

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

OMB Control Number 1018-0100

Migratory Birds and Wetlands Conservation Grant Programs

Note: Currently, information that we collect for Neotropical Bird Conservation Act grants is approved under OMB Control No. 1018-0113, which expires March 31, 2012. In this ICR, we are proposing to consolidate both of our migratory birds and wetlands conservation grant programs under OMB Control No. 1018-0100. If OMB approves this request, we will discontinue OMB Control Number 1018-0113.

Terms of Clearance. None.

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

The U.S. Fish and Wildlife Service (we, Service), Division of Bird Habitat Conservation (DBHC), administers competitive grant programs established by Congress through the North American Wetlands Conservation Act (16 U.S.C. 4401-4412) and the Neotropical Migratory Bird Conservation Act (Pub. L. 106-247). Grants funded through these programs are subject to applicable Federal financial assistance regulations, including 2 CFR parts 25, 170, 175, and 1400; 43 CFR parts 12, 18, and 43; 49 CFR part 24, and Department of Interior and Bureau directives for administering grants.

The North American Wetlands Conservation Act (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 associated with such habitat. Two types of NAWCA grants are offered: Standard and Small. Both types 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. A typical U.S. Standard grant award is \$1 million.

The Small grants program also supports projects that protect, restore, and enhance wetland habitats, but is available only to U.S. applicants. The program uses the same selection criteria and administrative guidelines as the U.S. Standard grants program, but project activities are usually smaller in scope and expense. Grant requests may not exceed \$75,000, and funding priority is given to grantees or partners new to the NAWCA grants program.

The Neotropical Migratory Bird Conservation Act (NMBCA) supports public-private partnerships carrying out projects that promote the long-term conservation of neotropical migratory birds and their habitats in the United States, Canada, Latin America, and the Caribbean. Principal conservation actions supported by the NMBCA are the protection and management of

populations; maintenance, management, protection and restoration of habitat; research and monitoring; law enforcement; and community outreach and education.

NMBCA grants require that grant requests be matched by partner contributions at a rate of \$3 of match to every \$1 in grant funds. Funds from U.S. Federal sources are not eligible as match. No more than 25 percent of NMBCA funds can be spent in the United States. Awards normally do not exceed \$250,000 and the average award is about \$100,000.

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.

We use the information collected to award grants as directed by Congress through the NAWCA and NMBCA. U.S. Standard NAWCA grants are awarded two times per year. All other NAWCA grants and NMBCA grants are awarded annually. From 1991 through 2011, 2,121 NAWCA grant projects have been awarded for a total of \$1.13 billion, an amount matched by about 12,500 partners with an additional \$2.35 billion. Through 21 years of partnerships, NAWCA has conserved almost 26.7 million acres of wetlands and associated uplands across the continent. Since the program's inception in 2002 through 2011, the NMBCA grants program has supported 367 projects, coordinated by more than 1,700 partners in 48 U.S. States/territories and 36 countries. More than \$39.6 million from NMBCA grants have leveraged about \$152 million in matching funds. NMBCA projects involving land conservation have affected about 2 million acres of bird habitat.

Applicants compete for grant funds by developing proposals that describe in substantial detail project locations, resource benefits, partnership funding, and other characteristics to meet the requirements of both the NAWCA and the NMBCA. The applications provide the basic information necessary to determine the appropriateness and eligibility of potential projects. A competitive process is used to score and rank all eligible applications.

Award recipients must provide annual and final performance reports to document the progress and accomplishments of projects. Applicants also must provide financial information annually and at the end of the project that shows the actual award amount spent and the non-Federal match provided to the project.

Information collected under this program is used to respond to the Executive Branch of the Federal Government, Congress, and the general public for requirements such as agency performance information (GPRA), budget reports and justifications, general public requests for information, data requests by other Federal financial assistance programs, and Congressional inquiries and reports.

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].

