

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

## **Application for Training, National Conservation Training Center OMB Control Number 1018-0115**

**Terms of Clearance: None.**

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

The U.S. Fish and Wildlife Service's National Conservation Training Center (NCTC) is internationally acclaimed as a premier natural resource training facility. It provides training and education services to Fish and Wildlife Service employees, employees of other bureaus of the Department of the Interior (DOI), State employees, and members of the public. FWS Form 3-2193 (Training Application) is a quick and easy method for non-DOI students to request training. We have used this form for 13 years in the daily operations of the NCTC.

Authorities for conducting training include:

- 5 U.S.C. 4101, et seq. (Government Organization and Employee Training)
- 5 U.S.C. 1302, 2951, 4118, 4308, 4506, 3101, 43 U.S.C. 1457, Title VI of the Civil Rights Act of 1964 as amended (42 U.S.C. 2000d)
- Executive Order 11348 as amended by Executive Order 12107
- 5 CFR 410, Subpart C (Establishing and Implementing Training Programs)

### **2. Indicate how, by whom, and for what purpose the information is to be used.**

FWS Form 3-2193 is the application form that non-DOI students use to register for classes at NCTC. We collect:

- Course information, including course code, name, date of training, and location.
- Names, addresses, phone/fax, and job titles, which NCTC staff use to:
  - Establish class rosters
  - Send enrollment letters
  - Respond to individual transcript requests
  - Prepare individual billing
- Supervisor's name, email address, and telephone number.
- Special needs so that we can meet the needs of these students and conform to requirements under Public Law 101-336 (Americans with Disabilities Act).
- Billing information. The desired billing method of the payer determines the billing information that we collect.

<b>If payment is by ...</b>	<b>We collect ...</b>
Credit card	Billing contact name, email, phone and address, credit card number, and expiration date.
SF 182	Billing contact name, email, phone and address, ALC code, DUNS number, and funding code.
Interagency agreement	Billing contact name, email, phone, ALC code, and voucher number.
Invoice	Billing contact name, phone and address, Tax ID #. and DUNS number

We do not share private information except as outlined in the routine uses section of the DOI LEARN system of records notice (70 FR 58230). We grant outside requests for information in accordance with the proposed routine uses identified in the system of records notice, DOI Privacy Act regulations, and Privacy Act disclosure requirements. When compiling statistical or budgetary information, we remove all personal identifiers prior to release of the information.

**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].**

We encourage applicants to use FWS Form 3-2193 and to submit their requests for training electronically. We estimate that 70 percent of applications will be submitted electronically via email. The form is available online in a fillable format at <http://nctc.fws.gov/documents/Student-Application.pdf>. The form can be saved to the applicant's local computer and then emailed to the NCTC Registrar. The form can also be printed, completed by hand, and faxed to the NCTC Registrar. We provide FWS Form 3-2193 in paper form to those members of the public who do not have access to or do not wish to use our electronic means of application.

The volume of students who take training requires the use of an electronic tracking system to more easily manage all aspects of the NCTC training curriculum. This approved Privacy Act system of records, called DOI LEARN, allows all prospective students to review the DOI LEARN training catalog via the Internet. DOI LEARN provides DOI employees, contractors, and volunteers the opportunity to log in to the system, view their own transcripts, review Web and computer based training, and directly register for any DOI sponsored training classes without the use of the Training Application form. This has helped DOI conform to the President's E-Gov Management Initiative regarding training.

The results of the information collection are not available to the public over the Internet due to the sensitive nature of the data contained in the collection. Individual students may request a copy of their training transcripts by contacting the NCTC Registrar.

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

There is no duplication of data. While we encourage applicants to use FWS Form 3-2193, we do not require them to complete both a training form required by their agency and FWS Form 3-2193. NCTC will accept any single training request as long as each submission identifies the name, address, and phone number of the applicant, sponsoring agency, course, class start date, and all required financial payment information when appropriate.

DOI LEARN is routinely updated with data from FPPS (Federal Personnel Payroll System) to update information within the system for DOI employees. However, other students (private, State, and NGO) must supply the information when they initially register for a course and update this information as needed each time they register for a subsequent course in order to ensure that no information has changed since the student last attended training.

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

This information collection will not significantly impact small businesses. Students complete this form to request training at NCTC. We request only the minimum information necessary to register students for classes at NCTC.

