

Supporting Statement A

Tribal Self-Governance Program, 25 CFR 1000

OMB Control Number 1076-0143

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 Office of Self-Governance (OSG) within the Department of the Interior (DOI) is submitting this information collection request to extend approval for the information collection requirements of the Tribal Self-Governance Act of 1994, 25 U.S.C. 5361-5368, as amended (hereafter referred to as the Act).

Tribes interested in entering into Self-Governance must submit certain information required by 25 U.S.C. 5361-5368 to support their admission into Tribal Self-Governance. In addition, those Tribes and Tribal consortia that have entered into Self-Governance compacts may be requested to submit certain information to justify budget requests on their behalf and to comport with Section 405 of the Act that calls for the Secretary to submit an annual report to the Congress.

Regulations at 25 CFR part 1000 implement the Act. These regulations define the circumstances and establish procedures under which a Tribe or Tribal consortium can obtain admittance to the applicant pool and negotiate with the DOI to assume control over programs and activities where there is a special geographic, historical, or cultural significance to the Tribe or consortium. The subparts summarized below contain the information collection requirements as provided by the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)).

The information requirements for this Act represent significant differences from other agencies in several respects:

1. The DOI and the Tribes enter into multiple-year and annual funding agreements (FAs) for multiple programs funded by the Bureau of Indian Affairs (BIA), whereas other agencies usually make single grants to Tribes;
2. The DOI may also enter into FAs for: (1) programs, services, functions, and activities (PSFAs) other than those provided for by the BIA and otherwise available to Indians; and (2) PSFAs for which there is a special geographic, historical, or cultural significance to the Self-Governance Tribe. Other agencies usually make single grants to Tribes based upon a set of competitive criteria which is part of the regulations.
3. For FAs containing programs funded by the BIA, the FAs are negotiated, whereas other agencies provide grants on a discretionary/competitive basis.
4. The Act only applies to the DOI. When BIA funds programs under Self-Governance, Tribes are entitled to reallocate funds and consolidate as well as redesign PSFAs contained in their FA. Other agencies in the DOI grant funds for specific purposes with little discretion for variance. For non-BIA funded programs, the authority to redesign and consolidate programs may be negotiated into the FA.

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.

OSG uses information provided by Tribes for a variety of purposes. The primary purpose is to ensure that qualified Tribal applicants are admitted into the applicant pool consistent with the requirements of the Act. In addition, OSG uses the information to determine whether the Tribes meet basic eligibility requirements (i.e., Tribal resolution indicating that the Tribe wants to plan for Self-Governance and proof that the last three years of audits do not have any material audit exceptions). OSG uses the remaining information to meet the reporting requirements under the Act.

The subparts summarized below contain information collection requirements:

Subpart B contains provisions relating to the contents of the initial Tribal proposal to enter Self-Governance as authorized by the Act. The proposal for admission to the applicant pool must contain the items described in 25 CFR 1000.17. All Tribes seeking to participate in Self-Governance must also prepare and submit a planning report, consisting of the contents as described in 25 CFR 1000.19 through 1000.21. Information requested includes: name and address; authorizing resolution; date of submission of proposal; description of geographical

service area; estimated number of Indian people to be served; brief statement of the PFSA's to be performed; description of the proposed program; financial, procurement, and property management standards; description of reports to be provided; staff qualifications, if any; budget information; and waiver information, if requested. The DOI uses the information to determine eligibility of the applicant, to protect the service population and to safeguard Federal funds and other resources. The information is collected at the time the Tribe or Tribal organization makes an initial application to become a Self-Governance Tribe. To withdraw from an existing consortium and become a member of the applicant pool, the Tribe must submit the information in 25 CFR 1000.18 (in addition to fulfilling the Tribal proposal information requirements). When a Tribe wishes to withdraw from a consortium's FA, it must submit the information set out in 25 CFR 1000.32. These requirements basically consist of the Tribe submitting a Tribal resolution documenting the Tribe's request. The Department uses these documents to ensure that the request is an official Tribal action, rather than an action by one member of the Tribe purporting to act on behalf of the Tribe.

