

# **Supporting Statement A**

## **Application for Job Placement and Training Services**

**OMB Control Number 1076-0062**

**Terms of Clearance:** None.

### **General Instructions**

**A completed Supporting Statement A 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 below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.**

### **Specific Instructions**

#### **Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Indian Adult Vocational Training Act of 1956 (Public Law 84-959), as amended, codified at 25 U.S.C. 309, authorizes the Secretary of the Interior to assist adult Indians who reside on or near Indian reservations in obtaining reasonable and satisfactory employment through vocational training. The Secretary is authorized to enter into contracts and other agreements with Federal, State and local governments, and with private schools, schools of nursing, corporations and associations to provide various types of training that lead to skilled employment. 25 CFR Part 26 establishes the procedures for IEED and Indian Self-Determination Act contractors to administer 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 service areas approved by the Bureau of Indian Affairs (BIA), and who can demonstrate a need for such services. The Job Placement and Training Program can be included in tribal demonstration projects authorized by the Employment, Training, and Related Services Demonstration Act (Public Law 102-477). To ensure that only eligible persons receive training under the Job Placement and Training Program, the Office of Indian Energy and Economic

Development (IEED) must collect certain information from applicants. IEED collects this information on an application form.

In addition, 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.**

IEED and Indian Self-Determination Act contractors use this information to determine the eligibility of an applicant to receive benefits under 25 CFR Part 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 IEED to identify the applicant and to learn whether the applicant has dependents, is a veteran, or has other circumstances that may affect the type of services available to the applicant.
- The third row provides information about services requested and whether services have been provided before. IEED uses this information to help match the applicant to desired services and determine eligibility. This row also requires an emergency contact.
- The fourth row provides educational information about the applicant. IEED uses this information to help assess the types of jobs that the applicant is 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 IEED 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 IEED match the applicant to the appropriate training.

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

IEED 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.**

Indian Self-Determination Act contractors may automate the form, but this is not required.

- 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.**

Some of the information collected on the application is also collected to determine eligibility for other social service programs. However, all of the information collected on the application is needed to document an applicant's eligibility to receive benefits under 25 CFR Part 26; therefore, this data collection does not duplicate any other collection efforts.

- 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, IEED will not be able to determine individuals' eligibility to receive benefits under 25 CFR Part 26.

- 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 60-day notice for public comments was published in the Federal Register on March 24, 2014 (79 FR 16043). No comments were received in response to this 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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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.**

We have consulted with members of the Public Law 102-477 tribal work group representing 254

federally recognized tribes and several BIA agencies that use the form. They expressed that no changes are needed for the forms, instructions, or the burden time. Based on the feedback received, no changes were made.

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

No payments 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. A copy of the “BIA-23 Employment Assistance Case Files” can be found on the following website: [http://www.doi.gov/ocio/information\\_assurance/BIA\\_23\\_Employment-20Assistance-20Case-20File.cfm](http://www.doi.gov/ocio/information_assurance/BIA_23_Employment-20Assistance-20Case-20File.cfm).

**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 included in the information collected.

**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.**

There are 7,450 responses with an estimated total annual burden of 3,726 hours or the amount equivalent to \$114,537.

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	\$ 30,063.72
26.32 – Application for Job Training	2,000	1	2,000	0.5	1,000	\$ 30,740.00
Employer Information on Available Opportunities	95	1	95	0.5	48	\$ 1,475.52
Employer Progress Reports	850	4	3,400	0.5	1,700	\$ 52,258.00
<b>Totals</b>			<b>7,450</b>		<b>3,726</b>	<b>\$ 114,537.24</b>

\*We are estimating salary using Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— March 2014 (released June 11, 2014), USDL 14-1075, Table 1, All Workers category (\$21.96/hour x 1.4 for benefits for individuals or \$30.74/hour). The 1.4 multiplier is derived from the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— March 2014 (released June 11, 2014), USDL 14-1075. 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 already reflected in item 12.)**

- \* **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 for form processing). 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.

**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.**

We estimate the annual cost to the Federal Government to administer this information collection to be \$129,779.

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	\$ 34,056.10
26.32 – Application for Job Training	2,000	1	2,000	0.25	500	\$ 34,840.00
Employer Information on Available Opportunities	95	1	95	0.25	23.75	\$ 1,654.90
Employer Progress Reports	850	4	3,400	0.25	850	\$ 59,228.00
<b>Totals</b>			<b>7,450</b>		<b>1862.5</b>	<b>\$ 129,779</b>

\*These hourly salary figures are based on the *Salary Table 2014 – GS Incorporating the 1% General Schedule Increase* for GS-14/5, at \$46.45, incorporating a 1.5 multiplier for benefits for a total of \$69.68. See, 2010 General Schedule (Base) [http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS_h.pdf). The 1.5 multiplier for benefits is based on the Bureau of Labor Statistics EMPLOYER COSTS FOR EMPLOYEE COMPENSATION— March 2014 (released June 11, 2014), USDL 14-1075. 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 in hour or cost burden.**

This request for renewal contains no program change or adjustments.

**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.

**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 OMB control number and expiration date on the forms.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions.