

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

**LAND AND WATER CONSERVATION FUND STATE ASSISTANCE PROGRAM
54 U.S.C. §200301 et seq.**

OMB Control Number 1024-0031

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 Land and Water Conservation Fund Act of 1965, as amended (LWCF Act) (54 U.S.C. §200301 et. seq.) was enacted to help preserve, develop, and ensure access for the public to outdoor recreation opportunities. Among other programs, the LWCF Act provides funds for and authorizes federal assistance to the States for planning, acquisition, and development of needed land and water areas and facilities for outdoor recreation purposes. In accordance with the LWCF Act, the National Park Service (we, NPS) administers the LWCF State Assistance Program, which provides matching grants to States, and through the States to local units of government. As used in this information collection request, the term “States” includes the 50 States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the District of Columbia; and the Territories of Guam, the U.S. Virgin Islands, and American Samoa.

LWCF grants are provided to States on a matching basis for up to 50 percent of the total project-related allowable costs. Grants to eligible Insular Areas may be for 100 percent assistance. The LWCF State Assistance Program gives maximum flexibility and responsibility to the States. States establish their own priorities and criteria, and allocate their grant money through a competitive selection process based on a Statewide Comprehensive Outdoor Recreation Plan, which is required by the Act to establish program eligibility. Payments for all projects are made to a State agency designated by the Governor or by state statute that is authorized to accept and administer funds for approved projects on behalf of that state. Local units of government participate in the program as sub-grantees of the State, with the State retaining primary grant compliance responsibility.

Legal Authorizations:

- Land and Water Conservation Fund Act of 1965, 54 U.S.C. §200305

- Land and Water Conservation Fund Program of Assistance to States; Post-Completion Compliance Responsibilities, 36 CFR Part 59
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200

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.

LWCF Forms

The forms listed below are used to collect information to administer the LWCF State Assistance Program:

Form	Function
<p>{Discontinued} NPS Form 10-902, LWCF Project Agreement</p>	<p>This form is being <u>discontinued</u> because we now use SF 424 the Application for Federal Assistance which is a standard grant and cooperative agreement template.</p>
<p>{Revised} NPS Form 10-902A, Amendment to Project Agreement</p>	<p>Use of this form is being <u>discontinued</u> for grant amendments in favor of a standard grant and cooperative agreement amendment template that is used across the NPS, which is prepared by LWCF State Assistance Program staff. However, Form 10-902A will continue to be used for compliance and stewardship actions. This form is required to alter the Project Agreement. When the amendment is signed by the NPS, it becomes part of the agreement and supersedes it in the specified matters.</p>
<p>NPS Form 10-903, “Description and Notification Form” (DNF)</p>	<p>No changes are proposed for the use of this form. The State must submit a DNF for each park or other recreation area that will receive grant funds, and for replacement sites in conversions. This form provides data describing the project site(s), such as location, acreage(s), and details about planned recreation improvements.</p>
<p>{Revised and Renamed} NPS Form 10-904, “Grant Application and Revision Form”</p>	<p>The revised NPS Form 10-904, renamed the Grant Application and Revision Form, will be required from States submitting applications for a new project and any requested amendments to the subsequent grant agreement. The revised form will constitute the cover and certification pages, Steps 1 through 3A, plus Steps 5 through 7 of the discontinued version of Form 10-904 – PD/ESF. In addition, some information previously requested in a narrative format will now be requested in a question and answer format.</p>

<p>{New} Form 10-904A, “Compliance and Stewardship Form”</p>	<p>NPS Form 10-904A: Compliance and Stewardship Form, will be required from States for each post-grant completion request seeking approval to convert a property from recreation use or for a non-recreation use of the site. This form will constitute the cover and certification pages, Steps 3B through 4, plus Steps 5 through 7 from the discontinued version of Form 10-904 – PD/ESF. In addition, some information previously requested in a narrative format will now be requested in a question and answer format.</p>
<p>NPS Form 10-905, “Record of Electronic Payment Form” (REP)</p>	<p>No changes are proposed for the use of this form. The State must submit an REP form when requesting payment on a grant. The form reports the amount being drawn and the timeframe of the expenses being reimbursed, whether it is a partial or final payment, and tracks the overall number of payments on each grant. Payments on multiple grants can be reported on a single REP form</p>

