

Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0120
Federal Subsistence Regional Advisory Council Membership
Application, Nomination, and Interview Forms
Alaska National Interest Lands Conservation Act (16 U.S.C. 3101) Title VIII
FWS Forms 3-2321, 3-2322, and 3-2323

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Title VIII of the Alaska National Interest Lands Conservation Act (16 U.S.C. 3101) designates the Departments of the Interior and Agriculture as the key agencies responsible for implementing the subsistence priority on Federal public lands for rural Alaska residents. This responsibility includes the establishment and maintenance of 10 regional advisory councils Statewide comprised of members who:

- (1) are residents of the region;
- (2) know the subsistence uses of and customs and traditions regarding fish, wildlife, and other renewable resources on public lands in the region;
- (3) know commercial, sport, and other uses of fish, wildlife, and other renewable resources on public lands in the region;
- (4) have proven leadership ability; and
- (5) have good communication skills.

Based upon recommendations of the Federal Subsistence Board, the Secretary of the Interior, with the concurrence of the Secretary of Agriculture, appoints members to the regional councils. One-third of the seats on the regional councils become vacant each year. Additional vacancies may occur due to resignations or deaths of sitting members. We recruit, screen, and rate applicants for membership on the regional councils to help the Federal Subsistence Board develop a list of recommended appointments for consideration by the Secretary of the Interior.

- 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.]**

We currently use OMB-approved forms 7-FW 4, 7 FW 5, and 7-FW 6 during the recruitment process for Regional Council members. The member selection process begins with the information that we collect on the application. Ten interagency review panels interview all applicants and nominees, their references, and regional key contacts. These contacts are all based on the information that the applicant provides on the application form. The information that we collect through the application form and subsequent interviews is the basis of the Federal

Subsistence Board's recommendations to the Secretaries of the Interior and Agriculture for appointment and reappointment of council members. During this renewal process, we have revised and reformatted the forms and assigned Fish and Wildlife Service forms numbers. These new forms collect the same information as the currently approved forms, but in an improved/streamlined format. We are requesting approval for the following forms:

- (1) FWS Form 3-2321, Federal Subsistence Regional Advisory Council Membership Application/Nomination (supersedes Forms 7-FW 4 and 7-FW 5).
- (2) FWS Form 3-2322, Regional Council Candidate Interview (supersedes Candidate Interview portion of Form 7-FW 6).
- (3) FWS Form 3-2323, Regional Council Reference/Key Contact Interview (supersedes Key Contact Interview portion of Form 7-FW 6).

FWS Form 3-2321 - applicants and others who nominate someone for membership complete this form.

- Questions 1 through 4 pertain to the applicant's regional knowledge of resources and uses of those resources.
- Question 5 concerns the applicant's leadership experience.
- Question 6 pertains to communication skills.
- Question 7 helps determine the applicant's knowledge of public lands.
- Questions 8 and 9 help gauge the applicant's willingness and availability to attend meetings.
- Question 10 is necessary to determine which user group the applicant wishes to represent.
- We request that applicants provide at least three references.

FWS Form 3-2322 - review panel members will use this form to interview applicants.

- Question 1 asks if the applicant is willing to serve as a volunteer with no compensation, except for travel and per diem expenses.
- Questions 2, 10, and 11 help to gauge the applicant's commitment level.
- Questions 3-9 relate to question on the application form and provide an opportunity for discussion and gathering of more detailed information that many respondents are not able to give in writing.

FWS Form 3-2323 - review panel members will use this form to interview references and key contacts.

- Questions 1-3 provide other perspectives of the applicant's experience and abilities.
- Questions 4 and 5 provide the agency with a better understanding of the applicant's ability to work with others and of his or her standing in the community and region.

- 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 proposed application form as well as the interview forms will be available on our website. However, many and in some regions most applicants live in remote communities and do not have internet access. Many who do have internet access have outdated programs and computers. Most applicants have access to fax machines through community government or tribal offices, and have generally reliable mail service. We will make the application form available to the public through extensive mail-outs of paper copies, distribution of paper copies at regional advisory council meetings, Federal agency field staff, and special mailings upon request. Applicants may submit completed applications by mail or fax.

- 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.**

The information contained in the application form is not available through any other information collection by the Service or other Federal agencies.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Not applicable. The collection of this information will not impact small businesses or other 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.**

The information that we collect on the application and interview forms enables the Federal Subsistence Board to form recommendations for appointments by the Secretaries of the Interior and Agriculture. Without this information and the applicant screening process, the Secretaries would not be able to make informed decisions regarding appointments. This would result in inadequate representation of those that the Federal subsistence management program affects.

- 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 that would require our collection to be conducted in a manner inconsistent with OMB guidelines.

- 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

The following persons completed the current OMB-approved application form during the 2005 recruitment/appointment cycle. We asked each person to provide their views regarding this information collection, including: (1) whether or not the information is useful and necessary, (2) if our estimates of burden hours are correct, and (3) if the instructions for completing the current form are clear. Because of their comments regarding time spent completing the forms, we revised our estimates as reflected in Item 12.

Dan O. Dunaway, POB 1490, Dillingham AK 99576, 907-842-2636
 Robert B. Churchill, 3415 Wentworth, Anchorage AK 99508, 907-261-5421
 Gloria Stickwan, POB 264, Copper Center AK 99573, 907-822-3476
 Austin Ahmasuk, POB 693, Nome AK 99762, 907-443-4265
 Richard R. Koso, POB 1990, Adak AK 99546, 907-592-2429

On November 23, 2005, we published in the Federal Register (70 FR 70874) a 60-day notice of our intent to request renewal of information collection authority from OMB. In that notice, we solicited public comments for 60 days, ending on January 23, 2006. We received one comment. The commenter did not address the necessity, clarity, or accuracy of the information collection, but instead provided general comments on the membership of the Regional Councils and the humane treatment of fish and wildlife. We did not make any changes to our information collection based on this comment.

