

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## U.S. Fish and Wildlife Service Law Enforcement Training System OMB Control Number 1018-New

**Terms of Clearance:** This is a request for a new OMB control number.

### Justification

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

The Branch of Training and Inspection (BTI) in the Service's Office of Law Enforcement coordinates and conducts training for Service special agents, wildlife inspectors, and administrative staff, as well as for State, Native American, and foreign individuals responsible for wildlife and habitat protection. Over the past decade, there have been substantial increases in the numbers of programs and individuals trained, hours of training provided, and numbers of training sites.

There is a critical need for a comprehensive, reliable, and secure internet-based system capable of enhancing the Service's ability to plan, coordinate, and track the increased training-associated information and workflow, as well as the associated equipment, materials, and supplies required to successfully accomplish and sustain our vital training environments.

The primary authorities for the Service to collect the required information necessary to administer training programs utilizing the Acadis Readiness Suite include:

- Bald and Golden Eagle Protection Act (16 U.S.C. 668–668c);
- Lacey Act (18 U.S.C. 42);
- National Wildlife Refuge System Administration Act (16 U.S.C. 668dd–668ee);
- Migratory Bird Hunting Stamp Act (16 U.S.C. 718–718h);
- Migratory Bird Treaty Act (16 U.S.C. 703–712);
- Endangered Species Act (16 U.S.C. 1531–1543);
- Marine Mammal Protection Act (16 U.S.C. 1361–1407);
- Refuge Recreation Act (16 U.S.C. 460k–460k-4);
- Tariff Act of 1930 (19 U.S.C. 1202–1527);
- Uniform Federal Crime Reporting Act (28 U.S.C. 534);
- USA PATRIOT Act of 2001 (Pub. L. No. 107-56);
- USA PATRIOT Improvement and Reauthorization Act of 2005 (Pub. L. 109-177);
- Intelligence Reform and Terrorism Prevention Act of 2004 (Pub. L. 108–458);
- Homeland Security Act of 2002 (Pub. L. 107–296);
- Homeland Security Presidential Directive 12 – Policy for a Common Identification Standard for Federal Employees and Contractors; and
- Criminal Intelligence Systems Operating Policies, 28 CFR part 23.

**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.**

The BTI purchased the Acadis Readiness Suite (Acadis), by Envisage Technologies. This software suite provides the Service with the opportunity to enhance the standardization of many of the internal processes associated with training and also provides us with an improved ability to respond to inquiries from Congress, the Department of the Interior, and other external agencies. The software suite will enhance the ability of the BTI to:

- Schedule/track internal and external training events;
- Improve the ability to register/track both our internal and external student population;
- To maintain training records throughout the career of Service personnel;
- To improve the ability to test and survey student populations;
- To establish a robust lesson plan repository; and
- To respond to inquiries from internal and external agencies.

### **Account Registration Process**

In order to administer this proposed collection of information, the Service (in consultation with trainee recommendations provided to the Service by U.S. Embassies and the State Department) will collect the following information from prospective trainees:

- Applicant's full legal name;
- Photograph;
- Biography;
- Gender;
- Date of birth;
- Last 4 digits of Social Security Number;
- Email address;
- Home address and telephone number;
- Years of law enforcement officer experience;
- Highest education level;
- Agency name and address, title/rank, and level in agency;
- Emergency contact name and phone number; and
- Supervisor's name, email address, and phone number.

In addition to the required information above, international course participants will also be required to provide the following, which would be used only in the event of an emergency:

- Passport number and country of issue;
- Passport expiration date;
- National ID number; and
- Languages spoken.

We will use two separate registration forms, one for U.S. citizens attending the domestic training programs and the other for international students who will attend training programs here in the United States. The U.S. citizens do not need a current passport or international identification number, because they will not be entering into the United States. Our international partners will be entering the United States and thus will need to ensure their citizenship documentation is valid for entry into the country.

### **Post-Course Evaluations**

Participants will each automatically receive the post-course evaluation form, which asks them to provide feedback on the following:

- Length of experience;

- Program length;
- Overall ratings;
- Content, presentation, and course materials;
- Labs, practical exercises, and written exams;
- Program outcomes; and
- General comments.

The Service will use the information collected to record, track, and manage training records of domestic and foreign students affiliated with law enforcement agencies who attend training offered by the Service. The information will provide us with the capability to search the records of previous attendees (upon official inquiry only) by name, country of origin, or specific identifying number. We will only use students' information in the Acadis Readiness Suite for administrative functions such as signing up/registering for training, training history, and training requirements. In the international survey, we also ask specific questions about language proficiency to determine what type and how many interpreters will be needed in the program; this information assists us in creating breakout groups.

