

**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 currently 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:
 - Whether the guide services were provided as advertised or represented;
 - Whether the client had any safety concerns;
 - Whether the client felt the guide took appropriate actions to minimize impacts on the environment;
 - Client's overall satisfaction;

- Any additional comments that they wish to provide; and
- 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.

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.

PROPOSED REVISION

Alaska Guide Service Evaluation (Form 3-2538) (NEW) – With this submission, the Service will propose a new form (Form 3-2538, "Alaska Guide Service Evaluation") to OMB for approval. The Service initially proposed this form for viability testing under OMB Control No. 1090-0011, "DOI Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery," in our December 22, 2020, *Federal Register* notice ([85 FR 83604](#)). However, the pandemic significantly limited the number of guide trips during the 2020 through 2022 seasons. In addition, changes to Control No. 1090-0011 now prohibit testing of new forms. We are now proposing the form to be approved under this collection (Control No. 1018-0141) rather than for usability testing under Control No. 1090-0011.

In order to effectively adapt visitor services programming in the Alaska Region, we need to understand visitor satisfaction. To that end, the Alaska Guide Service Evaluation team, comprised of representatives from across the Region, with the assistance of the Human Dimensions Branch and the Service Information Collection Clearance Officer, has revised the current guide evaluation form. The revised form provides the region's refuges with a useful and quantitative tool that reflects social science survey design best practices, and that is standardized for use across refuges in the region. Form 3-2538 would collect the following information from participants in the Alaska guide program:

- Details regarding the guided trip – name of the person(s) or (outfitters) guiding the trip and top three purposes for visiting the refuge.
- Experiences with guided trip.
- Level of satisfaction with guided trip and details regarding purpose of visit to refuge.
- Suggestions for improvements.
- Details about visitor – gender; State and/or country of residence; year of birth; race or ethnicity; details regarding formal schooling; and approximate household income.
- Contact information for follow-up questions (optional).

Upon approval of the new Form 3-2538, the Service will review the form after two seasons to determine what, if any, changes need to be made prior to the next renewal of this collection. Individual refuge programs within Alaska will use the information collected to determine baseline guide-supported visitor experience conditions and be able to adapt management over time to continue to achieve desired guide-supported visitor experience opportunities on Alaska's refuges.

Alaska Guide Service Evaluation (Form 3-2538) (DISCONTINUE) – With this submission, and upon approval of Form 3-2538, the Service requests to discontinue the original Alaska Guide Service Evaluation (Form 3-2349).

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.

Upon approval, we will post Form 2538 to the Service's forms web page and remove the discontinued Form 3-2349. 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 April 19, 2023, we published in the *Federal Register* ([88 FR 24207](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on June 20, 2023. The Service also published the *Federal Register* notice (and both forms) on Regulations.gov (Docket No. [FWS-R7-NWRS-2023-0005](#)) 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 received the following comments in response to that notice:

Comment 1: Anonymous electronic comment received May 6, 2023, via Regulations.gov ([FWS-R7-NWRS-2023-0005-0004](#)):

“I recommend prohibiting commercial guiding on public lands. It is not necessary or appropriate. Many of them do something illegal because they have a client paying money and that alone pressures them to same day airborne, herd animals, bait, and the list goes on and on.

There are plenty of hunters in Alaska if some rich fancy pants from Germany wants a trophy well he can afford to spend the time and money to learn the skill.”

Agency Response to Comment 1: This comment does not address the information collection requirements. No response required.

Comment 2: Electronic comment received May 16, 2023, via Regulations.gov ([FWS-R7-NWRS-2023-0005-0005](#)) from Josh Hayes:

“Data collection is necessary in order to properly understand guide/client/public interaction within the Refuges. In the high use areas, and in competitive permitted areas of Refuges in Alaska I feel it is paramount that commercial operators are regularly evaluated. Modern data collection is often electronic via phones, apps, internet based reporting etc...Due to limited internet/cell phone access and connectivity in many areas of Alaska - these collection methods are convenient only when allowing the Client to respond/reply within a fairly broad timeframe.

As a commercial operator collecting in depth personal information from every client/guest is not necessarily convenient. Often due to inclement weather, written documentation is nearly impossible, and phones/devices often prove difficult to operate in rain, snow, or colder climates. Many clients/guests are invitees of an individual or entity that has booked the trip on the client/guests behalf. For the commercial operators it would streamline data collection processes if only the individuals booking the trip provided their personal data - FWS could then solicit those individuals directly. Often times commercial operators only have the information of the point of contact for trip bookings and are not in contact with the other invitees until the day of the trip.

