 1978, 92 Stat. 3069
5. BIA Programs, Chapter 22 of Title 25 of the United States Code (25 U.S.C. 2007, Allotment formula)
6. Land Consolidation, Chapter 24 of Title 25 of the United States Code (25 U.S.C. 2201, Definitions)
7. 25 CFR Part 5 – Preference in Employment
8. 25 CFR Part 20 – Financial Assistance and Social Services Programs
9. 25 CFR Part 26 – Employment Assistance for Adult Indians
10. 25 CFR Part 27 – Vocational Training for Adult Indians
11. 25 CFR Part 36 – Minimum Academic Standards for the Basic Education of Indian Children and National Criteria for Dormitory Situations
12. 25 CFR Part 39 – The Indian School Equalization Program
13. 25 CFR Part 151 – Land Acquisitions
14. 25 CFR Part 273 – Education Contracts under Johnson O'Malley

Copies of the pertinent portions of the above-cited documents are attached.

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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 application forms are used by BIA staff and Tribal 638 contractors to verify the applicant's Indian ancestry and to determine the applicant's degree of Indian blood. The applicant will provide information, such as birth certificates, death certificates, and probates to document the applicant's descent from an Indian ancestor(s). The documentation will also be used to prove the ancestors' tribal affiliation and the historic roll(s) or other documents that list the ancestors' name, gender, date of birth, date of death, blood degree and other identifying information. After the information and supporting documentation has been verified, the BIA staff or Tribal 638 contractor will issue a CDIB to the applicant. The applicant will use the CDIB to help document their eligibility for programs and services provided to Indians because they are Indian.

Page one of the form collects the family history of the requester. The requester lists identifying information (all names used) and contact information. Column one requires information about requester such as DOB, place of birth, whether adopted or not, tribal enrollment and roll number. Column two requests similar information concerning parents. The third column requests information about paternal and maternal grandparents. The fourth column requests information about paternal and maternal great grandparents.

Page two of the form provides appeal rights and other notices, and requests certification of information by the requester.

This information may be disclosed to the Department of the Interior and the Department of Justice when required for litigation or anticipated litigation. Information also will be needed and sent to the Regional Director, BIA, for the appeals process. Notification of inquiries or access must be addressed to the appropriate Regional Director, BIA.

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. Recently the BIA was granted access to the internet and restraints were lifted. The office is working with IT personnel to add this form to the internet forms.

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The form will be available to print and complete but no access will be available to complete the document on-line. When the form is submitted, the following information must be attached:

The information to be collected may include: certificates of birth and death, marriage certificates, probate determinations, court orders, affidavits, Federal or tribal census records, and Social Security records. All information and documentation is to be collected once from each Requester.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information is not duplicated by any other Federal agency and similar information is not used or modified for this collection.

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

There is no significant economic impact on a substantial number of small businesses because the CDIB is for individuals only.

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.

Respondents may request a CDIB whenever they need to in order to receive Federal benefits. Submission of this information is voluntary. However, the consequence of not providing information may result in a determination that a respondent is not eligible to receive program services based upon his/her status as an American Indian or Alaska Native.

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*

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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 that would require exceptions to 5 CFR 1320.5(d)(2). Information is submitted once, the timing is up to the applicant to begin the process, multiple copies are not required, statistics are not involved and any confidential information is protected by the Privacy Act.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60 day comment period was announced in the **Federal Register** on October 30, 2007 (72 FR 61366), giving interested parties an additional opportunity to comment on the form. There was one comment received on the burden. The comment addressed several parts which were responded to in the 30 day Federal Register notice.

Comment: We received one comment regarding 1) who needs to fill out the form? Is it to be used only for new recognition applications or for all enrolled persons; 2) does this establish a new "blood" requirement, i.e., 1/8 or 1/4?; and 3) do not reinvent Enrollment for those who have already done it but have reasonable requirements for new enrollees or those denied.

