

# Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number 1085-0001**

**Conditions for Renewal: 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 of the Supporting Statement 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 Indian Arts and Crafts Act of August 27, 1935 (49 Stat. 891; 25 U.S.C. 305 et seq. 18 U.S.C. 1158-59 (the “act”), created the Indian Arts and Crafts Board (“the Board”). The Board is responsible for promoting the development of American Indian and Alaska Native arts and crafts, improving the economic status of members of Federally recognized Tribes, and helping to develop and expand marketing opportunities for arts and crafts produced by American Indians and Alaska Natives.

- 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.]**

This information clearance package is being submitted by the Indian Arts and Crafts Board (IACB) to request permission to collect information using a single Source Directory Business Listing Application for (1) new businesses – group; (2) new businesses – individual (3) renewal for businesses already listed – group; and (3) renewal for businesses already listed – individual. The form will be available on the Department of the Interior Indian Arts and Crafts Board website at [www.doi.gov/iacb](http://www.doi.gov/iacb), under the header Source Directory, then click on Source Directory Applications. The information collected will be used by the IACB: (a) to determine whether an individual or business meets the eligibility requirements for inclusion in the Source Directory of American Indian and Alaska Native owned and operated arts and crafts businesses, i.e., whether they are either an American Indian or Alaska Native owned and operated cooperative, Tribal enterprise, or nonprofit organization, or an enrolled member of a federally recognized American Indian Tribe or Alaska Native group; and (b) to identify the applicant’s business information to be printed in the Source Directory.

**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.]**

At this time, many Indian artisans do not have electronic capability for electronic filing. In addition, interested individuals and businesses must initially submit documentation supporting Tribal enrollment, which does not lend itself to electronic filing. However, the IACB will work to implement the use of electronic filing of the required information in the 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.**

No similar information is collected by other Federal agencies.

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

The Native American artisans that are included in the Source Directory are small businesses and being included in the Source Directory is voluntary and a means to further advertise their existing small business.

**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 is collected on an annual basis. If the information is conducted less frequently, the contact information for the businesses would not be current, i.e. addresses, telephone numbers etc. Also, information collected on an annual basis allows the IACB to add new businesses and delete defunct businesses to keep the publication current, accurate, and useful by the consumer.

**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.**

Guidelines in 5 CFR 1320.5(d) (2) are not exceeded.

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.**

**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 3 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.**

On November 3, 2017 the IACB published in the Federal Register ( 82 FR 51289) a notice requesting comments from the public regarding the need for the collection of information, the accuracy of the burden estimate, ways to enhance the information collection, and ways to minimize the burden on respondents. This notice gave the public 60 days in which to comment; however, no comments were received.

In addition, during the days of December 8 through December 29, 2017, the IACB engaged in consultation with three businesses from which information has been obtained, and they provided the following comments:

Owner from Cherokee Jewelry, in Indiana stated that it took no more than 15 minutes to fill the form out and the information that is requested is important for the vetting process and found nothing unclear on the form.

Owner from Regal Artist, LLC, Arlington, Virginia, reported it took no more than 10 minutes to complete the form and that the information requested was necessary. He did suggest making the form an online submission would be helpful.

A dealer from Elk Grove, California responded that the information that is collected is necessary and sufficient. She also responded that the application was processed in a timely manner and that it took no more than 15 minutes to fill the form out.

All of the respondents indicated that there were no problems with the format or the collection of

information.

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

Not applicable. No payments or gifts are provided to respondents.

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

Not applicable. No assurance of confidentiality is provided.

**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.**

Not applicable. Sensitive questions are not asked.

**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 Item 13 of OMB FORM 83-I.**
- \* 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.**

**a. Total Estimated Burden Hours**

This is a simple form, with business information requested, and a signed certification statement by the owner that they are the owner of the enterprise and an enrolled member of a federally recognized American Indian tribe or Alaska Native group. Average time to complete the forms and gather additional information as requested, i.e. tribal enrollment card, is 15 minutes, based on IACB experience and consultation with respondents. The frequency of response is annually. However, already-enrolled respondents are able to provide updates as desired to keep their information current. The average annual number of respondents/responses is 100; thus, the estimated total annual burden for these responses is 25 hours.

**b. Total Estimated Annualized Cost**

Using a wage factor of \$28.75 per hour, the cost for each respondent is \$7.18 for a total cost for all 100 respondents of \$718.00.

This hourly rate was derived by applying the Bureau of Labor Statistics (BLS) median wage for “Painters, sculptors, craft-artists, and artist printmakers” in 2016 which was \$23.45. This sum was rounded to derive the estimated \$23.00 per hour rate for this wage category. This is then multiplied by 1.25 to derive the amount including benefits. Multiplier based on BLS Employment Cost Index, October 2017, (<http://www.bls.gov/web/eci/echistrynaics.pdf>) Occupational Outlook Handbook,

**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.**

**a. Annualized Capital and Start-up Costs.**

Not applicable. There are no costs incurred beyond the customary and normal and administrative costs associated with handling. Respondent does not pay postage to return the application or renewal form. A self-addressed postage paid envelope is enclosed with the form application or renewal form.

**b. Operations and Maintenance Costs**

There are no significant or distinct non-wage operation or maintenance costs associated with compliance with the information requirement for this information.

**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.**

The IACB spends approximately 2 hours conducting a review and processing the updates required from the information per respondent.

The total burden hours for the IACB to process all responses is 2 hours x 100 responses = 200 hours.

The total estimated cost to the Federal Government is \$9,780.00

This sum is derived as follows: The typical worker processing responses has an average wage rate at the level of a GS 11, Step 1 employee. The current hourly wage rate for this level in the Washington-Baltimore area, where the work is accomplished, is \$32.60, [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf), which includes the locality pay for that geographical area before the application of a multiplier of 1.5 to determine benefits. (Multiplier based on BLS Employment Cost Index, October 2017, (<http://www.bls.gov/web/eci/echistrynaics.pdf>)). After this calculation, the hourly rate of Government cost is \$48.90. This amount multiplied by the estimated 200 hours yields the sum of \$9,780.00.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

There are no program changes or adjustments.

**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.**

Letters/Emails with renewal forms go out annually to current businesses listed in the Source Directory starting in January with deadline for return of renewal forms by the end of February.

Letters and applications will go out annually to businesses that have inquired about being listed in the Source Directory since 1998 and all other businesses that the staff believes might have an interest in being listed in the Source Directory in February with deadline for return of application forms by end of March.

In addition, the IACB web site posts the form that is used by individuals or groups seeking initial entry into the Source Directory; these may be received any time during the calendar year, as sent in by those responding to the web site. Similarly, the IACB web site posts the form to be used by individuals or groups seeking to update any information for the Source Directory. The form may thus be received at any time during the calendar year, as sent in by those responding to the web site.

Staff member review and processing of new entries, deletion of old entries and updating existing entries is done as the forms are received. Therefore, while there is a concentration of effort in April and May, when the bulk of responses are received, other responses are acted upon throughout the year.

Although formerly a paper publication was prepared, this has now been completely replaced by publication on the web, at [www.doi.gov/iacb](http://www.doi.gov/iacb).

Therefore, there is no longer a specific date for completion of annual publication, because the publication

on the Internet is kept current on an ongoing basis as entries are updated.

**17. If seeking approval to not display the expiration date for OMS approval of the information collection, explain the reasons that display would be inappropriate.**

The IACB will display the OMB control number and expiration date on the form.

**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.