

**1SUPPORTING STATEMENT A  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Indian Business Incubator Program (IBIP), 25 CFR 1187**

**OMB Control Number 1076-0199**

**Terms of Clearance:** None.

**Justification**

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

On October 20, 2020, Congress enacted the Native American Business Incubators Program Act, Pub. L. 116-174, which establishes a Native American Business Incubator Program within the Office of Indian Economic Development (OIED), under the Office of the Assistant Secretary – Indian Affairs. Under the Act, OIED was to solicit and award grants to eligible business incubators who will provide services to Native American entrepreneurs in Tribal reservation communities. The Act defines a “business incubator” to be an organization that provides physical workspace and facilities resources to startups and established businesses; and is designed to accelerate the growth and success of businesses through a variety of business support resources and services. Those business support resources and services range from providing advice on how to access capital to networking opportunities.

The Act (PL116-174, 25 USC 5801 *et seq.*) required the Secretary of the Interior to promulgate regulations (25 CFR 1187) to implement the program. Both the statute and regulations set out the requirements for what must be included in a grant application and the requirement for annual report. OIED is using “Indian Business Incubator Program (IBIP)” as an alternative to “Native American Business Incubator Program” because the acronym “NABIP” would be too close to similar acronyms for other OIED programs.

**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.**

The Notice of Funding Opportunity (NOFO) provided information such as eligibility, evaluation criteria, funding preferences/priorities, and the submission deadline. With regard to application contents, OIED will use each item to assist in its determination of whether to award a grant to the applicant. Specifically:

- The certification that the applicant is an eligible applicant, has an executive director or program manager to manage the incubator, and agrees to a site evaluation and annual examinations – *OIED will rely upon this certification as a legal representation that the applicant is eligible, has the appropriate staff to lead the incubator, and has consented to OIED’s site evaluation and annual examinations.*

- The description of the one or more reservation communities the incubator will serve – OIED will use this information in its evaluation of whether reservation communities will be served by the applicant’s incubator and to ensure that it meets the statutory requirement to achieve broad geographic distribution of awarded incubators.
- The three-year plan describing the number of Native entrepreneurs to participate in the incubator, the industry focus (if any) of the incubator, the services to be offered to entrepreneurs participating in the incubator, and the services to be offered to any Native entrepreneurs not participating – *OIED will use this information to evaluate whether the services to be provided and plan for providing them are likely to meet the objectives of supporting Native entrepreneurs’ ability to bring their services and products to market in Tribal reservation communities.*
- Information demonstrating effectiveness and experience of the applicant in conducting assistance programs to improve business skills of participants, working in and providing services to Native American communities, providing assistance to entities conducting business in reservation communities, providing technical assistance under Federal development programs to Native entrepreneurs, and managing finance and staff effectively – *OIED will use this information to evaluate the capabilities of the applicant to serve as a successful incubator for Native entrepreneurs.*
- Site description of the location at which the applicant will provide workspace to participants, including a description of the technologies, equipment, and other resources that will be made available or, if the applicant is not yet in possession of the site, a site proposal with sufficient detail for OIED to ensure the site will allow the applicant to meet program requirements and a timeline for possession – *OIED will use this information to ensure that there is a physical workplace for providing resources to Native entrepreneurs.*

With regard to the annual report, OIED will use the information provided to measure the success of the grant program:

- A detailed breakdown of the Native businesses and Native entrepreneurs receiving services from the business incubator, including, for the year covered by the report.
- The number of Native businesses and Native entrepreneurs participating in or receiving services from the business incubator and the types of services provided to those Native businesses and Native entrepreneurs; -- *OIED will use this information to evaluate the quantity of Native entrepreneurs the incubator has served and the types of services.*
- The number of Native businesses and Native entrepreneurs established and jobs created or maintained – *OIED will use this information as a measure of the short-term success of the incubator.*
- The performance of Native businesses and Native entrepreneurs while participating in the business incubator and after graduation or departure from the business incubator – *OIED will use this information as a measure of longer-term success of the incubator.*

**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.**

Submission requirements were listed in the NOFO. The NOFO provided information such as eligibility, evaluation criteria, funding preferences/priorities, and the submission deadline.

In addition to current application methods (e.g., Grants.gov), organizations with GrantSolutions accounts also had the option to apply for financial assistance awards through the GrantSolutions Grants Management Module. The Department of the Interior's electronic Grant Solutions tool (<https://www.doi.gov/grants/grantsolutions>) allows users to manage their applications, and for awarded grants, reporting, extensions, notification of change of personnel, and other information impacting the status of the grant.