The following information is collected to administer the LWCF State Assistance Program:

Application (Forms 10-903 and 10-904). States may seek financial assistance for acquisition, development, or planning projects to be conducted under the LWCF Act. To receive a grant, States must submit an application to NPS for review and approval. We use the information provided in applications to determine eligibility under the authorizing legislation and to select those projects that will provide the highest return on the federal investment. In addition to the above forms and SF-424 series of grant application forms, applications for LWCF grants comprise:

- **Budget Narrative.** Project sponsors must prepare estimates of the cost(s) of the proposed grant project.
- **Pre-award Onsite Inspection Report.** The State must physically inspect proposed project sites and report on the findings prior to the award of grant funds. The inspection must be conducted in accordance with the onsite inspection agreement between the State and NPS. See additional information under Reports, below.
- **Maps and other supporting documentation.** Applicants must develop and submit two maps: one depicting the general location of the park as well as the entrance area; the other delineating the specific boundary of the outdoor recreation area that will be protected for outdoor recreation purposes and subject to the conversion provisions at 54 U.S.C. 200305(f)(3). Applicants should submit other documentation that has a significant bearing on the project,

such as budget information or the results of environmental and cultural resources review.

Grant Amendment (Forms 10-903 and 10-904). After initial award and over the course of the award performance period, a State or project sponsor may seek to amend the agreed-upon terms (e.g., award end date, scope of work, or budget). NPS must review and approve such changes. To describe the reasons the change(s) is/are needed and the impact(s) to the overall project, States must submit an amendment request on behalf of themselves or the local sponsor, which depending on the nature of the change could comprise the following elements:

1. Request and recommendation letter from the State Liaison Officer (SLO)
2. Revised SF-424 forms and budget narrative
3. Revised boundary map
4. Revised 10-903, DNF

Conversion of Use and Other Post-Award Stewardship Issues (Forms 10-902A, 10-903, 10-904A). In accordance with the LWCF Act (54 U.S.C. 200305(f)(3)) and implementing regulations found codified in 36 C.F.R. 59, no property acquired or developed with LWCF funds can be converted to anything other than public outdoor recreation uses without the approval of the Secretary of the Interior. States must submit a formal request to the appropriate NPS Regional Office to substantiate that:

- (a) All alternatives to the conversion have been evaluated and then rejected on a sound basis;
 - (b) Required replacement land being offered as a substitute is of reasonably equivalent location and recreational usefulness as the assisted site proposed for conversion;
 - (c) The property proposed for substitution meets the eligibility requirements for LWCF assistance;
- and
- (d) Replacement property is of at least equal fair market value as established by an appraisal developed in accordance with federal appraisal standards.

- **Maps and Other Supporting Documentation.** In addition to the noted forms, project sponsors must prepare maps showing the existing protected recreation area and delineating the area(s) to be converted, as well as of the proposed replacement property or properties. Sponsors may also need to submit information validating that the proposed replacement property meets the equal fair market value (e.g., a property appraisal) and equivalent recreational usefulness criteria as required by the LWCF Act.

Statewide Comprehensive Outdoor Recreation Plan (SCORP). The LWCF Act requires that to be eligible for LWCF financial assistance, each State must prepare and submit a SCORP to the NPS for approval. The NPS requires a new or updated SCORP at least once every 5 years. Per the LWCF Act, the SCORP must include:

- (1) The name of the State agency that will have the authority to represent and act for the State.
- (2) An evaluation of the demand for and supply of outdoor recreation resources and facilities in the State.
- (3) A program for the implementation of the plan.
- (4) Certification by the Governor that ample opportunity for public participation has taken place in plan development.