Data Collection/Evaluation Comments;

I believe that the following questions should be asked to individual clients being hosted by the guides and outfitters within all refuges:

1. *Did the guide/outfitter create and express accurate expectations prior to booking?*
2. *Was the guide/outfitter honest regarding trip opportunities prior to booking? On the web, social media platforms, advertisements etc...?*
3. *What was the level of public access and participation within the Refuge?”*

Agency Response to Comment 2 (by comment):

1. *Did the guide/outfitter create and express accurate expectations prior to booking?* Section 2 Question 4 asks the respondent to rate their level of agreement with the following statement “My guided experience was what I expected based on the guide’s advertisement”. We believe this question captures what is being expressed by the commenter. We recommend no change.
2. *Was the guide/outfitter honest regarding trip opportunities prior to booking? On the web, social media platforms, advertisements etc...?* Section 2 Question 4 asks the respondent to rate their level of agreement with the following statement “My guided experience was what I expected based on the guide’s advertisement”. We believe this question captures what is being expressed by

the commenter. We recommend no change.

3. *What was the level of public access and participation within the Refuge?* It is unclear what the commenter is requesting clients be asked about “level of public access” and “participation”. We recommend no change.

Comment 3: Electronic comment received May 18, 2023, via Regulations.gov ([FWS-R7-NWRS-2023-0005-0006](#)) from Michael Zweng:

“Section #1 – New form question #1. Although I explain to my clients in detail where we hunt, I think the question should have some specifics to guide the clients such as : name the bay where you hunted, the river you hunted, the mountain range where you hunted. I would eliminate question # 5. This is going to guided hunting clients so we already know the answer.

Section #2 – New for question #1.I provide detailed client handbook to all my clients that explain everything on question #1. However, some clients are not necessarily interested in this aspect of the refuge and it goes in one ear and out the other. They may not absorb it and a guide may get a poor score just because the client did not absorb the information. This may reflect poorly on the guide and I think this question should be removed.

Section #3 – New form question #2. This question should be removed

Section #4 – New form Question #1. This question implies the guide did some things poorly. The client may feel obligated to fill in this section even if it was the best outdoor experience they ever had. Maybe ask the question “Please list anything your guide could have done to make your experience better”. You will probably get feedback about better food and better accommodations but my hunts are sold as adventurous backpack style hunting so it was explained what we eat and how we hunt.

Section #5 – This entire section should be eliminated. It has no bearing on the quality of guide services provided and adds no value to the intended purpose of this questionnaire. I feel a lot of my clients would fail to complete this entire questionnaire if they were asked these questions.”

Agency Response to Comment 3: Comment responses by section:

Section #1: We believe this open-ended style question allows for the respondent to have maximum flexibility in describing where on the refuge their guided trip occurred. We recommend no change. This Form is not specific to competitively awarded guide service evaluations, but rather to all guided services on refuges (including non-competitive guided activities as well as non-consumptive uses). We recommend no change.

Section #2: The question asks the respondent to rate their level of agreement with the statement “Your guide(s) provided information about...” not how well the client understood the information. The information gathered from this question is of interest to the National Wildlife Refuge System as it pertains to education and interpretation opportunities for guided clients. We recommend no change.

Section #3: Understanding accessibility accommodations on National Wildlife Refuges is important to ensuring visitor of different physical abilities can experience Refuges.

We recommend no change.

Section #4: We do not believe this question make any implications about the guides services. By asking how a guide might "have made your experience better" (as asked in the Form) the Service may learn valuable feedback about visitor preferences. This initial effort (i.e., revision of the Form) is necessary to conduct a two-year pilot of the revised Guide Service Evaluation Form. What we learn will help the Service determine whether further Form revision is needed. We recommend no change.

Section #5: The National Wildlife Refuge System is interested in who visits Refuges to inform Visitor Services outreach activities. We recommend no change.

Comment 4: Anonymous electronic comment received June 4, 2023, via Regulations.gov ([FWS-R7-NWRS-2023-0005-0007](#)):

"Please don't allow hunting, fishing, and trapping on any of these wildlife refuge locations anymore. Please protect the animals. These killings don't benefit these animals in any way and this killing business is unnecessary."

Agency Response to Comment 4: This comment does not address the information collection; no response required.

Comment 5: Electronic comment received June 19, 2023, via Regulations.gov ([FWS-R7-NWRS-2023-0005-0008](#)) from Jon M. DeVore, Attorney, on behalf of the Alaska Professional Hunters Association:

Excerpts from the letter that express perspectives about the AK Guide Evaluation Form are below:

1. So, the proposed Alaska Guide Service Evaluation form should set a specific goal of how best to gather the information it seeks in a manner that is most likely to obtain the greatest number of respondents.
2. APHA recommends that the FWS should be more transparent about how the Alaska Guide Service Evaluations may be used by the FWS.
3. This is not a suggestion that client evaluations be the only tool used to evaluate guides, but we do recommend that evaluations be available as a reference for the ranking panel and then used as a decision factor by the refuge manager.
4. However, if it is the intent that the name and operations of individual guides are to be made public, the FWS should notify in advance the guide and operations.
5. For example, bad weather may have caused a less than optimal experience, so we recommend that the FWS take any such factors into consideration when utilizing client feedback that might be pre-disposed to be negative for reasons unrelated to the guide personally.
6. It is critical to ask, up front, if the hunter was successful in harvesting their target species then bifurcate the evaluations into two broad categories: successful harvest and unsuccessful harvest.
7. Once harvest and weather are controlled for, clients should evaluate their trip first and foremost on safety.
8. However, the Federal Register is not transparent on how the information will be ultimately used.

