

**1 Supporting Statement A for  
Paperwork Reduction Act Submission**

**OMB Control Number 1076-0017**

**Financial Assistance & Social Services, 25 CFR 20**  
Forms BIA 5-6601, BIA 5-6602

**Terms of Clearance:** None

This is a request for a revision to the information collection.

**1. Explain the circumstances that make the collection of information necessary.**

The Bureau of Indian Affairs (BIA) provides assistance under 25 CFR 20 to eligible Indians when comparable financial assistance or social services either are not available or are not provided by state, tribal, county, local, or other federal agencies. The application form (BIA 5-6601) is necessary to determine eligibility for program funding and services, in accordance with 25 CFR 20.300. The Financial Assistance and Social Service program funding and services include: General Assistance, Child Assistance, Adult Care Assistance, Burial Assistance, and Emergency Assistance. BIA and tribal case workers also obtain information from clients to develop an Individual Self-Sufficiency Plan (ISP). The ISP is necessary to ensure that the recipient of services has a plan for achieving independence. Authority for 25 CFR 20 is contained in 25 U.S.C. 13, which provides that BIA shall direct, supervise and expend appropriated money for the benefit, care, and assistance of Indians, including for general support and civilization and relief of distress. Additional authority is provided by: Pub. L. 93-638; Pub. L. 98-473; Pub. L. 102-477; Pub. L. 104-193; and Pub. L. 105-83.

An application form currently is used only for General Assistance. BIA is seeking approval for a revision to its application form to include all Financial Assistance and Social Service components and to make the form more user-friendly. The revised application will also assist BIA personnel in the process of determining eligibility for the various Financial Assistance and Social Service components and provide a case management tool, with a breakdown of each component to be used as a checklist of items the personnel should include in the case file and obtain during the intake process and eligibility determination.

BIA is also seeking approval for a new form, to standardize the ISP. The form will guide BIA case workers to ensure they obtain and document only that information necessary to develop meaningful and attainable goals through specific action steps in the ISP.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or**

**used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.**

Applicants must provide information on BIA Form 6-6601 “Application for Assistance/Services” to BIA to request services and document their eligibility for: § 20.320 (Tribal Work Experience Program), § 20.325 (burial assistance), § 20.328 (disaster assistance), § 20.329 (burial assistance), § 20.330 (emergency assistance), § 20.333 (adult care assistance), § 20.400 (children, elderly, families assistance), § 20.500 (child assistance). BIA uses the information provided to determine eligibility for services, to ensure uniformity of services, and assure the maintenance of current and accurate records for clear audit 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 used to identify the applicant and members of the household who may be eligible for service. Questions pertain to income, sources of income and demographic data such as age, date of birth, income and address. The first two pages of the application package contain instructions for the form, which begins on page 3.

The form requires the applicant’s name, tribe, phone number, mailing address and physical address, as well as directions for how to get to the address. This information allows the BIA to identify and contact the applicant and allows the BIA case worker to locate the home. This section of the form also asks for background information on the reason for applying for assistance and the income on which the applicant has been living for the past 3 months—this information allows the BIA case worker to best match the types of assistance BIA can provide to the applicant’s needs.

- Section I of the form requests a list of members of the household, birth dates, sex, relation to head of household (applicant), marital status, highest grade/degree completed, social security number, and tribal enrollment #. BIA uses this information to identify each member of the household and determine whether the members qualify as dependents for the purposes of BIA assistance.
- Section II of the form requests the applicant to identify the type of service(s) requested.
- Section III of the form requests information on whether anyone in the household is earning income and, if so, the amounts earned. This section also requests the applicant to identify the types and amounts of all earned and unearned incomes. BIA uses compares this total to the state monthly standard and notes the difference as the monthly amount needed. The shaded portion of this section provides space for the BIA case worker to document the BIA decision to approve or disapprove. This section also requires information on whether the applicant

has applied for Temporary Assistance for Needy Families (TANF) under the U.S. Department of Health and Human Services.

- Section IV of the form requires the applicant to acknowledge that they are not committing fraud. The client's signature to this certification 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.

Pages 5 through 16 contains information that the BIA case worker will fill in based on information obtained through interviews. The top of page 5 identifies them as for BIA use only; these are also shaded to make clear that the applicant is not responsible for filling them out.

Pages 17 through 18 contain the required statements on Privacy Act, the Paperwork Reduction Act, Federal law concerning fraud, the right to appeal the BIA decision, information on eligibility, and reporting requirements.

Page 19 contains a Release of Information that the applicant may sign to acknowledge that BIA may release information for purposes directly connected with providing benefits or services on the applicant's behalf or for legal and investigative action related to fraud. The release is effective for one year or until rescission (whichever is earlier).

BIA Form 5-6602 "Individual Self-Sufficiency/Case Plan" Once BIA has determined an applicant to be eligible, a BIA case worker works with the individual to fill out a standardized Individual Self-Sufficiency/Case Plan (ISP), pursuant to 25 CFR § 20.301. The individual provides information on his or her goals to achieve self-sufficiency and his or her strengths and barriers. Through discussions with the case worker, the individual and case worker then develop the steps and action plan for self-sufficiency. BIA has developed a new form to standardize this process. The case worker will fill out the form, based on discussions with the individual, or the individual will provide input directly onto the form. Both the case worker and individual sign the form.