Open Project Selection Process (OPSP). Each State must develop an OPSP that provides objective criteria and standards for grant selection that are explicitly based on each State's priority needs for the acquisition and development of outdoor recreation resources as identified in the SCORP. The OPSP is the connection between the SCORP and the use of LWCF grants to assist State efforts in meeting high priority outdoor recreation resource needs. To ensure continuing close ties between the SCORP and the OPSP, States must review project selection criteria each time that a new or amended SCORP is approved by the NPS. States must submit to the NPS a revised set of OPSP criteria that conform to any changes in SCORP priorities or submit an appropriate certification that no such revisions are necessary.

Request for a Public Facility (Form 10-904A). Except for certain kinds of recreation-supporting facilities (e.g., restrooms, visitor information centers), project sponsors must seek NPS approval when constructing an indoor structure on a property that has received LWCF assistance. In most cases, development of an indoor structure would constitute a conversion, but, in certain cases NPS may approve them where it can be shown that they will enhance the outdoor recreation uses of a park and there will be a net gain in benefits to the outdoor recreating public using that park. The request describes the nature of the facility, how it will support and enhance the outdoor recreation use of the site, and ownership and management; as well as a copy of a revised boundary map indicating the location of the proposed facility.

Request for Temporary Non-Conforming Use (Form 10-904A). Project sponsors must seek NPS approval for the temporary (up to 6 months) use of an LWCF-assisted site for purposes that do not

conform to the public outdoor recreation requirements. Besides the noted form, the State's proposal to NPS must include:

- (1) Request and recommendation letter from the SLO, and
- (2) Acknowledgement by the SLO that a full conversion will result if the temporary use has not ceased after 6 months.

Request for Significant Change of Use (Form 10-904A). Project sponsors must seek NPS approval to change the use of an assisted site from one eligible use to another when the proposed use significantly contravenes the plans or intent for the area as they were outlined in the original LWCF application for federal assistance; e.g., changing a site's use from passive to active recreation.

Request to Shelter Facilities (Form 10-904A). Project sponsors must seek NPS approval to construct a new outdoor recreation facility, or partially or fully enclose an existing facility, such as a pool or ice rink, to shelter them from severe climatic conditions and thereby increase the recreational opportunities. This approval is required whether seeking to use LWCF grant funds for this purpose or not.

Extension of the 3-year Limit for Delayed Outdoor Recreation Development. Project sponsors must seek NPS approval to continue a non-recreation use beyond the 3-year limit for acquisition projects that were previously approved with delayed outdoor recreation development. The State must submit a written request and justification for such an extension to NPS before the end of the initial 3-year period. This request must include:

- (1) A full description of the property's current public outdoor recreation resources and the public's current ability to use the property; and
- (2) An update of the project sponsor's plans and schedule for developing outdoor recreation facilities on the property.

Reports. We use this information provided in reports to ensure that the grantee is accomplishing the work on schedule and to identify any problems that the grantee may be experiencing in accomplishing that work.

- **Onsite Inspection Reports.** States must administer a regular and continuing program of onsite inspections of projects. Onsite inspection reports are prepared for all inspections conducted and are included in the official project files maintained by the State. If a state conducts onsite project inspections during the grant project, an inspection progress report would be prepared.

Such reviews may coincide with annual performance reporting or when reimbursement is requested. Final onsite inspection reports must be submitted to the NPS within 90 days after the date of completing a project and prior to final reimbursement and administrative closeout. Post-completion onsite inspection reports must be completed within 5 years after the final project reimbursement and every 5 years thereafter. If there are problems, the report should include a description of the discrepancy and the corrective action to be taken. Only reports indicating problems are forwarded to the NPS for review and necessary action; all other reports are maintained in State files. However, within this 3-year collection window, we anticipate the Department of the Interior will implement a requirement for regular reporting on sites that were originally acquired with federal financial assistance, including LWCF, regardless of whether there is a problem. The SF-429 will be used for this purpose instead of individual state reports.

- **Financial and Program Performance Reports.** In accordance with 2 CFR 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), grantees must monitor grant and subgrant-supported activities to ensure compliance with applicable federal requirements and to ensure performance goals are being achieved. On an annual basis, States must submit reports that describe project performance to the NPS, on behalf of themselves or local sponsors. Similarly, the SF-425 is used to describe financial status.

