

# 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) is being revised to include information collection for the new Wildlife Without Borders African Grant Program. Revisions include:

- Responses and burden hour information for the new African program.
- New estimates for: (1) dollar value of burden hours on the public and (2) cost to Federal Government.

**Terms of Clearance.** None.

### 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 programs for: Mexico, Latin America and the Caribbean; Russia; and Africa:

- 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 (NOFA):

- (1) Cover page with basic project details (FWS Form 3-2338).
- (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.**

Funds are provided for these programs on an annual basis. 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 October 30, 2007, we published in the Federal Register (72 FR 61363) a notice of our intent to request that OMB approve the collection of information associated with the new Africa Grant Program. We solicited comments for 60 days, ending on December 31, 2007. We did not receive any comments in response to this notice.

In addition to our Federal Register notice, we solicited comments from several potential applicants for the new program. We specifically requested comments on:

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

Those who responded supported our burden estimates and stated that the information we request is generally appropriate, well-designed, clear, and useful. We received one comment that was concerned about how a particular target group would be identified accurately. We have reworded that section of the NOFA in response to this comment. Another commenter provided unsolicited programmatic comments. In response to one of these comments, we added an additional training category in the NOFA. Contact information for persons providing comments:

Katie Frohardt Executive Director Fauna & Flora International 1720 N Street, NW Washington, DC 20036 Tel. 202-329-1672 E-mail <a href="mailto:katie.frohardt@fauna-flora.org">katie.frohardt@fauna-flora.org</a>	Dr. Will Banham Associate Director, Training & Capacity Building Program Wildlife Conservation Society - Global Conservation Program 2300 Southern Boulevard Bronx, NY, 10460-1099 Tel: 718 741 8228 / Fax: 718 364 4275 Email: <a href="mailto:wbanham@wcs.org">wbanham@wcs.org</a>
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**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 791 responses totaling 14,028 burden hours. We estimate the annual dollar value of the burden hours to be \$236,878.56.

We expect to receive approximately 539 proposals, each taking applicants 12 hours to complete. We anticipate awarding an average of 126 grants per year to a subset of the applicants, 32 of which will be domestic recipients and 94 will be nondomestic recipients. We estimate that the respondents will submit 252 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 7,560 hours.

The estimated dollar value of the burden hours takes into account the nature of our respondents. We estimate the value of an hour for applicants from the United States and other advanced countries is \$28.60 USD. We determined this hourly wage based on Bureau of Labor Standards 2005 wage information for biological/life scientists across the United States. We multiplied the hourly wage by 1.4 to account for benefits (\$40.04).

We were not able to locate wage information for scientists from countries such as Asia, Latin America, Pacific islands, and Africa; however, the Bureau of Labor Statistics does provide information on manufacturing/production workers at <http://www.bls.gov/fls/home.htm>. Using 2005 data from Table 2, Hourly Compensation Costs in U.S. dollars, we estimate the dollar value of an hour for applicants from these countries to average no more than \$9.00 USD including benefits.

<b>Activity</b>	<b>No. of Annual Responses</b>	<b>Completion Time per Response</b>	<b>Total Annual Burden Hours</b>	<b>\$ Value of Hour incl. benefits</b>	<b>Total \$ Value of Burden Hrs</b>
Grant Application – Cover Sheet and Narratives	137 - domestic 402 - nondomestic	12 hours	1,644 4,824	\$40.04 USD \$ 9.00 USD	\$65,825.76 \$43,416.00
Grant Reporting	64 - domestic 188 - nondomestic	30 hours	1,920 5,640	\$40.04 USD \$ 9.00 USD	\$76,876.80 \$50,760.00
<b>Total</b>	<b>791</b>		<b>14,028</b>		<b>\$236,878.56</b>

**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 and reviewing proposals and reviewing reports as a result of this collection of information is \$190,646. This includes hourly wages only. The table below shows Federal staff and grade levels performing various

tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2008-DCB to determine the hourly wages and multiplied the hourly wage by 1.5 to account for benefits.

Our previous request for renewal included costs for awarding grants. We have determined that costs for awarding grants should not be included as part of administering this information collection.

Proposals are processed by clerical grants specialists who initially review each proposal for a minimum level of completeness. Proposals that do not meet that standard or clearly do not address the basic requirements of the targeted act are returned to applicants. All other proposals are passed forward for a technical review conducted by Biologists. This initial screening results in fewer proposals being fully reviewed than are received.

Action	Number	Position	Grade/Step	Hourly Rate	Hourly Rate incl. benefits	Estimated Time per Response	Est. Cost per Response	Annual Cost
Process Proposals	519	Grants Specialist Clerical	GS-9/5	\$26.13	\$39.20	1 hour	\$39.20	\$20,344.80
Review Proposals	504	Biologist/ Technical	GS-13/5	\$45.05	\$67.58	4 hours	\$270.32	\$136,241.28
Review Reports	252	Biologist/ Technical	GS-13/5	\$45.05	\$67.58	2 hours	\$135.16	\$34,060.32
<b>Estimated Total Cost to Federal Government</b>								<b>\$190,646.40</b>

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

We are estimating 791 responses, totaling 14,028 annual burden hours for this collection. This is an increase of 70 responses and 1,200 annual burden hours from our previous request. This increase is associated with the addition of the new Wildlife Without Borders—Africa program, and is reported as a program change.

**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.