Program descriptions, grant instructions, and application forms are available online at <http://www.fws.gov/birdhabitat/Grants/NAWCA/index.shtm> for NAWCA grants, <http://www.fws.gov/birdhabitat/Grants/NMBCA/index.shtm> for NMBCA grants, and at

Grants.gov. NAWCA and NMBCA grant programs also are listed in the Catalog of Federal Domestic Assistance.

Electronic application submission is encouraged. Fewer than 5% of applicants choose to submit applications only by mail or overnight service. Grant program information and application deadlines are posted on Grants.gov and applications can be submitted through that site. Reports may be submitted electronically or by mail or fax. More than 50 percent of award recipients send required reports and documentation by email. Almost all communications with applicants and recipients are accomplished by phone, email, or fax.

4. Describe efforts to identify duplication.

The information collected is unique to each location, situation, and proposal and is necessary for evaluating and selecting projects that make significant contributions to program 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 grant. 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 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 the NAWCA U.S. Standard grants and one opportunity for NAWCA Small, Canadian, and Mexican grants and NMBCA 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 May 24, 2011, a notice of our intent to request that OMB approve information collection for Migratory Birds and Wetlands Conservation Grants programs was published in the Federal Register (76 FR 30186). In that notice, we solicited comments for 60 days, ending on July 25, 2011. The single comment received expressed opposition to the NAWCA grants program, but did not address the information collection requirements. No changes were made to the information collection requirements as a result of this comment.

We interviewed seven grant recipients to determine 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 NAWCA (Standard and Small) and NMBCA 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 and has practical utility for that process. Four respondents who have participated in the NAWCA U.S. Standard grants program estimated that it takes 125-325 hours to prepare an application. A respondent with experience in preparing NAWCA U.S. Small grants program applications estimated that process takes approximately 70 hours. Two respondents with NMBCA grant application experience estimated that the process takes 4-120 hours. For all Migratory Bird and Wetland Conservation grants, 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 grant project. Participants in the NAWCA U.S. Standard grants program estimated that it takes approximately 40-180 hours to prepare reports during the life of the project, an average of 43 hours per report per year. A participant in the NAWCA Small Grants Program estimated that reports take approximately 33 hours to prepare each report. Two respondents who received NMBCA grants estimated that that it takes 4-80 hours to prepare reports annually. The number of annual reports required is determined by the length of the project. Grant agreements may be for terms of one-to-two years, but may be extended at the request of the recipient. Some project periods may last as long as five years. Both annual and final reports include program and financial information.

Following is contact information for and additional comments from the seven individuals

interviewed:

Janice Allen, Deputy Director, North Carolina Coastal Land Trust, 252-634-1927. Ms. Allen suggested that the requested budget/cost information be standardized throughout the proposal and that contributions of non-matching funds be documented in a different type of partner statement than those contributing matching funds.

Ron Leathers, Government Grants Coordinator, Pheasants Forever, 651-209-4919.

Chuck Lobdell, Manager of Conservation Programs, Ducks Unlimited, Inc., 360-885-2011. Mr. Lobdell noted that technical questions 3, regarding bird plans, and 6, regarding endangered species, might be simplified and/or more focused.

Chad Santerre, Senior Biologist/NAWCA Coordinator, California Waterfowl Association, 530-868-5072. Mr. Santerre stated that changes in the lists of relevant bird species in one of the technical questions could cause confusion in proposal preparation. He noted that repetitive portions of the application had been eliminated and suggested that DBHC reduce the number of bird species to be discussed in technical question #2.

Nancy Butler, Executive Director, Rio Grande Headwaters Land Trust, 719-657-0800. Ms. Butler said that duplication had been successfully eliminated in NAWCA grants, but that the page limit can be challenging. She was concerned that the summary page formatting was too strict. She said that their organization recognizes that the process is very competitive and understands why all of the information must be collected.

Sharon Liederman, Grants Specialist, The Nature Conservancy, 406-458-8160. Ms. Liederman had no suggestions for improving the application, stating that preparation and reporting times are reasonable and not burdensome.