Response: 1) Most of the individuals who fill out the form are non-enrolled Indians who wish to document their Indian or Alaska native ancestry. Non-enrolled persons with one-quarter (1/4) or more degree Indian blood are eligible to receive various services provided to Indians and Alaska Natives by the Bureau of Indian Affairs. Other Federal Agencies will accept a CDIB as proof of Indian ancestry. In general, enrolled tribal members who can show proof of tribal membership do not need a CDIB to demonstrate eligibility for services.

2) Minimum Indian blood degree requirements are established by Congress through federal statute or by tribes and Alaska native villages through tribal law. The Certificate Degree of Indian or Alaska Native Blood does not establish a new "blood" requirement. Rather, CDIBs are used by individuals who want to document their Indian or Alaska native ancestry and degree of Indian blood. **CDIBs do not establish membership in any Indian or Alaska Native tribe.**

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3) A CDIB is not an enrollment document. Tribes determine their own membership and the BIA does not enroll tribal members.

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.

If there is a need to know more about the issuance of CDIBs you can contact Josephine Zeller, Tribal Enrollment Coordinator, Alaska Region, P.O. Box 25520, Juneau, Alaska 98802-5520, Telephone number (907) 586-7635. Alaska follows rules under the Alaska Native Settlement Claims Act (ANCSA) which are specific to Alaska Natives. Contact was also made with Steve Flores at West-Central Alaska Agency (907) 271-4084 and Kathy Wilson, Fairbanks Agency (907) 456-0225. In Pacific Region, we contacted Shirley Lincoln, Tribal Operations Specialist, (916) 978-6063. The Indians of California Act is the legislation to follow in the issuance of CDIBs. Eastern Oklahoma Region also has specific legislation regarding the establishment of rolls approved by the Secretary for use in identifying individuals when issuing CDIBs. Contact is Charles Head, Eastern Oklahoma Region at (918) 781-4647. These Regions have specific legislation to identify persons on Secretarial approved rolls that are used in issuing CDIBs to respondents. There may also be specific legislation enacted to identify the base roll for tribes that have been recognized within the last 30-40 years in many of the regions.

Locations in the other nine Regions have historical records related to census records or payment rolls to refer to when issuing CDIBs. For additional information you may contact any of the following:

- Eastern Region – Ernest Young (615)-564-6752
- Southwest Region – Iris Drew (505) 563-3530
- Great Plains Region – Karen Joseph (605) 226-7376
- Midwest Region – Dave Christensen (612) 713-4400
- Navajo Region – Irene Herder (505) 863-8207
- Northwest Region – Betty Scissons (503) 231-6723
- Rocky Mountain Region – Louise Reyes (406) 247-7989
- Southern Plains Region – Sherry Lovin (405) 247-8516
- Western Region – Sharlot Johnson (602) 379-6786

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

No payment or gift is being given to respondents.

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

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The information is maintained in strict accordance with the Privacy Act System of Records pursuant to 5 U.S.C. 552(a)

- 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 main purpose of this information collection is sensitive in nature because it is used to identify the applicant's race and to document an individual's Indian ancestry. Sensitive questions include questions about an individual's age, adoption, the marital status of their parents, and proof of paternity. Proof of paternity is needed when the applicant's parents were not married at the time of the applicant's birth and the Indian blood is traced through the father. The same would apply to earlier generations when the Indian blood is traced through the father. If the applicant is adopted, the applicant will need to provide copies of the adoption records. Again, if the Indian ancestry is traced through the birth father, the applicant will need to provide proof of paternity.

- 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 the ICR part of ROCIS.**
 - * 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.**

The reporting and record keeping burden for this collection of information is estimated to

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average 1.5 hours per response for an estimated 154,980 requests per year, making an annual burden of 232,470 hours. This includes the time for reviewing instructions, searching existing data sources and gathering needed data. We have estimated the number of requests by using historical numbers; CDIBs issued in FY 02 = 125,000, FY 03 = 154,200, in FY 04 = 154,979, FY 05 = 129,125, and FY 06 = 135,580. However, backlogs have been identified for the following locations: Northern Idaho Agency = 100; Fairbanks Agency = 70; Alaska Region = 29;

Pacific Region = 72; Northern California Agency = 64; Central California Agency = 2,960. We anticipate that the number of requests will be stable within the next year. Once new regulations have been finalized, there may be an increase in requests due to changes proposed in the regulations. The 1.5 burden hours per response is estimated as the timeframe for completion of the form and collecting the required documentation to support the information on the form.

