

1 Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0123

International Conservation Grant Programs

Note: Currently, information that we collect for Critically Endangered Animals grants is approved under OMB Control No. 1018-0142, which expires December 31, 2012. Information collection for Amphibians in Decline grants is approved under OMB Control No. 1018-0144, which expires September 30, 2013. In this ICR, we are proposing to consolidate all of our international conservation grants under OMB Control No. 1018-0123. If OMB approves this request, we will discontinue OMB Control Numbers 1018-0142 and 1018-0144.

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 Amphibians in Decline, Critically Endangered Animals, Mexico, Latin America and the Caribbean, Russia and Africa:

- African Elephant Conservation Act of 1989 (16 U.S.C. 4201-4245)
- Rhinoceros and Tiger Conservation Act of 1994 (16 U.S.C. 5306)
- Asian Elephant Conservation Act of 1997 (16 U.S.C. 4261)
- Great Ape Conservation Act of 2000 (P.L. 106-411)
- Marine Turtle Conservation Act of 2004 (P.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. In addition, the Foreign Assistance Act Part 1, Section 119, mandates the U.S. Agency for International Development to offer financial support to our International Conservation Programs.

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 (NOFA) 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 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 and 424b (non-domestic applicants do not submit the standard forms).

FWS Form 3-2338 and the NOFAs will be available in Spanish, Russian, and French translations.

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 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 27, 2010, we published in the Federal Register (75 FR 66119) a notice of our intent to request that OMB approve the collection of information associated with 1018-0123. We solicited comments for 60 days, ending on December 27, 2010. We received no comments.

In addition to our Federal Register notice, we solicited comments from several previous applicants for these programs. 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.

Contact information for persons providing comments:

Peter Clyne Deputy Director, Asia Program Wildlife Conservation Society 2300 Southern Blvd. Bronx, NY 10460 pclyne@wcs.org	Stephen Browne Asia-Pacific Programme Manager Fauna & Flora International Jupiter House, 4th Floor Station Road Cambridge, CB1 2JD UK Stephen.browne@fauna-flora.org
Robert Williams Project Manager Africa Conservation Fund 10 Norwich St London EC4A 1BD UK robertw@gorilla.cd	Sean Southey Executive Director PCI Media Impact 777 United Nations Plaza - 5th Floor (44th Street @ 1st Avenue) New York, NY 10017 ssouthey@mediainpact.org

Those who responded stated that the information we request is generally appropriate, well-designed, clear and useful. In addition:

- Two respondents stated they spent 30 hours in completing an application and 40 hours in reporting. A third person stated it took them 60 hours to write reports. Based on this information, we have increased our burden estimates, as shown in item 12.
- Another person suggested a two-phase proposal process. In most of our programs, we do give applicants feedback from which they may revise their proposals for further consideration within the same grant cycle.
- It was suggested that DIC encourage multi-year proposals so that applicants do not have to apply year after year to fund ongoing work. We have incorporated new language in several of our NOFAs to inform applicants that some proposals may be considered for a multi-year grant.
- A respondent suggested that we remove the section in our NOFAs which asks about the sustainability of the project. In most NOFAs, this section was revised to provide more clarity on the specific information we are requesting.
- It was also suggested that DIC help coordinate the ongoing efforts of organizations running similar projects in the field that may not be aware of one another. Once we transition to our new internal and external databases this fiscal year, we hope to be able to collect data on current projects and provide such useful project information in ways that may be easily accessed by our applicants and grantees.

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 1,272 responses totaling 38,856 burden hours. We estimate the annual dollar value of the burden hours to be \$910,728.

We expect to receive approximately 668 applications, each taking applicants 22 hours to complete. We anticipate awarding an average of 302 grants per year to a subset of the applicants, 146 of which will be domestic recipients and 156 will be nondomestic recipients. We estimate that each respondent will submit two reports annually (mid-term and final) and that it will take approximately 40 hours to prepare each report.

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 \$29.17 USD. We determined this hourly wage based on Bureau of Labor Standards Occupational Employment and Wages, May 2009, 19-1023 Zoologists and Wildlife

Biologists at <http://www.bls.gov/oes/2009/may/oes191023.htm>. In accordance with Bureau of Labor Statistics Bulletin USDL 11-0304 entitled “Employer Costs for Employee Compensation—December 2010” (<http://www.bls.gov/news.release/pdf/ecec.pdf>), we multiplied the hourly wage by 1.4 to account for benefits, resulting in an hourly wage of \$41.00 (rounded).

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>. Using 2008 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.

We used the above rates for all respondent groups.

ACTIVITY	NO. OF ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY RATE W/ BENEFITS	TOTAL \$ VALUE OF ANNUAL BURDEN HOURS
Grant Application – Cover Sheet and Narratives	266 - domestic 402- nondomestic	22 hours	5,852 8,844	\$41.00 USD \$ 9.00 USD	\$ 239,932 \$ 79,596
Grant Reporting	292- domestic 312- nondomestic	40 hours	11,680 12,480	\$41.00 USD \$ 9.00 USD	\$ 478,880 \$112,320
Total	1,272		38,856		\$ 910,728

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 reports as a result of this collection of information is \$316,935 (rounded). 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’s Salary Table 2011-DCB to determine the hourly wages. To account for benefits, we multiplied the hourly rate by 1.5 in accordance with Bureau of Labor Statistics Bulletin USDL 11-0304 entitled “Employer Costs for Employee Compensation—December 2010” (<http://www.bls.gov/news.release/pdf/ecec.pdf>) released on March 9, 2010.

Proposals are processed by 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.

POSITION/ STEP & GRADE	ACTION	NO. OF RESPONSES	ESTIMATED TIME PER RESPONSE	TOTAL HOURS	HOURLY RATE W/ BENEFITS*	TOTAL ANNUAL COST*
Grant Specialist GS-12/5	Process Proposals	668	1 hour	668	\$60.99	\$40,741
Biologist/Technical GS-13/5	Review Proposals	650	4 hours	2,600	\$72.53	\$188,578
Biologist/Technical GS-13/5	Review Reports	604	2 hours	1,208	\$72.53	\$87,616
Estimated Total Cost to Federal Government						\$316,935

*rounded

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

We are requesting 1,272 responses totaling 38,856 annual burden hours, which is a net increase of 481 responses and 24,828 burden hours from our previous submission.

We are reporting as a program change, 120 responses totaling 3,360 burden hours. This is a result of incorporating the burden associated with collection requirements approved under OMB Control No. 1018-0142 and 1018-0144.

The remaining burden changes are adjustments made as a result of our experience in administering this collection over the past 3 years and comments received during our outreach.

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.