

# **1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION**

## **Federal Migratory Bird Hunting and Conservation Stamp (Duck Stamp) and Junior Duck Stamp Contests OMB Control Number 1018-0172**

**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.**

On March 16, 1934, Congress passed, and President Franklin D. Roosevelt signed, the Hunting and Conservation Stamp Tax (16 USC 718 – 718k). Popularly known as the Migratory Bird Hunting Stamp Act (or Duck Stamp Act), it required all waterfowl hunters 16 years or older to buy a stamp annually. Originally earmarked for the Department of Agriculture, the revenue generated by the Duck Stamp Act was transferred to the Department of the Interior and the Service 5 years later.

In the years since its enactment, the Federal Duck Stamp Program has become one of the most popular and successful conservation programs ever initiated. Today, some 1.5 million stamps are sold each year, and as of 2020, Federal Duck Stamps have generated more than \$1.1 billion for the preservation of more than 6 million acres of waterfowl habitat in the United States. Numerous other birds, mammals, fish, reptiles, and amphibians have similarly prospered because of habitat protection made possible by the program. An estimated one-third of the Nation's endangered and threatened species find food or shelter in refuges preserved by Duck Stamp funds. Moreover, the protected wetlands help dissipate storms, purify water supplies, store flood water, and nourish fish hatchlings important for sport and commercial fishermen.

Jay N. "Ding" Darling, a nationally known political cartoonist for the Des Moines Register and a noted hunter and wildlife conservationist, designed the first Federal Duck Stamp at President Roosevelt's request. In subsequent years, noted wildlife artists submitted designs. The first Federal Duck Stamp Contest was opened in 1949 to any U.S. artist who wished to enter, and 65 artists submitted a total of 88 design entries. Since then, the contest has been known as the Federal Migratory Bird Hunting and Conservation Stamp Art (Duck Stamp) Contest and has attracted large numbers of entrants.

The Duck Stamp Contest (50 CFR part 91) remains the only art competition of its kind sponsored by the U.S. Government. The Secretary of the Interior appoints a panel of noted art, waterfowl, and philatelic authorities to select each year's winning design. Winners receive no compensation for the work, except a pane of their stamps, but winners may sell prints of their designs, which are sought by hunters, conservationists, and art collectors.

The Federal Junior Duck Stamp Conservation and Design Program (Junior Duck Stamp Program) began in 1989 as an extension of the Migratory Bird Conservation and Hunting Stamp. The National Junior Duck Stamp Art Contest started in 1993, and the first stamp design was selected from entries from eight participating states. The program was recognized by Congress with the 1994 enactment of the Junior Duck Stamp Conservation and Design Program Act (16 U.S.C. 719). All 50 states, Washington D.C., and two of the U.S. Territories currently participate in the annual contest.

The Junior Duck Stamp Program introduces wetland and waterfowl conservation to students in kindergarten through high school. It crosses cultural, ethnic, social, and geographic boundaries to teach greater awareness and guide students in exploring our nation's natural resources. It is the Service's premier conservation education initiative.

The winning artwork from the national art contest serves as the design for the Junior Duck Stamp, which the Service produces annually. This \$5 stamp has become a much sought-after collector's item. One hundred percent of the revenue from the sale of Junior Duck Stamps goes to support recognition and environmental education activities for students who participate in the program. More than \$1.25 million in Junior Duck Stamp proceeds have been used to provide recognition, incentives, and scholarships to participating students, teachers, and schools. The program continues to educate youth about land stewardship and the importance of connecting to their natural worlds. Several students who have participated in the Junior Duck Stamp Program have gone on to become full-time wildlife artists and conservation professionals; many attribute their interest and success to their early exposure to the Junior Duck Stamp Program.

**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.**

**FEDERAL DUCK STAMP CONTEST**

All U.S. citizens, nationals, or resident aliens are eligible to participate in the annual Federal Duck Stamp Contest. However, all entrants must be 18 years of age by June 1<sup>st</sup>. Entries are accepted beginning June 1<sup>st</sup> of each year and must be postmarked by August 15<sup>th</sup>. A Federal Duck Stamp Contest art entry consists of a two-dimensional design. The regulations for the contest do not specify a medium, except to prohibit photographs or computer-generated artwork.

Entrants must complete and submit a "Display, Participation, & Reproduction Rights Agreement", along with the official "Entry Form for Federal Duck Stamp Contest" with their artwork. Information requested on the forms include:

*Display, Participation & Reproduction Rights Agreement* – All entries must include a completed Display, Participation, & Reproduction Rights Agreement Form and an entry fee (currently \$125). Failure to submit the signed agreement form will result in disqualification.

