JUSTIFICATION FOR NO MATERIAL/NONSUBSTANTIVE CHANGE

Eagle Take Permits and Fees, 50 CFR 22
OMB Control Number 1018-0167

This nonsubstantive change request submission is in response to necessary updates to FWS Form 3-200-15a identified by the National Eagle Repository (NER) staff allow the requested information about an order to be better visible and better organized:

- Clarification of item categories available and how to order combinations of items has been improved by the information changes on the form. This lessens any burden to the applicant to have to call or email the repository prior to submission for clarification of how to order the specific items the applicant needs for religious use.
- The changes to the Age/Species portion of the form allow the applicant to obtain more accurate customer service from the repository regarding current wait times. Applicants must select only one option from either category, the wait time list posted online will better correlate to the selections the applicant made.
- Instructions on which pages to include with the form is clarified directly after the signature line to help alleviate the return of the form due to it being incomplete upon receival at the repository.
- Reorganization of the information being requested on the form allows improved clarification of categories and required fields necessary to process an application/order in a timely manner.

Specific Changes:

- In the header section under the Department seal, we moved the "Before Filling Out" section to the left from the middle of the document to make it easier to see versus being buried in the text.
- In the header section under Department logo's, we moved "Type of Activity" part to the center of the header to allow the applicant to see the division of types of orders more easily.
- We removed "Limited to one pending order at any given time" from "Description of Requested Material" section and placed it after the "Reorder" checkbox at the top of the page to make the information more readily visible so it cannot be missed as it was previously in the body of text in the order section.
- We added two check boxes side by side for the "Inmate Specific Data" section instead of one above the other in the first box for "New Incarceration" to improve readability when checking the appropriate box for the corresponding circumstance.
- We grayed out box downsized in "Official Use Only" section to highlight "Dates Received, Completed, Permit Issued" as it is for repository use only.
- We moved the field "There is no processing fee for the permit." from signature block verbiage to bottom right corner of page 1. It is now more visible than in the verbiage of the signature block to make it clear to the applicants there is no fee for this permit within ePermits system.
- We shortened the wording under "Before filling out this form" section to read: *Please see Instructions and Frequently Asked Questions*. We removed "please access and print (if necessary) the Frequently Asked Questions and from Instructions. Please retain the "Notices" page for your records." There is no need to print out the forms if they have

access to them and must verify on page 2 that they read them. The "Notices" part is not always kept by the applicant as the repository gets that part attached to the application when received in office.

- We updated fields "Home Phone Number" and "Cell Phone Number" to read "Primary Phone Number" and "Secondary Phone Number." The applicant currently enters the same phone number for both home and cell phone number so this update will clarify which phone number is the primary number to reach the applicant and any secondary phone numbers (either landline or cell phone).

- We changed the wording in block of Tribe Name to read "Full Name of U.S. Federally Recognized Tribe." The NER only provides items for religious use to members of U.S. Federally recognized Tribes.

- We removed category option of "Either" out of "Species" and "Age" sections. The applicant only has two options of Species and Age; it is either one or the other but not both. This change also clarifies the options so applicants do not select either and then have no way of knowing which eagle they are waiting on the list for. The current wait times list does not include "either" as a category for parts or whole birds. Applicants do not know what their approximate wait time for the order is without a category.

- We separated the Section 2 category of Loose Feather Requests. The fields "Include Plumes" and "Plumes Only" are check boxes to better clarify the options of adding them to either feather category only. This change will clarify for the applicant that it can be added to either category of loose feather orders only. It does not apply to the entire order and any category as its previous location on the form indicated and as applicants filled out assuming it would be its own category. This will also help to clarify the loose feather categories from each other individually, as both cannot be requested in the same order.

- We added "Plumes Only" options to "10 Quality" and "20 Miscellaneous" sections. Applicants have the option to request "only plumes" for the feather request categories not just to include them with the loose feather requests. This change allows a place for that designation. Applicants previously had to indicate that request by writing it on the form someplace visible to the repository or request upon order verification. If it was missed or the applicant forgot to mention it, the repository does not automatically send feathers.

- We moved "Section 3: Parts" section below Sections 1 and 2 from previous location next to "Items" category under Section 1. We removed "Note: Parts cannot be added to whole eagle orders." from verbiage in Section 1. These changes allow more space for the "Other" option to be filled out. The line available to the applicant was very small and could not be filled in properly due to the location on the page. The instruction that "Parts to be included with order or ordered separately" was added to better clarify how to order the parts in the same order the applicant is placing. It also helps to alleviate any confusion on what can be ordered together or separate. These changes make the information more easily visible for the applicant and allows more space for Sections 1 and 2.

- Legal penalty code added to verbiage in signature line block. It is only mentioned on Page 3 in "Certification of Enrollment" and was not visible to the applicant if they are not filling out that page.

- We removed the red instruction box in center of page and clarified the instructions under the Signature Line block. The current wording is confusing and the red text is not 508 compliant. This section clarifies for the applicant which pages of the form need to be included to submit to the repository.

- In the header, under Section 2 block, we added the "Loose Feather Request" keeping "(Please select ONE)" in view here instead of in the body of the instructions for Section 2

to improve the visibility and better organized the explanation of section 2 for the applicant.

- We removed "(mm/dd/yyyy)" from under the "Date of Signature" field in the signature block. This field is not required and does not have to be in bold lettering.
- We changed the field "Full Name of Federally Recognized Tribe" on page 3 to match page 1 "Full Name of U.S. Federally Recognized Tribe." The NER only provides items to enrolled members of U.S. Federally recognized Tribes. This change clarifies applicants applying from other countries or other entities do not qualify to receive eagles/feathers from the NER.
- We removed the word "Tribe" from after the line asking for the full name of Federally recognized Tribe on page 3 because the names of some Tribes published in the *Federal Register* do not include "Tribe" at the end of their title. This change allows the applicant to designate the correct Tribal name without the prompt of the name containing the word "Tribe" at the end.
- We changed wording in "Applicant" instructions at bottom of page 3 to read "…and mail all pages…" instead of "…mail them… " to clarify for the applicant what is to be mailed to the repository.