

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

OMB Control Number 1018-0144

**Wildlife Without Borders –
Amphibians In Decline Grant Program
FWS Form 3-2338B**

Terms of Clearance: None.

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--Amphibians in Decline grant program to fund projects that conserve the world's rapidly declining amphibian species. This program supports activities that address threats to frogs, toads, salamanders, newts, and caecilians that face an unprecedented threat of extinction. Funding will be made available for conservation of species with native ranges in countries with the greatest need for conservation funding.

The Division of International Conservation, Fish and Wildlife Service, administers this competitive grants program to provide funding for specific conservation actions that have a high likelihood of creating durable benefits to amphibian species facing extinction, such as:

- 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 collect ensures that reviewers have sufficient information to select proposals for funding.

This grant program complements the other international conservation grant programs that we operate for:

- African Elephants.
- Asian Elephants.
- Great Apes.
- Marine Turtles.

- Rhinoceros and Tigers.
- Wildlife Without Borders: Africa, Mexico, Latin America and Caribbean, and Critically Endangered Animals.

The above grant programs are approved under OMB Control No. 1018-0123, which expires May 31, 2011, and OMB Control No. 1018-0142, which expires December 31, 2012. We will consolidate all of our international grant programs under 1018-0123 during the next renewal of that collection.

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 collect the following information for applications:

- Cover page with basic project details (FWS Form 3-2338B).
- Project summary and narrative.
- Letter of appropriate government endorsement.
- Brief curricula vitae for key project personnel.
- SF 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 are the basis for this information collection request. A panel of technical experts reviews 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.

- 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.]

On April 14, 2010, we published in the Federal Register (75 FR 19420) a notice of our intent to request that OMB renew this information collection. In that notice, we solicited comments for 60 days, ending on June 14, 2010. We received three comments in response to that notice.

One commenter voiced opposition to spending tax dollars for this program. Another commenter supported the program and expressed interest in applying for a grant. The third commenter also expressed interest in applying for a grant. None of the commenters addressed the information collection requirements, and we did not make any changes to our collection. We did send a copy of the NOFA to each individual interested in applying.

In addition to the Federal Register notice, we contacted the following persons and asked for comments on the information collection:

Will Banham PhD Associate Director, Training & Capacity Bldg Prog. Wildlife Conservation Society - Global Conserv. Prog. 2300 Southern Boulevard Bronx, NY, 10460-1099, USA Tel: 718 741 8228 / Fax: 718 364 4275 Email: wbanham@wcs.org	Roberto Ibáñez Director of the Amphibian Rescue and Conservation Project in Panama Smithsonian Tropical Research Institute Tupper Building, Unit 9100, Box 0948 DPO AA 340012-9998, USA Tel: +(507) 212-8222 Email: ibanezr@si.edu
Katie Frohardt Executive Director Fauna & Flora International P.O. Box 42575 Washington, DC 20015 voice 202-329-1672 e-mail katie.frohardt@fauna-flora.org	Brian Gratwicke Conservation Biologist National Zoological Park P.O. Box 37012, MRC 5503 Washington, DC 20013-7012 Tel: 202-633-0257 Email: gratwickeb@si.edu

<p>Richard Carroll World Wildlife Fund 1250 24th Street, NW Washington DC tel: 202-293-4800 Richard.Carroll@WWFUS.ORG</p>	<p>David Kramer President, EcoLogic Development Fund 25 Mt Auburn Street, Ste. 203 Cambridge, MA 02138 e-mail: dkramer@ecologic.org</p>
<p>Peter Clyne Assistant Director Asia Program, Wildlife Conservation Society 2300 Southern Boulevard, Bronx, NY 10460 pclyne@wcs.org</p>	<p>Rosa Maria Vidal Directora, Pronarura Sur, Pedro Moreno #1, esq. Benito Juarez, San Cristobal de las Casas, Chiapas, Mexico e-mail: rosavidal@pronatura-sur.org</p>

We received no comments from any of those contacted.

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 individuals; nonprofit, nongovernmental organizations; public and private institutions of higher education; and Federal, State, and local government agencies. All of the on-the-ground projects must 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 \$21,183.

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. The mean hourly wage for respondents from the United States and other developed countries is \$29.17. We determined this hourly wage based on Bureau of Labor

Statistics, Occupational Employment and Wages, May 2009, 19-1023 Zoologists and Wildlife Biologists. We multiplied the hourly wage by 1.4 to account for benefits (\$40.84) in accordance with BLS news release USDL 10-0774, June 9, 2010.

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/hcaesuptabtoc.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	12 hours	120	\$40.84 USD	\$ 4,901
	30 - nondomestic		360	\$ 9.00 USD	\$ 3,240
Grant Reporting	8 - domestic	30 hours	240	\$40.84 USD	\$ 9,802
	12 - nondomestic		360	\$ 9.00 USD	\$ 3,240
Total	60		1,080		\$21,183

*rounded

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 \$9,545 (rounded). We used the Office of Personnel Management Salary Table 2010-DCB to determine wages and multiplied the hourly wage by 1.5 to account for benefits in accordance with BLS news release USDL 0774, June 9, 2010. 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	\$28.04	\$42.06	20 hours	\$ 841.20
Review Proposals	Biologist or International Affairs Specialist GS-13/5	\$48.35	\$72.53	80 hours	5,802.40
Review Reports	Biologist or International Affairs Specialist GS-13/5	\$48.35	\$72.53	40 hours	2,901.20
Total Estimated Cost					\$9,544.80

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

There are no program changes or adjustments.

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.