

JUSTIFICATION FOR NO MATERIAL/NONSUBSTANTIVE CHANGE

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

We propose the following changes to Form 3-200-15a, "Permit Application/Order Form – Eagle Parts for Native American Religious Purposes" to improve the visibility and categorization of the requested information about an order:

- 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 for clarification of how to order the specific items the applicant needs for religious use.
- The changes to the format of the items being requested was changed to provide each category more clarity.
- 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 arrival at the repository.
- Required information is bold and more visible on the form to allow fields necessary to be filled out and the processing of the application/order form to be done in a timely manner.

Format changes made to 3-200-15a Form itself:

- "BEFORE FILLING OUT THIS FORM,..." column in corner at top of page on the left-hand side was spread out to one line.
- Moved "Type of Order" fields to one line for selection.
- Moved "There is no processing fee for this permit." from bottom right corner of page 1 to top right corner under header logo.
- All Required Fields in BOLD and annotated with an asterisk on pages 1 - 3.
- "Description of Requested Material:" was made bigger and two sections "Species" and "Age" added to columns next to it.
- Section 1 and Section 2 of Requested Material section was moved to single lines from side-by-side columns.
- Removed grayed out box "Official Use Only" section and made text box smaller. This section no longer used by the repository.
- Page 3 section "Note to certifying official" and "applicant" sections moved from bottom of page to under "Eagle Permit Applicant:" section.

Information changes:

List below is written in the following format: *Change made* – Justification/Reason for Change

1. ***"Inmate" category was removed from "Type of Order" section.*** – The repository only has two types of orders for all applicants regardless of incarceration or not. Incarcerated applicant information is requested further in the body of the application if it applies to the applicant requesting the permit. There is no need to check the box and majority of the time is left unmarked by an incarcerated applicant.
2. ***Added "ALL BOLD FIELDS MARKED WITH AN ASTERISK (*) ARE REQUIRED."***
Under header and all fields required were changed to bold font and annotated with an asterisk. – Application before was not clear and only some fields were bold while

other required fields were not thus creating incomplete applications and delays in processing of a permit. This allows the applicant to know what fields must be complete and the application to proceed through the process. Better visibility when printed in black and white format.

3. **Removed “..., no P.O. Boxes” from physical address line.** – Some applicants only have one address, and the P.O. Box does not disqualify the address from being used for a shipment to the applicant.
4. **Added “Must be 18+ years of age” to “Date of Birth” line.** –
 - a. Applicant must be 18+ years old to apply per federal regulation.
 - b. Allows underage applicant or parent/guardian of applicant to stop at this point and contact the repository for next steps or stop the application process if unnecessary.
5. **Replaced “(Not applicable for 1st order)” on Permit Number line with “(If known)”.** – This line is no longer a required field and there is no need to know the permit number by the applicant as it changes with each permit amendment per the new ePermit system.
6. **Better separation of Section 1 and Section 2 Category requests to individual lines instead of columns.** –
 - a. This helps clarify items in Section 1 cannot be ordered in addition to the loose feather categories in Section 2 and vice versa.
 - b. More information provided to applicant as to which section needs to be filled out per category applicant is requesting. i.e. Whole eagle or parts or loose feathers only.
 - c. Information regarding plumes was also added to these lines for clearer information for the applicant on inclusion of plumes with whole tails vs. quantity included in choices for loose feathers in section 2.
 - d. The loose feather categories are separate lines under Section 2 to better clarify that both cannot be requested in the same order and there are different options for the inclusion of plumes with each. These changes are internal to the repository historically and what is always readily available from inventory.
7. **Removed “Plumes Only” option from “10 Quality” section.** –
 - a. Applicants have the option to request “Include plumes” for the feather request categories. The quantity sent for 10 quality order regardless of checked box was two only due to inventory. Quantity was not previously indicated on form.
 - b. This allows clarification that two plumes can be included with order. If the applicant needs more than the two, the 20 miscellaneous category is the better option to select, and the quantity of plumes varies in that category from “(3 – 5)” or all “(20)”.
8. **Quantity of plumes included in order categories added to “Section 2” ordering categories.** – Form previously did not have set quantities as the repository internally has always had a set practice and availability of inventory that was set. This allows for the applicant to have transparency on how many plumes can be provided at any given time and it is not a random choice done by staff at the time of fulfillment of the order.
9. **“Is this a graduation order? Check Yes” was added to the 20 miscellaneous loose feather line.** –
 - a. This designates a specific location on the form for those applicants requesting graduation orders as previously it was requested of the applicant to write the word

“graduation” anywhere on the form or notes be sent or calls completed to notify staff what type of feathers were being requested.

- b. This is a regular request the repository sees often and regularly. Instructions for these orders has been always included in the FAQ posted for public view as well. Application will now have a designated section for it specifically.

10. *Section 3 categories expanded to include “ulna” –*

- a. This has been a longstanding request by applicants, and it was not on the form formally.
- b. These items are requested often and only included if a pair of wings was requested.
- c. These items are limited to two per limited supply but can be requested separately and the applicant does not have to order a pair of wings to get the items shipped.
- d. Easier ordering of a part for the applicant.

11. *Changed wording for “Other” option to “Other Items not found above (Please be specific.)” –* This clarifies for the applicant where to write specifics if none of the options up to this section is what the applicant needs. i.e. organs, skin only, etc.

12. *“Important Note” section reworded from three lines “Your order is not complete after filling out this page. For both first time orders and reorders, please complete question 1 in section E on page 2. Also fill out the Certification of Enrollment in a U.S. Federally Recognized Tribe form on page 3.” to “This application is not complete until questions 1 and 2 in Section E (page 2 below) are complete. The Certificate of Enrollment in a U.S. Federally Recognized Tribe form on page 3 must be signed by the Tribal Official who is authorized to certify that an individual is a duly enrolled member of that Tribe and must be submitted for all first-time applications.”* – These updates allow more clarity on what pages are required for a complete application specifically for first time orders versus reorders.

13. *Links for Code of Federal Regulations under Note on page 2 were checked and added if missing.* – Allows the applicant to easily find the information pages online if access is available.

14. *Note at top of page 3 changed from “Completed Certificate of Enrollment must be attached to process the application if applying for First Order.” to “The Completed Certificate of Enrollment must be attached to process new applications or if enrollment information has changed. ALL BOLD FIELDS MARKED WITH AN ASTERISK (*) ARE REQUIRED.”* – This better clarifies for the applicant and certified Tribal official what fields on page 3 need to be filled out and when the page should be filled out and included with the packet for permit/ordering.

15. *“To be completed by Certifying Tribal Official Only” changed to “This section should be completed by the Tribal official who is authorized to certify that an individual is a duly enrolled member of that Tribe.”* – Language expanded as written in 50 CFR 22.60 as it was too vague before and the Certificate of Enrollment was not filled out properly further delaying the issuance of a permit and the order of the applicant.

16. *Links on page 4 in the Authority section provided.* – Allows applicants to easily find the sections online for more information or resources involved with the application for this permit.