

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

## **Department of the Interior Regional Climate Science Centers**

**Terms of Clearance: None**

**OMB Control Number 1028-0096**

### **General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### **Specific Instructions**

#### **Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

In September 2009, Secretary of the Interior Salazar issued Secretarial Order 3289 (<http://www.doi.gov/climatechange/index.html>). Among other provisions, the Order broadened the mandate of the National Climate Change and Wildlife Science Center (NCCWSC) to include providing science on climate change-related impacts on the full array of resources, not limited to wildlife, fish, and aquatic and terrestrial habitats. The establishment of the DOI Climate Science Centers (CSCs) provided an excellent opportunity to take a broad and integrated approach to developing research, models, and tools for natural and cultural resource adaptation strategies.

Pursuant to P.L. 110-161, and according to its mission, the USGS developed DOI CSCs to provide climate change impact data and analysis geared to the needs of fish and wildlife managers as they develop adaptation strategies in response to climate change. These DOI CSCs were developed in close collaboration with Interior agencies and other federal, state, university, and non-governmental partners. The NCCWSC and DOI CSCs provide scientific research, data and information needed to explore the impacts from climate change and variability. The DOI CSCs perform climate model downscaling, integrate ecological and habitat models, and forecast future changes to natural and cultural resources. Finally, the DOI CSCs coordinate with other DOI land managers to provide forecasting, decision support and information products for adaptive management strategies, options and mitigation.

The NCCWSC has the responsibility to manage DOI CSCs that are co-located at cooperating organizations at non-USGS facilities. The DOI CSCs include USGS staff that report to a national USGS office. The NCCWSC works in close partnership with the climate change science and natural and cultural resource management communities to understand high priority science needs and to develop science information tools that can help resource managers develop strategies for responding to climate change. This program provides funding for researchers through cooperative agreements that involve climate change science as a major component.

Eight DOI CSCs have been established, with the last three started up in Fiscal Year 2012. The DOI CSCs and Host partnerships have been established on a 5-year renewable basis.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The initial information collection activity was performed to identify the preferred locations / institutional partners for Climate Science Centers. This was a full and open competition announced on Grants.gov. Based on this information, CSC host institutions have been identified and have entered cooperative agreements with USGS. At present, information collection activities focus on annual performance and financial reports, required under the cooperative agreements. This information is used to conduct an annual performance evaluation of each CSC's progress in meeting the goals of the agreement.

Information is collected in two ways.

(1) All cooperators are required to file quarterly financial statements (Standard Form 425). These provide management with updates on spending rates and available balances, and an end-of-project SF 425 within 90 days of project completion. This oversight is a basic part of CSC and NCCWSC management and administration, and is required to ensure that financial activities are matching project progress (i.e. drawdowns are proceeding as expected).

(2) All cooperators are required to provide annual progress reports. Such reports provide managers with a summary of CSC activities, including those of funded researchers and graduate students and post-doctoral researchers funded by or affiliated with the CSC. Annual reports describe research activities underway, students accepted into the program, other activities undertaken (e.g. summer training classes), and related implementation details. This information is required to ensure that CSC actions are being implemented as planned / expected, progress is satisfactory toward key objectives identified by USGS, products are being developed in a timely fashion, and data managed according to NCCWSC requirements.

**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.**

Annual reporting is conducted in two ways. One is a financial report (SF 425) that is delivered to the USGS Office of Acquisition and Grants (OAG). The second is a substantive progress report, prepared by the CSC host institution, and provided to the USGS National Climate Change and Wildlife Science Center. Each report is due 90 days after the end of the performance year.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Due to the unique nature of this program and authorizing legislation, no other Federal agency collects this information. No duplication will occur.

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

While this collection of information does not specifically impact small businesses, we have made efforts to keep the amount of information requested to a minimum. The information has to be sufficient to fulfill the requirements of the National Climate Change and Wildlife Science Center, as well as sufficient to make a competitive funding decision.

**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.**

Under the Stafford Act (P.L. 93–288; Sec. 202), the Department of the Interior has the responsibility to provide timely and high quality scientific information and products, in this case relating to climate change and impacts on DOI lands and throughout the United States, in general. Failure to collect this information would result in a deficiency to comply with the congressional mandate to establish these centers and the inability to inform decision makers, develop adaptive management strategies, and mitigate the risks to natural resources associated with climate change.

**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. **If applicable, provide a copy and identify 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 and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On January 11, 2013, we published a Federal Register notice (78 FR 2422) announcing that we would submit this information collection to OMB for approval. The notice provided a 60-day public comment period ending on March 12, 2013. We received two comments that were general invectives about the Federal Government and were not applicable to this information collection activity.

