# <sup>1</sup>Supporting Statement A for Paperwork Reduction Act Submission

### **OMB Control Number 1018-0141**

## ALASKA GUIDE SERVICE EVALUATION

Terms of Clearance. None.

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

We collect information to help us evaluate commercial guide services on our national wildlife refuges in the State of Alaska (State). The National Wildlife Refuge Administration Act of 1966, as amended (16 U.S.C. 668dd-ee), authorizes us to permit uses, including commercial visitor services, on national wildlife refuges when we find the activity to be compatible with the purposes for which the refuge was established. With the objective of making available a variety of quality visitor services for wildlife-dependent recreation on National Wildlife Refuge System lands, we issue permits for commercial guide services, including big game hunting, sport fishing, wildlife viewing, river trips, and other guided activities. We use FWS Form 3-2349 (Alaska Guide Service Evaluation) as a method to:

- (1) Monitor the quality of services provided by commercial guides.
- (2) Gauge client satisfaction with the services.
- (3) Assess the impacts of the activity on refuge resources.

The information that we collect, in combination with State-required guide activity reports and contacts with guides and clients in the field, provides a comprehensive method for monitoring permitted commercial guide activities. A regular program of client evaluation helps refuge managers detect potential problems with guide services so that we can take corrective actions promptly. In addition, we use this information during the competitive selection process for big game and sport fishing guides to evaluate an applicant's ability to provide a quality guiding service.

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.

The client is the best source of information on the quality of commercial guiding services. The information that we collect includes:

- Client name
- Guide name(s)
- Type of guided activity
- Dates and location of guided activity
- Information on the services received such as the client's expectations, safety, environmental impacts, and client's overall satisfaction.

We encourage respondents to provide any additional comments that they wish regarding the guide service or refuge experience, and ask whether or not they wish to be contacted for additional information.

We collect this information from clients identified on the guide activity reports. We mail FWS Form 3-2349 to clients and ask them to complete and return the form via mail, email, facsimile, or in person to the refuge office. We also accept responses over the phone. The form is available on the Service's forms website in a fillable and printable format.

The information collected normally remains with the appropriate refuge office. However, we may provide the information to Federal or State law enforcement agencies, or State licensing authorities as warranted. We will not release any information to the public except as required under the Freedom of Information and Privacy Acts.

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.].

FWS Form 3-2349 will be available on the Service's forms web page. We will accept completed forms via email. However, we only expect to receive about 10 percent of the responses electronically.

4. Describe efforts to identify duplication.

This information collection is specific to the client's experience with the guiding services received. No other office/agency collects this information.

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

This information collection is directed toward individuals who are clients of guiding services, and not 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.

If we do not collect this information, we would have difficulty monitoring the quality and effectiveness of guide services permitted on national wildlife refuges. By relying only on the occasional unsolicited feedback from clients, the refuge manager cannot evaluate a guide's performance with any degree of certainty. We collect this information only once upon conclusion of the guided activity.

- 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 collect this information in a manner 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.

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.]

On September 26, 2011, we published in the <u>Federal Register</u> (76 FR 59420) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on November 25, 2011. We received no comments.

We contacted the individuals (guide clients) below regarding their experience in completing the form. None indicated that that there were problems with availability of the information, or the clarity of the instructions. There was also no indication that our estimates of time to complete the form were inaccurate.

- 1. Dan Burton, 20 S. 1700 W., Kaysville, UT 84037. Phone 801-699-4554
- 2. Sheldon Alver, 1775 Vista Circle, Soda Springs, ID 83276. Phone 208-240-3312
- 3. Mark Rutherford, 4717 RT 27, Spring Creek, PA, 16436. Phone 814-563-2256
- 4. William Pace, Sr., 212 W. Harris Place, Eden, NC 27288. Phone 336-623-1189
- 9. Explain any decision to provide any payment or gift to respondents, other than

### remuneration of contractors or grantees.

We do not provide payment or gifts to respondents.

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

We do not provide any assurance of confidentiality 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.

We do not ask questions of a sensitive nature.

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

We estimate that we will receive 396 responses totaling 99 burden hours. We estimate the annual dollar value of the burden hours is \$4,851.99.

We expect to provide a total of 660 evaluation forms to clients each year, based on 110 guide permits with an average of six clients per guide permit each year. We estimate that 396 clients (60 percent) will complete and return the evaluation form, because they have a significant investment in the guide service. The requested information consists of 10 questions, none of which requires special information gathering. We estimate that the completion time per response will be 15 minutes, for a total annual burden of 99 hours.

We estimate the total dollar value of the burden on the public to be \$4,852 (rounded). The majority of the clients reside in States outside Alaska, and we expect that they have a slightly higher than average income level. We used USDL Bulletin11-1718, December 7, 2011, <a href="http://www.bls.gov/news.release/pdf/ecec.pdf">http://www.bls.gov/news.release/pdf/ecec.pdf</a>) to estimate wages and calculate benefits. Table 1 lists the wage for management, professional and related workers as \$35.01 per hour. We multiplied this rate by 1.4 to account for benefits, resulting in a total hourly cost factor of \$49.01.

ACTIVITY/REQUIREMENT	ANNUAL NO. OF RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HRS	TOTAL BURDEN COST TO PUBLIC (\$49.01/HR)
FWS Form 3-2349	396	396	15 minutes	99 hrs	\$4,851.99

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 to respondents associated with this information collection.

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

We estimate the total annual cost to the Federal Government for this information collection to be \$5,734 (rounded). We expect that 14 refuge headquarters offices will distribute an average of 47 evaluation forms and process an average of 28 responses per year. For each office, this would require 8 hours of processing time by a GS-11/1 employee, for a total of 112 hours. Salary rate for a GS-11/1 is \$30.04 per hour (source OPM Salary Table 2012-AK). Hourly rate including COLA (5.57 percent) and benefits (salary plus COLA multiplied by 1.5 as per BLS news release USDL 11-1718) is \$46.73. Total salary cost is \$5,233.76 (\$46.73 x 112 hours). In addition to salary costs, we estimate approximately \$500 for printing and mailing evaluation forms.

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

There are no program changes or adjustments.

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

This information collection is not subject to statistical analysis and will not be published. The information is solely for the benefit of the refuge manager in monitoring permitted commercial guiding activities on the refuge.

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.

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.