Agency Response to Comment 5: Comment responses by response number:

1. This comment addresses post-data collection decision-making but does not address the content of the Guide Service Evaluation Form; no response required.
2. This comment addresses post-data collection decision-making but does not address the content of the Guide Service Evaluation Form; no response required. This initial effort (i.e., revision of the Form) is necessary to conduct a two-year pilot of the revised Guide Service Evaluation Form. What we learn will help the Service determine whether further Form revision is needed and how we will use this information.
3. This comment addresses post-data collection decision-making but does not address the content of the Guide Service Evaluation Form; no response required. This initial effort (i.e., revision of the Form) is not specific to competitively awarded guide service evaluations, but rather to all guided services on refuges (including non-competitive guided activities as well as non-consumptive uses).
4. This comment addresses data management but does not address the content of the Guide Service Evaluation Form; no response required. All survey respondent names and responses will remain anonymous to the public.
5. There are many factors that may impact the guided client experience on refuges. It is not possible for the Guide Service Evaluation Form to analyze all factors that are outside of the control of the guide service provider or the Service. This initial effort (i.e., revision of the Form) is necessary to conduct a two-year pilot of the revised Guide Service Evaluation Form. What we learn will help the Service determine whether further Form revision is needed.
6. This Form is not specific to competitively awarded guide service evaluations, but rather to all guided services on refuges (including non-competitive guided activities as well as non-consumptive uses). This initial effort (i.e., revision of the Form) is necessary to conduct a two-year pilot of the revised Guide Service Evaluation Form. What we learn will help the Service determine whether further Form revision is needed.
7. Safety concerns are captured in Section 2 Question 2 of the Guide Survey Evaluation Form. "Please rate your level of agreement with the following statement: your guide used skills that kept you safe".
8. This comment addresses post-data collection decision-making but does not address the content of the Guide Service Evaluation Form; no response required. This initial effort (i.e., revision of the Form) is necessary to conduct a two-year pilot of the revised Guide Service Evaluation Form. What we learn will help the Service determine whether further Form revision is needed and how we will use this information.

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
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public
Previously Guided Client	General Public

Previously Guided Client

General Public

“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: No comments received

Agency Response/Action Taken: Not applicable

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

Comments: No comments received

Agency Response/Action Taken: Not applicable

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

Comments: No comments received

Agency Response/Action Taken: Not applicable

And

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

Comments: No comments received

Agency Response/Action Taken: Not applicable

We contacted individuals who had been a client of a guide service on Alaska refuges in the past. These individuals have familiarity with guided trips and would therefore be able to complete the Guide Service Evaluation Form. Due to the way the Refuge System in Alaska collects information about guided clients we only had access to names and mailing addresses. Nine individuals were sent letters with the new form as an attachment and were provided with an email address where they could send their responses/comments. The letter outlined the questions above. No responses were received. Because we did not have email addresses or phone numbers, we were unable to follow up with them. The new form will have a place for respondents to give their phone number and address should they be willing to be contacted by Refuge staff to provide more information, because of this we expect to be able to conduct more effective target outreach in future OMB submissions.

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](#); modifications published June 4, 2008, [73 FR 31877](#) and March 16, 2023, [88 FR 16277](#)). 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 **300 responses** totaling **100 burden hours**. We estimate the annual dollar value of the burden hours is **\$4,307**.

The majority of the clients reside in States outside Alaska; therefore, we used the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-23-1305, June 16, 2023, Employer Costs for Employee Compensation—March 2023, as a nationwide average. Table 1 lists the hourly rate for all workers as \$43.07, including benefits.

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
<i>Alaska Guide Service Evaluation (Form 3-2538) (NEW)</i>							
Individuals	300	1	300	20 minutes	100	\$ 43.07	\$ 4,307.00
TOTALS:	300		300		100		\$ 4,307.00

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 **\$1,276** (rounded).

We expect that 6 refuge offices will distribute an average of 100 forms each and process an average of 50 responses per year per refuge, for a total of grand total of 300 completed submissions for the Region. For each of the 6 offices, processing the 50 completed submissions would require 3 hours of processing time by a GS-11/5 employee, for a total of 18 hours (6 refuge offices x 3 hours of processing time per refuge = 18 hours).

The hourly rate for a GS-11/5 is \$42.30 (OPM Salary Table [2023-AK](#)). To account for benefits, we multiplied the hourly wage by 1.61 in accordance with BLS [News Release](#) USDL-23-0488, resulting in an hourly cost factor of \$68.10. Total salary cost is \$1,225.80 (\$68.10 x 18 hours). In addition to salary costs, we estimate approximately \$50 for printing and mailing evaluation forms in the event of special accommodation requests.

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

We are reporting a discretionary burden change of 36 annual responses and 34 annual burden hours associated with the new Form 3-2538, Alaska Guide Service Evaluation.

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.