

## 1 Supporting Statement A for Paperwork Reduction Act Submission

### OMB Control Number 1018-0109 Wildlife and Sport Fish Restoration Grants and Cooperative Agreements 50 CFR 80, 81, 84, 85, and 86

**Terms of Clearance: None.**

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

The Wildlife and Sport Fish Restoration Program (WSFR), Fish and Wildlife Service (Service), administers 18 financial assistance programs, in whole or in part. We award most financial assistance as grants, but cooperative agreements are possible if the Federal Government will be substantially involved in carrying out the project.

Program	CDFA No.	Authority	Implementing Regulations
Clean Vessel Act	15.616	16 U.S.C. 777g(c)	50 CFR 85
Coastal Wetlands Planning, Protection, and Restoration Act	15.614	16 U.S.C. 3951-3956	50 CFR 84
Cooperative Endangered Species Conservation Fund	15.615	16 U.S.C. 1531 et seq.	50 CFR 81
Everglades Restoration *	None	Pub. L. 104-127; 16 U.S.C. 460 I-4 - I-11	None
Fisheries Restoration and Irrigation Mitigation *	None	16 U.S.C. 777	None
Hunter Education and Safety	15.626	16 U.S.C. 669h-1	50 CFR 80
Landowner Incentive *	15.633	Pub. L. 110-5	None
Multistate Conservation Grants	15.628	16 U.S.C. 669h-2; 16 U.S.C. 777m	None
National Outreach and Communication	15.653	16 U.S.C. 777g(d)	None
Research Grants (Generic)	15.650	16 U.S.C. 753a; 16 U.S.C. 460(I-4 - I-11); 16 U.S.C. 1531-1543	None
Service Training and Technical Assistance (Generic Training)	15.649	16 U.S.C. 661 and 16 U.S.C. 742f	None
Sport Fish Restoration	15.605	16 U.S.C. 777-777n (except 777e-1)	50 CFR 80
Sportfishing and Boating Safety Act (Boating Infrastructure Grants)	15.622	16 U.S.C. 777g and g-1	50 CFR 86
State Wildlife Grants	15.634	Pub. L. 110-329	None
Tribal Landowner Incentive *	15.638	Pub. L. 110-5	None
Tribal Wildlife Grants	15.639	Pub. L. 110-329	None
Wildlife Conservation and Restoration *	15.625	16 U.S.C. 669b and 669c	None
Wildlife Restoration	15.611	16 U.S.C. 669-669k	50 CFR 80

\*Program has open grants, but no new funding.

Authorities and implementing regulations establish the purposes of the grant programs and the types of projects to be funded. Some list eligibility criteria as well as activities ineligible for funding. The authorities and implementing regulations for the competitive programs establish preferences or ranking factors for the selection of projects to be funded. These legal requirements make it essential for an awarding agency to have certain information so that it funds only eligible projects, and, in the case of competitive programs, to select those projects that will result in the greatest return on the Federal investment.

**OMB Circular A-102** (Grants and Cooperative Agreements with State and Local Governments)

states that Federal agencies awarding grants or cooperative agreements should generally request applicants to submit a program narrative statement.

**43 CFR 12** (Administrative and Audit Requirements and Cost Principles for Assistance Programs) requires grantees to:

- Request prior approval for budget, project, and program changes or amendments.
- Submit performance reports.

**Pittman-Robertson Wildlife Restoration Act (16 U.S.C. 669e(a)) and Dingell Johnson Sport Fish Restoration Act (16 U.S.C. 777e(a)).** These Acts apply to the Wildlife Restoration and Sport Fish Restoration Programs and their subprograms. The Acts require States, Commonwealths, and territories to submit programs or projects to the Secretary of the Interior in either of the following ways:

- Comprehensive fish and wildlife resource management plan.
- Full and detailed statement of any wildlife or fish restoration project.

**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.**

The majority of respondents are States and tribal governments; nonprofit organizations and institutions of higher education make up less than 5 percent of the respondents. We collect the following information from applicants and grantees:

**Applications.** We use the information provided in applications to: (1) determine eligibility under the authorizing legislation and applicable program regulations; (2) select those projects that will provide the highest return on the Federal investment; and (3) assist in compliance with laws such as the National Environmental Policy Act, the National Historic Preservation Act, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. In addition to the appropriate Standard Forms 424 (Application for Federal Assistance). Applications may include:

- Summary and project narratives to include objectives and need for assistance, approach, and geographic location.
- For research and demonstration assistance requests, a biographical sketch of the program director with the following information: name, address, telephone number, background, and other qualifying experience for the project. Also, the name, training, and background for other key personnel engaged in the project.
- Budget narrative.
- Other information as appropriate based on guidance in OMB Circular A-102.

