

# **1Supporting Statement A**

## **Bureau of Indian Affairs Reindeer in Alaska 25 CFR 243**

**OMB Control Number 1076-0047**

**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 Reindeer Industry Act of 1937, 25 U.S.C. 500, directs the Secretary of the Interior to establish an Alaska reindeer industry for Alaska Natives only and provide 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 is collected to manage the use of reindeer by non-Natives, requiring the minimum information needed to administer the trust responsibilities of the BIA for the 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. The form must be signed and dated by the permittee and the Alaska Regional Director.

### Special Use Reindeer Report

The permittee reports when a reindeer has died. The information collected includes the date, permit number, permittee's name and mailing address, the number of reindeer in possession, number of reindeer that died within the year, and the cause of death. The report must be signed by the permittee and sent to the Alaska Regional Office.

### Sale Permit for Alaskan Reindeer

The Sale Permit and Report form are on a single form, containing two sections. The top section is for the Sale Permit for Alaska Reindeer. This 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. The form must be signed by the permittee and Alaska Regional Director.

### Sale Report for Alaskan Reindeer

The Sale Permit and Report form are on a single form, containing two sections. The bottom section is the Sale Permit Report for Alaska Reindeer. This is a report that the permittee 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.

- 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 forms are not presently available online, but there are plans to make the forms available on the Office of Trust Services website in the near future.

- 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 BIA is the only Federal agency required to oversee the reindeer industry in Alaska; therefore, the information is not duplicated in any other data collection.

**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 information collection 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.**

If this information collection is not conducted, BIA will not be able to carry out the responsibility provided in 25 U.S.C. 500 to monitor Alaskan reindeer.

**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 will apply to this collection.

**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.**

A 60-day notice for public comments was published in the Federal Register on November 18, 2011 (76 FR 71600).

We received two comments on the Federal Register notice. One commenter requested the application forms and additional information on this collection, which has been completed. The other comment was a general comment about the BIA and did not address the information collection. Therefore, we have not changed the collection in response to the comments received.

**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.**

The following persons were contacted 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: Geni Ellhause, Alaska Wildlife Foundation, telephone: (907) 225-3290; and Jo Frame, telephone: (907) 490-2152. In summary, both individuals concurred with the burden time to complete the forms. They felt the forms were clear and self-explanatory and had no issues with the frequency in which it is collected.

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

Respondents will not receive any payment, gift, or other remuneration for providing the information collection requirements.

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

There is no assurance of confidentiality provided to respondents in connection with the information collection requirements.

**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.

We do not request any information of 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.**
- \* **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.**

Annual reporting and record keeping for this collection of information is estimated to take approximately 5-10 minutes, for approximately 18 respondents, annually, which is based on previous experience and information received from the individuals consulted regarding this information collection. Therefore, the total annual estimated burden is 2 hours or the amount equivalent to \$59.

	<b>Hourly Salary</b>	<b>Benefits Multiplier</b>	<b>Total Hourly Salary</b>	<b>Time to Complete</b>	<b>Total<sup>2</sup></b>
<b>Civilian*</b>	\$20.91	1.4	\$29.27	2 hours	\$58.54
<b>Total</b>					<b>\$59.00</b>

<b>Activity</b>	<b>No. of Respondents</b>	<b>Time per Application</b>	<b>Total Time</b>
Special Use Permit	1	10 minutes	10 minutes
Special Use Report	1	10 minutes	10 minutes
Reindeer Sale Permit	8	5 minutes	40 minutes
Reindeer Sale Report	8	5 minutes	40 minutes
<b>Totals</b>	<b>18</b>		<b>100 m (approx. 2 hrs)</b>

<sup>1</sup>We have used the Bureau of Labor Statistics, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—September 2011 (released December 7, 2011), USDL 11-1718, as a guide for our estimates, including the benefits multiplier. See [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf).

<sup>2</sup>Total Cost is rounded to the nearest dollar.

**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 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 are no costs to consider, except for those that may use postage to submit the form which comes to a total cost of \$10.00 (rounded to the nearest dollar), with a cost of .56 cents per stamp and envelope for 18 respondents.

**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.**

The estimated hourly salary cost to the Federal government is \$36.40. The application review takes approximately 10 minutes for each application, and totaling an estimated 3 hours to review 18 applications.

Activity	Hourly Base Rate <sup>2</sup>	Benefits Multiplier	Hourly Rate including Benefits <sup>3</sup>	Time to Complete	Total
Review and Filing	\$36.40	1.5	\$54.60	3 hours	\$163.80

(GS-11/10) <sup>1</sup>						
					<b>Total</b>	<b>\$164.00</b>

<sup>1</sup>The estimated average salary for Federal government and tribal compacting employees performing these duties is at the GS-11, Step 10 (\$36.40/hour) level. The salary associated with this grade and step is based on the General Schedule 2011.

<sup>2</sup>Incorporates the Alaska locality pay according the General Schedule 2011.

<sup>3</sup>This salary, multiplied by 1.5 to cover benefits, equals a rate of \$54.60/hour. This benefits multiplier is inferred from the Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2011; USDL 11-1718.

The total estimated annualized cost to the Federal government is \$164.

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

There was a program change, increasing the number of forms from two to four, to accurately reflect the number of forms being used to collect this information. Initially, the two forms were divided into two sections. During the review for the renewal, the program office determined that each section should be an individual form. Also, adjustments were made to the hour burden to reflect the accurate number of respondents, reducing the number of respondents from 21 to 18.

**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.**

The information collection will not be published.

**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 intend to display the OMB Control Number and the expiration date.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

We are not seeking any exceptions to the certification statement.