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

Not applicable. We do not provide gifts or payments to respondents.

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

The following assurance is included on the application and interview forms: "In accordance with the Privacy Act (5 U.S.C. 552a) and the Paperwork Reduction Act (44 U.S.C. 3501), please note the following information. This information collection is authorized by the Alaska National Interest Lands Conservation Act and regulations promulgated thereunder. It is our policy not to use your name for any other purpose. The Federal Subsistence Board will use information that you provide to make recommendations to the Secretaries of the Interior and Agriculture for appointment of members to the Federal Subsistence Regional Advisory Councils. We will maintain this information in accordance with the Privacy Act, but may release it under a Freedom of Information Act request (5 U.S.C. 552). Your response is voluntary."

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.

Not applicable. 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 in Item 13 of OMB**

Form 83-I.

*** 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. Instead, this cost should be included in Item 14.**

We receive approximately 100 applications annually. Both the currently approved and the proposed application form include a 2-page cover sheet that contains information about the Federal subsistence management program, contact information, and regional advisory council authorities, duties, and membership criteria. The application is four pages with space for narrative responses. We estimate that the time necessary to complete the form varies from 30 minutes to 4 hours with an average time of 2 hours. Many applicants are uncomfortable with English and/or with writing and, therefore, take less time to complete the form. Applicants whose first language is English and who are comfortable with writing take more time to complete the form. This time estimate also includes the time spent by applicants to contact potential references. According to the 2000 census, the average income per capita for Alaska is \$22,660 per year, which would average approximately \$11.00 per hour. Therefore, the approximate dollar equivalent of an applicant's burden hour to complete the application form is between \$6.00 and \$44.00 with an average of \$22.00. Candidate interviews take approximately 30 minutes (\$5.50) and reference and key contact references take approximately 15 minutes (\$2.75).

Form No.	No. of Respondents	No. Annual Responses	Average Burden Hours	Total Annual Burden Hours	Cost	Avg. Cost/Year
FWS Form 3-2321	100	100	2.0	200	\$22.00	\$4,400
FWS Form 3-2322	100	100	0.5	50	\$ 5.50	\$ 275
FWS Form 3-2323	400	400	0.25	100	\$ 2.75	\$ 275
TOTAL		600		350		\$4,950

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 shown in Items 12 and 14).

*** 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]. 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.**

There is no nonhour cost burden for applicants. There are no fees associated with submitting an application.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

To calculate the approximate annual personnel cost of the council member application process, we estimated the average time for each task involved in the process multiplied by the estimated average hourly wage of the staff involved in the process.

The council member appointment process is an interagency task involving approximately 55 personnel from five Federal agencies. Ten Statewide nominations review panels involving approximately 32 agency staff conduct applicant and reference interviews and evaluate applicants. Each panel meets annually to evaluate applicants and prepare a written report of its findings and recommendations. Total estimated panel hours are 660 and estimated cost is \$14,500. An additional seven staff members coordinate the work of the 10 regional panels and attend two meetings; the estimated time and cost of their involvement are 290 hours and \$11,600. One staff member coordinates the entire process, provides training, and prepares two reports and the paperwork sent to the Secretaries of the Interior and Agriculture (160 hrs., \$5,300). The Interagency Staff Committee, comprised of 10 members who act as advisors to the Federal Subsistence Board and a solicitor who is a nonvoting member, selects the panel members and evaluates the information collected by the regional panels. The ISC meets annually to make recommendations to the Board. We estimate 490 hours for ISC involvement at a cost of \$5,400. The Federal Subsistence Board is comprised of five Federal agency regional directors, the chairman, and a solicitor who is a nonvoting member. The Board evaluates the information collected by the regional panels and meets annually to make recommendations to the Secretaries of the Interior and Agriculture. The estimated hours and costs for the Board are 70 hours and \$3,500.

We estimated the approximate travel costs (\$12,400) associated with attending panel meetings and the Board meeting based on the estimated transportation (\$550 avg. airfare) and per diem costs (\$40 avg.) for one travel day and an estimated 50% of panelists and coordinators and two Board members traveling.

Each year, we print approximately 1,600 application forms for distribution in a mass mailing and to send upon request. Printing and distribution costs for 1,600 application/nomination forms are approximately \$1,300 per year or \$.80 per copy. Support staff time and costs associated with cover design, the print contracting process, and mailing is approximately 5 hours and \$155.

The following table summarizes the estimated annual cost to the Federal Government associated with the use of FWS Forms 3-2321, FWS 3-2322, and FWS 3-2323.

	Hours	Costs
Printing/Distribution		\$ 1,300
Admin.Support	5	155
Panels	660	14,500
Coordinators	450	16,900
ISC	490	5,400
Board	70	3,500
Travel		12,400
Total	1,675	\$ 54,155

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The information that we plan to collect using the revised forms is identical to that collected on our currently approved forms. We have made several adjustments based on our experience during the last 3 years and the outreach we conducted during the renewal process for this information collection. We increased our estimate of burden hours for applicants who complete the application, but reduced the number of respondents as well as the burden hours for key contact interviews. This resulted in a reduction of 160 burden 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.

Not applicable. We do not publish the information that we collect.

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.

Not applicable. We will display the OMB control number and expiration date.

**18. Explain each exception to the certification statement identified in Item 19,
"Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.