Arvind Panjabi, International Program Director, Rocky Mountain Bird Observatory, 970-482-1707 x 20.

Our burden estimates in item 12 reflect the outreach comments, above, as well as our experience in administering these grant programs. We are evaluating the other outreach comments and will incorporate them, as appropriate, when we revise our proposal instructions.

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 we will receive 670 responses totaling 45,396 burden hours. Estimates are presented by grant type because the scope, activities, complexity, and cost of projects vary significantly by grant size and location. NAWCA Standard grants are open to applicants from the United States, Canada, and Mexico. NAWCA Small grant opportunities are available only to U.S. applicants. NMBCA grants are available to applicants from the United States, Canada, Latin America, and the Caribbean.

The estimated dollar value of the annual burden hours is \$1,566,833. The estimated dollar value of a burden hour varies by respondents. Using Bureau of Labor Standards (BLS) May 2010 wage information for zoologists and wildlife biologists across the United States (www.bls.gov), we estimated the average hourly value for applicants from the United States to be \$29.64 USD. Total hourly compensation rates, including benefits, for individuals and those in the private sector and for those working in government were calculated by multiplying the hourly rate by 1.4 and 1.5 respectively.

We were unable to locate comparable wage information for similar occupational groups in Canada and Mexico. However, a March 2011 BLS news release (“International Comparisons of Hourly Compensation Costs in Manufacturing, 2009”) showed that the Canadian hourly compensation cost for all employees in manufacturing is about 11% less than the same cost in the United States. Therefore, we used \$26.38 USD to calculate the costs of information collection activities in Canada, 89% of the U.S. hourly wage for wildlife biologists. For Mexico, the same BLS article noted that compensation for Mexican manufacturing employees was approximately 16% of their U.S. counterparts, so we estimated the average hourly value for Mexican applicants and recipients, primarily professional biologists and conservation specialists, at \$4.74 USD. Total hourly compensation, including benefits, was calculated for Canadian and Mexican wages as it was for the U.S.

For NMBCA hourly cost estimates, the U.S. and Canadian wages were averaged, as were wages from the Latin American countries of Mexico, Argentina, and Brazil (the only Latin America countries included in the BLS comparison). Calculation of the final hourly rate average of \$13.53 was weighted to reflect that a higher number of applications and reports are received from applicants outside the U.S. and Canada. Most of those respondents also are professional biologists and conservationists, but are located in Latin American and the Caribbean where these costs are considerably lower. The total hourly compensation, including benefits, was determined as above.

REQUIREMENT	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS	HOURLY LABOR COSTS INCLUDING BENEFITS	TOTAL DOLLAR VALUE OF ANNUAL BURDEN HOURS *
APPLICATIONS						
NAWCA-U.S. Small						
Individuals	1	58	58	\$29.64	\$41.50	\$ 2,407
Private Sector	68	58	3,944	29.64	41.50	163,676
Government	18	58	1,044	29.64	44.46	46,416
NAWCA-U.S. Standard						
Individuals	1	215	215	29.64	41.50	8,923
Private Sector	60	215	12,900	29.64	41.50	535,350
Government	16	215	3,440	29.64	44.46	152,942

NAWCA-Canada/Mexico						
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Standard							
Individuals - Mexico	1	80	80	4.74	6.64	531	
Private Sector - Mexico	20	80	1,600	4.74	6.64	10,624	
Private Sector - Canada	6	80	480	26.28	36.93	17,726	
Government	5	80	400	4.74	7.11	2,844	
NMBCA							
Individuals	2	62	124	13.53	18.94	2,349	
Private Sector	82	62	5,084	13.53	18.94	96,291	
Government	22	62	1,364	13.53	20.29	27,676	
Subtotal - Applications	302		30,733			\$1,067,755	
REPORTS							
NAWCA-U.S. Small							
Individuals	1	33	33	29.64	41.50	1,370	
Private Sector	90	33	2,970	29.64	41.50	123,255	
Government	18	33	594	29.64	44.46	26,409	
NAWCA-U.S. Standard							
Private Sector	96	43	4,128	29.64	41.50	171,312	
Government	20	43	860	29.64	44.46	38,235	
NAWCA-Canada/Mexico Standard							
Individuals-Mexico	1	43	43	4.74	6.64	286	
Private Sector-Mexico	20	43	860	4.74	6.64	5,710	
Private Sector-Canada	47	43	2,021	26.28	36.93	74,635	
Government-Mexico	4	43	172	4.74	7.11	1,223	
NMBCA							
Individuals	1	42	42	4.74	6.64	279	
Private Sector	58	42	2,436	13.53	18.94	46,138	
Government	12	42	504	13.53	20.29	10,226	
Subtotal - Reports	368		14,663			\$499,078	
TOTALS	670		45,396			\$1,566,833	

