

Supporting Statement for
Paperwork Reduction Act Information Collection Submission
Take Pride in American National Awards
Application/Nomination Process
OMB Control Number 1093-0004

Terms of Clearance: “The burden estimated of one hour per application seems low. Upon the Agency’s next submission for OMB approval, the Agency shall contact at least three previous recipients and seek their opinion of whether this estimate is appropriate. The Agency is reminded that the burden includes the time it takes the recipients to gather the information needed for the application, as well as the time the contacts provided in the application spend answering questions about the nominee. The Agency shall also specify in the next FR 60 and 30 day notices that it is estimating the burden per application to be one hour.” These terms of clearance are addressed in items 8 and 12.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Take Pride in America Program was re-activated by The Secretary of the Interior on December 10, 2001 by Secretarial Order #3236. Under the Take Pride in America Act (Act), 16 U.S.C. Sec 4601-4608, the Secretary is to 1. “conduct a national awards program to honor those individuals and entities which, in the opinion of the Secretary of the Interior... have distinguished themselves in activities” under the purposes of the Act, and also to 2. “establish and maintain a public awareness campaign in cooperation with public and private organizations and individuals – A. to instill in the public the importance of the appropriate use of, and appreciation for Federal, State, and local lands and facilities, and natural and

cultural resources; B. to encourage an attitude of stewardship and responsibility toward these lands, facilities and resources; and C. to promote participation by individuals, organizations and communities of a conservation ethic in caring for these lands, facilities and resources.” The Act states that “[t]he Secretary is authorized...generally to do any and all lawful acts necessary or appropriate to further the purposes of the TPIA Program.” The program must collect information about individuals or organizations and their activities under the purposes of the Act to select finalists and winners of the Take Pride in America National Awards.

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 information collected is used by the Program primarily to select the winners of the Take Pride in America National Awards. Individuals, organizations/ groups can nominate themselves for an award or be nominated by a third party. The nominations are first reviewed by the Take Pride in America staff and then passed on to a panel of judges. The panel of judges is comprised of Federal agency representatives, outside partners and Departmental employees not associated directly with the Take Pride program. The information collected is also used to assure the integrity of the Program (so that, for example, an individual or organization does not receive an award twice for the same project), for reporting on the accomplishments of the Program, for the public awareness campaign (such as in press releases and website information on winning projects) and to further the purposes of the Act (such as fostering partnerships and coordination of projects).

Question Justification:

Part I:

- A. The name of nominated individual or organization/ group is used to identify and to confirm the proper name of the individual or organization/ group. This information is used in publicizing the award and is printed on all official materials related to the awards. Categories are used to group similar organizations and projects with like organizations and projects to ensure fair judging and to divide nominees into National Award categories. For the schools and local government categories, follow up questions are included to establish their participation in the existing Take Pride Schools program or in the Take Pride Cities program. This information is then used to engage those not already participating in these programs.
- B. Information collected about the nominated individuals or organizations/ groups is used for correspondence. The city and state of the winning individuals or organizations/ groups is also used to publicize the award and in the public awareness campaign. The point of contact acts as a liaison for their organization/ group in communicating the details of the award and the ceremony. For organizations/ groups, the 100 word description or mission statement is used as background information on the organization/ group and is used to publicize the awards and for use in the public awareness campaign. Nominees should be aware

of the nomination prior to its submission; this question serves as an indicator of their notification.

- C. Nominator contact information is used in communicating with that individual, to confirm the nomination information, to seek any information that was omitted and to collect supporting materials, such as press releases, photos or other details pertaining to the project to be used in publicizing the awards and for use in the public awareness campaign. The relationship of the nominator to the nominee is used to establish the connection between the two parties.

Part II:

- A. The site location and ownership question establishes what kind of public land the activity or project took place on and is used for reporting and publicity purposes.
- B. The duration of the project and the length of the project information are used as background information. The question of “Did the activity occur in [award year]?” explicitly confirms that the activity can be considered for an award in the subject year. If the answer is no, it also serves to save the respondent time from further filling in the form since the activity does not qualify for an award.
- C. The type of activity question is used to categorize the nominees for judging and for reporting and publicity purposes.
- D. The question on volunteer hours and numbers of volunteers quantifies the work that was done for comparison among nominees in the judging process and for use reporting and publicity purposes.
- E. The references are checked to verify the information provided and to determine the appropriateness of the nominee for the award.

Part III: A. – C. Project summaries on the scope of project/ activity, the impact and the collaborative efforts associated with the project/ activity are used to describe the accomplishments, the benefits and the partnerships of each project/ activity. The information given here serves as the basis for the nomination and is used in the judging process. This information is also used in publicizing the award and for use in the public awareness campaign. The information may also be used for awards brochures, other publicity, and for other purposes under the Act.