**Amendments.** Most grantees must explain and justify requests for amendments to terms of the grant. We use this information to determine the eligibility and allowability of activities and to comply with the requirements of 43 CFR 12.70 and 43 CFR 12.925.

**Performance Reports.** All grantees must submit performance reports. We use this information to ensure that the grantee is accomplishing the work on schedule and to identify any problems that the grantee may be experiencing in accomplishing that work. Most grantees

submit annual reports; however, one grant program requires quarterly reports. Reports may include:

- A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both.
- Reasons why established goals were not met, if appropriate.
- Other pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

**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 GPRA requirements].**

The public may find and apply for grants at Grants.gov. Applicants have a choice of submitting their applications electronically through Grants.gov or by e-mail. They may also submit applications by fax or mail. While we encourage electronic submission, the majority of applicants elect to send hard copies. Grantees may submit amendments and performance reports by e-mail, fax, or mail. We receive very few amendments electronically; however, almost all performance reports are sent electronically.

**4. Describe efforts to identify duplication.**

This information is not collected elsewhere within or outside the Service.

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

We do not believe the amount of information requested will have a significant impact on small entities. We request only the minimum information necessary to meet requirements of the authorizing statutes and Federal regulations, and to allow us to make a funding decision for competitive grants.

**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 ensure 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.

We collect information consistent with OMB guidelines except in those unusual circumstances permitted by the Department of the Interior's regulations at 43 CFR 12.52(b)(3), which applies to "high-risk grantees" and 43 CFR 12.914(a), which applies to special award conditions.

**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 18, 2009, we published in the Federal Register (74 FR 11596) a notice of our intent to request that OMB renew this information collection. In that notice, we solicited comments for 60 days, ending on May 18, 2009. We received one comment. The commenter did not address the information collection requirements associated with these grant programs. We did not make any changes to our requirements as a result of this comment.

In addition to our Federal Register notice, we continually work with the States to review and refine our Federal Assistance policies. The Director of the Fish and Wildlife Service and the President of the Association of Fish and Wildlife Agencies established a Joint Federal/State Task Force on Federal Assistance Policy on September 6, 2002, to review operational policies and administrative problems and to recommend solutions. The Joint Task Force has met 20 times since September 6, 2002, to review policies that apply to six grant programs. Most of these policies also apply to 11 of the 12 other grant programs covered by this information collection request. The Joint Task Force has recommended and we have implemented numerous changes to policies on performance reporting and budget.

We also consulted with Gary Armstrong, the Federal Aid Coordinator of the Indiana Division of Fish and Wildlife, on policies covering: (a) project narratives to supplement the Application for Federal Assistance, (b) grant amendments, and (c) performance reporting. Mr. Armstrong is the chairman of the State Federal Assistance Coordinators' working group, and he coordinated the review of these policies by the Federal Assistance coordinators in other State fish and wildlife agencies. Mr. Armstrong's contact information is:

Gary Armstrong, Planning Unit Supervisor  
 Indiana Department of Natural Resources  
 Fish and Wildlife - Central Office  
 402 West Washington, Room W273  
 Indianapolis, IN 46204  
 Telephone: 317-232-8166

We contacted employees of State fish and wildlife agencies to obtain their comments on the information collection requirements. Based on comments from this outreach and our experience, we have revised our burden estimates for applications and performance reports (see item 12).

Gary Moody, Chief of Wildlife Alabama Wildlife and Fresh Water Fisheries Div. Telephone: 334-242-3469 E-mail: <a href="mailto:gary.moody@dcnr.alabama.gov">gary.moody@dcnr.alabama.gov</a>	Phillip King, Former Federal Aid Coordinator Ohio Division of Wildlife (transferred to USFWS April 2009) Telephone: 304-876-7469 E-mail: <a href="mailto:phillip_king@fws.gov">phillip_king@fws.gov</a>
Rosie Roegner Federal Aid Coordinator Texas Parks and Wildlife Department Telephone: 512-389-4858	

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

We do not provide any payment or gift to respondents, 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.**

Approximately 200 different applicants will complete 2,500 applications annually. We estimate an average of 40 hours to complete an application, but the time will vary depending on the complexity and whether or not more than one project narrative is necessary.

We estimate that 150 different grantees will complete 1,500 requests for amendments annually. Grantees spend approximately 2 hours completing each amendment.

