

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

NATIVE YOUTH CLIMATE ADAPTATION LEADERSHIP CONGRESS OMB Control Number 1018-0176

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.

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.

Application Form (Online Form – No Form Number)

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.

Form 3-2525, “Native Youth Community Adaptation and Leadership Congress - Student Medical Information”

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.

Form 3-2546, “Enrollment Form,” is used to verify student’s eligibility for NYCALC; information is used to register student for NYCALC. Form 3-2546 collects the following information:

- Applicant’s full name, address, and contact information;
- Parent/guardian name and contact information;
- Student’s age, date of birth, and sex;
- Student’s high school year;
- Student’s high school name, address, and contact information; and
- Chaperone name.

Form 3-2547, “Parental Consent Form,” is used to gain parental consent for student’s attendance in NYCALC & to verify eligibility for program. Form 3-2547 collects the following information:

- Name of student and date of birth;
- Student address, school, grade, and contact information; and
- Student’s physician name, address, and contact information.

Form 3-2548, “Student Conduct Agreement,” is used to confirm student understands their role in NYCALC. Form 3-2548 collects the following information:

- Student’s full name and preferred name;
- Student signature and signature date; and
- Parent/guardian name, signature, and signature date.

Form 3-2549, “Mentor Waiver,” is used to release the contractor from damages and losses. Form 3-2549 collects the following information:

- Mentor name;
- Mentor signature and signature date;
- Emergency contact name and contact number.

We use this information for the application and selection process and to ensure the safety of NYCALC participants. We require successful students to provide basic medical information so that we can assure their health and safety while on site at the National Conservation Training Center. The on-site nurse keeps this information strictly confidential, for use only in an emergency.

PROPOSED REVISIONS

With this submission, the Service proposes the following new and revised requirements to the currently approved information collection:

1. **(Revision) Student Enrollment Information Form (Form 3-2546)** – We propose to revise Form 3-2546, Student Enrollment Information Form, to expand options for providing gender identity.
2. **(New) Travel Information (Form 3-2570)** – We propose to add Form 3-2570, Travel Information, which collects travel and personal identification information for students

attending the Congress. This new form will collect the following information:

- Name, contact information, date of birth, and group/school/community name for chaperone;
- Identifying information for groups' participants, to include name, date of birth, phone number, and gender (required by airline);
- Airport information;
- Special travel needs;
- Address for travel stipend payments; and
- Additional comments or questions.

3. **(New) Junior Faculty Competitive Nomination Form (Form 3-2571)** – We propose to add Form 3-2571, Junior Faculty Competitive Nomination Form, which collects nominee information, to include name, address, email, phone number, affiliated organization (sponsoring organization information), and a copy of the nominee's resume. We also ask the college-aged junior faculty to complete a Competitive Nomination Form (as part of the review and selection process). The Junior Faculty Competitive Nomination Form collects the following information:

- Student's full name;
- Student's Tribal affiliation;
- Student's phone number;
- Student's email address;
- Student's affiliated/sponsoring organization; and
- Affiliated/sponsoring organization address.

The Junior Faculty Competitive Nomination Form also includes the following four questions, which allow applicants to describe their interest in being nominated for the program:

- What are strengths that you can bring to share with the other junior faculty and larger Congress community?
- How do you hope to grow by participating in Congress?
- What would you like to learn or what opportunities are you looking for?
- What change do you hope to make or impact do you hope to have in your home community?

4. **(New) Adult Enrollment and Emergency Contact Form (Form 3-2572)** – We propose to add Form 3-2572, Adult Enrollment and Emergency Contact Form, which collects emergency contact information, should an event occur where we need to contact outside individuals related to the participant. We also ask the college-aged Junior Faculty to complete a Competitive Nomination Form (as part of the review and selection process) and an Adult Enrollment and Emergency Information Form once selected. The Adult Enrollment and Emergency Contact Form collects the following information (once the student has been accepted):

- Student's full name and preferred name/nickname;
- Student's full home address;
- Student's email address;
- Student's phone number;
- Student's affiliated/sponsoring organization's name and POC;

- Affiliated/sponsoring organization's address;
- Affiliated/sponsoring organizational POC's phone number and email;
- Student's nearest airport (for travel coordination);
- Student's person to notify in case of emergency;
- Student's person to notify phone number and email; and
- Additional information to be aware of (open ended).

