

1 Supporting Statement A for Paperwork Reduction Act Submission

Migratory Birds and Wetlands Conservation Grant Programs

OMB Control Number 1018-0100

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 the 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, and for what purpose the information is to be used.

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 2014, 2,445 NAWCA grant projects have been awarded for a total of \$1.36 billion, an amount matched by over 14,500 partners with an additional \$2.68 billion. Through 24 years of partnerships, NAWCA has conserved almost 27.9 million acres of wetlands and associated uplands across the continent. Since the program's inception in 2002 through 2014, the NMBCA grants program has supported 451 projects, coordinated by more than 2,100 partners in 48 U.S. States/territories and 36 countries. More than \$50.6 million from NMBCA grants have leveraged about \$190 million in matching funds. NMBCA projects involving land conservation have affected over 8.2 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](http://www.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 by mail or overnight service. Grant program information and application deadlines are posted on [Grants.gov](http://www.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 were 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. 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 October 22, 2014, 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 (79 FR 63159). In that notice, we solicited comments for 60 days, ending on December 22, 2014. 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 six 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. Five respondents who have participated in the NAWCA U.S. Standard grants program estimated that it takes 142 to 230 hours to prepare an application. A respondent with experience in preparing NAWCA U.S. Small grants program applications estimated that process takes approximately 40 hours. A respondent with NMBCA grant application experience estimated that the process takes 60 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 8 to 60 hours to prepare reports during the life of the project, an average of 30 hours per report per year. A participant in the NAWCA Small Grants Program estimated that it takes approximately 33 hours to prepare each report. A respondent who received NMBCA grants estimated that that it takes 40 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 1 to 2 years, but may be extended at the request of the recipient. Some project periods may last as long as 5 years. Both annual and final reports include program and financial information.

Following is contact information for and additional comments from the six individuals interviewed:

Nancy Butler, Executive Director, Rio Grande Headwaters Land Trust, 719-657-0800. Ms. Butler suggested that Technical Question 4 could potentially be easier to complete as an Excel document form, rather than the current Word version. She noted that a brief explanation of all of the existing bird plans would be very helpful to have.

Response: We have maintained the Word version in order to provide a uniform format for all seven of the Technical Questions. DBHC and North American Wetlands Conservation Council (Council) staff will discuss this possible modification prior to the 2016 instruction publication. We have omitted any bird plan text (Technical Question 3.A.) in an attempt to limit the size and

complexity of the application instructions. We provide links to the four bird groups to facilitate an applicant's search protocol.

Anne Fleming, Communications Coordinator, Little Traverse Conservancy, 231-344-1007. Ms. Fleming suggested that formatting the proposal instructions in a bulleted list wherever possible and a summary checklist at the end of the instructions would be helpful.

Response: DBHC is committed to simplifying the application instructions whenever possible. Historically, the initial instructions have been brief, but expand due to the need to elaborate the directions based on applicant requests and/or misinterpretations. DBHC and Council Staff will discuss the idea of bulleted lists and particularly the idea of a summary checklist prior to the 2016 instruction publication.

Matt Holland, Director of Grant Development, Pheasants Forever, Inc., 320-354-4377. Mr. Holland noted that it is difficult to find the right balance between accountability and valuing the time it takes to provide the information necessary for proposals and reports.

Response: Accountability of the expenditure and use of Federal funding is the entire point of reporting, so accurate reporting of the use of Federal funds would be a valuable use of time.

Todd Merendino, Conservation Programs Manager, Ducks Unlimited, Inc., 832-595-0663. Mr. Merendino suggested that a master project Geospatial Database that can be accessed by NAWCA applicants would be incredibly helpful for determining future project locations on the landscape. He also noted that the NAWCA proposal template is very straightforward and the page limitations for the Technical Questions ensure that the applicant does not get bogged down with providing excessive information.

Response: DBHC has invested resources in a Geospatial Information System and has hired a spatial data manager that spends part time on spatial data management. However, resources are limited in terms of expanding and populating historical spatial data sets. Potentially working with partners it may be possible to gather batches of historical data, but until the historical data is populated it will be challenging to provide this online resource. Nevertheless, we are making efforts to advance this capability, albeit slowly.

Dr. Brett Sandercock, Professor of Wildlife Ecology, Kansas State University, 785-532-0120. Dr. Sandercock suggested that reducing some required elements like biogeographical zones and congressional districts would help simplify application procedures. He also noted that timely completion of Section 10 Threatened and Endangered species compliance reports helps to avoid delays and ensure timely awards. Another suggestion provided was to allow the submission of graduate theses, dissertations, and unpublished manuscripts in lieu of final reports and allow investigators adequate time (suggested: a year after project completion) to prepare final reports.

Response: The data requested currently serves program purposes; however as our spatial data capabilities improve, it may be possible to reduce some elements as long as spatial data for where project activities is provided. This may result in an even trade in terms of workload to provide the data. DBHC makes every effort to facilitate compliance with endangered species reviews, which, depending upon project complexity, will require information from applicants to insure adequate compliance. Ultimately suggested reporting formats are designed to efficiently convey project accomplishments to the Service to allow for adequate accountability of the use of Federal resources. We are required to receive reports within a 90-day window after the project is completed and one of the required reports is a Standard Form 425 Federal Financial

Report. We do require any publications resulting from Federal funding be submitted if completed during the project period and encourage submission of these reports if completed 90 days after the end of the project period.

