

**SUPPORTING STATEMENT FOR DISTRIBUTION OF FEHB/FEGLI
IMPLEMENTATION QUESTIONNAIRE TO TRIBES AND
URBAN INDIAN ORGANIZATIONS**

Under the provisions of the Paperwork Reduction Act of 1980 (title 44, U.S. Code, Chapter 35), the Office of Personnel Management (OPM) is submitting to the Office of Management and Budget (OMB) a request to distribute a questionnaire regarding access to FEHB and FEGLI coverage for Tribes and urban Indian organizations, in order to gather information needed to properly scope and implement the provision in S. 1790, the Indian Health Care Improvement Reauthorization and Extension Act of 2009, allowing for eligible Tribes and urban Indian organizations to purchase FEHB and FEGLI coverage. This questionnaire also serves to initiate Tribal consultation in accordance with Executive Order 13175.

JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate the collection.

In order to develop a mechanism that can be used to effectively facilitate access to this coverage for eligible Tribes and urban Indian organization, an understanding of the scope of the project is needed. There is currently no data available that could be used to provide a reasonable estimate of the anticipated number of enrollees, or the anticipated number of participating tribal entities. Additionally, there is no information available regarding the existing methods of insurance premium collection used by Tribes and urban Indian organizations. Receipt of the above mentioned data, along with information related to the types of insurance coverage currently accessed by Tribes and urban Indian organizations, and the cost thereof, will allow OPM to properly scope and effectively implement this project.

Without any information regarding the scope of the project, it is not possible for OPM to determine the costs associated with implementation, operation, and enrollment. The cost of the project is of particular importance if the project is to be funded by way of an administrative fee added to the enrollee premium, since this is information that will need to be relayed to potential enrollees as quickly as possible. The practicality of creating and maintaining technology, and more specifically, the extent to which technology needs to be implemented, is contingent in large part on the number of anticipated enrollees. The current estimated cost associated with the creation and development of a technology-based system to manage this pool of enrollees is relatively static, so the number of interested tribal organizations and their estimates regarding enrollment impacts the cost per enrollee.

Without the information provided by respondents as a result of this questionnaire, the costs and procedures associated with this project cannot be determined. Irrespective of response rate, any data received will constitute more information than what is currently available. Since the implementation strategy deviates dramatically based on the number of predicted enrollees, this information will provide necessary guidance for purposes of creating a system that is both reasonably priced, and appropriately scoped to service the needs of the anticipated enrollees.

2. **Indicate how, by whom, and for what purpose the information is to be used.**

The information collected will be compiled for purposes of answering the above mentioned questions related to the scope of this project, and the costs associated with implementation and operation. The questionnaire is being distributed to approximately 600 tribal entities, so there is no need for an automated collection method, even with a 100 percent response rate. Collection of this information will provide OPM with information needed in order to move forward with this project, and will also serve as part of the tribal consultation process, in accordance with Executive Order 13175.

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.**

The questionnaire will be distributed to tribal organizations along with a letter, which is to be distributed in accordance with the standard methods used by the Indian Health Service (IHS). These letters are distributed by IHS on a regular basis, so there is already an effective method of distribution in place. Responses will be submitted via email, fax, or postal mail, allowing all tribal entities the opportunity to respond, irrespective of varying technological capabilities.

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

OPM is the sole authority to collect this information from the approximately 600 respondents. Therefore, duplication is minimized.

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

Not applicable.

6. **Describe the consequence to Federal program or policy activities if the collection were conducted less frequently.**

This is a one time collection. Not collecting this information will impair the ability of OPM to properly scope, project costs, and move forward with implementation of this project. There is no other data or resource available that can provide the information needed to complete this project. Additionally, providing tribal entities with this opportunity to provide feedback on the implementation of this provision is a necessary part of the tribal consultation process, in accordance with Executive Order 13175.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.**

Not applicable.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to OMB.**

Not applicable.

- 9. Explain any decision to provide any payment or gift to respondents other than re-enumeration of contractors or grantees.**

Not applicable.

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

Access to the information collected on this questionnaire will be strictly controlled and limited to appropriate OPM personnel and other authorized Federal personnel. This information will be used strictly for purposes of properly scoping this project, and will not be otherwise distributed or released. The responses will be submitted via fax, email, or postal mail, and will be maintained in confidential files. All authorized personnel with access to this information agree to and adhere to rules of behavior on the safe handling of data when accessing information collected. All records developed from the information collected will be purged and destroyed in accordance with record keeping schedules. OPM certifies that the information collection complies with the Privacy Act of 1974.

- 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.**

Not applicable.

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

We estimate that it will take approximately twenty minutes to complete each questionnaire. The tribal leader questionnaire will be distributed to approximately 564 tribal leaders, for an estimated total burden of 188 hours. The urban organization questionnaire will be distributed to approximately 65 urban organizations, for an estimated total burden of 22 hours. The total respondents will be 629 with a total burden estimate of 210 hours. We do not anticipate that respondents will incur any costs associated with the completion and submission of this questionnaire.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no annual cost burden.

- 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 expenses that would not have been incurred without the paperwork burden.

There is no annualized cost to the Federal Government associated with this information collection. This is a one time distribution, and the respondent pool is approximately 600 tribal entities.

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

Not applicable.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Not applicable. The results of this information collection will not be published.

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 do not seek approval to not display the expiration date.

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

No exceptions.