

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

OMB Control Number 1018-XXXX

**Wildlife Without Borders –
Critically Endangered Species Conservation Fund Grant Program
FWS Form 3-2338A**

NOTE: We are requesting that OMB take action on this request for emergency clearance by May 15, 2009. For justification of our request, see item 12 and the letter attached in ROCIS as a supplementary document.

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

Section 8 of the Endangered Species Act (16 U.S.C. 1531-43) authorizes the establishment of the Wildlife Without Borders-Critically Endangered Species Conservation Fund to fund projects that conserve the world's most endangered species. Critically endangered species are those that face an extremely high risk of extinction in the immediate future. Funding is limited to vertebrate species with natural habitat ranges in developing countries.

This program will be a competitive grants program administered by the Division of International Conservation, Fish and Wildlife Service, to provide funding for conservation actions that have a high likelihood of creating durable benefits to specific species facing immediate threat of extinction. Conservation actions include:

- Protection of at-risk populations.
- Veterinary/wildlife health interventions.
- Public education/outreach.
- Applied and well-focused research that would lead to immediate action.
- Activities related to execution of species survival plans.
- Conservation and management of critical habitat.
- Strengthening local capacity to conserve the target species.
- Actions addressing unsustainable exploitation.
- Efforts to mitigate or stop wildlife-human conflict.
- Rehabilitation and rescue.

Applicants must submit an application containing enough information to support an informed proposal selection. 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 Notice of Funding Availability (NOFA). The information we plan to collect will ensure 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 a NOFA that we publish on Grants.gov and the program web page. Applicants may submit a proposal by mail or e-mail or via the Internet through Grants.gov. We plan to collect the following information for applications:

- Cover page with basic project details (FWS Form 3-2338A).
- Project summary and narrative.
- Letter of appropriate government endorsement.
- Brief curricula vitae for key project personnel.
- Complete Standard Forms 424 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. A panel of technical experts will review each application to assess how well the project addresses the priorities identified in the program description. While applicants can be foreign or domestic, all of the on-the-ground projects must be 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. 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 additional documentation to support their proposal.

With prior approval from the applicant, we may share proposal information with 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:

- 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
- 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 or by e-mail or mail. We allow respondents to submit applications in hard copy through the mail because most of the eligible applicants are located in remote countries where access to the Internet and/or computers is limited. Applicants who do have access to the Internet may submit applications 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 implementation of this program 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 request only the minimum information necessary to meet requirements of the authorizing statutes and Federal regulations, and to allow us to make a competitive funding decision. We do not believe the amount of information requested will have a significant impact on 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.

Collection of proposals in order to competitively award grants and cooperative agreements is necessary to comply with the Federal Grants and Cooperative Agreement Act, the Federal Financial Assistance Management Improvement Act, and Part 505 of the Departmental Manual. Successful applicants must submit reports in compliance with Federal regulations. Failure to require reports would violate the reporting requirements of the Uniform Administrative Requirements as incorporated in 43 CFR Part 12. Information collection through regular reporting is essential to ensuring that Government funds are properly expended.

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.]

We are seeking emergency approval for this information collection. The Division of International Conservation recently, and unexpectedly, received funding that allows the creation of this new grant program directed at conserving the world's most endangered species. Funding will be provided to recipients who are currently engaged in activities that demonstrate a positive impact on species that are in immediate danger of becoming extinct.

We must expend this funding this fiscal year. Emergency approval is needed to ensure that (1) proponents have sufficient time to develop proposals, (2) those proposals receive a proper review, and (3) grant awards are in place by the end of fiscal year 2009. We are requesting a waiver of the requirement to publish 60-day and 30-day notices for this information collection. We request that OMB take action on this ICR no later than May 15, 2009. To award these grants this fiscal year, we must publish the NOFA on Grants.gov by June 1 to ensure sufficient time to receive applications by July 15, 2009. After approval of this ICR, we will immediately seek regular OMB approval by issuing a 60-day notice.

While it is not ideal to implement a grant competition in a rushed manner, we have the expertise to ensure that funds are properly focused for maximum impact. Through existing grant programs, we have forged partnerships and a strong presence in areas of high biodiversity and high threat. The current economic crisis has had a great impact on the ability of conservation organizations to address pressing wildlife threats. Availability of additional funding this year could serve as a life-saving bridge until other revenue sources are identified.

This new program will complement the eight international conservation grant programs that we currently operate. All of the current international grant programs are approved under OMB Control No. 1018-0123, which expires May 31, 2011.

Although we do not have time to publish Federal Register notices for this information collection, we conducted outreach with potential applicants. We specifically requested comment on: the utility of the information we plan to request, the estimated length of time to complete a submission, and the clarity of the applicant instructions. The entities that responded stated that the information we request is generally appropriate, well-designed, clear, and useful.

There were several comments and significant disagreement about the definition of "critically endangered." Since there is no standard definition for this term, we will require applicants to apply an accepted definition and justify their project in terms of that definition.

Several comments indicated that the NOFA did not explicitly state that this program is concerned with only species not supported by the programs of the Multinational Species Conservation Fund. We revised the NOFA to clarify this point.

