[1]**Supporting Statement for Paperwork Reduction Act Submissions**
Financial Assistance & Social Services, 25 CFR 20
OMB Control Number 1076-0017
Form BIA 5-6601

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 statistical methods are used, Section B "Collection of Information 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.**

Under [1]25 CFR 20.101, the kinds of financial assistance and social services available for eligible Indian applicants is described. The application form (BIA 5-6601) is necessary to determine eligibility for program funding and services and is prescribed in the 25 CFR 20. The program funding and services include: general assistance, miscellaneous assistance, child welfare assistance, and services such as crisis intervention, marital and individual counseling, financial planning and other services which enhance the functioning of individuals and families. Authority for 25 CFR 20 is contained in: 25 U.S.C. 13; Pub. L. 93–638; Pub. L. 98–473; Pub. L. 102–477; Pub. L. 104–193; Pub. L. 105–83.

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.)**

[1]The information is required by 25 CFR § 20.301, § 20.320, § 20.325, § 20.328, § 20.329, § 20.330, § 20.331, § 20.400, § 20.500 and is used to determine eligibility for services, to insure uniformity of services as well as to assure the maintenance of current and accurate records for clear audit facilitating data. All information is collected and retained in secure individual case files. The information collected is also used for budgetary purposes and/or for responses to inquiries from other Federal agencies. The compilation of total data provides for quick response

to inquiries received.

BIA Form 5-6601 “Application for Assistance/Services” is a 4 page document used to identify the applicant, who and how many people reside with the applicant and who may be eligible for service. Questions pertaining to income and sources of income are requested as well as other demographic data such as age, date of birth, income and address.

Page 1 lists applicant’s name, address and phone number at the top. The FAMILY PROFILE section A requests a list of members of the household, birth dates, sex, relation to head of household (applicant), social security number, tribal enrollment #. RECORD OF INCOME AND ASSETS requests amounts of earned and unearned income per month, liquid assets. This total is compared to state monthly standard and the difference. TYPES OF ASSISTANCE requests the type of service needed and includes part for the decision by the case worker. There is a Statement of Cooperation which also includes status concerning Temporary Assistance for Needy Families (TANF). The applicant signs and dates the form. The client’s signature is required to indicate his/her request for assistance and is used for the release of information in connection with eligibility under the Privacy Act.

Page 2 continues with more detail on the FAMILY PROFILE. Section C contains list of members of household with physical or mental handicaps. Listed for each is name, nature of handicap, whether temporary or permanent, minor or major, and if verification is available. Section D lists names of children not in the home. Listed is the name, relationship, date of birth, marital status, number of dependents, and address for each. Section E lists other key relatives--the name, case number, number related to, degree of relationship and address for each.

Page 3 contains instructions for filling out the form.

Page 4 contains definitions and examples of income and assets. It also contains the PRA and the Privacy Act statements.

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.)**

This information collection activity’s use of electronic technology to collect the information, and thus reduce the burden, is accomplished by having social workers enter the information provided by the clients directly into their data base. This does not preclude the tribal organizations from setting up a system that will enable them to easily provide the summary of reporting indicators. In addition, lack of funding prevents the Bureau from establishing a fully electronic system. [1]In keeping with GPEA, paper copies will continue to be made available to requesters. Tribes can request and obtain paper copies through commercial mail or by facsimile.

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.

1This is a unique program offered only to needy Indians who have no other recourse or resources available to them in order to meet basic essential needs. The information collection is specific to the applicant's current situation and environment and as such is not available elsewhere.

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

1Indian tribes and tribal organizations are not considered small governmental jurisdictions or small entities as defined under the Regulatory Flexibility Act. The data collection will come from individuals applying for services from their federally-recognized tribe. However, the collection will not have a significant economic impact. Tribes that have elected to operate this program in lieu of receiving direct services from the Bureau of Indian Affairs are required to use the information derived from the forms to determine eligibility for services of clients applying for services. The information requested on the form is the minimum needed.

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.**

1Initial collection of this information is necessary to determine eligibility for services and to place an individual or assistance group on active or open case status. Open cases are reviewed on a semi-annual basis, for the purpose of re-determining eligibility. In addition, clients are required to report changes in their personal circumstances which may lead to adjustments in eligible services. Without the individual reporting mechanisms and the system of eligibility of re-determination, overpayments might go undetected. The limited funding available for this program requires careful distribution based upon need.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner that requires reporting information more than quarterly, supplying more copies than the original & 2 copies, that requires responses in less than 30 days, that requires respondents to retain records for more than 3 years; that uses information in an invalid or unauthorized statistical survey, that does not supply an authority for keeping safe information of a confidential nature, or that requires the submission of proprietary information.**

1The Federal regulations governing this program, 25 CFR 20, require recipients to immediately inform the Bureau of any changes in status which may affect their eligibility for or the amount of assistance.

