

Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0120

Federal Subsistence Regional Advisory Council Membership Application, Nomination, and Interview Forms FWS Forms 3-2321, 3-2322, and 3-2323

Terms of Clearance. None.

1. Explain the circumstances that make the collection of information necessary.

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:

- Are residents of the region;
- Know the subsistence uses of and customs and traditions regarding fish, wildlife, and other renewable resources on public lands in the region;
- Know commercial, sport, and other uses of fish, wildlife, and other renewable resources on public lands in the region;
- Have proven leadership ability; and
- 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, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

We use FWS Forms 3-2321 (Federal Subsistence Regional Advisory Council Membership Application/Nomination), 3-2322 (Regional Advisory Council Candidate Interview), and 3-2323 (Regional Advisory Council Reference/Key Contact Interview) 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.

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 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 questions on the application form and provide an opportunity for discussion and gathering of detailed information that many respondents are not able to give in writing, because English is not their primary language.

FWS Form 3-2323 - review panel members 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 application and interview forms are available on our website. However, 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.

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, describe the methods used to minimize burden.

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 Board would not be able to make informed recommendations regarding appointments. In turn, the Secretaries would have less information when deciding whom to appoint. This could 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.

There are no special circumstances that require us to conduct this information collection in a manner that is inconsistent with OMB guidelines.

8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

On December 10, 2008, we published in the Federal Register (73 FR 75124) 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 February 9, 2009. We did not receive any comments in response to this notice.

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.]

The following persons completed the current OMB-approved application form during the 2009 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.

Robert Gibson, POB 650, Cooper Landing AK 99572, 907-595-6000
Merle Nancy Hawkins, 528 Deermount St., Ketchikan AK 99901, 907-225-2538
Jenny Pelkola, POB 227, Galena AK 99741, 907-656-1369
James Marcini, HC 60 Box 116, Copper Center AK 99573, 907-822-3961
Thomas Carpenter, POB 1663, Cordova AK 99574, 907-424-3354

All respondents stated that the collection of information was necessary and the instructions for completing the application form were clear. Most respondents said it took them about 1½ hours to complete the application form; however, response times varied from 1 to 4 hours. We believe our average of 2 hours for completion of the application is reasonable. Some respondents believed that the questions were redundant and could be simpler. We reviewed the application form and believe we only ask for the minimum information necessary for the Subsistence Board to make recommendations to the Secretaries of the Interior and Agriculture. We have not made any changes to the forms based on these comments.

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

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)."

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We receive approximately 75 applications annually. 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. We estimate that the time necessary to complete the form varies from 30 minutes to 4 hours with an average time of 2 hours. This includes time for reviewing instructions, gathering and maintaining data (including contacting potential references), and completing and reviewing the form. Candidate interviews take approximately 30 minutes each and reference and key contact interviews take approximately 15 minutes each.

We estimate the total dollar value of the burden on the public to be \$6,335. The Bureau of Labor Statistics May 2007 State Occupational Employment and Wage Estimates lists the mean hourly wage for persons in fishing, farming, and forestry occupations in Alaska as \$18.10 (http://www.bls.gov/oes/current/oes_ak.htm#b45-0000). We multiplied this rate by 1.4 to account for benefits (BLS news release USDL 07-1883, December 11, 2007), resulting in a total hourly cost factor of \$25.34. We used this same hourly rate for tribal officials (approximately 25) who may be contacted during the key contact interview process.

Form No.	No. of Respondents	No. Annual Responses	Average Burden Hours	Total Annual Burden Hours	\$ Value of Annual Burden Hours (\$25.34/HR)
FWS Form 3-2321	75	75	2.0	150	\$3,801
FWS Form 3-2322	75	75	0.5	38	963
FWS Form 3-2323	250	250	0.25	62	1,571
TOTAL	400	400		250	\$6,335

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

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

14. Provide estimates of annualized costs to the Federal Government.

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
Panels	660	\$ 39,277
Coordinators	450	26,780
Interagency Staff Committee	490	34,672
Board	70	6,884
Admin.Support	5	248
Travel		18,270
Newspaper/Radio/TV Ads		26,475
Printing/Distribution		1,100
Total		\$ 153,706

Salary Costs

The council member appointment process is an interagency task involving approximately 55 personnel from five Federal agencies. To calculate salary costs, we used the Office of Personnel Management Salary Table 2009-GS to determine the hourly rate for the average grades of staff involved in the application process. We multiplied each hourly rate by 23 percent (Cost of Living Allowance for Alaska). We multiplied the total of the salary rate and COLA by 1.5 to account for benefits (per BLS news release USDL 07-1883, December 11, 2007). Salary costs are as follows:

- 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 \$39,277 (GS-12 step 5 at \$59.51 per hour multiplied by 660).
- Six 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 \$17,258 (GS-12 step 5 at \$59.51 per hour multiplied by 290).
- 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. Total estimated hours are 160 and estimated cost is \$9,522 (GS-12 step 5 at \$59.51 per hour multiplied by 160).
- 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 \$34,672 (GS-13 step 5 at \$70.76 per hour multiplied by 490).
- The Federal Subsistence Board is comprised of five Federal agency regional directors/deputy 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 \$6,884 (GS-15 step 5 at \$98.34 per hour multiplied by 70).
- Support staff time and costs associated with cover design, the print contracting process, and mailing are approximately 5 hours and \$248 (GS-11 step 5 at \$49.64 per hour multiplied by 5).

Other Costs

Advertising – We estimate the cost of newspaper, radio, and television advertising to be \$26,475.

Travel - We estimate travel costs of \$18,270 associated with attending panel and Board meetings.

Printing and Mailing - Each year, we print approximately 1,400 application forms for distribution in a mass mailing and to send upon request. Printing and distribution costs for 1,400 application/nomination forms are approximately \$1,100 per year or \$.80 per copy.

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

Due to an error on the form 83I that we sent to OMB with our last renewal request, OMB approved 400 responses and 350 burden hours for this information collection. Our supporting statement indicated 600 responses and 350 burden hours. Based on our experience in administering this collection, we have decreased the number of responses to 400 and reduced the annual burden hours to 250. The time it takes to complete the forms remains unchanged.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

We do not publish the results of this information collection.

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 FWS Forms 3-2321, 3-2322, and 3-2323..

18. Certification.

There are no exceptions to the certifications required by 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).