<b>We ask for...</b>	<b>So that we can...</b>
Artist's signature, mailing address, and home phone number	Artist signs that they have read and agree to the display, participation and reproduction rights agreement. Mailing address and phone numbers are needed so we can contact artist and to return artwork after the contest/exhibit period.
Species information	Identify their art piece.

*Entry Form for Federal Duck Stamp Contest* – The entry form must be attached to the back of the entry.

<b>We ask for...</b>	<b>So that we can...</b>
Basic contact information (name, address, phone numbers, and email address)	Identify artists and contact them with information on the contest, announce winners, and return artwork after the contest/exhibit period.

Date of birth	The Service asks for the DOB, rather than age, to verify artists are at least 18 by June 1 of the contest year. As artists have a 10-week period in which they can submit artwork, they need to be eligible by June 1 – not on the day they send their artwork in.
Species portrayed and medium used	Verify eligibility and for press coverage.
Name of hometown newspaper	For press coverage

The Service selects five or fewer species of waterfowl each year; each entry must employ one of the Service-designated species as the dominant feature (defined as being in the foreground and clearly the focus of attention). In years in which a theme has been designated there may also be requirements for mandatory elements integrated into the composition. Designs may also include hunting dogs, hunting scenes, waterfowl decoys, national wildlife refuges as the background of habitat scenes, non-eligible species, or other scenes that depict uses of the stamp for sporting, conservation, and collecting purposes. Entries may be in any media EXCEPT photography or computer-generated art. Designs must be the contestants' original hand-drawn creation and may not be copied or duplicated from previously published art, including photographs, or from images in any format published on the Internet.

Each artist should have a working knowledge in three major areas of special interest to Federal Duck Stamp Contest judges:

- Basic Waterfowl Biology — for example, are the bird's plumage and the habitat correct for the indicated season?
- Artistic Composition — is the image artistically interesting and does it “pop” when viewed?
- Suitability for printing at a reduced size — the image provides the design for a 1-3/4” L x 1-1/2” W stamp. How well will the details show in the reduced size?

Entries must be uniform in size. Each entry must be 7” x 10” and matted over with bright white matting. The matting must be 1” wide. Total size (entry with matting) must be 9” x 12”. We recommend using a 1/8” Masonite board or foam core with 1/8” matting to equal the total width of 1/4” thick. Any entry exceeding 1/4” thick will be disqualified.

### **JUNIOR DUCK STAMP CONTEST**

All individuals enrolled in kindergarten through grade 12 may participate in the Junior Duck Stamp Conservation and Design Program. Eligible students are encouraged to participate in their state's annual art and conservation message contest as part of the program curriculum. Students may enter through public, private, and homeschools, as well as through non-formal educational experiences such as those found in scouting, art studios, and nature centers. Entry dates are set by the individual States but all occur on or prior to March 15. A Junior Duck Stamp Art Contest entry consists of a two-dimensional design in any art style (photorealistic, ethnic, abstract, impressionistic, caricature, etc.) of any native North American waterfowl species. Any medium except computer generated or photography is allowed.

The Junior Duck Stamp Program is a dynamic art- and science-based curriculum. This non-traditional pairing of subjects brings new interest to both the sciences and the arts. The program introduces students across the nation to conservation through the arts, using scientific and wildlife observation principles to encourage visual communication about what they learn.

Four curriculum guides, with activities for use as a year-round study plan, discovery kits, and outdoor field trips are employed to assist students in exploring science in real-life situations.

Modeled after the Federal Duck Stamp Contest, the Service designed the annual Junior Duck Stamp Art and Conservation Message Contest (Junior Duck Stamp Contest) to be a visual assessment of a student's learning and progression. The Junior Duck Stamp Contest encourages partnerships among Federal and State government agencies, nongovernment organizations, businesses, and volunteers to help recognize and honor thousands of teachers and students throughout the United States for their participation in conservation-related activities. Since 2000, the contest has received more than 530,000 entries; an average of 300,000 students, families, educators, and community members annually participate in Junior Duck Stamp activities outside of the actual contest.