There are no exceptions to referenced regulations. Information is reported on a quarterly and annual basis. Speed of reporting is not a factor. Only one copy of the report is required. The information does not include statistics; rather, it is a summary of progress in meeting annual service goals and objectives. Trade secrets are not a factor in the information collection.

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

A Federal Notice requesting comments on the proposed renewal of this information collection was published in the Federal Register. If necessary, describe changes to the form if helpful. Ensure that any changes made does not affect budget.

The 60 day notice requesting comments was published on February 4, 2008 (73 FR 6524). No comments were received regarding the attached copy of the Federal Register notice.

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 the names, titles, addresses, and phone numbers of persons contacted.]

As mentioned before, the information collected from the public is written down or entered into a computer by the social worker, and thus they have a good understanding of the length of time it takes for an applicant to provide the needed information. Ms. Evelyn Roanhorse, Regional Social Worker, Bureau of Indian Affairs, Western Regional Office, P.O. Box 10, Phoenix, AZ 85001, Telephone (602) -379-6785 is available to respond to questions concerning the clarity of instructions and usefulness of the information.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The collection of information activity is the same as in the prior period. The existing program has not been revised. Notwithstanding, continued budget cuts to this program have eroded the present social service staff to 3 FTEs at the Central Office and 12 FTEs at the regional office levels, which does not allow much individual consultation with representatives of those from whom information is obtained or those who must compile records. However, this does not preclude ongoing consultation with tribal or agency programs when this form is completed nor when the form is discussed at various social service meetings conducted during the course of each fiscal year by each of the 12 regional offices.

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

will not receive any payments or gifts for providing this information.

We do not provide payment or a gift to respondents for completing this form.

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

There is an assurance of confidentiality provided to respondents concerning this information collection by the Privacy Act.

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.**

There are no questions of a sensitive nature in this information 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.**

We estimate 1that on an average, there are 200,000 applications for assistance per year. It is estimated that it takes an average of 15 minutes to complete the application form. However, some applicants have to search for verification of the information submitted; therefore, we are adding an additional 15 minutes to cover the time spent collecting the backup papers. For 200,000 applicants @ **.**5hr/each, the annual burden hours are estimated to be 100,000 hours.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and then aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The applicants for the programs covered by Financial Assistance are usually unemployed or under employed. We are estimating their salary ~~as GS-1 step 5~~using BLS table 1 of May 2007, updated. ($~~9.25~~11.11/hour x 1.4 for benefits for individuals or $1~~2.9~~5.55/hour). ~~Our method of computing salary and benefits is based on BLS news release USDL: 07-1883 of December 11, 2007.~~ We used a sampling of various occupations ranging from $8.71 to $16.94/hour. The total estimated annual cost to the respondents is estimated to be 100,000 hours x $1~~2.9~~5.55 per hour = $1,~~295~~555,000.00. ~~We used the *2008 GS Salary Table Incorporating the 2.5% Increase.*~~

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**.

The annual cost burden to respondents from total capital and startup costs is estimated to be zero because financial assistance funds are provided to cover administrative costs *for* tribes managing the program.

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.

1The estimated annualized cost to the Federal Government for this information collection is estimated to be based on 200,000 applications taking from 1/4 hour to 8 hours because the information submitted on the application must be verified. Verification may mean sending the applicant home to get backup papers and often includes a home visit to verify that the person has stated living conditions truthfully. The salaries range from the equivalent of GS-7/5 to GS-9/8 ($17.67 X 1.4 = $24.738 to $23.52 X 1.4 = $32.928). These salaries are from the *Salary Table 2008-GS Incorporating the 2.50% General Schedule Increase*. If we use 3 hours as the average time spent, and we use GS-9/3 as the salary ($20.34 X 1.4 = $28.476), we have 200,000 X 3 = 600,000 total hours X $30.51 =$17,085,600.00 as the total cost to the government for processing the claims. Our method of computing salary and benefits is based on BLS news release USDL: 07-1883 of December 11, 2007. While this is Federal and normally would use 1.5 as the multiplier for benefits, since the tribes are collecting the information under contract for us, we are using 1.4 as the multiplier.

15. **Explain the reasons for any program changes or adjustments reported.**

This renewal is requesting an adjustment increase of 50,000 hours for a total of 100,000 hours due to the time involved to fill out the form and verify information submitted. There is no non-hour cost burden to report.

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.**

There are no plans to publish the results of this collection of information. However, a summary may be used for budget justification.

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 OMB approved Control Number and expiration date will be displayed on the form.

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).

There are no exceptions to 5 CFR 1320.9 or 5 CFR 1320.8(b)(3).