

Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0123

International Conservation Grant Programs 3-2338

Note: This Information Collection Request (ICR) includes information collection for the Marine Turtle Conservation Fund, which is approved under OMB 1018-0128 (expires March 31, 2009). After Office of Management and Budget action on this ICR, we will submit a request to discontinue 1018-0128.

Terms of Clearance. OMB approved information collection associated with 1018-0123 on June 25, 2004, with no terms of clearance. On March 26, 2006, OMB approved the information collection associated with 1018-0128 with the following terms of clearance: Upon the agency's next request for OMB approval, the agency shall provide grantees the option of applying through Grants.gov.

Response. All notices of funding availability and application packages for grant programs in this ICR are available on Grants.gov and applicants may apply through Grants.gov.

1. Explain the circumstances that make the collection of information necessary.

The following Acts authorize the establishment of the African Elephant, Asian Elephant, Great Ape, Rhinoceros and Tiger, and Marine Turtle Conservation Funds and the Wildlife Without Borders-Mexico, Latin America and the Caribbean and Russia grant programs:

- African Elephant Conservation Act of 1989 (16 U.S.C. 4201-4245).
- Asian Elephant Conservation Act of 1997 (16 U.S.C. 4261).
- Great Ape Conservation Act of 2000 (Pub. L. 106-411).
- Rhinoceros and Tiger Conservation Act of 1994 (16 U.S.C. 5306).
- Marine Turtle Conservation Act of 2004 (Pub. L. 108-266).
- Endangered Species Act (section 8) (16 U.S.C. 1531 et seq.).

These Acts provide financial resources for conservation projects that meet the requirements as outlined in each. The Secretary of the Interior has assigned oversight of these funds to the Division of International Conservation, Fish and Wildlife Service. Applicants must submit a proposal containing the information as outlined in the appropriate Act. A panel of technical experts reviews each proposal to assess how well the proposed project addresses the requirements and priorities identified in the program's authorizing legislation. This information collection ensures that reviewers have sufficient information to select proposals for funding.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

Applicants submit proposals for funding in response to Notices of Funding Availability that we publish on Grants.gov and our program web pages. Applicants may submit a proposal through Grants.gov, by e-mail, or by mail. We collect the following information under each Notice of Funding Availability:

(1) Cover page with basic project details (FWS Form 3-2338). We propose to replace the six forms currently approved under OMB Control No. 1018-0123 with this new form. Use of this form will not reduce burden on applicants. However, having only one form as the cover page for all grant programs will simplify procedures for applicants.

(2) Project summary and narrative.

(3) Letter of appropriate government endorsement.

(4) Brief curricula vitae for key project personnel.

(5) Complete Standard Forms 424, 424a, and 424b (non-domestic applicants do not submit the standard forms).

Proposals may also include, as appropriate, a copy of the organization's Negotiated Indirect Cost Rate Agreement (NICRA) and any additional documentation supporting the proposed project.

The project summary and narrative is the basis for this information collection request for approval. A panel of technical experts reviews each proposal to assess how well the project addresses the priorities identified by each program's authorizing legislation. As all of the on-the-ground projects funded by these programs are conducted outside the United States, the letter of appropriate government endorsement ensures that the proposed activities will not meet with local resistance or work in opposition to locally identified priorities and needs. Brief curricula vitae for key project personnel allow the review panel to assess the qualifications of project staff to effectively carry out the project goals and objectives. As all Federal entities must honor the indirect cost rates an organization has negotiated with its cognizant agency, we require all organizations with a NICRA to submit the agreement paperwork with their proposals to verify how their rate is applied in their proposed budget. Applicants may provide any additional documentation that they believe best supports their proposal.

With prior approval from the applicant, we may share proposal information with other qualified organizations or individuals that have the potential to enhance the proposed conservation effort.

All assistance awards under this program have a maximum reporting requirement of a:

(1) Mid-term report (performance report and a financial status report) due within 30 days of the conclusion of the first half of the project period, and

(2) Final report (performance and financial status report and copies of all deliverables, photographic documentation of the project and products resulting from the project) due within 90 days of the end of the performance period.

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.]

Applicants may submit a proposal through Grants.gov, by e-mail, or by mail. We allow respondents to submit their proposals in hard copy through the mail because most of the eligible applicants, as defined by the Acts, are located in remote countries where access to the Internet and/or computers is limited. To reduce the burden on applicants who do have access to the Internet, we allow electronic submissions through Grants.gov and e-mail. All application instructions and forms are available on the Internet for filling and printing by the public.

4. Describe efforts to identify duplication.

Due to the unique nature of the authorizing legislation or implementation of these programs, no other division of the Service or any other Federal agency collects this information.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

We have made efforts to keep the amount of information requested to a minimum for all of our applicants. The information has to be sufficient to fulfill the requirements of the authorizing statutes, as well as sufficient to make a competitive funding decision. We do not believe the amount of information requested will have a significant impact on small entities, as they will be providing the minimum amount of information needed to compete for financial assistance under these programs.

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.

Failure to collect the information or collecting the information less frequently would prevent the Secretary of the Interior from fulfilling responsibilities as outlined in the statutes establishing these programs.

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 circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

- 8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

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.]