5. **(Revision) Update to Title of Collection** – We updated the title of the collection to “Native Youth Climate Adaptation Leadership Congress” (previously “Native Youth Community Adaptation and Leadership Congress”).

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 March 10, 2023, we published in the *Federal Register* ([88 FR 15063](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 9, 2023. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-NCTC-2023-0007](#)) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We did not receive any comments in response to that notice.

On August 18, 2023, we published in the *Federal Register* ([88 FR 56644](#)) a notice to extend the comment period for this renewal. In that notice, we solicited comments for an additional 60 days, ending on October 17, 2023. We again published the *Federal Register* notice on Regulations.gov (reopening the comment period in the original Docket No. [FWS-HQ-NCTC-2023-0007](#)) to provide the public with an additional opportunity to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received one comment which did not address the information collection requirements. No response to that comment is required.

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

Organization	Title
Private citizen	Community Mentor
Private citizen	Former Participant

“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”

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

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

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

Comments: As a mentor for students who have attended NYCALC, the commenter feels the collection of the information is necessary for liability and emergencies. The commenter further stated the collection did not require much time to complete the forms associated with being a mentor. They did not have any suggestions to enhance the quality, utility, and clarity of the information collected. They also did not have any suggestions for minimizing the burden of information collection, as they didn’t feel it was much of a burden on them. The commenter added that NYCALC is a great program and they appreciate the application process being straightforward and concise, requiring pertinent information that would be useful given certain circumstances.

Agency Response to Comments: No response required.

Despite multiple attempts to solicit feedback, we did not receive responses from 8 of the 9 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. Information may be shared in accordance with the Privacy Act of 1974 or the routine uses identified in System of Records Notice “INTERIOR/DOI-16, Learning Management System” ([83 FR 50682](#), published October 9, 2018).

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 **835 annual responses** and **629 annual burden hours** (rounded). The total dollar value of the annual burden hours is approximately **\$25,048** (rounded) (\$43.26 x 579 hours).

We used Table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-23-1971, September 12, 2023, Employer Costs for Employee Compensation—June 2023, which lists the hourly rate for all workers as \$43.26, including benefits.

Table 12.1

Requirement	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours
NYCALC Application (Online)	105	4 hours	420
Form 3-2525, Student Medical Information	100	30 Mins	50
Form 3-2546, Student Enrollment Information	100	18 Mins	30
Form 3-2547, Parental Consent	100	12 Mins	20
Form 3-2548, Student Conduct Agreement	100	12 Mins	20
Form 3-2549, Mentor Waiver	30	12 Mins	6
Form 3-2570, Travel Form (NEW)	100	20 Mins	33
Form 3-2571, Jr. Faculty Competitive Nomination Form (NEW)	100	20 Mins	33
Form 3-2572, Enrollment and Emergency Contact Information (NEW)	100	10 Mins	17
Totals:	835		629

*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 **\$2,271 (rounded)**. 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 [2023-DCB](#) as an average nationwide rate. The salary rate for a GS-09, step 5 is \$35.27. In accordance with BLS [News Release](#) USDL-23-1971, we multiplied the hourly rate by 1.61 to account for benefits resulting in a fully burdened rate of \$56.78. We estimate the total time spent on the information collection to be 40 hours. We multiplied this rate by 40 hours per work week to get \$2,271 (rounded).

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

With this submission, we are reporting a discretionary burden change of **300 annual responses** and **83 annual burden hours** associated with the new Forms 3-2570, 3-2571, and 3-2572 added to the collection as identified in question #2 of this Supporting Statement A.

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.