Subpart C contains the information required to be submitted when Indian Tribes or Tribal organizations wish to apply for negotiation and planning grants for BIA programs as authorized by the Act. Sections 1000.47 and 1000.50 allow Tribes/consortiums to receive funding to help cover the costs of preparing for and negotiating a compact and an FA, and to cover the costs of preparing the planning phase for Self-Governance. The information required for a negotiation grant includes a letter requesting negotiation funds and affirming the Tribe's readiness to negotiate. For a planning grant, the information required includes a proposal which includes the Tribe's/consortium's plans for conducting legal and budgetary research, internal organizational planning, timetables for conducting the planning phase, and a demonstration that the Tribe/consortium is capable of successfully completing the proposal and the last three years of audit reports.

NOTE: Congress has not appropriated funding for Planning and Negotiation Grants and is not expected to do so in the foreseeable future. However, there is a possibility that funding may be allocated in the future; therefore, this particular section will remain a part of the entire information collection.

Subpart D contains information requirements Tribes/consortiums must submit to OSG to apply for planning and negotiation grants for non-BIA programs as authorized by the Act. The information required, as described in 25 CFR 1000.66, includes a written notification of intent, a description of the planning and negotiation activities, a timetable for the activities, and the amount of funding requested. This is the minimum information necessary to ensure that each Tribe/consortium can be considered for the grants they need to plan and negotiate the assumption of non-BIA programs.

Subpart G provides the process and timelines for newly selected or participating Tribes/consortia wishing to negotiate either an initial or a successor FA. The information provided is used to determine the interest and scope of programs a Tribe/consortium may wish to include in an FA. Specifically, 25 CFR 1000.169 requires Tribes/consortia to submit a letter indicating their interest in negotiating for one or more bureau programs. Section 1000.170 specifies that the letter shall include information regarding points of contact, programs of

interest, an explanation of the special geographic, historical, or cultural significance the program has to the Tribe/consortium, a request for information on available funding, and a request for technical assistance, if needed. Section 1000.173 requires that the Tribe/consortium submit a request to initiate the negotiation phase for a FA. This information allows the DOI to know what information it needs to provide to the Tribe and whether or not any technical assistance is required. Section 1000.181 requests that the Tribe/consortium inform the DOI when it anticipates a significant change in an existing program in a successor FA.

Subpart J provides the Secretary the flexibility to make exceptions in the regulations promulgated to implement the Act or to waive such regulations under certain circumstances and explains how Indian Tribes or Tribal organizations apply for waiver requests as authorized by the Act. The information is collected and reported when a Tribe submits a waiver request to the appropriate authority under 25 CFR 1000.222.

Subpart K addresses the process by which an Indian Tribe or Tribal organization may provide construction activities, or portions thereof, under an FA and sets forth minimum requirements for those activities as authorized by the Act. Section 1000.243 requires the Indian Tribe or Tribal organization to submit descriptions of standards when proposing to include a construction project in an FA. These standards include use of licensed and qualified architects and engineers; applicable health and safety standards; adherence to applicable Federal, State, local or Tribal building codes and engineering standards; accountability of funds; date of the commencement of work; necessary inspection and testing; and a process for changes when warranted. The parties that would have to submit information under these proposed regulations are Tribal governments or Tribal organizations authorized by Tribal governments. The DOI needs and uses the information to determine the appropriateness of including a specific construction project in the FA, to evaluate applicant capabilities, to protect the population's health and safety, and to safeguard Federal funds and other resources. Information is collected during negotiations and may be included in the FA. Section 1000.243 also provides that the Secretary may require progress reports and status reports to allow the Secretary to ensure proper use of funds. Under 25 CFR 1000.248, the Tribe must provide notice of any proposed changes to the project, so that the Secretary knows if additional funding or time is necessary.

Subpart N requires a Tribe/consortium, which voluntarily wishes to return a program to a bureau, to prepare and submit a written notice of the retrocession to the appropriate bureau. This action, called a retrocession, is authorized by the Act. Section 1000.333 requires that written notice be provided to ensure the transfer of a program from a Tribe/consortium to the appropriate bureau.

Subpart P contains the requirements for Tribes/consortia to submit annual reports on Self-Governance as required by the Act. Section 1000.382 requires respondents to submit a report which includes a list of Tribal needs, the Tribe's year-end Tribal budget for programs and services funded under the FA, identification of any program redesign or reallocation of trust related programs. The DOI needs and uses the information to meet its Congressional reporting responsibility. OSG uses a form to collect this information, which can be accessed on the Self-Governance website (www.osgdb.org).

- 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.**

Tribes/consortia may submit information electronically using e-mail; generally, approximately 30% do submit their information via e-mail.

