

**Supporting Statement**  
**Application for Job Placement and Training Services, 25 CFR 26**  
**OMB Control Number 1076-0062**

**Terms of Clearance: None**

**A. Justification**

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

The Snyder Act of Nov. 2, 1921 (Public Law 67-85) and the Indian Adult Vocational Training Act of 1956 (Public Law 84-959) authorizes the Department of the Interior (DOI) to assist adult Indians who reside on or near Indian reservations, or in Alaska, in obtaining meaningful and satisfactory employment (and training necessary to acquire gainful employment). These statutes, implemented by 25 CFR 26, establish the procedures DOI uses to carry out the Job Placement and Training Program. The program provides vocational/technical training including related counseling, guidance, job placement services and limited financial assistance for any recognized vocation, apprenticeship, trade, or on-the-job training that has a high probability of leading to permanent, full time, unsubsidized employment. These services are available to eligible Indian individuals who are not less than 18 years old, who reside within DOI-approved service areas, and who can demonstrate a need for such services. This program is eligible to be included in the Employment, Training, and Related Services Demonstration Act program (Public Law 102-477). Authorizing legislation and subsequent regulations authorize the DOI to enter into contracts and other agreements with Federal, State, Tribal governments, and the private sector to provide various types of training that lead to skilled employment. To ensure that only eligible persons receive training under this program, DOI must collect certain information from applicants. DOI collects this information on an application form.

This information collection is necessary to comply with Government Performance Results Act, (GPRA), address Performance Assessment Rating Tool, (PART), program monitoring and evaluation. The White House has also established "Common Performance Measures" for all job placement and training programs. This information collection document satisfies all of these requirements.

- 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.]**

DOI and Tribal PL93-638 contractors use this information to determine eligibility and need of an applicant to receive benefits under 25 CFR 26.

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- The first two rows of the form ask for personal information that provides the family situation of the applicant. This information allows DOI to identify the applicant, whether the applicant has dependents, is a veteran, or has other circumstances that may affect the type of services available.
- The third row provides information about services requested and whether services have been provided before. DOI uses this information to help match the applicant to desired services and determine their eligibility. This row also requires an emergency contact.
- The fourth row provides educational information about the applicant. DOI uses this information to help assess the types of jobs qualified for and the types of training needed.
- The fifth row provides the training interest of the applicant and also income sources, if any, to help DOI match the applicant to the appropriate training.
- The next three rows provide employment information relevant to the career goals of the applicant, starting with the most recent. Again, this information helps DOI match the applicant to the appropriate training.

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- This page requires applicant to initial form if for training only. It also requires applicant to read the Paperwork Reduction Act and Privacy Act statements, and then sign and date that applicant has done so.

DOI uses the information contained in this form on a regular basis. The information is incorporated into the quarterly GPRA submission and has been included in our recent PART review to monitor the performance of the program and provide a basis to develop new or revised program initiatives to address the high unemployment rate on Indian reservations.

- 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].**

Tribal contractors may automate the form, but this is not required. This form is not available on the website because BIA may conduct an initial interview to determine whether the individual meets the baseline for eligibility before providing the form. The individual respondents will not use an automated electronic form because of the nature

of the interview and guidance that the bureau or contractor provide is best conducted face to face.

**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.**

Within the Department of the Interior, parts of Indian Affairs, such as Social Services, Bureau of Indian Education, and Economic Development collect similar information to determine whether specific eligibility requirements are met for their respective programs. The Department of Labor through its Job Training Program also collects similar data. Tribes use the form required by the federal agency they deal with. Each application developed must document eligibility for those particular services; therefore, this data collection does not duplicate any other collection efforts.

Tribes and contractors (except PL102-477 tribal contractors, who are not required to complete a form unless it is part of the 102-477 program) may be able to automate their information to the point that they use one data base to respond to several agencies.

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

This information collection does not impact small entities. Small tribes that carry out the program are provided funding to do so.

**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.**

If this information collection is not conducted, DOI will not be able to carry out its statutory authority to provide vocational training and assistance directly to individuals or indirectly to individuals through contracts or agreements with tribes, certified organizations, and local or state governments.

**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.*

There are no special circumstances that would require the respondents to report more than once a quarter; applications are filled out by individuals on an as-needed basis; programs cannot exceed 12-24 months (with the exception of the nursing program which can last 36 months). The application is not subject to a statistical survey.

Some of the information is covered by the Privacy Act (BIA-23, Employment Assistance Case Files, 61 FR 36573, July 11, 1996) and applicants are informed of this and assured that the data will be handled in accordance with the Privacy Act. No proprietary information is collected.

Respondents are not required to submit written responses in fewer than 30 days after receipt and they are not required to submit more than one original and two copies. Respondents are not required to retain records for longer than three years. The information is not used with any statistical survey and not used for statistical data classification.

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 notice requesting public comment on renewal of this information collection was published on December 21, 2010 (75 FR 80067). 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.**

We have consulted with members of the 477 tribal work group representing 243 federally recognized tribes. There have been no issues with the existing form. We have consulted with BIA regional offices and agencies. Brenda Davis, Vocational Development Specialist, BIA, may be consulted at 701-477-6176. To address individuals' privacy concerns, we are not including the name and contact information of any individual applicant or program participant here.