In addition to our Federal Register Notice, we solicited comments from former applicants about the clarity of instructions, our burden estimates and the utility of the information sought.

The individuals listed below provided editorial suggestions and feedback concerning the information collection and its clarity, based on their previous experiences with cooperative agreement applications. We incorporated their suggested edits to improve the grammatical clarity of the final announcement.

**Individuals Contacted Outside the Agency:**

1. Dr. Richard Palmer, Lead PI for NE CSC, University of Massachusetts, Amherst, MA
2. Alison Meadow, SW CSC, University of Arizona, Tucson, AZ
3. Damian Shea, Lead PI for SE CSC, North Carolina State University, Raleigh, NC

**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 the remuneration of awards

**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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

We do not ask questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- \* **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

- \* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate each report will take an average of 20 hours to complete.

Our estimates are based on our own knowledge plus the outreach described in item 8. We expect to receive approximately 40 responses from a combination of state/local and tribal governments as well as from individuals representing the private sector. This amount is reduced from previous estimates to better match the actual number of projects and reports expected. (Initial estimates were higher than actual experience has proven.) We expect that it will take each applicant approximately 20 hours to complete the reporting process, totaling 800 burden hours.

We estimate the dollar value of the annual burden hours to be \$35,656 (see Table 1). The hour cost is based on BLS news release USDL USDL-13-0421 (<http://www.bls.gov/news.release/pdf/ecec.pdf>) of March 12, 2013, for average full compensation per hour including benefits for private industry and state, local, tribal governments. The particular values utilized are:

States/tribal/local governments. Average hourly wage is \$35.76 multiplied by 1.4 to account for benefits (\$50.10). To obtain the rate for State/local/tribal government, we used data from [http://www.bls.gov/oes/current/naics4\\_999200.htm#00-0000](http://www.bls.gov/oes/current/naics4_999200.htm#00-0000), Physical Scientist mean hourly income.

Private sector. Average hourly wage is \$45.06 multiplied by 1.4 to account for benefits (\$63.08). To obtain the rate for Physical Scientist in the private sector we used data from <http://www.bls.gov/news.release/pdf/ocwage.pdf>, Table 1.

**Table 1. Estimated Dollar Value of Annual Burden Hours**

Activity	Annual Number of Responses	Estimated Completion Time per Respondent	Total Annual Burden Hours	Dollar Value of Burden Hour [Including Benefits]	Total Dollar Value of Annual Burden Hours
<b>Reports</b>					
State/Local/Tribal	30	20 hours	600	\$50.10	\$30,060
Private	10	20 hours	200	\$63.08	\$12,616
<b>TOTAL</b>	<b>40</b>		<b>800</b>		<b>\$30,676</b>

- 13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* **The cost estimate should be split into two components: (a) a total capital and start-**

**up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour cost burden to applicants resulting from this collection. There are no fees associated with application process or requirements.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The total estimated cost to the Federal Government for processing and reviewing proposals as a result of this collection of information is \$28,328. This includes Federal employees' hourly wages and benefits. Table 2 below shows Federal staff and grade levels performing various tasks associated with this information collection.

We used the Office of Personnel Management Salary Table 2012-DCB (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2012/general-schedule/washington-baltimore-northern-virginia-dc-md-va-wv-pa-annual-rates-by-grade-and-step/>) to determine the hourly wages for the Federal employees associated with this collection. We multiplied the hourly wage by 1.5 to account for benefits (as implied by the previously referenced BLS news release).

**Table 2. Annual Cost to the Federal Government**

<b>Position</b>	<b>Grade/ Step</b>	<b>Hourly Rate</b>	<b>Hourly Rate incl. benefits (1.5 x hourly pay rate)</b>	<b>Estimated time spent by Federal Employees (hours)</b>	<b>Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)</b>
NCCWSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
NCCWSC Policy & Partnership Coordinator	GS-15/10	\$74.47	\$111.71	24	\$2,681
NCCWSC Program Analyst	GS-13/5	\$48.33	\$72.50	40	\$2,900
NCCWSC Executive Assistant	GS-8/8	\$27.60	\$ 41.41	24	\$ 994
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
CSC Director	GS-15/5	\$67.13	\$100.70	24	\$2,417
<b>TOTAL</b>					<b>\$28,328</b>

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

There were no program changes. The reduction in burden hours reflects the removal of respondents submitting applications. Because the CSCs have been established, applications will not be necessary until it is time to renew the partnerships in approximately three years.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**



The information collected will not be tabulated or published for statistical use.

**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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.