*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 respondents.

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

The total estimated annual cost to the Federal Government for processing and reviewing proposals and reviewing reports as a result of this collection of information is \$724,142. This estimate includes salary and benefits (\$541,476), as well as other costs associated with proposal review, selection, and report review (\$182,666). Table 14.1 shows Federal staff and grade levels performing various tasks associated with this information collection. DBHC staff develop and post application instructions annually, Grant Administrators, Proposal Coordinators, and the Program Analyst review all proposals for eligibility, cost allowability, scope, and content. Volunteer staff to the North American Wetlands Conservation Council, whose expenses are paid by the Service, score the NAWCA proposals and recommend a project 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. The volunteer NMBCA review team members, participating at no cost to the Service, score NMBCA proposals and recommend a slate of projects for funding to the Director of the U.S. Fish and Wildlife Service.

Information collection costs also include expenses associated with proposal solicitation, review,

and selection, including travel and travel arrangement costs for the NAWCA Council staff and Council project selection meetings, site visits, and printing (see Table 14.2).

We used Office of Personnel Management Salary Table 2011-DCB http://www.opm.gov/oca/11tables/pdf/dcb_h.pdf to determine the hourly wages and multiplied the hourly wage by 1.5 to account for benefits.

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	\$28.04	\$42.06	624	\$26,245
	Wildlife Biologist/Grant Administrator GS 13/5	\$48.35	\$72.53	624	\$45,259
Proposal Review	Wildlife Biologist/Grant Administrator GS 13/5	\$48.35	\$72.52	2,752	\$199,603
	Program Analyst GS 9/5	\$28.04	\$42.06	960	\$40,378
	Grant Administrator-GS 12/5	\$40.66	\$60.99	280	\$17,077
Proposal Selection	Wildlife Biologist GS 13/5	\$48.35	\$72.53	375	\$27,199
	Wildlife Administrator (Grants Branch Chief) GS 14/5	\$57.13	\$85.70	475	\$40,708
	Wildlife Administrator (Council Coordinator) GS 15	\$67.21	\$100.82	375	\$37,808
	Wildlife Biologist/Grant Administrator GS 13/5	\$48.35	\$72.53	1,478	\$107,199
Total					\$541,476

*rounded

Table 14.2 – Other NAWCA Costs

Action	Travel (NAWCA Council, Council Staff, and FWS)	NAWCA Council Site Visits (As Needed for Project Evaluation)	Printing/ FedEx	Invitational Travel Coord. Contract	Total
	\$148,000	\$10,000	\$3,000	\$21,666	\$182,666

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

We are reporting 670 responses totaling 45,396 annual burden hours for this collection, a net increase of 197 responses and 7,595 burden hours from the last request for OMB 1018-0100.

Based on our outreach and our experience in administering these grant programs, we made adjustments to our estimates of the number of responses and the completion time for each response. These adjustments resulted in an increase of 20 responses and a decrease of 1,959 annual burden hours.

We are reporting as a program change an increase of 177 responses and 9,554 annual burden hours associated with NMBCA applications and reports (currently approved under 1018-0113).

Once this ICR is approved, we will discontinue 1018-0113 (195 responses and 10,650 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.