OSG has also considered collection of information by automated methods (such as a database applicants and participants could access and enter data into). Such automated methods would not be practical for applications because the collections are non-repetitive; specifically, the requested information varies with time and is unique to each Tribe or consortium. The last time this information collection was renewed, we stated that automated methods of reporting were being developed for the program. This is no longer an accurate statement. Those methods were never fully developed, not funded and therefore never implemented. Automated methods for the reports may be practical, however, the development and implementation of an electronic system would need to be deemed a priority and funded by the Department.

- 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.**

OSG is the only Federal agency charged with implementation of the Act. No other offices/agencies collect the information required under the Act.

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

Although Tribes are not considered small businesses, to the extent allowable by the regulations, the BIA has attempted to reduce the burden on small entities.

- 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.**

Without this information collection, Tribes/consortia could not participate in Tribal Self-Governance and would be severely restricted in funding decisions for their programs. Information collection occurs at the time requests to participate are made. Information collection activities associated with the FAs (25 CFR 1000.173 and 1000.181) are conducted annually, in accordance with the applicable statute, to receive DOI appropriations. Tribal information used in the Secretary's annual report to Congress (25 CFR 1000.382) is provided on an annual basis as required by law. The remaining information is collected on occasion. The frequency of collection therefore cannot be reduced.

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.**

As discussed in the previous section, some of the information is statutorily required to be collected and reported annually, and the rest is collected on occasion. No collection of information under this part is inconsistent with the guidelines at 5 CFR 1320.5(d)(2) as summarized in the instructions for this item of the supporting statement.

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.**

DOI published the 60-day notice soliciting comments in the Federal Register on February 13, 2019, 84 FR 3812. No comments were received.

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.

OSG communicates with the Self-Governance Advisory Committee (SGAC) on a regular basis and meets three times per year. OSG as well SGAC participates in the Annual Consultation Conference. SGAC represents all self-governance Tribes. OSG reached out to the SGAC to obtain the views of self-governance Tribes on the availability of data, the frequency in which this collection is collected, the clarity of the instructions, and concurrence with the burden hours to collect this information. SGAC found this information collection to be necessary and concurred with the frequency in which it is collected and the estimated burden hours.

Three Tribal representatives were reached in an effort to provide feedback on this information collection. Each representative was asked about the clarity of the instructions and reporting requirements, whether the time burden estimates provided by OSG were accurate, and if he or she had any suggestions on how to minimize the burden.

Assistant Director of Health Services/Self-Governance Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians stated the following:

The Minimum Data Collection Form format is fine and we prefer it stay the same for continuity of reporting. As to the timeline of completing the reporting template, 2016 was the first year of compiling and completing the form because 2016 was our first year of self-governance. It took a bit longer to complete since we had to contact our different department directors for their input and stats regarding their individual programs. We would estimate that it took approximately 11 to 15 hours to complete the form. Henceforth, we estimate the time to complete the form could be about the same or less/more as our programs expand. We agree it would be very beneficial to be able to complete this template form online and submit electronically.

OSG is supportive of an automated or electronic submission of the form, however, development and implementation of an electronic system would need to be deemed a priority and funded by the Department. This Tribe's estimate does not affect the overall burden estimate for the form. This is a very small Tribe that just started self-governance and only operates a few programs. The amount in the table is an average estimate for all Tribes.

Self Governance /Trust Director for the Kaw Nation responded as follows;

- 1) Is the collection necessary?

Yes, we believe the collection corresponds to the proper functions of BIA.

- 2) Is the estimate of Burden accurate?

The report takes several days from different department directors to complete before it is compiled into one report.

- 3) How might the BIA enhance the quality, utility and clarity of the information to be collected?

The Tribal Demographic section on the 1st page of the form is very difficult to report on. We must use information from the Census Bureau/OK State Data Center; the information found is not always updated every year. It's the most challenging part of the data collection.

In some cases the Tribe relies upon information gathered by the Census Bureau or by the state. Most Tribes do not have the resources to conduct a "Tribal census" and each State collects data differently. These issues have been addressed by Tribal comments to the "Labor Force Report."

- 4) How might the BIA minimize the burden of this collection on the respondents, including through the use of information technology?

We believe there have been advances in technology that could be utilized to improve the data collection/submission process. Perhaps an on-line tool similar to the one used by BIA for the 2021 BIA Budget Formulation could be developed for the Minimum Data Report.