Chad Santerre, Wetland Programs Supervisor/NAWCA Coordinator, California Waterfowl Association, 916-275-0983. Mr. Santerre suggested that Technical Question 2 (Sections A & B) could trim the number of bird species listed to a maximum of 5. He noted that 5 species would still allow proposal writers the ability to judge the proposed projects on their beneficial results.

Response: The application instructions were revised significantly 3 years ago. At that time, Technical Question 2 was simplified to its current format. The 10 species number was derived in the belief that this would provide the best balance between providing proposal reviewers/scorers an adequate description of the strength of the proposal's waterbird/shorebird/PIF resources versus the brevity desired by both applicant and scorer. DBHC and Council staff will discuss this idea prior to the 2016 instruction publication.

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 598 responses totaling 5,464 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 \$1,295,110. The estimated dollar value of a burden hour varies by respondents. Using Bureau of Labor Standards (BLS) May 2013 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 \$30.10 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, an August 2013 BLS news release (“International Comparisons of Hourly Compensation Costs in Manufacturing, 2012”) showed that the Canadian hourly compensation cost for all employees in manufacturing is about 3% more than the same cost in the United States. Therefore, we used \$31.00 USD to calculate the costs of information collection activities in Canada, 103% of the U.S. hourly wage for wildlife biologists. For Mexico, the same BLS article noted that compensation for Mexican manufacturing employees was approximately 18% of their U.S. counterparts, so we estimated the average hourly value for Mexican applicants and recipients, primarily professional biologists and conservation specialists, at \$5.42 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 American countries included in the BLS comparison). Calculation of the final hourly rate average of \$16.89 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 America 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	40	40	\$30.10	\$42.14	\$1,686
Private Sector	54	40	2,160	30.10	42.14	91,022
Government	16	40	640	30.10	45.15	28,896
NAWCA-U.S. Standard						
Individuals	1	203	203	30.10	42.14	8,554
Private Sector	53	203	10,759	30.10	42.14	453,384
Government	15	203	3,045	30.10	45.15	137,482
NAWCA-Canada/Mexico Standard						
Individuals-Mexico	1	80	80	5.42	7.59	607
Private Sector-Mexico	13	80	1,040	5.42	7.59	7,894
Private Sector-Canada	9	80	720	31.00	43.40	31,248
Government-Mexico	4	80	320	5.42	8.13	2,602
NMBCA						
Individuals	1	60	60	16.89	23.65	1,419
Private Sector	64	60	3,840	16.89	23.65	90,816
Government	19	60	1,140	16.89	25.34	28,888

Subtotal - Applications	251		24,047			884,498
REPORTS						
NAWCA-U.S. Small						
Individuals	1	33	33	30.10	42.14	1,391
Private Sector	80	33	2,640	30.10	42.14	111,250
Government	18	33	594	30.10	45.15	26,819
NAWCA-U.S. Standard						
Private Sector	107	30	3,210	30.10	42.14	135,269
Government	25	30	750	30.10	45.15	33,863
NAWCA-Canada/Mexico Standard						
Private Sector-Mexico	19	30	570	5.42	7.59	4,326
Private Sector-Canada	22	30	660	31.00	43.40	28,644
Government-Mexico	4	30	120	5.42	8.13	976
NMBCA						
Private Sector	57	40	2,280	16.89	23.65	53,922
Government	14	40	560	16.89	25.34	14,190
Subtotal - Reports	347		11,417			410,650
Totals	598		35,464			\$1,295,148

*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 \$599,907 (rounded). This estimate includes salary and benefits (\$391,407), as well as other costs associated with proposal review, selection, and report review (\$208,500). 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, 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 2015-DCB to determine the hourly wages and multiplied the hourly wage by 1.5 to account for benefits in accordance with BLS News Release USDL 14-2208

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	\$28.60	\$42.90	624	\$26,770
	Wildlife Biologist/Grant Administrator GS 13/5	49.32	73.98	624	46,164
Proposal Review	Wildlife Biologist/Grant Administrator GS 13/5	49.32	73.98	800	59,184
	Program Analyst GS 9/5	28.60	42.90	240	10,296
	Biologist GS 11/5	34.60	51.90	240	12,456
	Grant Administrator GS 13/5	49.32	73.98	280	20,714
Proposal Selection	Wildlife Biologist GS 13/5	49.32	73.98	400	29,592
	Grant Administrator GS 13/5	49.32	73.98	200	14,796
	Wildlife Administrator (Grants Branch Chief) GS 14/5	58.28	87.42	475	41,525
	Wildlife Administrator (Council Coordinator) GS 15/5	68.56	102.84	200	20,568
Report Review	Wildlife Biologist/Grant Administrator GS 13/5	49.32	73.98	1,478	109,342
Total					\$391407

Table 14.2 – Other NAWCA Costs

Action	Travel (NAWCA Council and FWS)	NAWCA Council Site Visits (As Needed for Project Evaluation)	Printing/FedEx	Invitational Travel Coord. Contract	Total
	\$166,500	\$12,000	\$2,000	\$28,000	\$208,500

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

We are reporting 598 responses totaling 35,464 annual burden hours for this collection, a net decrease of 72 responses and 9,932 burden hours from the last submission.

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. Overall our funding has dropped significantly since 2011, and we have observed a slight lag effect in responses (applications) relative to the amount of funding. The drop in responses reflects the reduction in funding, as well as a drop in available match, for both NAWCA and NMBCA.

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.