

2019 Supporting Statement - Part A OMB 0596-0201

Role of Communities in Stewardship Contracting Projects

Terms of Clearance

The June 1, 2016 Notice of Action contained no terms of clearance.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Section 8205 of Public Law 113-79, the Agricultural Act of 2014 requires the Forest Service (FS) to report to Congress annually on the role of local communities in the development of agreement or contract plans through stewardship contracting. To meet that requirement, the FS annually conducts interviews to gather the necessary information to develop the annual report to Congress.

- 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.**

The FS is contracting with the Pinchot Institute for Conservation (Pinchot Institute) to fulfill the requirements of the Congressional direction for the FS.

Information is being both reviewed from past projects as well as collected as we initiate follow up questionnaires. Surveys were performed from 2013-2018 in a sample of stewardship projects to determine their successes and challenges, and provide feedback on the thoughts of all involved. This project will provide the opportunity to look back over the five years to evaluate whether the findings of the reviews as well as the recommendations provided were influential in guiding the project forward and improved the successes. The data will then be presented at regional summits to provide an opportunity to have further dialog between the Forest Service as well as the partners involved. A report to Congress will be developed to meet our annual responsibility.

The FS uses the final report information to report to Congress specifically on the role of local communities in the development of stewardship contract/agreement plans, as required by Section 8205 of Public Law 113-79, the Agricultural Act of 2014. The FS also makes its final report, as prepared and provided by the Pinchot Institute, available to the public on the internet at http://www.fs.fed.us/restoration/Stewardship_Contracting/results/index.shtml.

The FS may use the data provided by the Pinchot Institute, as shown in the final report, in other reports related to stewardship contracting (such as the FS's 2004

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Stewardship Contracting Assessment Review available at http://www.fs.fed.us/restoration/Stewardship_Contracting/results/index.shtml. Congress does make the final report available for use by organizations both inside and outside the government.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

The final reports from 2013-2018 will be used to collect information on the projects evaluated during that time period. Interviews will be then conducted, both through phone calls as well as follow up correspondence to determine whether the findings were substantiated, the recommendations were implemented and the final outcome of the success of the project. The interview collects information on the role of local communities in the development of agreement or contract plans through stewardship contracting. Interviews are recorded to improve accuracy of data collection without additional burden to participants.

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

All respondents have been involved in a stewardship-contracting project - either as a FS project manager, as an external participant in the project development, or as a contractor involved in project implementation.

Table 1: Response to items a and b

Information Collected	Description	Information Provided to:	Prepared by
Phone interview regarding the on the success of the annual review and recommendation process.	FS project manager involved in a stewardship contracting project	Pinchot Institute for Conservation	Colorado State University (analysis) and Pinchot Institute for Conservation (final report)
	Contractor involved in stewardship contracting project implementation		
	External participant involved in a stewardship contracting project		

c. What will this information be used for - provide ALL uses?

The information is used for the annual report to Congress that is required by the enabling legislation. The responses, through their inclusion in the FS report to Congress, are available for use by organizations both inside and outside the government. The FS may use the data provided by the Pinchot

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Institute, as shown in the final reports to each agency, in other reports related to stewardship contracting (such as the FS's 2004 Stewardship Contracting Assessment Review available at http://www.fs.fed.us/restoration/Stewardship_Contracting/results/index.shtml). Congress does make the summarized analysis data, as shown in the final report supplied by the Pinchot Institute to each agency and in each agency's report to Congress, available for use by organizations both inside and outside the government. Additionally, the Pinchot Institute will provide regional conferences presenting the results of the review to interested agency and public participants.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

Information is collected through a semi-structured phone interview conducted by the Pinchot Institute and its sub-contractors. The interviews are recorded to avoid asking participants to repeat information. Recordings are destroyed after results are transcribed.

e. How frequently will the information be collected?

Information is collected once annually through a phone interview conducted by the Pinchot Institute for Conservation and its sub-contractors.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

Interview information is collected, transcribed, and summarized by Pinchot Institute and their partners at Colorado State University (CSU). The summarized results from these analyses are provided by the Pinchot Institute in its final report to the Forest Service. The individual interview responses are not shared with the agency; only the summarized results are shared. The FS posts the report it receives from the Pinchot Institute agency on its internet webpage for viewing by the public. The FS develops an annual report for Congress, as required under Section 8205 of Public Law 113-79, the Agricultural Act of 2014, which includes the summarized analysis data provided by the Pinchot Institute. Congress makes the agency reports available for use by organizations both inside and outside the government.

g. If this is an ongoing collection, how have the collection requirements changed over time?