We use the Level 1 and Level 3 survey instruments in the Curriculum Development and Accreditation processes. The Level 1 survey is what the students fill out after they complete a training program, and the Level 3 survey is one that the students take six to 18 months after they have completed the program to determine the impact of the training.

NOTE: A Level 2 survey is actually the written/practical examination that the students take as part of course curriculum. The agency who is conducting the training actually evaluates how well the students performed during the cognitive or psychomotor skill examination.

**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.**

Currently, the majority applicants will register for Service provided training opportunities electronically via the Acadis. However, we will also accept enrollment requests as an email attachment or via fax. We estimate receiving approximately 100% of submissions 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. The information collected is specific to the Service. Due to the unique nature of this program, no other division of the Service or any other Federal agency collects this information from the public.

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

We collect only the minimum information necessary to establish eligibility of the applicant and to assess the application. There is no impact to 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.**

The Acadis Readiness Suite is an automated system designed to manage all of the administrative functions associated with organizational training. If we did not collect the information, the Service would be unable to schedule and track both internal and external training events; register and track the internal and external student populations; maintain training records throughout the career of Service personnel; evaluate, test and survey the student population; manage a robust lesson plan and student text repository associated with the curriculum; capture and record critical firearm qualifications and inventories, and respond to inquiries from internal and external agencies as it relates to historical training events in an rapid, less burdensome, automated fashion.

**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 requiring collection of 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 October 9, 2020, we published in the *Federal Register* (85 FR 64157) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 8, 2020. We did not receive any comments in response to that notice.

In addition to the *Federal Register* notice, we consulted with 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>
Missouri Department of Conservation	Protection Branch Captain
Colorado Parks and Wildlife	Area Wildlife Manager
Maryland Natural Resource Police	Major – Field Operation Bureau Chief
Federal Law Enforcement Training Center	Deputy Assistant Director - Retired
National Association of Conservation Law Enforcement Chiefs	Executive Director
California Department of Fish and Wildlife	Deputy Director and Chief of the Law Enforcement Division
Washington Department of Fish and Wildlife	WDFW Enforcement Captain
California Department of Fish and Wildlife	Assistant Chief
Wisconsin Department of Natural Resources	Deputy Chief Warden

***“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:* All responses indicated the form was appropriate, reasonable, and necessary. One respondent questioned the need to ask respondents if they speak or read English and suggested a note be included to inform the applicant that if they do not read or speak English, an accommodation would be explored. Another respondent questioned the placement of the question asking for number of years in law enforcement as if it were being asked of the emergency contact rather than the applicant. Additionally, one respondent questioned the need to request passport information.

*Agency Response/Action Taken:* The Service utilizes the information captured concerning languages spoken or proficiencies with languages when assigning individuals to teams or working groups in international settings. We reviewed the alignment of the question concerning the number of years in law enforcement to better align with the topical areas and have made the necessary enhancements on the form. The Service collects passport information for all foreign students attending training as it is required for entry into the United States, collected by the Department of State in their registration process, and to have this information readily available in emergency situations.

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

Comments: The responses indicated a range of 5 minutes to 15 minutes to respond to the collection of information.

Agency Response/Action Taken: Although there was a range of 5 to 15 minutes required to complete the registration process by our sample group, all of these individuals were United States citizens and were not required to enter passport information. International students would have to enter this information which would add additional time so the estimate of 15 minutes is appropriate and no action is required.

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

Comments: One respondent suggested moving the number of years in law enforcement or the emergency contact section so they do not appear to be connected. Another suggestion recommended a notification process for individuals completing the form to advise them of the documents needed prior to assessing the portal to complete the registration process. It was noted the section titled "Home Address and Telephone Number" needed clarification as it included two address blocks, but no telephone number block. Additionally, one commenter suggested it may be helpful to provide clarification/definitions to "Level in Agency," i.e., what is a manager vs a supervisor, or a senior manager.

Agency Response/Action Taken: The USFWS has worked with Acadis to realign the number of years in law enforcement, will provide prospective students with an email that identifies the required documents before they begin the registration process, is working with Acadis to add a space for a telephone number on the registration form and does not feel that definitions are necessary for "Level in Agency."

And

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

Comments: One commenter felt it would be helpful to know if a person speaks other languages in order to put that person with others that speak that same language, both as a primary and a secondary language. Another commenter suggested limiting the applicant's summary to no more than 3 sentences (e.g., I conduct natural resources law enforcement. I manage and direct 240 staff). Two commenters suggested a notification process for individuals completing the form to advise them of the documents needed prior to assessing the portal to complete the registration process. Another suggested the system provide a "Successful Completion" response after it is submitted to notify the applicant when a question was not completed correctly. And finally, one commenter questioned whether the platform is capable of having "Agency Country" default to whatever country is selected for "County of Residence" to save time.

