

# 1 Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0123

## International Conservation Grant Programs

Terms of Clearance: None

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

The following Acts authorize the establishment of the African Elephant, Asian Elephant, Great Ape, Rhinoceros and Tiger, and Marine Turtle Conservation Funds and the Wildlife Without Borders programs for Amphibians in Decline, Critically Endangered Animals, Mexico, Latin America and the Caribbean, Russia and Africa:

- African Elephant Conservation Act of 1989 (16 U.S.C. 4201-4245)
- Rhinoceros and Tiger Conservation Act of 1994 (16 U.S.C. 5306)
- Asian Elephant Conservation Act of 1997 (16 U.S.C. 4261)
- Great Ape Conservation Act of 2000 (16 U.S.C. 82)
- Marine Turtle Conservation Act of 2004 (16 U.S.C.82)
- Endangered Species Act [Section 8] (16 U.S.C. 1531 et seq.)

These Acts provide financial resources for conservation projects that meet the requirements as outlined in each. The Secretary of the Interior has assigned oversight of these funds to the Division of International Conservation, Fish and Wildlife Service. In addition, the Foreign Assistance Act Part 1, Section 119, mandates the U.S. Agency for International Development to offer financial support to our International Conservation Programs.

Applicants must submit a proposal containing the information as outlined in the appropriate Act. A panel of technical experts reviews each proposal to assess how well the proposed project addresses the requirements and priorities identified in the program's authorizing legislation. This information collection ensures that reviewers have sufficient information to select proposals for funding.

**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.**

Applicants submit proposals for funding in response to Notices of Funding Opportunity (NOFO) that we publish on Grants.gov and our program web pages. Applicants may submit a proposal through Grants.gov, by email, or by mail. We collect the following information under each NOFO\*:

- (1) SF424 with basic project details.
- (2) Project summary and narrative.

- (3) Letter of appropriate government endorsement.
- (4) Brief curricula vitae for key project personnel.
- (5) Complete Standard Form 424b

Proposals may also include, as appropriate, a copy of the organization's Negotiated Indirect Cost Rate Agreement (NICRA) and any additional documentation supporting the proposed project.

Applicants must also indicate whether they have an active registration in the System for Awards Management (SAM), as this is a government-wide requirement for recipients of Federal assistance awards. As appropriate, applicants may also be required to submit an A-133 audit report. Per the Leahy Amendments to the Foreign Assistance Act, these grant programs are prohibited from involvement in financial or in-kind support for security forces. In order to avoid duplication of effort and ensure transparency, we ask applicants to state whether or not their proposals: a) include funding from other Federal agencies; and b) have been submitted to other Service grants programs. As none of these questions involves significant additional detail, we do not anticipate a change in the time to complete the form.

The project summary and narrative are the basis for this information collection request. A panel of technical experts reviews each proposal to assess how well the project addresses the priorities identified by each program's authorizing legislation. As all of the on-the-ground projects funded by these programs are conducted outside the United States, the letter of appropriate government endorsement ensures that the proposed activities will not meet with local resistance or work in opposition to locally identified priorities and needs. Brief curricula vitae for key project personnel allow the review panel to assess the qualifications of project staff to effectively carry out the project goals and objectives. As all Federal entities must honor the indirect cost rates an organization has negotiated with its cognizant agency, we require all organizations with a NICRA to submit the agreement paperwork with their proposals to verify how their rate is applied in their proposed budget. Applicants may provide any additional documentation that they believe best supports their proposal.

With prior approval from the applicant, we may share proposal information with other qualified organizations or individuals that have the potential to enhance the proposed conservation effort.

All assistance awards under this program have a maximum reporting requirement of a:

- (1) Mid-term report (performance report and a financial status report) due within 30 days of the conclusion of the first half of the project period, and

- (2) Final report (performance and financial status report and copies of all deliverables, photographic documentation of the project and products resulting from the project) due within 90 days of the end of the performance period.

In accordance with DOI/FWS Policy, FWS Form 3-2338, "International Conservation Programs Cover Page) has expired and been replaced by the Standard Form 424 for all applicants to all of our programs. Accordingly, this form instrument has been removed from this collection and is no longer used.