- 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 case workers enter the information provided by the clients directly into their database. 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, BIA plans to make the

application form available on its website and the standardized ISP available on the intranet for Bureau personnel. Paper copies will continue to be made available, upon request. Tribes can request and obtain paper copies through commercial mail or by facsimile.

**4. Describe efforts to identify duplication.**

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

Indian 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.**

Initial 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:**

- \* 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.

<sup>1</sup>The Federal regulations governing this program, 25 CFR 20, require recipients to immediately inform the Bureau of any changes in status that may affect their eligibility for or the amount of assistance; this could result in the recipient to report information more often quarterly. There are no other special circumstances that would cause information collection to be conducted in any of the above manners.

**8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

The 60-day notice requesting comments was published on April 16, 2010 (75 FR 19986). No comments were received in response to that 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 BIA case worker actually writes down or enters into a computer the information collected from the public, and thus BIA case workers have a lot of experience with the length of time it takes for an applicant to provide the needed information. Ms. Sue V. Settles, Chief, Division of Human Services, Bureau of Indian

Affairs, 1849 C. Street, NW Washington, DC 20240, telephone (202) 513-7608 is available to respond to questions concerning the clarity of instructions and usefulness of the information. BIA case workers also conduct ongoing review and discussion of this information with program staff when this form is completed and at various social service meetings conducted during the course of each fiscal year.

In addition, we contacted Becky Benton, who is with the Red Cliff Tribe, at [rbenton@redcliff-nsn.gov](mailto:rbenton@redcliff-nsn.gov). Ms. Benton indicated that the application form is user-friendly, but that a little more room could be made available in response to the question regarding the applicant's goals. Ms. Benton also suggested making the forms available in fillable format. We have not made any changes to our burden estimates as a result of these comments. We decided not to expand the space allotted for the response to the applicant's goals at this time because only an overview is necessary for this response and the limited space encourages succinctness. Space is allotted for more specific information on goals where individual goal is listed separately in the Self-Sufficiency Action Plan portion of the form. We do plan to make fillable forms available.

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

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.**

This information collection includes a system of record under the Privacy Act: BIA-8, Indian Affairs Social Services Case Files.

**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.**

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

**12. Provide estimates of the hour burden of the collection of information.**

We estimate that on an average, there are 240,000 applications for assistance per year. Approximately 95,000 of the 240,000 respondents also provide information for an ISP.

Description	Respondents	Responses per Respondent	Burden Hours per Response	Total Burden Hours	Salary Cost (\$28.77/hr)*
Application	240,000	1	0.5	120,000	\$ 3,452,400
ISP	95,000	1	1	95,000	\$ 2,733,150

				<b>215,000</b>	<b>\$ 6,185,550</b>
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\*The applicants for the programs covered by Financial Assistance are usually unemployed or under employed.

We are estimating salary using Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— June 2010 (released September 8, 2010), USDL 10-1241, Table 1, for all civilians (\$20.55/hour x 1.4 for benefits for individuals or \$28.77/hour). The 1.4 multiplier is also derived from the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— June 2010 (released September 8, 2010), USDL 10-1241. See [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf).

**13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.**

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 costs to the Federal Government.**

The estimated annualized cost to the Federal Government for this information collection is summarized in the table below.

<b>Description</b>	<b>Respondents</b>	<b>Responses per Respondent</b>	<b>Federal Burden Hours per Response</b>	<b>Total Burden Hours</b>	<b>Salary Cost (\$29.46/hr)*</b>
Application	240,000	1	3*	720,000	\$21,211,200
ISP	95,000	1	1	95,000	\$2,798,700
				<b>215,000</b>	<b>\$24,009,900</b>

\* Based on a range from 1/4 hour to 8 hours because of the varying amount of time it takes to verify the information submitted on the application.

The salaries range from the equivalent of GS-7/5 to GS-9/8 (\$18.45 X 1.4 = \$25.83 to \$24.56 X 1.4 = \$34.38). For this reason, we use GS-8/6 as the average salary (\$21.04 X 1.4 = \$29.46). See [www.opm.gov/oca/10tables/indexGS.asp](http://www.opm.gov/oca/10tables/indexGS.asp). These salaries are from the *Salary Table 2010-GS Incorporating the 1.50% General Schedule Increase*. While this is Federal and normally would use 1.5 as the multiplier for benefits, because the tribes are collecting the information under contract for us, we are using 1.4 as the multiplier. The 1.4 multiplier for benefits is based on the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— June 2010 (released

September 8, 2010), USDL 10-1241. See [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf).

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

This revision is requesting a programmatic increase of 115,000 hours. This increase results from:

- An additional 40,000 respondents completing an application each year as a result of a program change due to agency discretion expanding the application to include all Financial Assistance and Social Services components, for an annual increase of 20,000 hours; and
- The 95,000 respondents providing information for the newly standardized ISP, for an annual increase of 95,000 hours.

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.**

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. Certification.**

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