When activating the submit button, the nominator is attesting that the application has been filled out to the best of their knowledge and that the individual or organization nominated has been informed and has agreed to the nomination.

- 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].**

The collection of the information is primarily through electronic submission, estimated at 99% of all nominations. Once the online Awards Application form is completed, the submit button automatically transmits the nomination directly to the Program. Pick lists and

selection buttons were utilized to the maximum extent to reduce public burden. Members of the public without Internet access can request a form from the Take Pride office and return it by mail.

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 are several award programs within or sponsored by the Federal government. Most are tailored to a narrow program or purpose. The Take Pride in America Program encompasses the broadest range of any Federal agencies for activities and individuals or organizations that can qualify for an award under the purposes of the Act. Activities can be in the areas of habitat restoration, education, interpretation and outreach; research, monitoring and studies; historic and cultural restoration or improvement, clean-up and maintenance; administration; host and steward; community resources improvements, species management and soil and water conservation; and other specified actions under the Act. Projects and activities can also take place on Federal, State and local public lands. The ten categories of winners range from individuals and corporations to youth groups, schools and non profits. Areas might encompass cultural and historical resources, soil and water conservation, beautification and litter control, schools and playgrounds, geology and mapping and natural resources on public lands. While there may be some overlap, the information requested by Take Pride in America is the same as requested for other awards programs, but with a broader base and encompassing not only Federal lands, but state and local public lands as well. There is no single repository of the information Take Pride needs to gather.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information does not have a significant impact on 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.

The collection is only once a year, prior to the Take Pride in America National Awards Ceremony. If the Take Pride in America Program cannot collect nominations for individuals or organizations/ groups to receive awards, the Awardees will be limited to only those activities that are nominated by Federal agencies based on projects within their sphere of influence, effectively blocking many individuals or organizations from being considered for the awards. This would severely restrict the application and purposes of the Act. This Program was re-activated in December of 2001 with the purpose of honoring the best in the Nation, without restriction; thus it would reflect poorly on the Department and the President if only volunteers to Federal agencies were honored.

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.

None of these special circumstances would apply.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

A Federal Register notice soliciting public comments on the information collection was

published on August 8, 2006 (volume 71, number 152, pages 45068-45068). No comments were received from the public in response to this notice, or in response to the Paperwork Reduction Act statement associated with the collection over the past three years.

However, prior to submitting the information collection application to OMB for approval, active attempts were made to consult with persons from whom the information is being solicited.

Nine respondents to the 2006 National Award Nomination cycle were selected at random, and sent a letter asking the following questions:

- “1. How long did it take you to complete the Nomination form?
2. What parts(s), if any, did you have the most trouble with?
3. Do you have any suggestions on how we can make the form more user-friendly?
4. Other Comments:”

The nine respondents included three individuals representing State, Local or Tribal governments; four non-profit, for-profit, and not-for-profit organizations; and two individuals representing components of the Federal government. They were advised that participation in this outreach effort was completely voluntary.

Responses were received from four of these parties. Their answers to our questions are summarized below:

Respondent A:

1. 15 – 30 minutes
“As we had the information in our computer data base, it was easy to just ‘cut and paste.’”
2. “Very easy to do with a minimum amount of effort.”
3. No suggestions provided.
“Thanks for the opportunity to enter.”
4. No other comments.

Respondent B:

1. 1 hour
2. “None.”
3. “Be able to type information onto the form on the computer and print it off to submit.”
4. No other comments.

Respondent C:

1. “Because I had most of the information collected already for other local nominations, it didn’t take long, perhaps a couple of hours to find the rest of the information specific to this

application. If I had started from scratch, however, it would have taken twice as long at least. The writing itself didn't take long – the time is about collecting the information.”

2. “No trouble.”

3. “It was fine for me. I can see where a volunteer off the street might have a little more difficulty simply because they might not have kept track of this information but I had no trouble.”

4. “Keep up the good work!”

Respondent D:

1. 30-40 minutes

“. . . because I had most of the information already gathered for other reasons . . . fortunately.”

2. “None.”

3. “Actually, I found it to be a very user friendly, straightforward form.”

No suggestions provided.

4. “We’re happy – we had two wonderful winners.”

Please note that since receiving these comments, we have improved the printability of our information collection form. It should now be fully printable as well as fileable.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gifts are given to respondents. The Take Pride in America National Awards for winners consists of certificates and an invitation to the annual Awards Ceremony. Invitees are responsible for their own transportation and lodging. There is no monetary award. Winners may receive minor tokens of appreciation, such as lapel pins and Take Pride in America t-shirts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information provided by respondents is used for a National Awards Ceremony, for a public awareness campaign and for other activities under the purposes of the Act. There is no assurance of confidentiality with respect to information submitted by parties relating to the identification of the individuals or groups performing the projects for which they have been nominated for awards, or information pertaining to the details of the projects performed, as described in the nomination applications.

