

**Supporting Statement for Paperwork Reduction Act Submissions
Reindeer in Alaska, 25 CFR 243
OMB Control Number 1076-0047**

Terms of Clearance: None.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, 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 in Section A below. If an item is not applicable, provide a brief explanation. When statistical methods are used, Section B "Information Collection Employing Statistical Methods" must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

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.*

The Reindeer Industry Act of 1937, codified as 25 U.S.C. 500, directs the Secretary of the Interior to establish an Alaska reindeer industry for Alaska Natives only. The Act also provides the authority for monitoring non-Natives who purchase reindeer for various reasons. Without monitoring non-Natives who purchase reindeer, it would be impossible for the Bureau of Indian Affairs (BIA) to maintain the Native character of the Alaska reindeer industry, and to fulfill its responsibility.

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 data to be gathered is the minimum required to manage the use of reindeer by non-Natives, usually less than a page in length. The information was never intended for data collection and record keeping, such as might be necessary if we were doing statistical studies of the reindeer, but are essential for administering the trust responsibilities of the BIA for reindeer industry in Alaska.

Special Use Permit for Public Display of Alaska Reindeer

This permit authorizes the use of Alaska reindeer by non-Natives, is effective for 5 years, and spells out the conditions under which the permit is granted, including the requirement for an annual report. Information collected includes name and address of permittee, the number of reindeer that may be kept for public display, and the address where they will be kept.

Special Use Reindeer Report

The permittee may report that the reindeer has died, but no effort is made to enforce an annual report because the program is too small to spend much time on it. The usual number of special use permits is 2-3.

Sale Permit for Alaskan Reindeer

This sale permit authorizes the sale of reindeer to non-Natives. It lists the name and address of the permittee, the number of reindeer authorized for purchase, and the name and address of the seller.

Sale Permit Report

The bottom of the sale permit form is a report that permittees must provide within 30 days of the date of transfer. The report asks for the total number of reindeer acquired and the number butchered or shipped out of Alaska. If shipped, the permittee must provide the address to which the reindeer were shipped.

Generic Report

The University of Alaska occasionally prepares a report on their reindeer study. This is not a yearly occurrence.

- 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.].*

During December 2001, Indian Affairs (IA) was forced to disconnect from the Internet by a court order issued by the judge in the Cobell litigation. Hence, IA cannot implement GPEA until reconnection to the internet is completed.

When, or if, the Alaska Region of the BIA is allowed the use of the Internet, data for permits may be gathered by e-mail submissions from applicants. Final permits will continue to be signed by applicants. Except for special circumstances such as short time frames, original permits will continue to be used instead of facsimile copies.

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 Bureau of Indian Affairs is the only Federal agency required to oversee the reindeer industry in Alaska.

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

Reindeer herders are the only small businesses impacted by this collection and we reduced the impact on them by requiring collections of information only as it involves non-Natives. For the non-Native population, the information is minimal and designed to allow monitoring by the BIA.

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 collected is the minimum required to operate the program, as required by PRA; the Reindeer Industry Act of 1937 authorizes and directs DOI to organize and manage the reindeer industry or business to encourage a self-sustaining economy for Native Alaskans.

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.*

All required reports are either one-time submissions within 30 days of completing the permit requirements or annual reports. Only a single copy of any report is required and we do not

require the permittees to keep copies for themselves, which they may do for their own reasons. No confidential, statistical, or proprietary information is required in the reports.

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.*

The request for comments was published April 8, 2008 (73 FR 19094). There were no comments.

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.

Representatives of the BIA have consulted for the past decade with the Reindeer Herders Association and the Island Herders Association, the two Native reindeer herder associations, about their desired requirements for enhancing the reindeer industry in Alaska. Three years ago, regulations and the data gathering requirements were developed as a result of the consultations, and of discussions and consultations with non-Natives who interact with the Alaska reindeer industry. Because of the wide dispersion of permittees, please contact Warren Eastland at 907-586-7321, who can provide you contact information for a permittee.

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 to respondents.

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 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 statement.*
- * *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 estimate the dollar value of the annual burden hours to be \$92.41. We used the Bureau of Labor Statistics May 2007 State Occupational Employment and Wage Estimates (http://www.bls.gov/oes/current/naics4_999200.htm#b19-0000) to determine the dollar value of the burden hours [\$22.00 (mean hourly wage for all occupations in Alaska) multiplied by 1.4 to account for benefits equals \$30.80 per hour]. We calculated the benefits in accordance with BLS news release USDL 07-1883, December 11, 2007.

See item 14 for calculation of Federal salary costs.

Activity	No. of Responses	Completion Time per Response	Total Burden	\$ Value of Burden Hours @ \$30.80/hr	Federal cost @ \$55.79/Hr
Special Use Permit	2	10 minutes	20 minutes	\$10.27	\$ 18.60
Special Use Report	2	10 minutes	20 minutes	10.27	18.60
Reindeer Sale Permit	8	10 minutes	80 minutes	41.07	74.39
Reindeer Sale Report	8	5 minutes	40 minutes	20.53	37.19
Generic Report*	1	20 minutes	20 minutes	10.27	18.60
Totals	21	180 m (3 hrs)		\$92.41	\$167.38

* Occasionally, this report is prepared by the University of Alaska on their reindeer study but is not a yearly occurrence.

The Federal costs are shown in the above table to provide the information in one place.

13. *Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers 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 non-hour burden cost to respondents. Respondents may incur minimal costs for postage and an envelope. However, our toll-free number allows applicants to call the BIA office, thus, even applying and reporting need not be a cost.

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.*

We estimate the annual cost to the Federal Government to be \$340.38 (\$167.38 for salary costs and \$173 non-salary costs).

See item 12 for salary breakout. For salary costs, we used the Office of Personnel Management Salary Table 2008-GS to determine the hourly wage for a GS-11/step 10 (\$29.99) and multiplied by 24% (COLA for Juneau, Alaska), which equals \$37.19. We multiplied \$37.19 by 1.5 to account for benefits, or a total hourly wage of \$55.79. Benefits were calculated in accordance with BLS news release USDL 07-1883, December 11, 2007.

The non-salary costs of \$173 per year are extremely variable. We work with respondents who may be out of communication for periods of time which can lead to numerous follow-up calls. The phone calls, letters, and general follow-up that we have to do to get respondents to fill out

their permit would be incredible if we had more than a few requests during a year. Because of the remoteness of the Alaskan reindeer raising businesses and the comparative high cost of acquiring live reindeer from such operations, we do not anticipate the number of requests to increase.

15. *Explain the reasons for any program changes or adjustments.*

There are no changes or adjustments to the program.

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.*

We do not publish the information but may summarize for budget purposes.

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 the expiration date.

18. *Explain each exception to the certification statement identified in 5 CFR 1320.8(b)(3) and 5 CFR 1320.9.*

There are no exceptions to the certification statement.