**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.**

U.S.-based applicants must submit proposals through Grants.gov. Non-U.S. entities may submit proposals through grants.gov, by email, or by mail. We allow respondents to submit their proposals in hard copy through the mail because many eligible applicants, as defined by the Acts, are located in remote countries where access to the Internet and/or computers is limited. To reduce the burden on applicants who do have access to the Internet, we allow electronic submissions through Grants.gov and email. All application instructions and forms are available on the Internet for filling and printing by the public.

We estimate that 100% of grant applications and 100% of grant reports will be submitted electronically. All application instructions and forms are available on the Internet for filling and printing by the public.

**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 the authorizing legislation or implementation of these programs, no other division of the Service or any other Federal agency collects this information.

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

We have made efforts to keep the amount of information requested to a minimum for all of our applicants. The information has to be sufficient to fulfill the requirements of the authorizing statutes, as well as sufficient to make a competitive funding decision. We do not believe the amount of information requested will have a significant impact on small entities, as they will be providing the minimum amount of information needed to compete for financial assistance under these programs.

**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.**

Funds are provided for these programs on an annual basis. Failure to collect the information or collecting the information less frequently would prevent the Secretary of the Interior from fulfilling responsibilities as outlined in the statutes establishing these programs.

**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 June 27, 2017, we published in the *Federal Register* (82 FR 29093) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on August 28, 2017. We did not receive any comments in response to that Notice.

In addition to the Federal Register Notice, we solicited feedback from the nine (9) individuals identified in Table 8.1 who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

**Table 8.1**

<b>Organization</b>	<b>Title</b>
Panthera	Senior Donor Communications Manager
Wildlife Conservation Society	Director
World Wildlife Fund	Director, Agreements and Compliance
Global Wildlife Conservation	Program Manager
Conservation International	Vice President of Development
Houston Zoo, Inc	Development Ariter
Frankfurt Zoological Society	Sr. Program Manager

Flora and Fauna International	Program Manager
Wildlands Network	Executive Director

***“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”***

Comments: The information collection process is useful helping to formulate projects more strategically.

FWS Response/Action Taken: No action required. This has been an important component of the Strategic Reviews undertaken in many of our programs in recent years.

***“The accuracy of our estimate of the burden for this collection of information”***

Comments: While the process is valuable, burden estimates may be low – particularly for foreign applicants.

FWS Response/Action Taken: Based on our experience administering the collection, we believe that our estimates fairly represent average times to complete the application package. The dollar value of our burden estimates may be somewhat low because the Bureau of Labor Statistics has not updated their tables for foreign workers in used with this collection since 2012. For these reasons, we did not make any changes to our estimates. However, to reduce burden on potential respondents, we continue to encourage applicants to summarize, to the extent possible, and in some cases invite pre-proposals, that allow applicants to submit their concepts for determination of eligibility.

***“Ways to enhance the quality, utility, and clarity of the information to be collected”***

Comments: In similarly-themed projects undertaken in different countries or regions, it might be helpful to share information among these projects to identify shared goals and/or methodologies.

FWS Response/Action Taken: No action required. This does occur in these types of situations, with applicants' permission, which helps forge alliances towards common conservation goals.

And

***“Ways to minimize the burden of the collection of information on respondents”***

Comments: Registration in the System for Awards Management (SAM) can be a significant obstacle, particularly for foreign entities. Also, PDF fillable forms may be version-specific and at times unstable.

FWS Response/Action Taken: No action taken. SAM registration is a government-wide requirement. However, we go to great lengths to assist entities in obtaining (and maintaining) an Active SAM Registration. Likewise, the PDF-based forms used are maintained on Grants.gov and are not our agency forms. However, we do provide extensive guidance to applicants with questions on how to enter the necessary information.

**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 remuneration of grantees.

**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. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (Interior, DOI-89, Grants and Cooperative Agreements: FBMS, 78 FR 43775).

**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 we will receive **1,272 responses** totaling **38,856 burden hours** (see Table 12.1). We estimate the annual dollar value of the burden hours to be **\$1,057,276** (rounded) (see Table 12.2).

