

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number 1018-0100

North American Wetlands Conservation Act Grant Programs

Terms of Clearance. None.

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

The North American Waterfowl Management Plan (NAWMP) is a tripartite agreement among Canada, Mexico, and the United States to enhance, restore, and protect habitat to benefit waterfowl and other wetlands-associated wildlife. Because the NAWMP did not include a mechanism to provide for broadly based and sustained financial support for wetland conservation activities, Congress passed the North American Wetlands Conservation Act (NAWCA) in 1989. The NAWCA promotes, through partnerships between the private and public sectors, long-term conservation of North American wetland ecosystems and the waterfowl and other migratory birds, fish, and wildlife that depend upon such habitat.

In addition to providing for a continuing and stable funding base, NAWCA establishes an administrative body, the North American Wetlands Conservation Council. It is made up of a State representative from each of the four flyways, three representatives from nonprofit wetlands conservation organizations, the Secretary of the Board of the National Fish and Wildlife Foundation, and the Director of the Fish and Wildlife Service. The Council recommends funding of select wetlands conservation project proposals to the Migratory Bird Conservation Commission.

Under NAWCA, we (Fish and Wildlife Service) administer two competitive grants programs: Standard and Small Grants. Both require that grant requests be matched by partner contributions at no less than a 1-to-1 ratio. Funds from U.S. Federal sources may contribute to a project, but are not eligible as match.

The Standard Grants Program supports projects in Canada, the United States, and Mexico that involve long-term protection, restoration, and/or enhancement of wetlands and associated uplands habitats. In Mexico, partners may also conduct projects involving technical training, environmental education and outreach, organizational infrastructure development, and sustainable-use studies.

The Small Grants Program operates only in the United States. It supports the same type of projects and adheres to the same selection criteria and administrative guidelines as the U.S. Standard Grants Program. However, project activities are usually smaller in scope and involve fewer project dollars. Grant requests may not exceed \$75,000, and funding priority is given to grantees or partners new to the NAWCA Grants Program.

Once awarded, grants funded through these programs are subject to Federal financial assistance regulations.

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.

From September 1990 through June 2008, more than 5,450 partners have been involved in 680 U.S. Standard Grant projects. More than \$518 million has been invested through the Act; total partner contributions have amounted to more than \$2.1 billion. Approximately 6.1 million acres of wetlands and associated uplands have been affected across the continent. Since 1996, 416 U.S. Small Grant Projects have been funded, involving more than 1,650 partners. Partners added more than \$136 million to more than \$20.2 million in grants to conserve some 165,085 acres of habitat in the United States.

We publish notices of funding availability on the Grants.gov website (<http://www.grants.gov>) as well as in the Catalog of Federal Domestic Assistance. Applicants may include State and local governments, tribes, nonprofit organizations, businesses, individuals, and Federal agencies in the United States, Mexico, and Canada. To compete for grant funds, partnerships submit applications that describe in substantial detail project locations, project resources, future benefits, and other characteristics that meet the standards established by the Council and the requirements of NAWCA. The applications provide the basic information necessary to determine the appropriateness and eligibility of potential NAWCA projects. We use a competitive process to score and rank all eligible applications. We use information from the applications in the grant selection process only and do not share the information with other organizations.

Materials that describe the program and assist applicants in developing project proposals are available on our website at <http://www.fws.gov/birdhabitat/Grants/NAWCA>. Persons who do not have access to the Internet may obtain instructional materials by mail. We have not made any major changes in the scope and general nature of the instructions since the OMB first approved the information collection in 1999. We provide instructions for the Mexican standard grants in Spanish.

Applicants receiving a grant must provide annual and final reports to document the progress and accomplishments of a NAWCA project (program reports). Applicants also must provide financial information that shows the actual award amount spent and the non-Federal match provided to the project.

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].

To meet e-Government objectives and ease the applicant's burden, we encourage electronic submission of NAWCA applications and reports. We post NAWCA grant programs and application deadlines on Grants.gov and applications can be submitted through that site. Grant applicants also may submit applications and project reports by e-mail or by sending documents via mail or overnight service. During the last 3 years, we received less than 10 applications via Grants.gov for the U.S. Standard and U.S. Small Grants NAWCA Program. However, almost 100 percent of our U.S. applicants submit grant applications by e-mail or computer disk, and more than 50 percent of award recipients send required reports and documentation via e-mail.