Information gathered for identifying the burden hourly rate was reviewed in connection with Bureau of Labor Statistics (www.bls.gov/ncs/ocs/sp/ncbl0910) report on private industry rates, using sales & office and service. We used the average of the two hourly rates: $\frac{1}{2}(20.61 + \$12.88) = \16.75 .

Type of request	# of respondents annually	Annual response X time Per request = hourly Burden	Burden hours X \$16.75./hour = Annual cost to respondents
Applications	154,980	154,980 X 1.5 each = 232,470 annual burden	232,470 X \$16.75/hr = \$3,893,872.50

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**

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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 Federal government supplies the application form. Currently applicants must request a CDIB application but we are anticipating that the form will be available on the web site in the near future with the lifting of the restrictions on the use of the internet. However, the cost to the respondent would be state certified birth, death and marriage records as well as any other required documents. Several states, California, Oklahoma, Oregon, and Washington, D.C. were surveyed regarding birth and death records. A copy of a certified birth certificate will cost approximately \$18.00. Certified death records cost about \$12.00 each. Marriage certificates are approximately \$10.00 each. Some respondents may already have copies of birth, death or marriage records. These documents would also be kept by individuals for other reasons and would have them on hand at no cost.

If the parents are enrolled, the cost would be minimal for children to provide their birth certificates because documentation is only one generation away and the records would be easily retrievable. However, many persons are required to trace ancestry back to the late 1800s and documentation must be provided for each generation to trace back to an ancestor on an approved Secretarial roll. These individuals would have a higher cost to document their ancestors at the projected rates listed below.

Type of request	# of respondents annually	Cost of birth certificate, death record and marriage record. Cost is estimated for the average	Annual submissions X cost Non-salary burden
Birth Certificates	154,980	\$18.00	154,980 X \$18.00 =\$2,789,640
Death Records	154,980	\$12.00	154,980 X \$12.00 =\$1,859,760
Marriage Records	154,980	\$10.00	154,980 X \$10.00 =\$1,549,800

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			Total =\$6,199,200

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 annual salary cost to the government for processing CDIB requests in the 12 regions is **\$5,312,715** broken down as follows:

- The Bureau enrollment clerk takes about 1.25 hours to review each request; the salary and benefits are \$18.50/hour (averaging at GS-8) (or \$23.12 for 1.25 hrs) multiplied by 154,980 requests equals **\$3,583,138** annually. (Increased by \$5.00/hour from 2005 to 2008 to allow for COLAs.)
- The certifying Bureau Official takes about .25 hour to certify each request; the salary and benefits are \$41.45/hour (averaging GS-12) (or \$10.36/quarter hour) multiplied by 154,980 requests equals **\$1,605,593** annually. (Increased by \$5.00/hour from 2005 to 2008 to allow for COLAs.)
- The cost of the 3 page form @ \$.13/page is about \$.39 multiplied by 154,980 equals **\$60,442** annually for supplies.
- The postage at \$.41 multiplied by 154,980 equals **\$63,542** per year.

# of annual respondents	Salary & benefits cost per hour	Hourly burden	Cost of Federal Burdens			
			Salary	supplies	postage	Total
154,980	\$18.50	1.25	\$3,583,138	\$60,442	\$63,542	\$3,707,122
	\$41.45	.25	\$1,605,593			\$1,605,593
			\$5,188,731	\$60,442	\$63,542	\$5,312,715

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15. Explain the reasons for any program changes or adjustments reported in reporting and record keeping burden, and in capital start-up costs or O&M.