The data that recipients are able to view regarding their open DOI financial assistance awards includes, but is not limited to, the following:

- Grant Number
- Grant Program
- Program Office
- Project Title
- Award Issue Date
- Project Period dates
- Budget Period dates
- Total Approved Budget (Federal and Non-Federal)
- Non-Federal Budget amount
- Next Terms and Conditions Due Date (if applicable)
- Amendment Status (if applicable)
- Non-Competing Status (if applicable)
- Non-Competing Due Date (if applicable)
- Most recent Notice of Award

Submission of information to satisfy the grant periodic Performance Progress Reports (PPR) and Federal Financial Reports (FFR) can be completed in the GrantSolutions reporting modules. Statutory reporting requirements can be uploaded as Grant Notes in the GrantSolutions system, and can be emailed to the OIED staff for compilation.

**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.**

There is no duplication in the information provided because the information is specific to business incubators.

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

Some of the business incubators are small entities (categories of eligible applicants are Indian Tribes, Tribal colleges and universities, institutions of higher education, Tribal organizations, and nonprofit organizations). OIED is collecting only the minimum that is specifically required by statute from these entities. The entrepreneurs that the business incubators will serve using the

IBIP grants are all expected to be small entities, but the IBIP does not require any information or reporting from those entrepreneur small entities served by the business incubators.

**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.**

The information collection burden cannot be reduced any further because the information is required by the Native American Business Incubator Program Act and is collected only on an annual basis while appropriations are available (the Act provides appropriations only through Fiscal Year 2024).

**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.

This information collection does not involve any of these special circumstances.

**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.**

**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.**

A 60-day notice for public comments was published in the Federal Register on June 21, 2024 (89 FR 52076). There were no comments received in response to this notice. In addition, during physical site visits we requested feedback from 9 individuals; and received no additional feedback.

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

We will not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552).

**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.**

We do not ask questions of a sensitive nature.

**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.

We estimate a total annual salary burden of **\$34,065**. We arrived at the estimate for burden hours per response considering that the information collection will require the respondents to prepare and provide as part of their applications a three-year plan. We estimate it will take each respondent an average of 40 hours total, including 35 hours to prepare, compile, and submit the application, and an additional 5 hours to prepare and submit the annual report.

**2024 Updated Estimates**

We estimate that there will be approximately 30 respondents. Once for each application received (20), and then each grantee to report on the required reporting (10) at an estimated 35 hours for each application; and once for the report at an estimated 5 hours; totaling 750 annual burden hours.

To obtain the hourly rate, we used \$45.42, the wages and salaries including benefits figure for civilian workers from BLS Release USDL-24-0485, Employer Costs for Employee Compensation—December 2023, Table 2. Civilian workers, at <https://www.bls.gov/news.release/pdf/ecec.pdf>. This wage includes a multiplier for benefits.

Respondent	Activity	Annual No. of Respondents	Number of Submissions Each	Total Annual Responses	Avg. Time per Response (hours)	Total Annual Burden Hours*	Hourly Labor Costs Incl. Benefits	Dollar Value of Annual Burden Hours
<b>Application</b>								
Individuals	Reporting	20	1	20	35	700	\$45.42	\$31,794
<b>Annual Reports</b>								
Individuals	Reporting	10	1	10	5	50	\$45.42	\$2,271
<b>Totals:</b>		<b>30</b>		<b>30</b>		<b>750</b>		<b>\$34,065</b>

**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, 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 information collection will not require the purchase of any capital equipment nor create any start-up costs because no equipment purchase is contemplated. Any computers and software used to complete this information collection are part of the respondent’s customary and usual business practices.

**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 \$39,755. 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](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx) and multiplied by 1.6 to cover benefits.

Program	Grade, Step	Loaded Rate	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden (Hours)	Value of Annual Burden Hours
<b>Information Collection Clearance</b>						
DOI staff	GS-14, Step 6	\$124.67 (77.92 x 1.6)	N/A	N/A	20	\$2,493
<b>Administration of Information Collection</b>						
Solicitation and Evaluation of Applications	GS-12, Step 6	88.72 (55.45 x 1.6)	20	20	400	\$35,488
Monitoring and Review of Reports	GS-12, Step 6	88.72 (55.45 x 1.6)	10	2	20	\$1,774
<b>TOTAL</b>					<b>440</b>	<b>\$39,755</b>

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

Updates were made to the Bureau of Labor Statistics (BLS) and Office of Personnel Management (OPM) compensation data contained in Sections 12 and 14.

**2024 Updated Estimates**

We are proposing to revise the “Total Estimated Number of Annual Respondents” from 50 to 30 to reflect actual responses received in recent years. We are also proposing to revise “Total Estimated Number of Annual Responses” 100 from 30 by streamlining the program’s business practices. Finally, we are proposing to revise “Total Estimated Number of Annual Burden Hours” from 2,000 to 750 hours.

**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 of the results of these information collections.

**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 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.