4. Describe efforts to identify duplication.

The information we collect is unique to each location, situation, and proposal and is necessary for evaluating and selecting projects that make significant contributions to NAWCA objectives. No other office or 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 collect only the minimum information necessary for participation in the NAWCA grant programs. Small entities (e.g., small land trusts, conservancies, and nonprofit conservation organizations) are affected in the same way and to the same degree as larger 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.

Elimination of the information collection would result in elimination of the NAWCA grant programs since it would be impossible to determine the eligibility, resource values, or relative worth of proposed projects. Reducing the frequency of collection would reduce the frequency of grant opportunities. There are two opportunities per year to apply for U.S. Standard Grants and one opportunity for U.S. Small Grants (and Canadian and Mexican Grants).

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 June 24, 2008, we published in the Federal Register (73 FR 35703) a notice of our intent to request that OMB renew this information collection. In that notice, we solicited comments for 60 days, ending on August 25, 2008. We received one comment. The comment expressed opposition to the NAWCA grants program, but did not address the information collection requirements. We did not make any changes to our information collection requirements as a result of this comment.

We interviewed five recipients of NAWCA grants with regard to the necessity of the information (grant applications and reports) requested, the practical utility of the information requested, and the annual burden hours for preparing applications and reports for both the U.S. Small Grant and U.S. Standard Grants programs. All respondents interviewed advised that the information requested by both programs is necessary and applicable for the selection and ranking of proposed grant projects. Three of the five respondents who have had experience with the U.S. Small Grants Program estimated that it takes 16-90 hours to prepare an application. All five respondents with experience in preparing U.S. Standard Grants Program applications estimated that process takes approximately 200-400 hours. For both programs, the complexity and size of a proposed project are important factors contributing to the length of time necessary for completing an application proposal.

We require grant recipients to submit annual and final reports to document the progress and accomplishments of a NAWCA project. Participants in the Small Grants Program estimated that it takes approximately 24-40 hours per report. Participants in the Standard Grants Program estimated that reports take approximately 24-56 hours to prepare. Consequently, we believe that an average of 34 hours per report is a reasonable estimate. The number of annual reports required is determined by the length of the project. Projects are written for 2-year periods, but may be extended at the request of the recipient. Both annual and final reports include program and financial information.

Following is contact information for and additional comments from the five individuals interviewed:

Mr. Ron Leathers, Government Grants Coordinator, Pheasants Forever, 651-209-4919, suggested that a proposal format similar to a "tax wizard" program would be helpful to applicants. Such a program would ask pertinent questions and then auto-fill data in the appropriate place in the proposal. A lack of human and financial resources, as well as the ongoing development of DOI's grant management system (FBMS), precludes the advancement of such program in the foreseeable future. An online application is available through grants.gov.

Mr. Todd Bishop, Grants Coordinator, Iowa Dept. of Natural Resources, 515-281-7127, stated that given the amount of money awarded and the importance of the projects, it is appropriate for the applications to be so detailed.

Mr. Brad Paymar, Associate Director, Columbia Land Trust, 360-213-1208, stated that although some Federal forms are confusing, such as the SF269 Financial Status Report, the current NAWCA grant application seems more applicable to the subsequent project administration.

Mr. Russel Terry, Manager of Conservation Programs, Ducks Unlimited, 734-623-2000, stated that the application guidelines, if followed, provide good, quality information about projects. He felt that we request too much cost information. The cost information requested is necessary for the informed selection of projects to be funded.

Mr. George Norris, North Carolina Wildlife Resources Commission, 919-707-0066, stated that requiring less documentation of costs would minimize the burden on respondents. Less reporting would be preferable. We require the minimum amount of reporting allowable, one report annually and a final report.

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

We do not provide payments or gifts to applicants or grant recipients.

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 applicants any 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.

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 473 responses totaling 37,801 burden hours. Estimates are presented by grant type because the scope, activities, complexity, and cost of projects vary significantly by grant size and location. Standard grants (up to \$1,000,000) are open to applicants from the United States, Canada, and Mexico. Small grant (up to \$75,000) opportunities are available only to U.S. applicants.

The estimated dollar value of the annual burden hours is \$1,344,303. The estimated dollar value of a burden hour varies by respondents. Using Bureau of Labor Standards (BLS) 2007 wage information for zoologists and wildlife biologists across the United States (www.bls.gov), we estimate the hourly value for applicants from the United States is \$28.11 USD. We multiplied the hourly wage by 1.4 to account for benefits (\$39.35).