The annual burden for this collection is a program change because the collection expired before renewal could be completed. While we continue with the burden previously approved, we believe this number may increase in 2008 with more non-enrolled Indian descendants filing for a CDIB. Numerous tribes are disenrolling members because they do not meet enrollment criteria or may have been enrolled erroneously in the past. Intermarriage has caused the children to not be eligible for membership requirements. An individual may be $\frac{1}{4}$ or more degree Indian blood but that blood is not from one tribe. Many tribal enrollment criteria require a minimum of $\frac{1}{4}$ degree tribal blood derived from an ancestor listed on the tribe's base roll. Tribal blood derived from an ancestor who was left off of the base roll is not counted for membership purposes. The result is that the children may not be eligible for membership but may be eligible for services or programs based upon the fact that they possess $\frac{1}{4}$ or more degree Indian blood. To receive these services, they must possess a CDIB issued by the Bureau of Indian Affairs.

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 results of this information collection will not be published unless total application numbers are used in reports, such as budget justifications.

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 intend to display the OMB Control Number and the expiration date.

18. Explain each exception to the certification statement identified in 5 CFR 1320.9 (hourly and cost burden) and 5 CFR 1320.8(b)(3) (the questions we ask commenters to address).

We are not seeking any exceptions.

**REINSTATEMENT OF THE CERTIFICATE
DEGREE OF INDIAN BLOOD (CDIB) FORM**

Information was collected from several of our regional offices to assist in determining how

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long it takes to process a request for a CDIB. Due to the differing legislative requirements for the different regions, the answers are varying.

Alaska: All information is entered in the Progeny ES Program and CDIBs are issued based upon the use of that system. Under the Alaska Native Claims Settlement Act (ANCSA), a person had to be born & alive on or before December 18, 1971 & possess one fourth or more Alaska Native Blood and be a Citizen of the United States to be eligible for enrollment into ANCSA. They certify enrollees and their descendants, using State certified original birth certificates as proof of descent. Tribes in Alaska issue their own tribal cards, however Sitka Tribes of Alaska enroll only if an individual provides a BIA CDIB. Time required to complete review of document for the issuance of a CDIB ranges from 15-30 minutes if no major research is required. Juneau's Regional Office has two Enrollment persons, West-Central Alaska Agency has three enrollment clerks and a data entry clerk; and Fairbanks Agency has one enrollment clerk.

California: California uses three rolls - 1928 which is the only roll that has blood degrees, and 1950 roll and a 1972 roll. Each roll must be checked to determine descendancy. There is no easier way to perform the function. The vast majority of their requests come from non-enrolled Indians who need the CDIB for receipt of services. Indian Health Services does not always recognize tribal membership cards in California and so the CDIB is necessary to receive services. Very few of the CDIBs are issued to enrolled tribal members. There are backlogs waiting for the issuance of BIA CDIBs. If all information is provided immediately, the processing time takes no longer than 20 minutes. If research is required, it may take as long as a couple of hours. The Region has one individual, GS-12, working on CDIBs; Northern California Agency has two individuals, 1 GS-5 and 1 GS-6; and Southern California Agency has one individual - 1 GS-7.

New Mexico: The Southwest Region issues CDIBs based upon past payment rolls for Judgment Awards and/or Census rolls. Tribes are authorized to sign only for those persons that are enrolled. BIA issues the CDIB to all others, based upon contact with other regions/agencies and tribes. Enrollment for most of the 25 tribal entities is based upon traditional standards and may not be based upon blood degrees. Additionally, tribal enrollment may depend upon meeting a conduct standard requiring participation in tribal activities. One GS-14 Tribal Government Officer is located at the Region and serves all tribal government activities for all nine agencies. Superintendents have the authority to sign CDIBs and work with Regional staff or have rolls at their location to issue CDIBs. There is not a lot of activity at the Southwest Region in the issuance of CDIBs.

We have also requested further information from other locations to be a part of this final document.

The CDIB is required for non-enrolled members to receive services under several identifying legislative actions. All CDIBs issued under the reinstated form will follow the uses identified when the form was originally approved by OMB. No changes will be in effect during the reinstatement of this form.

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