

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## Native Youth Community Adaptation and Leadership Congress OMB Control Number 1018-New

**Terms of Clearance:** This is a request for a new OMB control number (existing collection in use without an OMB control number).

### Justification

#### 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The U.S. Fish and Wildlife Service (Service, FWS, we) offers eligible Native American, Alaskan Native, and Pacific Islander high school students the opportunity to apply for the Native Youth Community Adaptation and Leadership Congress (Congress, NYCALC). The mission of the Congress is to develop future conservation leaders with the skills, knowledge, and tools to address environmental change and conservation challenges to better serve their schools and home communities. The Congress supports and operates under the following authorities:

- Executive Order (EO) 13175, "Consultation and Coordination With Indian Tribal Governments" (November 6, 2000);
- EO 13515, "Increasing Participation of Asian Americans and Pacific Islanders in Federal Programs" (October 14, 2009);
- EO 13592, "Improving American Indian and Alaska Native Educational Opportunities and Strengthening Tribal Colleges and Universities" (December 2, 2011);
- Public Law 116–9, Section 9003, "John D. Dingell, Jr. Conservation, Management, and Recreation Act" (March 12, 2019);
- 16 U.S.C. § 1727b, Indian Youth Service Corps;
- White House Memorandum on Government-to-Government Relationships with Native Governments (September 27, 2004);
- Department of the Interior Secretarial Order (SO) 3206, "American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act" (June 5, 1997);
- SO 3317, "DOI Policy: Department of the Interior Policy on Consultation with Indian Tribes" (December 1, 2011);
- SO 3335, "Reaffirmation of the Federal Trust Responsibility to Federally Recognized Indian Tribes and Individual Indian Beneficiaries" (August 20, 2014); and
- Service Policy 520 FW 1, "Native American Policy" (January 20, 2016).

The weeklong environmental conference fosters an inclusive, meaningful, educational opportunity for aspiring Native youth leaders interested in addressing environmental issues facing Native American, Alaskan Native, and Pacific Islander communities. Eligible students—representing a diverse mix of Native communities from various geographic locations, both urban and rural—compete for the opportunity to represent their Native communities from across the country. The students learn about environmental change and conservation while strengthening their leadership skills for addressing conservation issues within their own Native communities.

The following Federal partners assist and support the Service's administration of the Congress:

- The U.S. Department of the Interior –
  - Bureau of Indian Affairs;
  - Bureau of Land Management;
  - National Park Service;
  - United States Geological Survey;
- The U.S. Department of Agriculture – U.S. Forest Service;
- The U.S. Department of Commerce – National Oceanic and Atmospheric Administration;
- The Federal Emergency Management Agency; and
- The National Aeronautics and Space Administration.

**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.**

Through a cooperative agreement with the New Mexico Wildlife Federation (NMWF), the Service solicits and evaluates applications from eligible students interested in applying for the program. The NMWF notifies successful applicants and arranges all travel for them. Information collected from each applicant via an online application administered by the NMWF includes:

- Applicant's full name, contact information, date of birth, and Tribal/community affiliation;
- Emergency contact information for applicant;
- Name and contact information of applicant's mentor;
- Applicant's school name and address;
- Applicant's current grade in school;
- Applicant's participation in extracurricular activities, school clubs, or community organizations;
- Applicant's volunteer experience; and
- Applicant's accomplishments or awards received.

Each applicant also provides essay responses to questions concerning topics such as environmental issues affecting his or her home/Tribal community, how or whether the environmental issues are addressed, and/or how, as a Native youth leader, he or she can lead the community in adapting to a changing environment.

Successful applicants must also provide basic medical information using FWS Form 3-2525 to assure their health and safety while on site at the National Conservation Training Center for the Congress. The on-site nurse maintains this strictly confidential information for use only during an emergency (see privacy determination in question 9). The information collected via Form 3-2525 includes:

- Name, nickname, date of birth, and age;
- Health insurance information;
- Physician name and phone number;
- Medication information;
- Drug sensitivities/allergies;
- Date of last tetanus shot;
- Pre-existing conditions;
- Food allergies; and

- Parent/emergency contact name and phone number.