We estimate that 200 grantees will complete 3,500 performance reports annually. We estimate an average of 6 hours to complete each performance report. As with the application, the completion time will vary depending on the complexity of the project. The total annual dollar value of the burden hours is approximately \$4,340,000, based on an hourly wage of \$35 per hour including benefits. To obtain the rate for State/local/tribal government employees, we used data from May 2008 National Industry-Specific Occupational

Employment and Wage Estimates NAICS 999200 - State Government - all occupations mean income ([http://www.bls.gov/oes/current/naics4\\_999200.htm](http://www.bls.gov/oes/current/naics4_999200.htm)). To account for benefits, we multiplied the hourly rate (\$23) by 1.5, in accordance with USDL: 08-1802, December 10, 2008. For this collection, we have assumed that the rate for the private sector is identical to the rate for State/local/tribal (less than 5 percent of the respondents will be from the private sector).

ACTIVITY	ANNUAL NO. OF RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HRS	TOTAL DOLLAR VALUE OF BURDEN HRS
Applications	200	2,500	40 hrs	100,000	\$ 3,500,000
Amendments	150	1,500	2 hrs	3,000	105,000
Reports	200	3,500	6 hrs	21,000	735,000
<b>Totals</b>	<b>550</b>	<b>7,500</b>		<b>124,000</b>	<b>\$ 4,340,000</b>

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

There are no nonhour burden costs associated with this information collection.

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

We estimate the total cost to the Federal Government for processing and reviewing applications, amendments, and reports as a result of this collection of information is \$3,250,000. This estimate includes FWS salary and benefits (\$1,230,000) and other associated costs (\$2,000,000).

**Salary Costs: \$1,230,000** (20,500 hours X \$60 (weighted average \$/hr)). This figure excludes salary costs associated with the Federal Assistance Information Management System (FAIMS) (see Other Costs).

- For applications, we estimate Federal staff will spend 5,000 hours (2 hours per application) to: (1) develop and post application instructions; (2) review applications; (3) perform data entry; and (4) maintain files.
- For amendments, we estimate a total of 1,500 hours (1 hour per amendment) for staff to: (1) review the amendment; (2) perform data entry; and (3) maintain files.
- For reports, we estimate a total of 14,000 hours (4 hours per report) for staff to: (1) review the reports; (2) perform data entry; and (3) maintain files.

POSITION	GRADE/STEP	HOURLY RATE <sup>1</sup>	HOURLY RATE INCL BENEFITS <sup>2</sup>	PERCENTAGE OF TIME SPENT	WEIGHTED AVERAGE (\$/HR) <sup>3</sup>
Clerical, unskilled	GS-7/step 1	\$19.75	\$29.63	10%	<b>\$ 3.00</b>
Skilled, craft and technical	GS-13/step 1	\$41.65	\$62.48	85%	<b>53.00</b>
Management/professional	GS-15/step 1	\$57.90	\$86.85	5%	<b>4.00</b>
<b>Total Weighted Average (\$/HR)</b>					<b>\$60.00</b>

<sup>1</sup>While staff in eight Regional Offices and the Washington Office perform the work, we used the Office of Personnel Management Salary Table 2009-DCB as the basis for an average salary rate.

<sup>2</sup>Hourly rate multiplied by 1.5 to account for benefits in accordance with BLS news release USDL: 08-1802, December 10, 2008.

<sup>3</sup>Values are rounded.

**Other Costs: \$2,020,000**

MAILING	PRINTING	FAIMS <sup>1</sup>	TOTAL
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\$10,000	\$10,000	\$2,000,000	<b>\$2,020,000</b>
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<sup>1</sup> Includes costs for eight staff members, three contractors; FAIMS file maintenance; software/hardware upgrades; purchase of servers; and rental space and utilities.

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

We are reporting 7,500 responses and 124,000 burden hours for this information collection, which is a decrease from the 9,750 responses and 325,500 hours approved in our last request. Based on our experience over the past 3 years and our outreach, we made the following adjustments:

- Reduced the number of responses for applications, amendments, and reports.
- Reduced our estimate of the completion time for applications.
- Increased our estimate of the completion time for reports.

We are reporting as a program change an increase of 27 responses and 482 burden hours associated with five grant programs not included in our previous request.

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

Fish and Wildlife Service personnel write summaries of the project narratives and publish them on the Internet to provide the general public with descriptive information about grant awards. Fish and Wildlife Service grant managers gather accomplishment details from performance reports, aggregate details by activity category, and publish them on the Internet for public viewing. We compile and publish data continually as a normal part of business.

**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.