Request for Reimbursement/Record of Electronic Payment (Form 10-905). States use the Automated Standard Application for Payments (ASAP) system for drawing funds on approved grants. For planning grants, States must submit to NPS a progress report and request for reimbursement before they may request payments. Payments on acquisition and development projects do not require prior approval, but upon completion of an electronic payment on a given date the State must concurrently (within 24 hours) submit a completed NPS Form 10-905, "Record of Electronic Payment" to the LWCF Program offices in Washington, DC and applicable NPS Region.

Recordkeeping. To comply with the grant requirements of 2 CFR 200, States must maintain financial records, supporting documents, statistical records, and all other records pertinent to a grant program for a period of 3 years after final payment on a project. The records must be retained beyond the 3-year period if audit findings have not been resolved. However, to comply with the LWCF Act perpetuity requirements, States must maintain sufficient records to allow them to keep track of parks and other recreation areas that have been assisted.

- 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.**

All forms are available on our website and on Grants.gov in a fillable-fileable format. Grant applications are submitted via the Grants.gov application portal; reports and responses to other requirements may be submitted electronically by email or in hard copy. Based on previous experience administering this collection, we estimate that 100 percent of respondents will submit grant applications electronically; for grant amendment as well as compliance and stewardship requests, we anticipate that on average about 60% will be submitted electronically.

- 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.**

There is no duplication. All information collected is project specific for the LWCF State Assistance Program. There may be some duplication of data within this collection when there are grant amendments and Conversion of Use requests. However, this is necessary to ensure up-to-date information on the project.

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

This collection does not affect small businesses or other small entities.

- 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.**

We collect this data to record each project, monitor project status and establish how funds are used, in accordance with OMB requirements. Without this data NPS would not have the sufficient overall LWCF program information to quickly report on inquiries or analyze trends in assistance. We only collect the data at the onset of a project, at yearly (active grants) or 5-year (closed grants) intervals, or when changes are made to the project; therefore, we could not collect the data less frequently.

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 special circumstances that would cause 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 May 14, 2019, we published in the Federal Register (84 FR 21357) 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, 2019. One comment was received in response to the notice; it objected to the use of federal dollars for support of state projects that would permit hunting, fishing, and timber

harvest as opposed to focusing on conservation and more passive recreation activities such as wildlife watching. It did not specifically address the information collection, therefore no NPS actions were required.

In addition to the Federal Register notice, we contacted five (5) state grantee representatives familiar with this collection and asked for comments on the questions listed below.

Organization	Title
Alabama Department of Environment and Community Affairs	Community Services Unit Chief
Idaho Department of Parks and Recreation (IDDP)	State and Federal Grant Manager
New Jersey Department of Environmental Protection	Planning and Technical Assistance Manager
New Mexico Department of Energy, Minerals, and Natural Resources	Design and Development Bureau Chief
Wisconsin Department of Natural Resources (WIDNR)	Federal Aid Coordinator

1. ***“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: One respondent (IDDP) suggested that the DNF (Form 10-903) and the PD/ESF (form 10-904) should be combined; and another (WIDNR) commented that it would be great to clean-up the PD/ESF to eliminate internal redundancy.

NPS Response/Action Taken: *As noted in Question 2 above, we have revised and revamped the PD/ESF in response to concerns of our state partners as well as program staff. We believe splitting the document into two request-specific forms will address the redundancy and other concerns. We also looked at trying to incorporate the DNF content into the revamped versions of the former PD/ESF but ultimately decided that it would be a lot of change and would not necessarily simplify the information collection effort. However, we will keep the idea in mind for a future renewal.*

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

Comments: All respondents stated that their estimates were the same or closer to the NPS estimates than in past years, except that all of them found the estimate of time to prepare a new application too low, especially if factoring in time spent on running their own grant rounds. As has been true for past collections. Specifically, IDDPN noted not having experience with certain kinds of collections and thus could not comment for all of them. WIDNR proposed some additional information collection categories and data, although several were process-related and did not necessarily result in information that needed to be collected by the NPS.