In an effort to reduce the burden and cost, the information collection requirements are being simplified from a random sample to a targeted case study sample impacting only the sampled National Forests that were originally reviewed. This reinstatement request revises the original survey of

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16 multipart questions to a semi-structured interview with 6 multi-part questions.

- 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.**

The interview is designed for and is conducted by phone so it does not involve the use of automated, electronic, mechanical, or other technological collection techniques.

- 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.**

The FS does not monitor the follow up of the annual review. National Forests are allowed to implement all, some or none of the recommendations that came from the annual review. Projects not surveyed are allowed to follow any of the recommendations presented as lessons learned. From the original annual studies, the FS does not collect information regarding the role of local communities in stewardship contracting in any other format. The stewardship contracting project managers frequently work with external groups that are interested in stewardship contracting. As far as these program managers are aware, there are no similar information collections currently conducted by other government sources or other outside sources that can be used or modified for use for the purposed described herein. This study will not look at those Forests with Stewardship projects that were not reviewed to determine whether they took any advice from the studies.

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

There may be some small businesses within the interview pool. However, the phone interview was purposefully limited to 30 - 45 minutes in order to decrease the effect on all respondents, including small businesses and other contractors. The interview is designed to take 30 minutes, but the burden estimate shown in A-12 allows for a maximum of 45 minutes in the event that the interviewee wants to provide further comments or discuss in depth any of their responses with the interviewer during the phone interview. Additionally, the interview is voluntary, which accommodates those who do not have time to respond. Prior to beginning the interview, the interviewer reads the burden statement to the interviewee, lets them know the interview is strictly voluntary, provides the estimated amount of time the interview will take, and asks them if they are willing to participate.

- 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.**

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Without the information from this annual collection of data, the FS will not be able to provide the annual report to Congress, as required by law, on the role of local communities in the development of agreement and contract plans. Without this look back, we will not know whether the time and effort that went into the annual reports actually has an impact on the stewardship program.

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;**

N/A

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

The interview is designed for and is conducted by telephone and does not require respondents to prepare a written response. The phone interview is optional and may be scheduled at the respondents' convenience, though generally in fewer than 30 days after receiving a request for interview.

- **Requiring respondents to submit more than an original and two copies of any document;**

N/A

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

N/A

- **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;**

N/A

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

N/A

- **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**

There is no assurance of confidentiality. However, the names of people

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interviewed are not associated with the interviewer's notes from the phone interview, and are not retained after all the phone interviews have been conducted for the year, ensuring some measure of privacy.

- **Requiring respondents to submit proprietary trade secret, 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.**

N/A

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day notice was published in the Federal Register on July 24, 2019 (84 FR 35590). No comments were received.

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 record keeping, 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 3 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.

Persons Consulted

The following people were contacted to ascertain if the requested information collection and burden estimate are reasonable.

1. Mr. William Price, President
Pinchot Institute for Conservation
1400 16th St NW Ste 350
Washington, DC 20036Office: 202.797.6580

Comment:

- Mr. Price stated that the interview was designed to take 0.5 hours to administer, and that based on their experience over the last several years, the 0.5 hours seems to be the average time it takes for the interviews.

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Response:

- The estimate of annual burden per respondent remains at 0.75 hours, even though the interview is designed to be completed in 0.5 hours, in the event that the interviewee wishes to further discuss one or more of their responses to the interviewer.

2. Mr. Terry Conley
TC Company
Work Phone: 505-929-1245

Comment:

- The interview has practical application.
- The interviews would be better in person than on the phone.
- The burden on the respondent is reasonable given the usefulness of the report.

Response:

- The interview was designed for and is conducted by telephone. Due to the geographic distribution and scheduling of interviews, on-site interviewing is not feasible for this information collection.

3. Mr. Neil Chapman, Northern Arizona Program Restoration Manager
The Nature Conservancy
Work Phone: 928-774-8892
Email: nchapman@tnc.org

Comment:

Mr. Chapman commented:

- The interview was no burden at all---he enjoyed being able to do it. It took approximately ½ hour to complete.
- The interview has practical or scientific utility;
- The interview and subsequent report and webinar provided validation of their organization's mission, and as such validated the time it took to do the interview. It was also great to hear about how other projects are completing their projects.

Response:

- The interviewee validated the minimum time needed to complete the interview. The burden statement over estimates the time needed for the interview, but there are likely some respondents that will take the extra time, hence the .75 hours for each interview in the calculation of burden. This estimation of burden appears reasonable.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

There are no payments or gifts to respondents, other than remuneration of contractors or grantees.