Agency Response/Action Taken: The Service will provide an introductory email for each training program and will provide information to the potential student notifying them of the required documents necessary to complete the process. We will inquire whether the Acadis Readiness Suite has this capability to notify the applicant when each section is successfully completed. The system has a drop down menu for country but not one for the county of residence. The Service does not feel this feature is necessary.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We will not provide any payment 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. Information may be shared in accordance with the Privacy Act of 1974; as described in the Law Enforcement Management Information System (LEMIS) [Privacy Impact Assessment](#), the forthcoming Law Enforcement Training System (LETS) Privacy Impact Assessment and in accordance with the routine uses listed in the following System of Record Notices:

- Investigative Case File System (FWS-20), (Published May 28, 1999, [64 FR 29055](#)); Modification published June 4, 2008, [73 FR 31877](#)), and
- Incident Management, Analysis and Reporting System (Interior/DOI-10), (Published June 3, 2014, [79 FR 31974](#), associated Final Rule for Privacy Act Exemptions published September 2, 2014, [79 FR 51916](#)).

We provided OMB with copies of the final and draft PIAs, as well as the referenced SORNs, as supplemental documents to the ICR in ROCIS.

**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 will not ask any 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 that we will receive **2,200 annual responses** and **550 annual burden hours** (rounded). The total dollar value of the annual burden hours is approximately **\$9,775** (rounded).

To calculate the domestic government rate, we used the Bureau of Labor Statistics (BLS) Occupational Employment and Wages (May 2019), [Table 33-3051](#) – Policy and Sheriff's Patrol

Officers, which lists a mean hourly rate of \$32.50. In accordance with BLS News Release [USDL-20-2266](#), December 17, 2020, Employer Costs for Employee Compensation—September 2020, we multiplied this rate by 1.4 to account for benefits, resulting in a fully burdened hourly rate of \$45.50.

The USFWS projects approximately 1,000 international students annually. This would equate 1,000 annual responses and an estimated annual burden hours (for each IC) to be approximately 63 hours (rounded) with a total burden of 189 hours for the international component of this request. The USFWS conducts international training in coordination with the U.S. Department of State’s Bureau of International Narcotics and Law Enforcement (INL) in many of the continents around the world. We were unable to locate comparable international wage information for similar occupational groups by the Bureau of Labor Statistics (BLS). We have no basis to determine the benefits rates for international respondents and the annualized labor costs were calculated solely using the calculation method as follows. The BLS does not provide salary information for international law enforcement at their International Labor Comparison website <http://www.bls.gov/fls>. To develop a basis for calculating the hourly cost burden of the international students, we searched average annual salaries for law enforcement officers across various countries Africa, Central and South America, and Asia to develop an average law enforcement salary of \$23,841 or \$11/hour. We applied a benefits rate of 30% (which is likely high) to obtain an average rate of \$15/hour.

**Table 12.1**

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours*
<b>Account Registration</b>							
State/Local/Tribal Governments	100	1	100	15 mins	25	\$45.50	\$ 1,137.50
Foreign Governments	1,000	1	1,000	15 mins	250	15.00	3,750.00
<b>Post Course Evaluation</b>							
State/Local/Tribal Governments	100	1	100	15 mins	25	45.50	1,137.50
Foreign Governments	1,000	1	1,000	15 mins	250	15.00	3,750.00
<b>TOTALS:</b>	<b>2,200</b>		<b>2,200</b>		<b>550</b>		<b>\$ 9,775.00</b>

\*Rounded

**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.

This collection does not impose any non-hour cost burden on the respondents.

**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 estimated annual cost to the Federal Government associated with this collection of information is **\$119,877** (rounded). This cost includes \$9,629 in salaries and \$110,249 for annual software maintenance.

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2021-RUS](#) as an average nationwide rate. In accordance with BLS News Release [USDL-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020, we multiplied the annual salary by 1.59 to account for benefits.

Position/Grade	2021 Annual Salary	Annual Salary, Incl. Benefits (x1.59 multiplier)*	Time Spent on Information Collection	Total Annual Cost*
Training Technician (GS-09/05)	\$ 60,557	\$ 96,286	10%	\$ 9,629

\*Rounded

The government incurred a one-time cost of \$195,518.40 for the purchase, setup, and training associated with the new software. The annual maintenance costs for the next five years will be \$110,248.31/year for a total of \$551,241.55.

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

This is a request for a new OMB control number.

**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.**

The information we will collect will not be published.

**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.**

Not applicable.

**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.