We use this information for the application and selection process and to ensure the safety of NYCALC participants.

**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.**

Currently, we expect most applicants will submit information to the Service online via Google forms. We will also accept documents as an email attachment or via fax. We estimate receiving approximately 100% of submissions electronically.

**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.**

There is no duplication. The information collected is specific to the NYCALC. Due to the unique nature of this program, no other Federal agency collects this information from the public.

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

This information collection does 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.**

If we did not collect the information, the Service would be unable to review candidates for the selection process to attend NYCALC.

**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 requiring collection of the information in a manner inconsistent with OMB guidelines.

**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 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.

On May 26, 2020, we published in the *Federal Register* (85 FR 31543) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 27, 2020. We received the following comments in response to that notice:

**Comment 1:** Comment received via email from Jean Public on May 26, 2020 – Commenter believes taxpayer funds associated with the Native Youth Community Adaptation and Leadership Congress (NYCALC) Program should be used only for Alaska Natives.

**Agency Response to Comment 1:** No action was taken, as the NYCALC program is already open to Alaska Natives, with a strong emphasis on recruitment from Alaska.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals (private citizens) who are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

***“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”***

Comments: Students provided no specific responses; they expressed no concerns with the information collection.

Agency Response/Action Taken: No action required.

***“The accuracy of our estimate of the burden for this collection of information”***

Comments: Students commented there was no burden in filling out the paperwork

Agency Response/Action Taken: No action required.

***“Ways to enhance the quality, utility, and clarity of the information to be collected”***

Comments: Students provided no specific responses

Agency Response/Action Taken: No action required.

And

***“Ways to minimize the burden of the collection of information on respondents”***

Comments: Students had no comment to make regarding this

Agency Response/Action Taken: No action required.

Despite multiple attempts by email (6/8 & 6/14) and once by phone (6/17), we received no response from 7 of the individuals contacted.

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

We will not provide any 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 will not provide any assurance of confidentiality. The NMWF collects and maintains all applicant and attendee information and shares with the Service on official need-to-know basis to help run the conference. For example, in the case of an emergency, the NMWF may share attendee medical information with the nurse on staff at NCTC.

The Service’s Associate Privacy Officer (APO) determined this collection does not require a Systems of Records Notice or a Privacy Impact Assessment. We completed the required Privacy Threshold Analysis (PTA), approved by the Service’s APO on January 8, 2020. We provided a copy of the PTA to OMB via ROCIS as a supplemental document.

If and when information collected from a participant by the NMWF is provided to the Service, responsibility for the protection of the FWS copy of the information is transferred to FWS and it becomes the agency’s responsibility to protect that information and any derivative copies as required by Federal law, including the Privacy Act of 1974, and DOI regulation.

**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 will not ask any questions of a 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.

We anticipate receiving **205 annual responses** and **470 annual burden hours** (rounded). The total dollar value of the annual burden hours is approximately **\$17,733** (rounded).

We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release [USDL-20-1232](#), June 18, 2020, Employer Costs for Employee Compensation—March 2020, which lists the hourly rate for all workers as \$37.73, including benefits.

**Table 12.1**

Requirement	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours*
NYCALC Application	105	4 hours	420	\$ 37.73	\$ 15,846.60
NYCALC Student Medical Information	100	.5 hours	50	37.73	1,886.50
<b>Totals:</b>	<b>600</b>		<b>150</b>		<b>\$ 17,733.10</b>

\*Rounded

**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 is no non-hour cost burden associated with this information collection.

**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 total estimated cost to the Federal Government for processing and reviewing reports from States as a result of this collection of information is **\$2,056**. This estimate includes FWS salary and benefits only; no other costs are associated with this information collection.

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2020-DCB](#) as an average nationwide rate. The salary rate for a GS-09, step 5 is \$32.33. In accordance with BLS News Release [USDL-20-1232](#), we multiplied the annual salaries by 1.59 to account for benefits resulting in a fully burdened rate of \$51.40. We estimate the total time spent on the information collection to be 40 hours. We multiplied this rate by 40 hours for a work week to get \$2,056.

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

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**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 we will collect 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.**

Not applicable.

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

There are no exceptions to the certification statement.