

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Source Directory of American Indian and Alaska Native
Owned Arts and Crafts Businesses
OMB Control Number 1085-0001**

Terms of Clearance: None.

Justification

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

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 (IACB). The IACB 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.

The Source Directory is a listing of American Indian and Alaska Native owned and operated arts and crafts businesses that may be accessed by the public on the IACB’s website <http://www.doi.gov/iacb>. The service of being listed in this directory is provided free-of-charge to members of federally recognized tribes. Businesses listed in the Source Directory include American Indian and Alaska Native artists and craftspeople, cooperatives, tribal arts and crafts enterprises, businesses privately owned-and-operated by American Indian and Alaska Native artists, designers, and craftspeople, and businesses privately owned-and-operated by American Indian and Alaska Native merchants who retail and/or wholesale authentic Indian and Alaska Native arts and crafts. Business listings in the Source Directory are arranged alphabetically by State.

The Director of the IACB uses this information to determine whether an individual or business applying to be listed in the Source Directory meets the requirements for listing. The approved application will be printed in the Source Directory. The Source Directory is updated as needed to include new businesses and to update existing information. Applicants or current enrollees submit Form DI-5001, “Source Directory Business Listing Application” which collects the following information:

- Type of listing they are applying for:
 - New listing;
 - Renewal/changes;
 - Individual; or
 - Group.

- Business name;
- Manager and owner name, along with tribal affiliation; and
- Tribal or group affiliation of signer.

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 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 September 17, 2020, we published in the *Federal Register* (85 FR 58069) 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 16, 2020. We did not receive any comments in response to that Notice:

In addition to the Federal Register Notice, we consulted with the seven (7) individuals identified in Table 8.1 who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Table 8.1

Organization	Title
Still Plays with Dolls & West Native Dolls	Owner
Heather Sapp	Owner
Essence of the Plains, LLC	Owner
Johnnie Diacon Art	Owner
My Sticks N Stones Shop	Owner
Martha's Vineyard Native	Owner
Native Designs by Dana	Owner

“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: Yes, the information is necessary.

Agency Response/Action Taken: No action needed, continue to collection information.

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

Comments: Participants felt that the questions were relevant, and a person could provide little information or more detailed if they preferred.

Agency Response/Action Taken: No action needed.

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

Comments: Two participants had no suggestions, one participant suggested we first ask for tribal enrollment document then verify with tribe if needed. Another participant suggested we include the tribal enrollment number directly on the Source Director application.

Agency Response/Action Taken: The IACB already requires applicants to submit their official tribal enrollment documentation, along with the Source Directory application, to show that they are enrolled in a federally recognized tribe. Adding a place on the Source Directory application for an applicant to include their tribal enrollment number would be a duplication of PII information since the official tribal enrollment documentation is required to verify the applicant is a member of a federally recognized federal tribe.

And

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

Comments: No suggestions provided.

Agency Response/Action Taken: No action needed.

We reached out to a total of nine individuals. Of the nine, seven responded. We followed up with the other two individuals on December 1 and December 4, 2020 and received no response from them.

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.**
- * **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 estimate that we will receive **100 responses** totaling **25 burden hours**. We estimate the annual dollar value of the burden hours is **\$885** (rounded).

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.

To calculate the cost of the total annual burden hours, 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 private sector workers as \$35.34.

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours
Source Directory of American Indian and Alaska Native Owned and Operated Arts and Crafts Businesses							
Private Sector	100	1	100	15 minutes	25	\$ 35.34	\$ 883.50

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.

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.

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 is **\$12,440**. To calculate salary costs, we used Office of Personnel Management Salary Table [2020-DCB](#) to obtain the most up-to-date wages for staff (GS-11/05). To account for benefits, we multiplied the hourly rate of \$39.12 by 1.59 in accordance with from BLS News Release [USDL-20-1232](#), June 18, 2020, Employer Costs for Employee Compensation—March 2020, to obtain a fully burdened rate of \$62.20.

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 200 hours (2 hours x 100 responses). The hourly rate of \$62.20 multiplied by the estimated 200 hours yields the sum of \$12,440.

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. 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 is 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.

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 OMB 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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.