OSG is supportive of an automated or electronic submission of the form, however, development and implementation of an electronic system would need to be deemed a priority and funded by the Department.

Director of Operations for the Ysleta del Sur Pueblo responded as follows:

- 1) Is the collection necessary?

The Minimum Data Collection Request is absolutely necessary. It can serve to support funding requests while providing a baseline of demographic and service data relative to BIA programs, services, functions and activities. Annual requests are sufficient in terms of frequency.

- 2) Is the estimate of burden accurate?

The estimate of burden (64 hours) to complete the form is sufficient for the initial report. Tribes need the 64 hours to gather source documents, research census data and gain an understanding of each variable requested. The time is sufficient to coordinate with all self-governance tribal programs to centralize information gathering. After the initial report is composed, however, the estimate of burden reduces greatly to approximately 40 hours.

- 3) How might the BIA enhance the quality, utility, and clarity of the information to be collected?

Recommendations for Enhanced Quality and Clarity

- The Self-Governance Minimum Data Collection Form itself needs an update to

include an overall Purpose to communicate why the information is requested, how the information will be utilized and whether it is a mandatory requirement of a self-governance participant and indicate if there are any repercussions to not completing and submitting the report.

This information is communicated in the transmittal letter to all self-governance Tribes, including due dates. Therefore, it is not included in the Minimum Data Collection Report form itself.

- A Self Governance Data Management Workgroup could be helpful in maintaining the Minimum Data Collection Form and assist the Office of Self Governance with data analysis and annual report generation
 - A general “Definitions” section is imperative to ensure that tribal responses received are as consistent as possible. Terminology such as Total Tribal Resident Indian Population needs to be defined to ensure all tribes are providing consistent responses. If this instrument could be administered as a survey, the definition could be included. An Excel instrument could also be helpful in including the Definitions as comments within a cell.
 - The fact that no Economic Development measures are requested is a huge weakness and an opportunity to fold in former Labor Force measures. This would greatly enhance the potential for this instrument to be even more meaningful. Information such as employment, income, tribal businesses and entrepreneurship are indicators that would better enhance our overall narrative when petitioning for additional funds.
- 4) How might the BIA minimize the burden of this collection on the respondents, including through the use of information technology?
- If the Minimum Data Collection Request could be administered as a survey, this would greatly impact a tribe’s burden time. In survey format, tribal respondents would be able to skip those budget categories that are not compacted and reducing the overall completion time. This method of administration would also mitigate tribes erroneously answering sections where no self-governance programs are administered. This would also greatly serve those BIA personnel who analyze the data. In the current word format, it is difficult to extrapolate the data.
 - Another observation is that this instrument requests Human Services information that is already requested on the Financial Assistance and Social Services Report (FASSR) such as number of cases and \$ for Welfare Assistance. Avoiding duplication of data requests such as this will also ease the reporting burden for tribal respondents.

The Minimum Data Collection Report form is almost 30 years old and was developed long before the FASSR which is submitted to Office of Indian Services (OIS). OSG is receptive to revisiting the Minimum Data Collection Report form, instructions and the data content requested from Tribes. As stated above, OSG meets with the SGAC three

times per year and will be bringing this form up for discuss and possible revision at the next meeting scheduled for April 2019.

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.

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

No assurance of confidentiality is provided. The information that is collected is subject to the requirements of the Freedom of Information 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.

No questions of a sensitive nature are asked.

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.**

The total annual reporting and recordkeeping burden for this collection is estimated to be 4,443 hours or the amount equivalent to \$242,040. The burden hours and associated costs estimated for the Tribal Self-Governance information collection requirements are as follows:

Final CFR Section	Sections of the Act	Number of Respondents	Frequency of Response	Total Annual Responses	Estimated Hours per Response	Estimated Total Annual Burden Hours	Wages & Benefits @ \$54.48/hr
Subpart B 1000.17	402(c)	4	1	4	3	12	\$654
1000.18	402(c)	3	1	3	.25	1*	\$55
1000.19 1000.20 1000.21	402(d)	5	1	5	400	2,000	\$108,960
1000.32	402(b)(2)	3	1	3	3	9	\$490
Subpart C 1000.47	402(d)	1	1	1	.5	.5	\$27
1000.50	402(d)	1	1	1	43.25	43.25	\$2,356
Subpart D 1000.66	402(d)	4	1	4	40	160	\$8,717
Subpart G 1000.169 1000.170	402(b)(2) 403(c)	5	1	5	2	10	\$545
1000.173	402(b)(2) 403(c)	5	1	5	3	15	\$817
1000.181	402(b)(2) 403(c)	1	1	1	2	2	\$109
Subpart J 1000.222	403(i)(2)	3	1	3	10	30	\$1,634
Subpart K 1000.243	403(e)	3	4	12	3	36	\$1,961
1000.248	403(e)	3	1	3	3	9	\$490
Subpart N 1000.333	403(e)	1	1	1	3	3	\$163
Subpart P 1000.382	403(a)(b)	33	1	33	64	2,112	\$115,062
Totals		75		84		4,443	\$242,040

To obtain the hourly rate for Tribal government employees, we used \$36.32, the wages and salaries figure for all workers from Bureau of Labor Statistics Release, *Employer Costs for Employee Compensation – September 2018 (released December 9, 2015)* Table 2, *Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by occupational and industry group, December 2018*. To account for benefits, we then multiplied this rate by 1.5, to obtain a total rate of \$54.48. See <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 annualized capital and start-up costs of \$10,500 associated with this information collection activity is depicted in the table below. The main component of this cost (\$10,000) is attributed to Tribes and Tribal consortia first entering the Self-Governance Program. These Tribes and Tribal consortia must obtain the equipment and materials necessary to assume the programs and activities for which they are entering the Self-Governance Program. Equipment includes personal computers, software and other materials. Other start-up costs may be necessary for Tribes applying for grants and requesting to negotiate funding agreements. In those cases, the start-up costs are smaller because likely the Tribes will already have the necessary hardware, and likely will only need additional software or other incidental materials.

CFR Section	Sections of the Act	Start Up O&M
Subpart B 1000.19 1000.20 1000.21	402(d)	\$ 10,000.00
Subpart D 1000.66	402(d)	\$ 400.00
Subpart G 1000.173	402(b)(2) 403(c)	\$ 100.00
Total Start Up		\$ 10,500.00

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.

The total estimated annualized cost to the Federal government is \$40,937, reflected in the table below.

CFR Section	Sections of the Act	Number of Respondents	Frequency of Response	Total Annual Responses	Estimated Federal Hrs. per Response	Estimated Federal Total Annual Burden Hours	Annual Federal Cost
Subpart B							
1000.17	402(c)	5	1	5	1	5	\$379
1000.18	402(c)	3	1	3	8.333	25	\$1,895
1000.19							
1000.20							
1000.21	402(d)	5	1	5	2.4	12	\$910
1000.32	402(b)(2)	3	1	3	0.333	1	\$76
Subpart C							
1000.47							
1000.50	402(d)	0	0	0	0	0	\$0
Subpart D							
1000.66	402(d)	5	1	5	20	100	\$7,581
Subpart G							
1000.169							
1000.170	(402(b)(2) 403(c)	5	1	5	20	100	\$7,581
1000.173	(402(b)(2) 403(c)	5	1	5	41.6	208	\$15,769
	402(b)(2)	1	1	1	4	4	\$303

1000.18 1	403(c)						
Subpart J							
1000.22 2	403(i)(2)	3	1	3	8	24	\$1,819
Subpart K							
1000.24 3	403(e)	3	4	12	0.75	9	\$682
1000.24 8	403(e)	3	1	3	1	3	\$227
Subpart N							
1000.33 3	403(e)	1	1	1	2	2	\$152
Subpart P							
1000.38 2	403(a)(b)	33	1	33	1.424	47	\$3,563
Total Federal Burden						540	\$40,937

The average hourly wage rate used to estimate Federal costs is based on the hourly basic rate for a grade 13/step 5 worker in Washington DC as indicated in the Office of Personnel Management Salary Table 2019. The average hourly wage rate (\$47.38) was multiplied by a benefits factor of 1.6 to derive the estimate of total Federal hourly salary (\$75.81). See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

No changes were made to this collection.

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.

Not applicable. Most data that is provided will be used internally for decision-making purposes. Tribes will also be submitting data that will be summarized in justifying budgets and in preparing the Secretary’s annual report. DOI has no plans to publish the information collected.

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 control number and expiration date will be displayed on all appropriate materials.

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

There are no exceptions to the certification statement.