

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

**Survey of U.S. Fish and Wildlife Service
Habitat Conservation Bank Sponsors and Managers**

OMB Control Number 1018-XXXX

Terms of Clearance. None – this is a new collection.

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

Since the early 1990's, the U.S. Fish and Wildlife Service (we, Service) has been approving and overseeing the development and management of habitat conservation banks, primarily under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. §§1531 et seq.).

Conservation banks are permanently protected lands that contain natural resource values that are conserved and permanently managed for species that are endangered, threatened, candidates for listing as endangered or threatened, or are otherwise species-at-risk. At the Federal level, conservation banks are regulated by the Service for terrestrial and freshwater species and some marine mammals. We approve a specified number of credits to the bank owner in exchange for permanently protecting and managing habitat for the endangered species in question.

There has been little systematic analysis of the operation of these conservation banks and the factors that might hinder their development or facilitate their creation. In July 2012, we requested that the Office of Policy Analysis (PPA), Department of the Interior, conduct an analysis of the Service conservation banking program and factors affecting its success. A first phase of the analysis was completed in September 2013, which consisted of a survey of Service employees that work in conservation banking and endangered species issues. This effort provided very useful information related to factors that may hinder or encourage the formation of conservation banks based on the experience of Service staff. The full results of phase 1 of the study are available at: http://www.fws.gov/endangered/landowners/pdf/CB%20Report%20DOI_Final_Sept2013.pdf). This survey effort expands upon phase 1 of the analysis by collecting similar information related to factors that may hinder or encourage the conservation bank creation from the point of view of individuals involved in the management and operation of conservation banks, as well as information related to the current status of the conservation banking program. This information will be a valuable complement to the information collected in the survey of Service employees.

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

The collection of this information is necessary to provide an understanding of the current performance of the conservation banking program and to identify areas in which the program can be improved.

We collect information using two surveys: the first collects information from a corporate or organizational point of view, and the second collects information from the point of view of managers of individual banks.

Conservation bank sponsors, individuals who work in the leadership of organizations that own or manage conservation banks, will complete Survey 1. The survey will collect basic information about the company/organization, training activities, regulations, the length of time required for bank approval, and perceived future demand. We need this information to identify factors that may be inhibiting or encouraging the creation of additional conservation banks.

Conservation bank managers, individuals involved in the management of specific conservation banks will complete Survey 2. This survey collects information on the individuals' experience with conservation banking as well as their experience with and opinions of various factors that may hinder conservation bank creation.

- 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].**

The surveys will be administered electronically using Survey Monkey's online program. Respondents will be contacted by email and will receive a URL to access the survey. Using an electronic survey will reduce the burden on respondents as well as reduce the time required to input and clean the data for analysis.

- 4. Describe efforts to identify duplication.**

There will be no duplication. To date, very few studies have collected information about Service conservation banks. Previous studies are several years' old and collected limited information (Stratus Consulting, 2003; Fox and Nino-Murcia, 2005). The proposed survey will collect a broader range of information than has been collected in the past about the performance of the conservation banking program and the experiences of conservation bank sponsors and managers related to the development of additional conservation banks.

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

We do not expect this collection to have a significant impact on small businesses or small entities. Only businesses that currently own or manage conservation banks will be surveyed. We will collect only the minimum amount of information necessary for the analysis.

- 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.**

We need the information obtained in this collection in order to review the performance of the conservation banking program and obtain information on factors that might facilitate or hinder the creation of additional conservation banks. This collection will only be conducted one time.

- 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 May 15, 2013, we published in the Federal Register (78 FR 28619) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 15, 2013. We received one comment, which did not address the information collection requirements. The commenter believes that the proposed survey is not essential and objected to the use of Government funds. We did not make any changes to our information collection requirements as a result of this comment.