Entrants in the Junior Duck Stamp Contest must complete and submit a "Junior Duck Stamp Program Conservation and Design Contest Entry Form" and a "Reference Form" with their artwork:

Junior Duck Stamp Program Conservation and Design Contest Entry Form - Each entry in the Junior Duck Stamp Contest requires a completed entry form that requests:

<b>We ask for...</b>	<b>So that we can...</b>
Basic contact information (student name and mailing address)	Identify artists and return artwork after the contest/exhibit period.
Age/Grade	To verify eligibility, assist in selecting proper grade group so they can be judged with their peers, and to identify graduating seniors eligible for additional incentives.
Parent's name, email, and telephone number	Provide parent contact information for staff to request media, collector, and other requests as we do not give out contact information of students.
Whether the student has a Social Security or VISA immigration number	Students planning to enter the contest must be citizens of the United States or U.S. Territories, or have an official Immigration Visa or green card as proof of legal residency. A valid SSN is required for the award of monetary prizes.
Whether the student is a foreign exchange student	In the case of foreign exchange students, their artwork may be judged at the state level, but if awarded State Best of Show, the entry will not be forwarded for entry into the national contest.
Title, species, medium/style used, and conservation message associated with the drawing	Information on species, medium, style and title aid in identification of entries if forms and artwork become separated. To encourage students to participate even if their preferred art style is not photorealistic acrylic painting, students are encouraged to provide the medium and style used to assist in recognition of superb talent. Each student is encouraged, but not required, to write a short conservation message that expresses the spirit of what they have learned through classroom discussions, research, and planning for their Junior Duck Stamp Art Contest entry.
Basic contact information for their supervising adult or teacher (name, address, phone numbers, school/studio/organization/troop)	Recognize and contact educators and to assist in the return of artwork and recognition certificates. Knowing where the artwork is coming from also assists in the ability to better meet students' educational needs for this

name, and email address)	program
Authenticity and Liability Statement	To verify that the student has not infringed on copyright that would lead to the US government being sued.

*Reference Form* – Students in grades 7-12 must include a Reference Form citing all resources used to create their entry. Failure to include a Reference Form will result in disqualification of their entry. Each entry in the Junior Duck Stamp Contest submitted by a student in grades 7-12 and all state best of show entries require a completed Reference Form that requests:

We ask for...	So that we can...
Grade	Determine if the form is mandatory or optional and to assist in the judging if they used resources appropriately for their age group.
Name and state of student's residence	Assist in identifying and matching up the artwork and forms.
Reference Information	To verify the student did not reproduce another artists' work and to ensure unique creations.

Technical requirements for design and submission of an entry in the Junior Duck Stamp Contest:

- Entries must be uniform in size. Each entry must be 9" x 12" less than ¼" thick, and must be horizontal.
- Image must be a live portrayal of a native North American duck, swan, or goose (selected from the list of eligible species).
- Entries may be rendered in any style including but not limited to photorealistic, abstract, impressionistic, ethnic, caricature or other preferred 2-dimensional art style.
- An entry may be multi-color, black and white, or a single color; it may be rendered in ink, paint, pastel, crayon, or pencil. Techniques may include scratchboard, airbrush, linoleum printing, paper collage, dry brush, crosshatch, pointillism, etc. No photography or computer-generated art is accepted.
- Design entries must be the contestant's original, hand-illustrated creation and may not be traced or copied from photographs or other artists' works.
- Photographs taken by the student may be used as references in the development of the design.
- No lettering, words, signatures, or initials may appear on the front of the artwork as they may influence judges and can interfere with the final stamp design.
- Entries may not be matted or framed and there should be no border around the image.
- The signed Entry Form must be taped to the back of entry and older students must include a completed Reference Form.

**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.**

Submission of the forms and artwork cannot be accomplished through automated or technological methods. Signed forms must be attached to the original artwork and mailed to the appropriate receiving office.

**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. No other government entity is authorized to conduct the Federal Duck Stamp or Junior Duck Stamp Art Contests.

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

The collection does not impact 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.**

If we do not collect the information, we would be unable to conduct the annual contests. We cannot collect the information less frequently because we only collect the information from contestants at the time they submit their drawing for consideration. Only one entry is permitted per participant per year.

**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.

All information is collected consistent 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 March 4, 2021, we published in the *Federal Register* ([86 FR 12707](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 3, 2021. We received one comment in response to that Notice:

**Comment 1:** Concern was expressed that the programs were morally wrong because they supported wildlife hunting.

**Agency Response to Comment 1:** The comment did not address the information collection requirements so no response is required.

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who are 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**

Organization	Title
Private NGO	Junior Duck Stamp State Coordinator
Private NGO	Junior Duck Stamp State Coordinator
Private NGO	Junior Duck Stamp State Coordinator
Individual	Junior Duck Stamp/Federal Artist
Individual	Junior Duck Stamp Instructor
Individual	Junior Duck Stamp Parent/Federal Artist
Individual	Federal Duck Stamp Artist
Individual	Federal Duck Stamp Artist
Individual	Federal Duck Stamp Artist

***“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: Respondents indicated that all questions on the Federal Entry Form were considered necessary.