A few comments were received regarding the activities to be funded. We added several suggested activities as a result of these comments. A few comments were related to inclusion of ex-situ conservation measures. The NOFA does not prohibit such activities, and we did not change it to address that issue.

Several comments related to programmatic issues such as a cap on indirect costs, definition of stakeholder involvement, and separate applications based on amount of funding requested. These suggestions will prove useful in an overall assessment of our international grant programs, but are not specific to the data collection request for which this approval is being sought. However, in reference to matching funds, we changed the NOFA to remove the term “significant.”

We received comments from:

<p>Graeme Patterson Assistant Director, Africa Program Wildlife Conservation Society 2300 Southern Boulevard Bronx, NY 10460. Tel. (718) 220-5100</p>	<p>Annette Lanjouw Director Great Apes Program Arcus Foundation Wellington House, East Road Cambridge CB1 1BH, United Kingdom Tel: +44-1223-451050</p>
<p>Katie Frohardt Executive Director, Fauna & Flora International 1720 N Street, NW. Washington, DC 20036 Tel. 202-329-1672</p>	<p>Jeff Flocken Country Director, United States International Fund for Animal Welfare 1350 Connecticut Avenue NW., Suite 1220 Washington, DC 20036 Tel: (202) 296 3860</p>
<p>James Deutsch Director, Africa Program Wildlife Conservation Society 2300 Southern Boulevard Bronx, New York 10460 Tel. (718) 220-5100</p>	<p>Dr. Fiona Maisels Surveys and Monitoring Coordinator Wildlife Conservation Society Central Africa Programme Libreville, Gabon +241 07 41 03 13</p>
<p>Dr. Al Roca M/C 630, 432 ASL 1207 West Gregory Drive Department of Animal Sciences University of Illinois at Urbana-Champaign Urbana, IL 60801 Tel: (217) 244-8853</p>	

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.

Applicants for this grant program may be nonprofit, nongovernmental organizations; public and private institutions of higher education; and federal, state, and local government agencies. All of the on-the-ground projects will be conducted outside the United States

We estimate that we will receive 60 responses totaling 1,080 burden hours. We estimate the annual dollar value of the burden hours to be \$20,646.

We expect to receive approximately 40 applications, each taking applicants 12 hours to complete for a total of 480 annual burden hours. We anticipate awarding an average of 10 grants per year to a subset of the applicants, 4 of which will be domestic recipients and 6 will be nondomestic recipients. We estimate that the respondents will submit 20 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 600 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 developed countries is \$28.11 USD. We determined this hourly wage based on Bureau of Labor Statistics, National employment and wage data from the Occupational Employment Statistics survey by occupation, May 2007, for zoologists and wildlife biologists across the United States. We multiplied the hourly wage by 1.4 to account for benefits (\$39.35) in accordance with BLS news release USDL 08-1802, December 10, 2008

We were not able to locate wage information for scientists from countries in Asia, Latin America, the Pacific islands, and Africa; however, the Bureau of Labor Statistics does provide information on manufacturing/production workers at <http://www.bls.gov/fls/hcaesupptabtoc.htm>. Using 2007 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.

Activity	No. of Annual Responses	Completion Time per Response	Total Annual Burden Hours	\$ Value of Hour incl. benefits	Total \$ Value of Burden Hrs
Grant Application – Cover Sheet and Narratives	10 - domestic 30 - nondomestic	12 hours	120 360	\$39.35 USD \$ 9.00 USD	\$ 4,722 \$ 3,240
Grant Reporting	8 - domestic 12 - nondomestic	30 hours	240 360	\$39.35 USD \$ 9.00 USD	\$ 9,444 \$ 3,240
Total	60		1,080		\$20,646

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 to process and review applications and reports is \$9,319. We used the Office of Personnel Management Salary Table 2009-DCB to determine wages and multiplied the hourly wage by 1.5 to account for benefits in accordance with BLS news release USDL 08-1802, December 10, 2008. Because the Division of International Conservation relies heavily on processing and reviewing proposals and projects electronically, the equipment and supply cost per proposal as a percentage of the Division's overall equipment and supply base is negligible.

ACTION	POSITION AND GRADE	HOURLY RATE	HOURLY RATE INCLUDING BENEFITS	TOTAL ANNUAL HOURS	ANNUAL COST
Process Proposals	International Affairs Specialist GS-9/5	\$27.37	\$41.06	20 hours	\$ 821.20
Review Proposals	Biologist or International Affairs Specialist GS-13/5	\$47.21	\$70.82	80 hours	5,665.60
Review Reports	Biologist or International Affairs Specialist GS-13/5	\$47.21	\$70.82	40 hours	2,832.80
Total Estimated Cost					\$9,318.60

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

This is a new information collection.

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. Once all projects are reviewed, we will publish a list of the projects selected, as well as the amount of FWS funding and a description of each project, on our website at http://www.fws.gov/international/DIC/grants/grants_home.html. We will publish formal summary reports on project results every 2 years in a report distributed 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.

Not applicable. We will display the expiration date.

18. Certification.

There are no exceptions to the certification statement.