

1 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.

On October 21, 2020, the Practical Reforms & Other Goals to Reinforce the Effectiveness of Self Governance & Self Determination for Indian Tribes (PROGRESS) Act was signed into law. The PROGRESS Act amends subchapter 1 of the Indian Self-Determination and Education Assistance Act (ISDEAA), 25 U.S.C. 5301 *et seq.*, which addresses Indian Self-Determination, and subchapter IV of the ISDEAA, which addresses Indian Self-Determination, and subchapter IV of the ISDEAA, which addresses DOI's Tribal Self-Governance program. The PROGRESS Act called for a negotiated rulemaking committee (Committee) to be established. The Secretary charged the Committee with developing proposed regulations for the Secretary's implementation of the PROGRESS Act's provisions regarding DOI's Self-Governance Program. On September 30, 2023, Congress extended the Committee's authority until December 21, 2024. Pub. L. 118-15 at section 2102.

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 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, cultural, or historical connection 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 entities are eligible to participate in Self-Governance 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 uncorrected significant and material audit exceptions). OSG uses the remaining information to meet the reporting requirements under the Act. The subparts summarized below contain the information collection requirements as provided by the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)).

Subpart B – Selection of Additional Tribes for Participation in Tribal Self-Governance: contains provisions relating to the contents of the initial Tribal proposal to participate in Tribal Self-Governance as authorized by the Act. The proposal for participation in Tribal Self-Governance must contain the items described in 25 CFR 1000.125. At the option of the Tribe, a Tribe may identify BIA and non-BIA programs that the Tribe may wish to subsequently negotiate for inclusion in a funding agreement described in 25 CFR 1000.130. Tribes seeking to participate in Self-Governance must also prepare and submit information as part of the planning phase, consisting of the contents as described in 25 CFR 1000.140 and 1000.145. Information requested includes: name and address; authorizing resolution; date of submission of request; and three years of audit information showing no uncorrected significant and material audit exceptions. The DOI uses the information to determine eligibility of the Tribe, to protect the service population and to safeguard Federal funds and other resources. The information is collected at the time the Tribe or Tribal Consortium makes an initial request to participate in the Self-Governance program. If a Tribe withdraw from a Consortium and be selected to participate in the Tribal Self-Governance program, the

Tribe must submit the information in 25 CFR 1000.135 (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 1000.205. 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 – Planning and Negotiation Grants: contains the information required to be submitted when Tribe/Consortium wish to apply for negotiation and planning grants for BIA programs as authorized by the Act. Section 1000.310 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, a Tribe/Consortium must first be selected to join self-governance and then submit a letter affirming the Tribe's readiness to negotiate and requesting a negotiation grant. This subpart also indicates that a Tribe/Consortium may elect to negotiate for self-governance agreement if selected without applying for or receiving a negotiation grant. Planning grants will be awarded to Tribe/Consortium requesting financial assistance in order to complete the planning phase requirements for joining self-governance.

Subpart D – Planning and Negotiation Grants for Non-BIA Programs: contains information requirements and criteria applicable to receiving financial assistance for planning and negotiating non-BIA programs available to any Tribe/Consortium that: 1) applied to participate in self-governance, 2) has been selected to participate in self-governance, or 3) has negotiated and entered into an existing funding agreement. The information required, as described in 25 CFR 1000.430, 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 E –Compacts: describes self-governance compacts and the minimum content requirements of a self-governance compact. Unlike a funding agreement, parts of a compact apply to all bureaus within DOI rather than a single bureau. Therefore, a Tribe/Consortium needs only to negotiate and execute one self-governance compact to participate in self-governance, as described in 25 CFR 1000.505. The previous version of Title IV included no such requirement for a Tribe to have a compact to participate in self-governance and compacts were negotiated and executed at the option of the participating Tribe/Consortium.

Subpart H – Negotiation Process: establishes the process and timelines for newly selected or participating Tribes/Consortium 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. Under this subpart, the negotiation process consists of two phases, an information phase, and a negotiation

phase. In the information phase, Specifically, 25 CFR 1000.1020 requires any Tribe/Consortium that has been selected to participate in the self-governance program may submit a written request clearly identified as a “Request to Initiate the Information Phase,” which notifies the Secretary of a Tribe/Consortium’s interest in negotiating for a program(s) and requesting information about the program(s). In 25 CFR 1000.1025, 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. The negotiation phase establishes detailed timelines and procedures for conducting negotiations with Tribes that have been selected into the self-governance program, including the minimum issues that must be addressed at negotiation meetings. In 25 CFR 1000.1040 requires that the Tribe/Consortium initiates this phase by submitting a Request to Initiate the Negotiation Phase for a FA. Further, this subpart establishes the process for finalizing and executing a compact and/or funding agreement when the parties are in agreement on such terms and conditions following the completion of negotiations. In 25 CFR 1000.1085, requests that the Tribe/consortium inform the DOI when it anticipates a significant change in an existing program in a successor FA.