NPS Response/Action Taken: *Responses are submitted to the LWCF Program by 50 States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the District of Columbia; and the territories of Guam, the U.S. Virgin Islands, and American Samoa. The variability of responses reflects the unique circumstances of each state agency that administers the LWCF program, the amount of funding the State receives for this program and the number and types of projects funded historically. Therefore, it is difficult to derive a full suite of one size-fits-all estimates. The fact that there was less variability in responses than in past renewals suggests the estimates have improved from past renewals, except for new applications. Given the feedback, we are increasing the estimate for new applications by 4 hours. The additional categories proposed will be evaluated to determine if they merit inclusion in future renewals; now we don't have sufficient information or data to develop estimates.*

Aside from new applications, the other information collections (ICs) were unchanged from our previous submission as the state estimates we received were the same or fell within the average range. As in past years, weighing all of the complex factors that go into the experiences of individual states in gathering and submitting this information, we developed the below listed average response times for the burden on the public to fulfill minimum federal program requirements. For those ICs that have widely varying completion times, we included both a range and an overall estimate. The average response times are based on the type and complexity of the response, the level of experience of the preparer, and the level of research needed:

**Respondent Response Time
(hours)**

Activity	Range	Average
Conversions of Use	35-150	92.5
SCORP	500-700	600
Open Project Selection Process	20-35	30
Onsite Inspection Reports	1.5-10	5.75
Request for Reimbursement/Record of Electronic Payment -	0.5 -1.5	1

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

Comments: Two respondents (IDDP and WIDNR) commented that the government standard forms used for grants (i.e., the SF-424 family) included too many forms, that they were hard to fill out because there is not good guidance, and also that it is time-consuming to fill them out in Grants.gov (would prefer to be able to prepare them outside of grants.gov and upload them as PDFs).

NPS Response/Action Taken: *We have developed some program-specific guidance for filling out the forms to supplement the Government’s instructions for each form and conducted some web-ex training for our state partners. We will look into the suggestion regarding submitting PDFs of standard forms, but we are not sure about how to bypass the Grants.gov application development program (Workspace).*

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.

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.**

There are a maximum of 56 respondents (States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the District of Columbia; and the territories of Guam, U.S. Virgin Islands, and American Samoa). We estimate that we will receive **7,105 annual responses totaling 52,467 annual burden** hours.

We used the Bureau of Labor Statistics news release USDL-19-2195, December 18, 2019, Employer Costs for Employee Compensation—September 2019, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the total annual burden for this collection. Table 5 of the bulletin lists the hourly wage for management, profession, and related positions as \$63.07, including benefits.

The total dollar value of the burden hours is approximately **\$3,309,094** (rounded) ($\$63.07 \times 52,467$ hours). We consulted with a small sample of our state partners to validate previously developed estimates, which for the most part they did except for the completion time to develop new applications, which we increased in response to their feedback.

Table 12.1 Estimated Annual Hour Burden

Activity	Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Completion Time per Response (hours) *	Total Annual Burden Hours
Grant Application	56	8	448	16	7,168
Grant Amendment (not including Conversion of Use)	50	3.6	180	5	900
Conversion of Use	50	1	50	92.5	4,625
Statewide Comprehensive Outdoor Recreation Plan	11	1	11	600	6,600
Open Project Selection Process	11	1	11	30	330
Request for Public Facility	8	1	8	16	128
Request for Temporary Non-Conforming Use	5	1	5	16	80
Request for Significant Change of Use	2	1	2	16	32
Request to Shelter Facilities	1	1	1	16	16
Extension of 3-Year Limit for Delayed Outdoor Recreation Development	5	1	5	16	80
Onsite Inspection Reports	56	90	5,040	5.75	28,980
Financial and Program Performance Reports (per grant)	56	15	840	1	840
Request for Reimbursement/ Record of Electronic Payment	56	8	448	1	448
Recordkeeping	56	1	56	40	2,240
TOTALS			7,105		52,467

* Rounded to match ROCIS

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 are no non-hour burden costs.

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.

We estimate that the annual cost to the Federal Government to administer this information collection is **\$996,803** (rounded). To determine average hourly rates, we used Office of Personnel Management Salary Table 2019-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf) as an average nationwide rate. The Bureau of Labor Statistics news release USDL-19-2195, December 18, 2019, Employer Costs for Employee Compensation—September 2019, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) was used to calculate benefits.