**Table 12.1 – Annual Burden**

Activity	% Reporting Electronically	Number of Respondents	Number of Responses Each	Number of Annual Responses	Completion Time per Response (Hours)	Total Annual Burden Hours
<b>Grant Application</b>						
Individuals	100%	8	1	8	22	176
Private Sector	100%	414	1,545	640	22	14,080
Governments	100%	20	1	20	22	440

<i>Subtotal:</i>		442		668		14,696
<b>Grant Reporting</b>						
Individuals	100%	3	2	6	40	240
Private Sector	100%	285	2	570	40	22,800
Governments	100%	14	2	28	40	1,120
<i>Subtotal:</i>		302		604		24,160
<b>TOTAL:</b>		<b>744</b>		<b>1,272</b>		<b>38,856</b>

Of the 668 grant applications received during an average year, we anticipate 266 will be domestic recipients and 402 will be nondomestic recipients. Of the 302 successful grant awardees during an average year, we anticipate 146 will be domestic recipients and 156 will be nondomestic recipients.

**Domestic Recipients:**

The estimated dollar value of the burden hours takes into account the nature of our respondents. We estimate the value of an hour for applicants from the United States and other advanced countries is \$31.31 USD. We determined this hourly wage based on Bureau of Labor Standards Occupational Employment and Wages, May 2016, [19-1031 Conservation Scientists](#). In accordance with Bureau of Labor Statistics (BLS) News Release [USDL-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016,” we multiplied the hourly wage by 1.46 to account for benefits, resulting in an hourly wage of \$45.71.

**Non-Domestic Recipients:**

We were unable to locate wage information for scientists from countries such as Asia, Latin America, Pacific islands, and Africa; however, the Bureau of Labor Statistics does provide information on manufacturing/production workers at <http://www.bls.gov/fls>. Using 2012 data from Table 2, Hourly Compensation Costs in U.S. dollars, we estimate the dollar value of an hour for applicants from these countries to average no more than \$12.00 USD including benefits. We used this rate to calculate the total dollar value of non-domestic respondents for both the grant application and grant reporting.

**Table 12.2 – Total Dollar Value of Annual Burden Hours**

Category	Responses	Completion Time per Response (Hours)	Total Burden Hours	Hourly Labor Costs – USD (Incl. Benefits)	Total Dollar Value of Burden Hours
<b>Grant Application – Cover Sheet and Narratives</b>					
Domestic	266	22 hours	5,852	\$45.71	\$ 267,494.92
Non-Domestic	402	22 hours	8,844	12.00	106,128.00
<b>Subtotal:</b>	<b>668</b>		<b>14,696</b>		<b>\$ 373,622.92</b>
<b>Grant Reporting</b>					
Domestic	292	40 hours	11,680	\$45.71	\$ 533,892.80
Non-Domestic	312	40 hours	12,480	12.00	149,760.00
<b>Subtotal:</b>	<b>604</b>		<b>24,160</b>		<b>\$ 683,652.80</b>
<b>TOTALS:</b>	<b>1,272</b>		<b>38,856</b>		<b>\$1,057,275.72</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 nonhour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application 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 and reports as a result of this collection of information is **\$359,040** (rounded). This includes hourly wages only. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used Office of Personnel Management Salary Table [2017-DCB](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with BLS News Release [USDL-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016.

Proposals are processed by grants specialists who initially review each proposal for a minimum level of completeness. Proposals that do not meet that standard or clearly do not address the basic requirements of the targeted act are returned to applicants. All other proposals are passed forward for a technical review conducted by biologists. This initial screening results in fewer proposals being fully reviewed than are received.

Position (Step & Grade)	Action	Number of Responses	Estimated Time per Response	Total Hours	2017 Hourly Rate	Fully Burdened Hourly Rate (x 1.59)	Total Annual Cost
Grant Specialist GS-12/5	Process Proposals	668	1 hour	668	\$ 43.29	\$ 68.83	\$ 47,355.04
Biologist/ Technical GS-13/5	Review Proposals	650	4 hours	2,600	51.48	81.85	212,810.00
Biologist/ Technical GS-13/5	Review Reports	604	2 hours	1,208	51.48	81.85	98,874.80
<b>Estimated Total Cost to Federal Government</b>							<b>\$ 359,039.84</b>



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

We are not reporting any program changes or adjustments in hour or cost burden. We discontinued FWS Form 3-2338 and now use SF-424 to ensure consistency across the Service with our grant application packages.

**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.**

We maintain data on proposals and resulting grant awards in a database. We publish a list of selected projects, the amount of FWS funding, and a description of each project on our website. We prepare formal summary reports on project results every 2 years, and distribute a report to Congress, cooperators, and the general public.

**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.