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

There are no assurances of confidentiality. However, the names of people interviewed are not associated with the interviewer's notes from the phone interview, and the names of those interviewed are not retained, ensuring some measure of privacy.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

There are no questions in the interview of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form. Record keeping burden should be addressed separately.**

This information collection is performed annually, interviewing on average 3-5 respondents in approximately 15 stewardship case study samples, for an approximate total of 75 respondents. This is reduced from 507 respondents estimated in the prior renewal using the previous random sample and survey format. The interview is designed to take no more than 0.5 hours per respondent but the burden estimate is 0.75 hours to allow additional time if desired. The estimated annual number of responses per respondent is one. Therefore the total annual burden is 56 hours.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

This information collection does not require respondents to gather or prepare data; the burden is limited to the actual time necessary to schedule and complete the interview. There is no record keeping requirement placed upon the respondents in relation to this information collection.

To determine the estimated income per hour, the Bureau of Labor Statistics, “Table 1 Summary: mean hourly earnings and weekly hours for selected worker and establishment characteristics” were reviewed (<http://www.bls.gov/ncs/home.htm#>). The specific data table is located at <http://www.bls.gov/ncs/ocs/sp/nctb1475.pdf>. Average mean hourly civilian earnings are \$21.29; private industry workers are \$20.47, and state and local government workers are \$26.08. Averaging the three totals \$22.61 (rounded to \$23). Using the rounded figure of \$23/hour results in a cost per respondent of \$17.25 per interview and a total annualized cost to respondents of \$1,293.75. Please see table below for calculations of the burden. Note, this table has not been updated by BLS since 2010.

IDENTIFICATION OF REPORTING OR RECORDKEEPING REQUIREMENT		ANNUAL BURDEN										
		REPORTS						RECORDS			RESPONDENT COST	
SECTION OF REGS.	DESCRIPTION	FORMS NO (S) (If "none" so state)	NO. OF RESPONDENTS	NO OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES (Col. D x E)	HOURS PER RESPONSE	TOTAL HOURS (Col. F x G)	NO. OF RECORD-KEEPERS	ANNUAL HOURS PER RECORD-KEEPER	TOTAL RECORD-KEEPING HOURS (Col. I x J)	COST PER HOUR	TOTAL COST (Col. H x L)
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
	Telephone Survey											
	-- Federal Government	None	15	1.00	15.00	0.750	11.25			0.00	23.00	\$258.75
	-- Businesses (Private Sector)	None	20	1.00	20.00	0.750	15.00			0.00	23.00	\$345.00
	-- Individuals	None	20	1.00	20.00	0.750	15.00			0.00	23.00	\$345.00
	-- State, Local or Tribal Government	None	20	1.00	20.00	0.750	15.00			0.00	23.00	\$345.00
TOTAL			75	4	75	3	56					\$1293.75

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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.**

There are no capital/start-up or operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- **Employee travel costs**
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Cost of contractor services in FY2019 is \$65,000 and, based on past contracts for this information collection, is expected to increase back to \$100,000 if the original reporting process is continued. This includes development of interview protocol, information collection, and analysis, summarizing, and reporting on collected information. Forest Service employee labor and materials for contract administration, including review, final approval, and acceptance of contract requirements, is estimated at \$10,000 per year for three National Headquarters employees serving as Contracting Officer, Contracting Officer's Representative, and technical point of contact.

- 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

Due to a change in the format for the year 2019, the number being contacted should be roughly 100.

- 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The results of the collection of information are included in the FS annual Report

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to Congress on stewardship contracting. Ideally, information collection from participants not employed by the federal government begins in early July. The information collection and analysis is conducted by the Pinchot Institute between July and November. The Pinchot Institute provides a report to the FS by January 15th of the following year, and the FS provides their report to Congress by spring. After inclusion in the Report to Congress, the analysis of the data may be used in other reports created both internally and externally by the FS. For example, the FS's 2018 Stewardship Contracting Assessment Review which is available to the public at

http://www.fs.fed.us/restoration/Stewardship_Contracting/results/index.shtml.

Congress does make the summarized analysis data, as shown in the final report supplied by the Pinchot Institute to the FS and in the FS's report to Congress, available for use by organizations both inside and outside the government.

No complex analytical techniques are used.

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

The FS is not seeking this approval.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

There are no exceptions to the certification statement identified in Item 19.