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

No payment or gifts are provided to respondents.

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

Confidentiality of personal information is maintained in accordance with the Privacy Act, 5. U.S.C. 552a. The BIA Privacy Act System of Records "BIA-23 Employment Assistance Case Files" explains how we maintain personal information in accordance with the Act. Personal information is not disclosed without the written consent of the individual to whom the record pertains.

**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.**

No information of a sensitive nature, such as sexual behavior and attitudes or religious beliefs, is needed or requested.

**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.
- \* 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.

One application is used for both job placement and training, but the requirements for information collected differ slightly.

CFR Section	No. Respondents	No. of Responses per Year	Total Annual Responses	Burden Hours per Response	Annual Burden Hours	Cost to Respondents*
26.25 – Application for Job Placement	1,955	1	1,955	0.5	978	\$ 28,333
26.32 – Application for Job Training	2,000	1	2,000	0.5	1,000	\$ 28,970
Employer Information on Available Opportunities	95	1	95	0.5	48	\$ 1,391
Employer Progress Reports	850	4	3,400	0.5	1,700	\$ 49,249
<b>Totals</b>			<b>7,450</b>		<b>3,726</b>	<b>\$ 107,943</b>

\*We are estimating salary using Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— September 2010 (released December 8, 2010), USDL 10-1687, Table 1, All Workers category (\$20.69/hour x 1.4 for benefits for individuals or \$28.97/hour). The 1.4 multiplier is derived from the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— September 2010 (released December 8, 2010), USDL 10-1687. 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 [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs

include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The total cost burden for recordkeepers resulting from the collection of information is zero. Service providers normally maintain such records and the responsibility is a normal part of their business. Respondents complete the one form and are not required to perform any other record maintenance. No equipment is used. In addition, the grant comes with administration funds.

**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.**

CFR Section	No. Respondents	No. of Responses per Year	Total Annual Responses	Federal Burden Hours per Response	Annual Burden Hours	Cost to Respondents*
26.25 – Application for Job Placement	1,955	1	1,955	0.25	488.75	\$ 28,533
26.32 – Application for Job Training	2,000	1	2,000	0.25	500	\$ 29,190
Employer Information on Available Opportunities	95	1	95	0.25	23.75	\$ 1,387
Employer Progress Reports	850	4	3,400	0.25	850	\$ 49,623
<b>Totals</b>			<b>7,450</b>		<b>1862.5</b>	<b>\$ 108,733</b>

\*These hourly salary figures are based on the *Salary Table 2011-GS Rates Frozen at 2010 Levels* for GS14/5, at \$38.92, incorporating a 1.5 multiplier for benefits for a total of \$58.38. See, 2010 General Schedule (Base) [www.opm.gov/oca/10tables/indexGS.asp](http://www.opm.gov/oca/10tables/indexGS.asp). The 1.5 multiplier for benefits is based on the Bureau of Labor Statistics EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— September 2010 (released December 8, 2010), USDL 10-1687. 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 reported.**

As part of the last submission, a database entry error occurred that quadrupled the number of responses and burden hours for all information collections, when only the information collection for “progress reports” should have been quadrupled to reflect quarterly submissions. The justification, 60-day notice, and 30-day notice for the last approval reflected the current number of responses and burden hours. This renewal adjusts the ROCIS entries for responses and burden hours to reflect these figures through a change due to adjustment in agency estimate.

This request for renewal also removes the separate IC for “On-the-job (OJT) Training” because that information collection is now incorporated in “Application for Job Placement” to reduce redundancy - OJT approval requests are made as part of the application.

IC		Previous Justification, FR Notices	Previous ROCIS Approval (bold indicates inadvertent quadrupling)	Adjustment in ROCIS to eliminate inadvertent quadrupling	Move “OJT Approved” to “Application for Job Placement”	Final
Application for Job Placement	Responses	955	<b>3,820</b>	-2,865	+1,000	1,955
	Hours	478	<b>1,910</b>	-1,432	+500	978
Employer Information on Available Job Opportunities	Responses	95	<b>380</b>	-285	--	95
	Hours	48	<b>190</b>	-142	--	48
Application for Job Training	Responses	2,000	<b>8,000</b>	-6,000	--	2,000
	Hours	1,000	<b>4,000</b>	-3,000	--	1,000
Progress Reports	Responses	850	3,400	--	--	3,400
	Hours	425	1,700	--	--	1,700
OJT Approved	Responses	1,000	<b>4,000</b>	-3,000	-1,000	0
	Hours	500	<b>2,000</b>	-1,500	-500	0
Totals	Responses			-12,150	0	7,450
	Hours			-6,074	0	3,726

**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 for publication. Information is collected as employment and training assistance requests are made. This is an ongoing information collection with no ending date established, and no plans for publication.

**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 expiration date and OMB number on the information collection form.

**18. Explain each exception to the certification statement identified in 5 CFR 1320.8(b)(3) and 5 CFR 1320.9.**

There are no exceptions to the certification.