Subpart I – Final Offer: explains the final offer process provided by the Act for resolving disputes when the Secretary and a Tribe/Consortium are unable to agree, in whole or in part, on the terms of a compact or funding agreement (including funding levels) during a negotiation. Under this subpart, a Tribe/Consortium may submit a final offer to resolve these disputes. In 25 CFR 1000.1110, a final offer must be emailed or mailed to the Director at OSG’s headquarters. In 25 CFR 1000.1115, a final offer must contain a description of the disagreement, the Tribe/Consortium final proposal to resolve the disagreement (including any proposed terms for a compact, funding agreement, or amendment), and the name and contact information for the Tribe’s/Consortium’s authorized official.

Subpart J – Waiver of Regulations: implements 25 U.S.C. 5363(i)(2)(A) that authorizes the Secretary to waive all DOI regulations governing programs included in a funding agreement, as identified by the Tribe/Consortium. This 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 Tribes/Consortium 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 1000.1215.

Subpart K – Construction: addresses the process by which a Tribe/Consortium may provide construction activities, or portions thereof, under an FA and sets forth minimum requirements for those activities as authorized by the Act. 25 CFR 1000.1355 requires the Tribe/Consortium 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. Under 25 CFR 1000.1470, the Tribe must provide notice of any proposed changes to the project, so that the Secretary knows if additional funding or time is necessary. Under 25 CFR 1000.1475 also provides that the Secretary may require progress reports and status reports to allow the Secretary to ensure proper use of funds (which references back to 25 CFR 1000.1355 requirements).

Subpart M – Reassumption: explains the types of reassumptions authorized under Title IV, as amended by the PROGRESS Act as described in 25 CFR 1000.1730, including the rights of a Consortium member, the types of circumstances necessitating reassumption as described in 25 CFR 1000.1755, and Secretarial responsibilities including prior notice requirements and other procedures.

Subpart N – Retrocession: is the Tribally initiated voluntary action of returning control of certain programs to a bureau. In 25 CFR 1000.1815, the Tribe/Consortium must prepare and submit a written notice of the retrocession to the appropriate bureau.

Subpart P – Reports: contains the requirements for Tribes/Consortium to submit annual reports on Self-Governance as required by the Act. In 25 CFR 1000.1020, includes the requirements for the annual report that Tribe/Consortium submit to the Secretary, which includes a list of Tribal need, 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. In Section 1000.2025 and 1000.2030, are other data requirements the Secretary may request of the Tribe/Consortium, which include data for the Secretary to determine allocation of funds to be awarded under a FA, and the Single Audit Act reports. 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).

Proposed Revisions to Information Collection

The OSG is submitting this request to revise the information collection requirements and to reflect the proposed rule revised section numbers and subparts. This revision package is associated with NPRM, Self-Governance PROGRESS Act Regulations, RIN 1076-AF62. We anticipate an increase in IC burden estimates and total number of annual respondents. – resulting from the intended effect of streamlining the existing regulations. Tribes interested in entering into Self-Governance must submit certain information required by 25 U.S.C. 5361-5368 to support their participation into Tribal Self-Governance and the selection process and eligibility criteria that the Secretary uses to decide that a Tribe/Consortium may participate. 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. The revised regulations define the circumstances and establish procedures under which a Tribe or Tribal consortium can participate and negotiate with the DOI to assume control over programs and activities where there is a special geographic, cultural, or historical connection to the Tribe or consortium.

ICR Summary of Burden:

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	130	0	46	0	0	84
Annual Time Burden (Hr)	5,073	0	630	0	0	4,443

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/Consortium may submit information electronically using 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). 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/Consortium 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 1000.1025 and 1000.1040) 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 1000.2020) 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.

This notice of proposed rule making for public comments was published in the Federal Register on July 15, 2024 (89 FR 57524), Self-Governance PROGRESS Act Regulations, RIN 1076-AF62.

In accordance with 5 CFR 1320, we will examine public comment in response to the proposed rulemaking and include in the supporting statement of the next ICR a description of how the agency has responded to any public comments on the ICR, including comments on maximizing the practical utility of the collection and minimizing the burden. The next ICR is to be submitted to OMB at the final rule stage.

