

**1 Supporting Statement A for  
Paperwork Reduction Act Submission**

**Annual Certification of Hunting and Sport Fishing Licenses Issued  
50 CFR 80, Subpart D**

**OMB Control Number 1018-0007**

**Terms of Clearance. None**

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

The Federal Aid in Wildlife Restoration Act (16 U.S.C. 669 et seq.) and the Federal Aid in Sport Fish Restoration Act (16 U.S.C. 777 et seq. except 777e-1) provide Federal assistance to the States for management and restoration of fish and wildlife. These Acts and our regulations at 50 CFR 80, Subpart D--Certification of License Holders, require that States and territories annually certify hunting and sport fishing license sales in order for the Fish and Wildlife Service (we, Service) to apportion funds under formulas provided in the Acts.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

Annually, States, the Commonwealths of Puerto Rico and the Northern Mariana Islands, the District of Columbia, and the territories of Guam, the U.S. Virgin Islands, and American Samoa (State grantees) complete FWS Form 3-154b to indicate the total hunting and fishing licenses issued and the dollar amounts involved. This summary includes all paid and nonpaid licenses, tags, stamps, and permits issued for hunting (both firearm and bow) and for sport or recreational fishing.

Grantees then take the data from FWS Form 3-154b, eliminate all duplicates, and use FWS Form 3-154a to certify the number of paid hunting and fishing license holders.

We have added instructions for the forms in response to outreach comments (see item 8).

We use this information to apportion funds to State fish and wildlife agencies under the Acts. During Fiscal Year 2015, we apportioned \$808,492,189 under the Wildlife Restoration Program and \$346,517,212 under the Sport Fish Restoration Program.

States, nonprofit organizations, and commercial entities use the information to track statistics and identify economic and participatory trends and anomalies. The information is available to the public on the Wildlife and Sport Fish Restoration Program Internet site at <http://wsfrprograms.fws.gov/>.

**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 Forms 3-154a and 3-154b are available online at <http://www.fws.gov/forms/> in a fillable format. Respondents can complete the forms online, and then must mail or email them to us. Prior to the FY 2013 apportionments, grantees could also submit the forms electronically

through iFAIMS, the Federal Aid Information Management System Internet site. These forms were fillable, fileable and signable. Historically, we have received approximately 50% of the information electronically. The iFAIMS system was decommissioned after the collection of the information for the FY 2013 apportionment. We expect to have our new electronic submission site (Wildlife TRACS) available by the time the next certification for FY 2017 is due. Wildlife TRACS will have the same functionality as iFAIMS for collecting license certification information.

**4. Describe efforts to identify duplication.**

There are no other forms that collect similar information.

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

We collect the data from State grantees only; therefore, there is no impact on small entities.

**6. Describe the consequence to Federal program or policy activities if the collection were not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Failure to submit these certifications may result in grant funds being partially or totally withheld pending receipt of the certifications.

**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. **If applicable, 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.**

On December 23, 2015, we published in the Federal Register (80 FR 79924) a notice requesting public comment on this information collection. The comment period ended on February 22, 2016. We received one comment in response to this notice. The respondent objected to the Wildlife Restoration Act, but did not address the information collection requirements. We did not make any changes to our requirements.

In addition to the Federal Register notice, we solicited input from:

Lee Rolle, State of Washington, Lee.Rolle@dfw.wa.gov  
Sherry Crouch, State of Arizona, scrouch@azgfd.gov  
Stacy Xenakis, State of Ohio, Stacy.Xenakis@dnr.state.oh.us  
Barry Sumners, State of Tennessee, Barry.Sumners@tn.gov  
Randy Curtis, State of New Hampshire, Randy.Curtis@wildlife.nh.gov  
Carl Magnuson, State of Kansas, carl.magnuson@ksoutdoors.com  
Tony Straw, State of California, tony.straw@wildlife.ca.gov

We asked:

- Whether or not the collection of information is necessary, including whether or not the information will have practical utility;
- The accuracy of our estimate of the burden for this collection of information;
- Ways to enhance the quality, utility, and clarity of the information to be collected; and
- Ways to minimize the burden of the collection of information on respondents.

*Comment:* Five commenters believed the collection of information is necessary and that the information has practical utility. Two commenters said the collection from Form 3-154a is necessary, but they were uncertain as to the value of information from Form 3-154b.