In addition to the published Federal Register notice, we consulted with several individuals during the development of the survey. Before developing the survey questions, we conducted scoping interviews with conservation bank representatives. We solicited comments on the draft survey from three external reviewers, including one conservation bank employee, and two Federal reviewers from outside the Department (see below), as well as several Department of the Interior employees.

Suggestions included the addition of several factors to be ranked in some survey questions, asking for acreage per bank instead of total acreage for all banks, and the addition of a question related to factors that might impede conservation bank operations, as well as small edits to the text to improve clarity. We incorporated the suggestions, edits, and comments from the reviewers into subsequent versions of the survey.

Table 1. Individuals Contacted

Contact #1	Contact #2	Contact #3
James Parker Falling Springs LLC jparker@fallingspringsllc.com	Steve Martin U.S. Army Corps of Engineers steven.m.martin@usace.army.mil	Palmer Hough U.S. Environmental Protection Agency hough.palmer@epa.gov

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 respondents.

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. Survey responses will not be attributed to individual respondents. Data from all respondents will be reported in aggregate form. No list of respondent email addresses will be retained after data collection is completed.

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 587 responses totaling 50 annual burden hours for this information collection. We will initially contact one individual from each organization by phone (85 individuals in total) to determine the appropriate individual from each organization to fill out each survey, and to obtain their email addresses. We estimate these initial phone contacts will take 5 minutes, totaling 7 burden hours.

We will send initial invitation emails to 186 individuals asking them to complete the survey. We estimate it will take 2 minutes to read the initial invitation email, totaling 6 burden hours. Survey 1 will be completed by conservation bank sponsors, and is expected to take 10 minutes to complete. We estimate that a total of 85 conservation bank sponsors will receive Survey 1. With an 85% response rate, we estimate 72 responses to Survey 1, totaling 12 burden hours. Survey 2 will be completed by managers of individual conservation banks, and is expected to take 15 minutes to complete. We estimate a total of 101 conservation bank managers will receive Survey 2 (an estimate of one respondent for every two banks for organizations with more than two banks). With an 85% response rate, we estimate 86 responses to Survey 2. In cases where the bank sponsor is also the bank manager, one respondent may fill out both surveys.

Nonrespondents will receive follow-up emails reminding them to complete the survey. We estimate a 45% response rate from the initial contact, so 55% of the sample or 102 individuals will receive the first email reminder. We estimate an additional 25% of respondents will complete the survey after the first reminder, so 30% of the sample or 56 individuals will receive the second email reminder.

We estimate the dollar value of the burden hours to be \$1,656.50. The hour cost of \$33.13 is based on BLS News Release USDL-15-0386, March 11, 2015, for average full compensation per hour including benefits for all workers.

ACTIVITY	NO. OF RESPONSES	ESTIMATED COMPLETION TIME PER RESPONSE (minutes)	TOTAL ANNUAL BURDEN HOURS	\$ VALUE OF BURDEN HOURS (\$33.13 p/hr)
Initial Contact	85	5	7	\$231.91
Invitation Email	186	2	6	\$198.78
Complete Survey 1	72	10	12	\$397.56
Complete Survey 2	86	15	22	\$728.86
Reminder 1	102	1	2	\$66.26
Reminder 2	56	1	1	\$33.13
Total	587		50	\$1,656.50

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.

We estimate the total cost to the Federal Government for processing and reviewing information received as a result of this collection will be \$43,086 (600 hours * \$71.81). We estimate that an Economist, GS 13/step 4, will spend 600 hours on survey development, survey administration, and data analysis. We used the Office of Personnel Management Salary Table 2015-DCB to determine the hourly wage (\$47.87). To account for benefits, we multiplied the hourly wage by 1.5 in accordance with BLS News Release 15-0386, resulting in an hourly of factor of \$71.81.

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

This is a new collection.

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

PPA will tabulate the information in aggregate form and provide results in a report to the Service. We expect that the survey process will take approximately 6 weeks. Data analysis and report completion is expected to take approximately 4 months from the completion of the survey.

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.