Table 14.1 Estimated Annual Cost to the Federal Government

Activity	Grade/ Step	Hourly Rate	Hourly Rate w/ Benefits (x 1.6)	Total Responses	Time per Response (hours)	Total Annual Hours	Annual Cost
Grant Application	12/05	\$ 40.51	\$ 64.82	448	12	5,376	\$ 348,472
Grant Amendment	12/05	40.51	64.82	180	3	540	35,003
Conversion of Use	12/05	40.51	64.82	50	16	800	51,856
Statewide Comprehensive Outdoor Recreation Plan	12/05	40.51	64.82	11	40	440	28,521
Open Project Selection Process	12/05	40.51	64.82	11	8	88	5,704
Request for Public Facility	12/05	40.51	64.82	8	16	128	8,297
Request for Temporary Non-Conforming Use	12/05	40.51	64.82	5	16	80	5,186
Request for a Significant Change of Use	12/05	40.51	64.82	2	4	8	519
Request to Shelter a Facility	12/05	40.51	64.82	1	4	4	259
Extension of 3-Year Limit for	12/05	40.51	64.82	5	2	10	648

Activity	Grade/ Step	Hourly Rate	Hourly Rate w/ Benefits (x 1.6)	Total Responses	Time per Response (hours)	Total Annual Hours	Annual Cost
Delayed Outdoor Recreation Development							
Onsite Inspection Reports	12/05	40.51	64.82	5,040	1	5,040	326,693
Financial and Program Performance Reports (per grant)	12/05	40.51	64.82	840	1	840	54,449
Request for Reimbursement/ Record of Electronic Payment	12/05	40.51	64.82	448	.5	224	14,520
Recordkeeping (per grant)	12/05	40.51	64.82	900	2	1,800	116,676
Total							\$996,803

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

We are requesting a net **increase of 1,111** annual responses and a net **increase of 7,723** total burden hours from our 2016 submission. Since the last renewal, annual appropriations for the program have more than tripled, leading to increases in several activities including the number of grant applications, financial and performance reports, and reimbursement requests. Separately, the number of applications also increased due to Congress' creation in 2014 of a nationally competitive grant program for the LWCF, which has similar information collection requirements for applications but is in addition to the formula grant program. Annual funding for this effort has increased since 2016. We also increased the estimated hours to prepare a grant application, following consultation with our partners, as well as considering the effort for the competitive program applications. Finally, with the additional grant projects, the number of assisted sites to be monitored, inspected, and reported on post-award has also increased.

Table 15.1 Program Changes

Activity	Anticipated Completed Responses			Anticipated Respondent Burden (hours)		
	Current Request	Previous	Net Change	Current	Previous	Net Change
Grant Application	448	300	+148	7,168	3,600	+3,568
Grant Amendment (not including Conversion of Use)	180	180	0	900	900	0
Conversion of Use	50	50	0	4,625	4,625	0
Statewide Comprehensive Outdoor Recreation Plan	11	11	0	6,600	6,600	0

Activity	Anticipated Completed Responses			Anticipated Respondent Burden (hours)		
	Current Request	Previous	Net Change	Current	Previous	Net Change
Open Project Selection Process	11	11	0	330	330	0
Request for a Public Facility	8	8	0	128	128	0
Request for Temporary Non-Conforming Use	5	5	0	80	80	0
Request for Significant Change of Use	2	2	0	32	32	0
Request to Shelter Facilities	1	1	0	16	16	0
Extension of 3-Year Limit for Delayed Outdoor Recreation Development	5	5	0	80	80	0
Onsite Inspection Reports	5,040	4,368	+672	28,980	25,116	+3,864
Financial and Program Performance Reports (per grant)	840	661	+179	840	661	+179
Request for Reimbursement/ Record of Electronic Payment	448	336	+112	448	336	+112
Recordkeeping	56	56	0	2,240	2,240	0
TOTAL	7,105	5,994	+1,111	52,467	44,744	+7,723

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 do not publish this information.

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 forms and other appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.