However, because nominations are solicited from individuals and households, and because representatives of these groups submitting award nominations may provide home addresses and home telephone numbers as nominator contact information, personal information provided by respondents as nominator contact information is managed according to the provisions of the Privacy Act of 1974 (5 U.S.C. 552a) and is covered by Privacy Act System

of Records Notice Interior OS-14: "Take Pride in America System." The nomination form itself contains a Privacy Act Statement which includes an explanation of the purpose and use of the information collected, and the statutory basis for this assurance of confidentiality.

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.

There are no questions of a sensitive nature that are commonly considered private.

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 in Item 13 of OMB Form 83-I.**
- * 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. Instead, this cost should be included in Item 14.**

In its previous renewal application, approved by OMB on January 28, 2004, we estimated that the time burden on the public is about 1 hour per respondent. To test the validity of this assumption, as explained in response to question 8., above, we solicited comments from the public, both in our published Federal Register notice, and in letters sent to nine individuals, selected at random, who responded to the 2006 National Awards Nomination cycle.

Based on responses that we received to our outreach effort, we believe that our estimate of 1 hour per application is still valid. All of the four individuals responding to our query agreed that it took at least 15 minutes to complete the application. Beyond that, two of the four thought it could be completed in less than 1 hour (indicating that it took them, respectively, no more than 30 or 40 minutes to complete the application.) One

respondent indicated that it took no more than 1 hour for him/her to complete the application. Only the fourth individual indicated that it took more than 1 hour – and possibly as many as 2-3 hours – to complete the application. What all of the respondents appear to agree on is that the length of time required to complete the application is dependent upon the extent to which potential respondents have the information asked for in the application readily at hand, either in their computer databases or paper files. We believe that it is reasonable to assume a. that since more of the individuals likely to complete the application represent organizations, rather than individuals or households, and b. that it is reasonable to assume that organizations are, indeed, likely, to retain the information required by the application, for a variety of reasons unrelated to the application process, e.g., publicity, grant applications, and the like, it is not unreasonable to assume that – on the average – respondents ought to be able to complete the application form within 1 hour.

Our current estimate of the number of applications that we expect to receive is 179, rather than the 500 we estimated in our previous renewal application. (Over the past four years we have received an average of 179 nominations per year, with 5 of these, on the average, coming from Federal agencies.) The total [public] burden hours are thus 174. The frequency of response is once a year, prior to the judging for the annual National Awards Ceremony and is entirely voluntary. This brings our total [public] burden hours to only 174 hours per year (174 public respondents x 1 hour = 174 hours). This represents a reduction in burden hours of 326 hours per year.

The estimated annualized cost to respondents for the hourly burdens for this collection of information is \$3201.60 (or \$3201), based on a value of \$18.04 per hour, which is the dollar value used by volunteer programs within the Department as the cost of a volunteer hour.

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- * 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]. 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 dollar burden associated with this 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The Take Pride in America database for the Awards Applications nominations is a small system, with very low data storage needs. This system is subsumed within the Office of the Secretary's data server. There are no separate operational or maintenance costs for this system.

There is, however, the nominal cost incurred by the government in handling and processing the award nomination forms received. On the average, we estimate that this process requires 80 hours of a GS-5 employee's time, which, adjusted for benefits at a rate of 25%, comes to \$1456, and 15 hours of a GS-9 employee's time, which, adjusted for benefits at a rate of 25%, comes to \$414, for a total of an average of \$1870 per year.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

As discussed in response to question 12, above, our current estimate of the number of applications that we expect to receive is 179, rather than the 500 we estimated in our previous renewal application. (Over the past four years we have received an average of 179 nominations per year, with 5 of these, on the average, coming from Federal agencies.) The total [public] burden hours are thus 174. The frequency of response is once a year, prior to the judging for the annual National Awards Ceremony and is entirely voluntary. This brings our total [public] burden hours to only 174 hours per year (174 public respondents x 1 hour = 174 hours). This represents a reduction (an adjustment) in burden hours of 326 hours per year.

- 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.

Although winning projects are publicized for the Awards Ceremony and for the public awareness campaign, other data tabulations will only be used to show coverage of the awards and results and accomplishments of the Program. No complex analytical techniques are used. A typical time schedule for the entire project is as follows:

- January: Nomination form is posted on the Take Pride website, at www.TakePride.gov, and nominations are accepted for National Awards.
- June: Nominations are closed. Nominations are reviewed and a panel of judges reviews nominations and selects winners for each category.
- July: Winners are notified and invited to Awards Ceremony.
- September: Take Pride in America National Awards Ceremony.

Information on the 2006 National Awards ceremony and past ceremonies, is posted on the Take Pride website at: <http://www.takepride.gov/awards/national.cfm>

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 show the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions requested for the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.