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.

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 4,568 hours or the amount equivalent to **\$614,443**. To obtain the hourly rate for Tribal government employees, the wages and salaries figure for all workers from Bureau of Labor Statistics Release, USDL-24-0485 – issued March 2024, Table 3, *Employer costs per hour worked: State and local government workers, December 2023*. See <http://www.bls.gov/news.release/pdf/ecec.pdf>. Table 3 lists the hourly rate for State and local government workers as \$60.56, including benefits.

Final CFR Section	IC Title	Number of Respondents	Frequency of Response	Total Annual Responses	Estimated Hours per Response	Estimated Total Annual Burden Hours	Wages & Benefits
1000.125 1000.130	Subpart B: Admission to applicant pool	4	1	4	3	12	\$727
1000.135	Subpart B: Withdrawal from consortium to become member of applicant pool	3	1	3	0.25	1	\$61
1000.140 1000.145	Subpart B: Planning report	5	1	5	400	2,000	\$121,120
1000.205	Subpart B: Withdrawal from consortium FA	3	1	3	3	9	\$545
1000.310	Subpart C:	10	1	10	30.25	303	\$18,350

	Request for a negotiation grant						
1000.430	Subpart D: Financial Assistance for Planning and Negotiations	5	4	5	5	25	\$1,514
1000.510	Subpart E: Compacts	5	1	5	75	375	\$22,710
1000.1020 1000.1025	Subpart H: Letter of interest and supporting documents for FA	5	1	5	2	10	\$606
1000.1040	Subpart H: Request to negotiate a FA	5	1	5	3	15	\$908
1000.1085	Subpart H: Request to negotiate successor FA	1	1	1	2	2	\$121
1000.1110 1000.1115	Subpart I: Final Offer	25	1	25	5	125	\$7,570
1000.1215	Subpart J: Request for waiver	3	1	3	10	30	\$1,817
1000.1355 1000.1470	Subpart K: Construction	5	4	20	2.25	45	\$2,725
1000.1815	Subpart N: Notice to retrocede	3	1	3	3	9	\$545
1000.1020 1000.2025 1000.2030	Subpart P: Annual self-governance report	33	1	33	64	2,112	\$127,903
Totals		115		130		5,073	\$614,443

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 \$10,600 associated with this information collection activity is depicted in the table below. The main component of this cost is attributed to Tribes and Tribal consortia first entering the Self-Governance Program. These Tribes and Tribal consortia may hire consultants, hold Tribal community meetings, attend self-governance conferences to learn about the differences between self-determination and self-governance, take training courses in audit, contract support and other BIA fund explanation classes, may reorganize the workload, work force and point of contact for self-governance.

CFR Section	Sections of the Act	Start Up O&M
Subpart B 1000.140 1000.145	402(d)	\$10,000
Subpart D 1000.430	402(d)	\$500
Subpart H 1000.1040	402(b)(2) 403(c)	\$100
Total Start Up		\$10,600

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 \$1,592,490.

Salary estimates were based on the General Schedule 2024, located at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx.

- *DOI Staff:* The estimated average salary for Federal government performing duties at the GS-14, Step 6 level. The salary associated with this grade and step is \$77.92/hour. This salary was further multiplied by 1.6 to cover benefits, for a total loaded rate of \$124.67/hour.
- *OSG Staff:* The estimated average salary for Federal government employees performing these duties is at the GS-13, Step 5 (\$64.06/hour) level. This salary was further multiplied by 1.6 to cover benefits, for a total loaded rate of \$102.50/hour.

Program	Grade, Step	Loaded Rate	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden (Hours)	Value of Annual Burden Hours
Information Collection Clearance						
DOI staff	GS-14, Step 6	\$124.67	N/A	N/A	30	\$3,740
					<i>Subtotal \$3,740</i>	
OSG Administration of Information Collection						
OSG Staff – Existing Participants	GS-13, Step 5	\$102.50	130	118	15,340	\$1,572,350
OSG Staff – New Participants	GS-13, Step 5	\$102.50	4	40	160	\$16,400
					<i>Subtotal \$1,588,750</i>	
TOTAL					15,530	\$1,592,490

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

Updates made to the BLS and OPM salary data contained in questions 12 and 14 were due to:

- Salary/benefit increases from the Bureau of Labor and Statistics and the Federal government.
- Incremental changes: We anticipate an increase in IC burden estimates and total number of annual respondents – resulting from the intended effect of streamlining/revising the existing regulations.

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.