



Nez Perce

TRIBAL EXECUTIVE COMMITTEE

P.O. BOX 305 • LAPWAI, IDAHO 83540 • (208) 843-2253

October 21, 2014

Jack Stevens, Acting Director
Indian Energy and Economic Development,
Bureau of Indian Affairs
MS-SIB-20
1951 Constitution Avenue, N.W.
Washington, D.C. 20245

Dear Mr. Stevens,

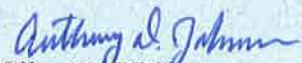
The Nez Perce Tribe provides this initial response to the September 26, 2014 notice by the Bureau of Indian Affairs (BIA) that revised 477 reporting forms have been submitted to the Office of Management and Budget (OMB) for approval. See 79 Fed. Reg. 57969 (Sep. 26, 2014). (The notice of draft forms subject to comment was published on February 21, 2014. See 79 Fed. Reg. 9915 (Feb. 21, 2014)). The notice provides information about where to find the proposed forms and requests that additional comments on the forms be provided to OMB by October 27, 2014. The Nez Perce Tribe objects to the manner and content of the Federal Register notice and requests that the notice be republished, or that the comment period be extended, for the reasons outlined below.

First, the notice does not provide correct information regarding the proposed new forms, and does not provide access to all information necessary for tribes to be able to respond to the notice. The notice states that the information collection documents can be reviewed online at reginfo.gov by following instructions to review Department of the Interior collections. However, there are no clear directions or instructions at that site that enable easy access to the documents. Our Tribe obtained copies of the documents by other means, only to discover that they include documents that are obsolete and apparently not intended to be part of the information collection package.

In addition, the short time of 30 days provided for review and comment is not adequate to address concerns raised by the forms. The BIA took nearly six months to respond to comments, and has revised the forms in light of the comments. The 477 tribes need additional time to respond to the new proposed forms. In view of the errors in the September 26, 2014 notice regarding the specific forms which will be used, the misinformation regarding the location of those forms at reginfo.gov, and the BIA's failure to provide access to the complete comments

and proposed responses, the Tribe requests that the notice be republished with adequate documentation and that it provide additional time for 477 tribes to access the data and respond with appropriate comments before OMB approves the forms. The notice indicates that the forms will be transitioned into use during a period up to 2017. Under these circumstances, the additional time necessary to republish the notice with appropriate documents and provide opportunity to comment is warranted.

Sincerely,


Silas C. Whitman
Chairman