*Response:* The information we collect on Form 3-154b is valuable to internal and external users. We use the information from Form 3-154b for part of our analyses of the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. We also use this information to verify the reasonableness of numbers that the States certify on Form 3-154a. States regularly employ these numbers for their own purposes as they track resident versus nonresident hunters and anglers and their impacts on funding State programs. Additionally, we post this information on our Web site and use the information in news releases and to answer requests from Congressional offices, State agencies, conservation organizations, outdoor writers, and others.

*Comment:* Four commenters concurred with our estimates of the burden for this collection of information and believed that our estimates seem reasonable. Two commenters replied that our estimates are higher than what are required for this collection. One commenter reported that the estimates for the two forms should be reversed; i.e., 20 hours for Form 3-154a and 12 hours

for Form 3-154b. One commenter said at least 30 days is needed to complete the collection.

*Response:* We believe that, in aggregate, our estimate of the time burden for the collection of information is adequate based on the overall responses we received this year and from prior years. We do not believe that the estimates for the two forms should be reversed, based on the comments of the one commenter. Additionally, in the cover letter we send out to the States requesting the license certification, we allow State respondents at least 30 days to complete the information request.

*Comment:* Five commenters believed that the forms are clear and did not provide any suggestions to enhance the quality, utility, and clarity of the information to be collected. One commenter suggested that any changes in instructions on the forms should be explained clearly and examples will be useful to illustrate the changes made. One commenter suggested providing references to specific CFR on the forms for data calculations.

*Response:* Based on the majority of the comments, we believe that the forms are clear overall. Based on the comments of two of the respondents, we have added separate instruction pages for the forms that provide specific CFR references and examples to help users complete the forms.

*Comment:* Four commenters had no suggestions for ways to minimize the burden. One suggested that we provide the collection date and contacts information on the forms. One suggested that we allow States that provide public access to license sales data on their Web sites to only provide the URL on Form 3-154b.

*Response:* The instructions for the provide contact information. We do not believe that it would be practical to allow States to provide only the URL on Form 3-154b, due to the constant changes/updates on each State Web site. Furthermore, it may be difficult and unnecessarily time-consuming to attempt to extract the exact information we need from each State's Web site.

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

We do not provide any 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.**

There is no assurance of confidentiality. Once submitted, this form is public information and is not protected under the Privacy Act.

**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.**

None of the information collected on FWS Forms 3-154a and 3-154b is sensitive.

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

We estimate that 56 respondents will submit 112 annual responses totaling 1,792 burden hours.

The hour burden associated with the information collection varies with each respondent and depends significantly on whether or not the State has an automated process for issuing hunting and fishing licenses. We believe our estimates are reasonable and represent an average time to complete the forms. We based the hourly wage rate on the Bureau of Labor Statistics News Release USDL 16-0463, March 10, 2016 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). We used the professional and related category from Table 4 for State and local government workers, which stated an hourly rate of \$35.40. To calculate benefits, we multiplied the hourly rate by 1.5. The hourly rate including benefits is \$53.10. The total dollar value of the annual burden hours is \$95,155 (1,792 \* \$53.10) (rounded).

**Table 12.1 – Annual Burden Estimates**

ACTIVITY	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	ANNUAL BURDEN HOURS
FWS Form 3-154a	56	12 hours	672
FWS Form 3-154b	56	20 hours	1,120
TOTALS	112		1,792

**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.

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

We estimate that the total annual cost to Federal Government for processing these forms is \$2,102 (rounded). We used the Office of Personnel Management Salary Table 2016-DCB ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DCB_h.pdf)) to determine the hourly wage rate for a GS-13, step 5. To calculate benefits, we multiplied the hourly rate (\$50.04) by 1.5, resulting in an hourly cost factor of \$75.06. We will receive 112 responses annually, each of which takes approximately 15 minutes to process.

**Table 14.1 – Fish and Wildlife Salary/Benefits**

Action	Position and Grade	Hourly Rate	Hourly Rate including Benefits	Total Annual Hours	Annual Cost (rounded)
Review and process forms	Accountant GS 13/5	\$50.04	\$75.06	28	\$ 2,102
<b>Total</b>					<b>\$ 2,102</b>

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

There are no program changes or adjustments.

**16. For collections of information whose results will be published, outline plans for**

**tabulation and publication.**

The information collected is for grant administration purposes, and we do not formally publish the results. However, we do make the license data available on the Wildlife and Sport Fish Restoration Program Web site for use by the States and others.

**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 3-154a and 3-154b.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.