We were unable to locate wage information for these occupational groups in Canada and Mexico. The 2007 BLS data (<http://www.bls.gov/fls/hcaesupptabtoc.htm>) show that Canadian hourly compensation costs for all employees in manufacturing is practically the same as for U.S. workers. Therefore, we used the same U.S. hourly wage for wildlife biologists for activities in Canada. Using the Hourly Compensation Costs in U.S. Dollars from the same BLS site, we estimate the hourly value for Mexican applicants and recipients, primarily professional biologists and conservation specialists, to average approximately \$4.00 USD, including benefits.

Activity	Number of	Completion	Annual	\$ Value of	Total Burden
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	annual responses	time per response	burden hours	Hour incl. benefits	Cost to Public
U.S. Small Grants – Applications	70	59 hours	4,130	39.35	\$162,516
U.S. Small Grants – Reports	88	32 hours	2,816	39.35	\$110,810
U.S. Standard Grants – Applications	60	325 hours	19,500	39.35	\$767,325
U.S. Standard Grants – Reports	96	35 hours	3,360	39.35	\$132,216
CA Standard Grants - Applications	20	80 hours	1,600	39.35	\$62,960
CA Standard Grants - Reports	67	35 hours	2,345	39.35	\$92,276
MX Standard Grants - Applications	34	80 hours	2,720	4.00	\$10,880
MX Standard Grants - Reports	38	35 hours	1,330	4.00	\$5,320
Totals	473		37,801		\$1,344,303

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 respondents.

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 \$545,673. This estimate includes FWS salary and benefits (\$368,154), as well as other costs associated with NAWCA proposal review, selection, and reporting review (\$177,519). Table 14.1 shows Federal staff and grade levels performing various tasks associated with this information collection. Staff in the Division of Bird Habitat Conservation develop and post application instructions annually for the Standard and Small grant programs. Service and volunteer staff to the North American Wetlands Conservation Council review proposals for eligibility, cost allowability, scope, and content. The Council staff reviews and scores the proposals, and eventually recommends a slate to the Council. Council members review those proposals and decide which will be recommended to the Migratory Bird Conservation Commission (MBCC) for final approval and funding. FWS staff plan, coordinate, organize, and attend all Council staff, Council, and MBCC meetings.

Information collection costs include expenses associated with proposal solicitation, review, and selection and also include travel and travel arrangement for the Council staff and Council selection meetings, site visits, and printing (see Table 14.2).

We used Office of Personnel Management Salary Table 2008-DCB (<http://www.opm.gov/oca/08tables/>) to determine the hourly wages and multiplied the hourly wage by 1.5 to account for benefits. All application preparation, project review and project selection is done from the Division of Bird Habitat Conservation in Arlington, Virginia.

Table 14.1 – Fish and Wildlife Salary/Benefits

Action	Position and Grade	Hourly Rate	Hourly Rate including Benefits	Total Annual Hours	Annual Cost
Administrative Work Associated with Application Process	Program Analyst GS 9/5	26.13	39.20	624	\$24,461
	Wildlife Biologist/Grant Administrator GS 13/5	45.05	67.58	624	42,170
Proposal Review	Wildlife Biologist/Grant Administrator GS 13/5	45.05	67.58	1,040	70,283
	Program Analyst GS 9/5	26.13	39.20	960	37,632
	Grant Administrator- Small Grants GS 12/5	37.89	56.84	280	15,915
	Grant Administrator- Small Grants, Standard Grants GS 13/5	45.05	67.58	712	48,117
Proposal Selection	Wildlife Biologist GS 13/5	45.05	67.58	375	25,343
	Wildlife Administrator (Grants Branch Chief) GS 14/5	53.24	79.86	375	29,948
	Wildlife Administrator (Council Coordinator) GS 15	62.62	93.93	375	35,224
Report Review	Wildlife Biologist/Grant Administrator GS 13/5	45.05	67.58	578	39,061
Total					\$368,154

Table 14.2 – Other NAWA Costs

Action	Travel (NAWCA Council and FWS)	NAWCA Council Site Visits (As Needed for Project Evaluation)	Printing/ FedEx	Invitational Travel Coord. Contract	Total
Proposal Review	\$70,000	\$10,000	\$13,100	\$10,273	\$103,373
Proposal Selection	69,200			4,946	74,146
Total	\$139,200	\$10,000	\$13,100	\$15,219	\$177,519

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

We are reporting 473 responses totaling 37,801 burden hours for this collection. Based on our outreach and our experience in administering this information collection, we reevaluated and adjusted our estimates for responses and completion times, resulting in an increase of 323 responses and an increase of 201 burden hours.

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

We will not publish data from this information collection.

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 on appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.