On March 16, 2007, we published in the Federal Register (72 FR 12630) a notice of our intent to request that OMB renew authority for this information collection. We solicited comments for 60 days, ending on May 15, 2007. We received one comment. The commenter did not address the information collection requirements, but did express a general concern as to whether appropriated funds were reaching the intended species. The commenter requested information detailing how funds were spent, and we directed her to our web pages. We have not made any changes to our information collection as a result of the comment.

In addition to our Federal Register notice, we solicited comments from several current and past applicants. We specifically requested comments on:

- Utility of the information we request.
- Estimated length of time to complete a submission.
- Clarity of the instructions.

Those who responded stated that the information we request is appropriate, well-designed, clear, and useful. We received one comment that requested additional clarification concerning our request for details on the anticipated benefits and outcomes of the proposed project. We reworded the appropriate section in our Notices of Funding Availability based on that comment. The responses on the estimated length of time to complete a submission supported our current burden estimates. Contact information for persons providing comments:

(1) Dr. Peter Clyne, Assistant Director, Asia Program, Wildlife Conservation Society, 2300 Southern Avenue, Bronx, NY, Tel: 718-741-8153, E-mail: pclyne@wcs.org

(2) Dr. Andrew Chek, Director, Global Programs & Partnerships, Organization for Tropical Studies, 410 Swift Avenue, Durham, NC 27705, Tel: 613-231-3684, E-mail: achek@duke.edu

(3) S.C. Dey, Secretary General, Global Tiger Forum, A-269, 2nd Floor, Defense Colony, New Delhi 110024 India, Tel: 91-11-2-433-0685, E-mail: gtf@bol.net.in

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

We do not provide gifts or payments other than remuneration of grantees.

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 assurance of confidentiality to respondents.

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate that we will receive approximately 489 proposals, each taking applicants 12 hours to complete. The annual burden for applications is 5,868 hours.

We anticipate awarding an average of 116 grants per year to a subset of the applicants, 29 of which will be domestic recipients and 87 will be nondomestic recipients. We estimate that the respondents will submit 232 reports annually (mid-term and final) and that it will take approximately 30 hours to prepare each report. Therefore, the estimated annual burden for report preparation is 6,960 hours.

The estimated dollar value of the burden hours must take into account the nature of our respondents. We estimate the value of an hour (including salary and benefits) for applicants from the United States and other advanced countries to be \$27.00 USD. The same hour for applicants from many other countries (Asia, Latin America, Pacific islands) is no more than \$9.00 USD. We estimate the annual burden dollar value to be \$130,824.

Activity	No. of Annual Responses	Completion Time per Response	Total Annual Burden Hours	\$ Value of Hour	Total \$ Value of Burden Hrs
Grant Application – Cover Sheet and Narratives	122 – domestic	12 hours	1,464	\$27.00 USD	\$39,528
	367 - nondomestic		4,404	\$9.00 USD	\$39,636
Grant Reporting	58 – domestic	30 hours	1,740	\$27.00 USD	\$46,980
	174 - nondomestic		5,220	\$9.00 USD	\$ 4,680
Total	721		12,828		\$130,824

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

There is no nonhour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

14. Provide estimates of annualized costs to the Federal Government.

The total estimated cost to the Federal Government for processing proposals and subsequent awards and reports is \$291,220. We estimated the cost per hour by averaging the hourly wages (including benefits) of the variety of individuals working at different pay scales who are involved in each process. We then increased this figure to incorporate other non-salary operational expenses for equipment and supplies.

We increased our estimated cost to the Federal Government from the previous estimate of \$171,500 based on:

- A slight increase in the number of responses.
- An increase in the dollar value of each hour as a result of overall increase in salaries over the past 3 years.
- Inclusion of the burden associated with processing awards and reviewing grantee reports that result from the collection, which was not reported as part of prior estimates.

ACTION	NO. OF RESPONSES	ESTIMATED TIME/RESPONSE	EST. COST/HR	EST. COST/RESPONSE	ANNUAL COST
Process Proposals	489	12 hours	\$35.00	\$420.00	\$ 205,380
Process Awards	116	12 hours	\$35.00	\$420.00	\$ 48,720
Review Reports	232	4 hours	\$40.00	\$160.00	\$ 37,120
Total Estimated Cost					\$ 291,220

15. Explain the reasons for any program changes or adjustments.

We are estimating 721 responses, totaling 12,828 annual burden hours for this collection. This is an increase of 386 responses and 8,808 annual burden hours from our previous request. Part of this increase (95 responses and 1,260 hours) is due to the inclusion of the Marine Turtles Conservation Fund (previously approved under 1018-0128) in this collection. Based on experience over the past 3 years, we have made adjustments by slightly increasing the number of annual responses received.

We are reporting as a program change the 232 responses totaling 6,960 burden hours associated with mid-term and final reports. While this is not a new requirement, the burden hours were not part of our previous request for 1018-0123.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

We maintain data on proposals and resulting grant awards in a database. We publish a list of selected projects, the amount of FWS funding, and a description of each project on our website at <http://international.fws.gov/grants/grants.html>. We prepare formal summary reports on project results every 2 years, and distribute a report to Congress, cooperators, and the general public.

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 certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.