

1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Alaska Guide Service Evaluation OMB Control No. 1018-0141

Terms of Clearance: None.

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

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, 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 client is the best source of information on the quality of commercial guiding services. The information that we collect via FWS Form 3-2349, "Alaska Guide Service Evaluation" includes:

- Client name;
- Name of guide on contract (if available);
- Name(s) of guide(s) that assisted in the field;
- Type of guided activity;
- Dates and location of guided activity;
- Information on the services received such as:
 - o Whether the guide services were provided as advertised or represented;
 - o Whether the client had any safety concerns;
 - o Whether the client felt the guide took appropriate actions to minimize impacts on the environment;

- o Client's overall satisfaction;
- o Any additional comments that they wish to provide; and
- o Whether or not they wish to be contacted for additional information, to include their preferred method of contact if they respond yes.

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, printable, 508-compliant 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 and/or allowed under the Freedom of Information and Privacy Acts.

Planned Review for Possible Changes in FY21/FY22

The Service is actively reviewing the current evaluation form to identify ways to improve the information collected to:

- Provide more quantifiable and defensible data;
- Provide statistical data for each completed and submitted form;
- Provide more quantifiable rather than qualitative information; and
- Translate the client responses into useful information in order for refuge management to make informed decisions.

As part of this process, the Service will provide the State of Alaska ANILCA Coordinator with a copy of the proposed new guide form (tentatively assigned FWS Form 3-2538, "Alaska Guide Service Evaluation) for review/comment. The Service initially planned to submit FWS Form 3-2538 to OMB for approval to conduct usability testing under OMB Control No. 1090-0011, "DOI Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery," in time to pretest it during the 2020 Alaska guide season. However, the pandemic significantly limited the number of guide trips during the 2020 guide season necessitating the usability testing be conducted during the 2021 Alaska guide season (and possibly the 2022 season). At the conclusion of the usability testing (once approved by OMB under Fast Track, the Service will evaluate all feedback of the new evaluation form to determine whether additional updates need to be made to it. At that time, we will begin the process to initiate a revision to this information collection by publishing the required notices in the *Federal Register* announcing to the public our intention to submit the final evaluation form to OMB for approval prior to the calendar year 2023 Alaska guide season.

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 is available on the Service's forms web page. We will accept completed forms via email or fax. However, we only expect to receive about 10 percent of the responses 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.

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 any 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. 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 August 26, 2020, we published in the *Federal Register* ([85 FR 52631](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on October 26, 2020. We received no comments in response to that notice.

In addition to the *Federal Register* Notice, we consulted with the nine (9) individuals identified in Table 8.1 who are familiar with this collection of information in order to validate our time burden estimates and asked for comments on the questions below:

Table 8.1

Organization	Title
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Client of big game guide service
N/A	Private citizen
N/A	Private citizen

“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: The collection of information was all necessary.

Agency Response/Action Taken: No action required.

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

Comments: To complete the survey required about 15-20 minutes.

Agency Response/Action Taken: The estimated time is within the Service’s estimate. No action required.

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

Comments: Make the evaluation questions more succinct.

Agency Response/Action Taken: The Service has been updating the evaluation questions and will submit them to OMB for approval to pretest under OMB Control No. 1090-0011. Due to the pandemic, there have been fewer guided visitors on Alaska refuge lands necessitating the pre-testing be conducted during the 2021 Alaska guide season and possibly the 2022 season. The updated questions and implementing pre-testing will 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”

Comments: Use electronic submission. Collect information automatically when submitting responses electronically.

Agency Response/Action Taken: The Service’s Human Dimensions Branch will be creating an approved website to electronically provide the guided clients the updated form. In that manner, their responses will automatically be collected and stored digitally. This method will minimize the burden of the collection of information on guided clients.

Additional comments received during the outreach:

Comments: I love hunting in Alaska; keep up the good work. No issues.

Agency Response/Action Taken: No action required.

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 assurances of confidentiality. This collection does not constitute a system of records under the Privacy Act of 1974 because the records are not retrieved by a unique identifier assigned to an individual. However, the following System of Records Notice is applicable: Correspondence Control System, FWS-27 (May 28, 1999, [64 FR 29055](#); modification published June 4, 2008, [73 FR 31877](#)). Further information regarding how FWS handles contact information from visitors and survey respondents is available in the FWS Privacy Impact Assessment (PIA) for Contact Information (attached).

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 do not ask 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 estimate that we will receive **264 responses** totaling **66 burden hours**. We estimate the annual dollar value of the burden hours is **\$2,521** (rounded).

The majority of the clients reside in States outside Alaska; therefore, we used the of Bureau of Labor Statistics (BLS) News Release [USDL-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020, as a nationwide average. Table 1 lists the hourly rate for all workers as \$38.20, including benefits.

Requirement	Number of Annual Respondents	Number of Responses Each	Total Number of Annual Responses	Average Completion Time per Response	Total Annual Burden Hours	\$ Value of Annual Burden Hours (\$38.20/Hour)
Form 3-2349	264	1	264	15 minutes	66	\$ 2,521.20

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 to respondents 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.

We estimate the total annual cost to the Federal Government for this information collection to be **\$2,896** (rounded). We expect that 14 refuge headquarters offices will distribute an average of 29 evaluation forms and process an average of 18 responses per year. For each office, this would require 3 hours of processing time by a GS-11/5 employee, for a total of 42 hours. The hourly rate for a GS-11/5 is \$38.87 (OPM Salary Table [2020-AK](#)). To account for benefits, we multiplied the hourly wage by 1.59 in accordance with BLS News Release [USD-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020, resulting in an hourly cost factor of \$61.80. Total salary cost is \$2,595.60 (\$61.80 x 42 hours). In addition to salary costs, we estimate approximately \$300 for printing and mailing evaluation forms.

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

We are not reporting any 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.

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

There are no exceptions to the certification statement.