

¹Supporting Statement A
Indian Affairs Public Health Needs Assessment
OMB Control Number 1076-0200

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 purpose of this survey is to identify and prioritize public health issues and needs, and to enhance public health and safety capacity throughout Indian country. The Indian Affairs (IA), Office of Facilities, Property and Safety Management (OFPSM), Public Health and Safety (PHS) Team will use survey results to develop and coordinate action plans for Bureau of Indian Affairs (BIA), Bureau of Indian Education (BIE), and the rest of IA.

To understand the concerns and priorities of IA employees and stakeholders, OFPSM plans to administer a public health needs assessment every two years. This effort to gather input from tribal partners supports Executive Order 13175 and the Biden Administration’s corresponding [Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships](#). Stakeholders include BIE-funded tribally-controlled schools and BIA-funded tribal justice programs, where non-federal employees work in federal owned and operated buildings.

Legal authority for this information collection:

- Occupational Safety and Health Act of 1970 (Pub. L. 91–596, § 5), as amended (29 U.S.C. 654), directive to create a place of employment free from recognized hazards.

- 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.

This survey is administered online through Microsoft Forms and will collect responses for 60 days. IA OFPSM will control the online survey platform. The survey is distributed through the network of BIE educational program administrators (which oversees both bureau-operated and tribally-controlled schools) and the network of BIA Office of Justice Services (which oversees both bureau and tribal justice programs). This needs assessment survey will capture the topics of concern and collect ideas/feedback for improving public health. Results are used to tailor outreach, training and assessment efforts (for example, topics to be covered in a monthly training series available to IA employees and stakeholders).

OFPSM administered the same survey internally – to only IA employees – in 2021. OFPSM used the data from those respondents to develop a Public Health and Safety Action Plan, guiding the work of the public health program. The action plan was targeted at the topics of concern reported most frequently by respondents, such as water quality, employee wellness, and indoor air quality. An example action plan is included as an attachment to this supporting statement. As part of the action plan, OFPSM developed a monthly training series, assessment contracts, educational materials, and platforms for sharing best practices to address these topics.

- 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.**

The survey is collected exclusively using electronic means via Microsoft Forms. The settings for DOI's Microsoft Forms allows an option for "Anyone to Respond". Respondents will not be required to download, print or submit any additional paperwork, thereby meeting the intent of the GPEA.

- 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.**

While there are national public health surveys, including those administered by the Department of Health and Human Services (e.g., the CAHPS American Indian Survey), this survey is targeted at IA programs and facilities. It is necessary to get input specific to how IA programs and facilities can improve coordination and infrastructure to protect the health of employees and stakeholders that work to fulfill IA missions.

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

This collection does not impact small businesses. The information collection burden under the Program is limited further by the fact that information is generally collected only when it is needed.

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 we do not collect this information, we risk missing critical needs, gaps, opportunities and ideas to improve public health for IA employees and stakeholders. Administering a needs assessment survey every two years will help IA protect and promote its most important asset: its people.

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.

No special circumstances exist.

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 Federal Register notice with a 60-day public comment period soliciting comments on this collection of information was published on June 9, 2025 (90 FR 24288). No comments were received.

In addition, we consulted 9 individuals within the target audience to validate our time burden estimate and gather feedback on this collection of information. We received feedback from 9 individuals – these individuals agreed the time burden estimates were reasonable.

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

There is no gift or payment provided to respondents.

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

The survey is anonymous and does not collect Personally Identifiable Information. The only identifier field is organization, which is shared with leadership only to provide context on the feedback received. At no point will names be used in the collection or display of data. The open-ended questions explicitly instruct the participant to not include any personally identifiable information.

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 this nature on the survey. Only three questions allow for additional comments (i.e., are not multiple-choice selection). These are voluntary questions and explicitly

instruct the participant to not include any personally identifiable information.

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.**

For each time the survey is administered (every other year), we estimate that we will receive 1,000 responses. At approximately 10 min per respondent, this totals 167 burden hours. We estimate the annual dollar value of the burden hours is **\$9,915**.

We used the of Bureau of Labor Statistics (BLS) News Release, USDL-25-0335 for labor and benefit calculations released March 14, 2025, see <http://www.bls.gov/news.release/pdf/ecec.pdf>.

Requirement	Average Number of Bi-Annual Respondents	Average Number of Responses Each Time	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours
Civ. Workers	250	1	10 min	42	\$47.20	\$1,982
State, Local, Tribal Governments	750	1	10 min	125	\$63.46	\$7,933
Totals:	1000			167		\$9,915

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 is 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.

There is no non-hour cost burden associated with this collection.

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 annualized cost to the Federal government is **\$16,505**.

The hourly cost to the Federal Government is based on data from the 2025 General Schedule. See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/RUS_h.pdf. OPM hourly rate was multiplied by 1.6 to account for benefits.

Total burden for maintaining external records in the DOI Talent database system through the lifecycle of the account are estimated below.

Action	Position and Grade	Total Burden Hours per Bi-Annual Survey	Loaded Hourly Rate	Total Annual Cost
Compilation and	Data Steward –	40	\$86.18 (\$53.86 x 1.6)	\$4,642

analysis of results	GS 13/03			
Review of open-ended comments	Data Steward – GS 13/03	24	\$86.18 (\$53.86 x 1.6)	\$4,642
Respond to questions and troubleshooting	Data Steward – GS 13/03	16	\$86.18 (\$53.86 x 1.6)	\$4,642
Preparation and presentation of final report	Data Steward – GS 11/05	24	\$64.24 (\$40.15 x 1.6)	\$2,579
Total		104		\$16,505

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.

16. For collections of information whose results is published, outline plans for tabulation and publication. Address any complex analytical techniques that is 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.

Results from this survey are published internally within IA. The organizations of respondents, topics of concern, and needed support activities are compiled into histograms depicting number of responses by category. Notable comments (not including any PII) is included in the final report – this includes those that were commonly noted by multiple respondents.

Time Schedule for Bi-Annual Survey Distribution:

- February 15: Distribute survey through IA, BIA and BIE networks. Response collection begins.
- April 15: Survey closes; responses no longer collected.
- May 30: Compile initial results, including graphical distribution of responses.
- June 30: Coordinate with BIE and BIA to identify action items and strategies to address concerns noted in the survey.
- August 30: Provide final report and action plan covering the next two fiscal years to IA, BIA and BIE leadership.

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 are not seeking this approval.

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 in this collection.

Supporting Statement B

Included within this information collection is a Supporting Statement B.