**6. Describe the consequence to Federal program or policy activities if the collection were not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the information were not collected, public use of the training offered by NCTC would significantly decrease. Tracking training would become labor intensive and communication to students would be negatively affected. Maintaining transcript records and supplying them when requested would require hours of manually paging through files for each request. Conducting the collection less frequently would result in incomplete and incorrect contact information for our students, thus making contact with the prospective student nearly impossible.

**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 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.**

On July 3, 2014, we published in the Federal Register (79 FR 38055) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending on September 2, 2014.

We received one comment. The comment was directed to the subject matter, validity, and necessity of the training and not to the information collection requirements. The commenter believes that employees should obtain training prior to employment and that further training is unnecessary. We have not made any changes to the collection in response to this comment.

In addition to the Federal Register notice, we contacted the following individuals and asked for their comments on:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility;
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

Permitting/Wildlife Environmental Specialist Chicago, IL	Wildlife Biologist Riverdale, MD
Hatchery Manager Cherokee, NC	Special Agent Glynco, GA
Conservation Team Leader Auburn, CA	Wildlife Biologist Washington, DC
Environmental Biologist Washington, DC	Audubon Society Greenwich, CT
Common Ground Education Center New Haven, CT	

We received comments from all of the individuals we contacted. All agreed that our burden estimate is accurate and that the information we collect is necessary. Most of them agreed that the form is much easier to use than our current learning management system. There were no comments or suggestions for minimizing the burden of completing this form.

Several respondents expressed concerns about having their personal information published in a document available to the public. We have included information about those contacted that does not include Personally Identifiable Information (PII). We will provide contact information upon request.

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

We do not provide any compensation or gifts to the respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The information collected is subject to the Privacy Act. Electronic system security measures are in place and have been approved by OPM, the e-learning contract manager for DOI LEARN. The NCTC does not submit training records to persons who do not have a need to know. Individuals can request their own transcripts or verify their enrollment status and supervisors can review for mandatory training requirements of their staff only.

**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 500 applicants will submit a training application each year. It will take an average of 10 minutes to complete each application for a total of 84 annual burden hours.

We estimate the total dollar value of the annual burden hours for this collection to be \$2,979 (rounded). We used BLS Bulletin USDL-14-2208 to estimate hourly wages and calculate benefits as follows:

- Individuals/Households – Table 1 lists an hourly wage of \$22.13 for all workers. We multiplied the hourly rate by 1.4 to account for benefits, resulting in an hourly rate of \$30.98.
- Private Sector – Table 5 lists an hourly wage of \$21.18 for all private industry workers. We multiplied the hourly rate by 1.4 to account for benefits, resulting in an hourly rate of \$29.65 (rounded).
- State/local/tribal Government – Table 3 lists an hourly wage of \$27.89 for all State and local government workers. We multiplied the hourly rate by 1.5 to account for benefits, resulting in an hourly rate of \$41.84.

Respondent	Number of Annual Responses	Completion Time per Response	Total Annual Burden Hours	Hourly Rate w/Benefits	Total \$ Value of Annual Burden Hours
Individual	165	10 minutes	28	\$30.98	\$ 867.44
Private sector	116	10 minutes	19	29.65	563.35
State/Local/Tribal Govt	219	10 minutes	37	41.84	1,548.08
Total	500		84		\$2,978.87

**13. Provide an estimate of the total annual [nonhour] cost burden to respondents or record keepers resulting from the collection of information.**

There is no nonhour cost burden associated with this collection.

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

We estimate the total annual cost to the Federal Government to administer this information collection is \$1,784 (rounded) (42 hours \* \$42.48/hr). It takes approximately 5 minutes to process each application, or a total of 42 hours annually. The current Registrar position is a GS-9. Using the Office of Personnel Management's Salary Table 2014-DCB, the hourly wage for a GS-9/step 5 is \$28.32. We multiplied this figure by 1.5 to account for benefits for an hourly rate of \$42.48.

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

There are no adjustments or program changes.

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

We do not publish this collection of information, except for internal management planning and evaluation reports to meet periodic reporting requirements of the Office of Personnel Management, the Fish and Wildlife Service's Service Directorate and Division of Human Capital, and the Office of Management and Budget (reports on training budget and total student training days).

**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.**

There are no exceptions to the certification statement.