For the Junior Duck Entry Form, respondents indicated several questions that, while necessary, could be clarified (see below).

Agency Response/Action Taken: As there were no questions thought to be unnecessary and all respondents agreed that the collection of the information was necessary, none of the questions were removed. However, several questions were clarified as described below.

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

Comments: Responses indicated that the Federal Entry Form would take between 5-10 minutes to read and fill out.

No comments were provided on the length of time it would take to fill in the Junior Duck Stamp Entry or Reference forms.

Agency Response/Action Taken: The Service will continue to use 7 minutes for an estimate of the time needed to fill out the Federal Entry Form and 20 minutes of an estimate of the time needed to fill out the Junior Entry and Reference forms.

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

Comments: Respondents indicated that the Federal Entry Form were concise, clear, easy to understand, and practical.

In response to the Junior Entry Form, several respondents suggested we ask for both art style and grade. “Grade” was thought to be a more helpful question than “Grade Group” as it avoided having to ask follow-up questions as to whether the student was graduating that year. Respondents also thought students should indicate their individual art style. Coordinators did not want to have to guess and students and educators did not want their skills to be mistaken and therefore diminished.

A respondent felt that we should be requesting the parent’s email and phone rather than the student’s as they felt it was not good practice to contact an underage minor.

Several respondents requested that the question of Social Security Number or VISA immigration number should be separated as it may not be clear that one or the other is acceptable and both were not needed to qualify.

One respondent felt that the URL should be provided for the Contest Brochure and that there was clarification needed on particular items (definition of copying and tracing), stated in the Authenticity and Liability Statement on the Entry Form.

One respondent suggested that the clarity of the information needed to be included on the Junior Reference Form could be enhanced.

One respondent felt that the Reference Form did not have enough space for student’s information and suggested that the number of lines be reduced to ten.

Agency Response/Action Taken: Changes were made to the Junior Duck Stamp Entry Form to reflect comments regarding the information collected on students.

As the URL is provided for the home page of the Junior Duck Stamp Program at the top of the Entry Form and because of space limitations, a separate listing of the URL for the Annual Contest Brochure was not added to the Entry Form.

The Annual Contest Brochure provides detailed information and examples of what may be considered plagiarism or a potential copyright violation. Students, parents, and educators are reminded to refer to the Annual Contest Brochure. Words were added to remind them to refer to the Annual Contest Brochure for more detailed information on plagiarism and

potential copyright violations.

Several examples of how to cite references and what is considered an appropriate use of reference materials are provided in the Annual Contest Brochure. Due to limitations of space, examples were not added to the Junior Duck Stamp Reference Form itself. Reminders were added that students should refer to the Annual Contest Brochure and the following sentences were added: "See examples in the Annual Contest Brochure. You may also include copies of your reference materials."

Lines on the Reference Form were reduced from 11 to 10 as per the respondent's suggestion.

#### ***"Ways to minimize the burden of the collection of information on respondents"***

Comments: No suggestions were offered to minimize the burden. Respondents indicated they did not feel it was an unnecessary burden to fill in the entry forms for either program. While some respondents thought artists might submit their form electronically, since the entry forms must be printed and attached to the entry and physically sent with payment (for the Federal Contest), requiring forms to be filled out or submitted electronically would actually **increase** the burden on the artists.

Agency Response/Action Taken: No action will be taken at this time.

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

The artist will receive publicity and media recognition. He/she will also travel and be a guest speaker at several prestigious national waterfowl festivals and wildlife art events. The artist receives a pane of his or her Duck Stamps signed by the Secretary of the Interior. Finally, the winner can choose to market the winning image and any other works as "by the Federal Duck Stamp artist."

NOTE: Any publishing contract offered to the winning artist is between the artist and publisher. The Federal Government does not guarantee the offer of a contract. The Government assumes no liability, responsibility, nor claims any interest in resulting publishing contracts.

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

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Freedom of Information Act (5 U.S.C. 552). The Service's Associate Privacy Act Officer conducted a review of the forms to review the collection and use of information associated with the contests. She subsequently determined that because each entry is given a unique number that is associated to the painting and not the individual, it is not a system of records. They only use the forms in case the entries are finalists, or when it's returned to the individual. Therefore, there is no need for a SORN or a Privacy Act Statement.

However, we handle the forms of winning entrants differently. We never disclose their information to anyone, and we do not use it for marketing purposes. We use the information from the winning entry forms to make the appropriate travel arrangements for the entrants. We maintain the information from the winning entrant's forms in accordance with DOI Systems of Records Notice, "Travel Management: FBMS, DOI-88" ([73 FR 43769](#), published July 28, 2008).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that **25,200 applicants** will submit a contest entry form each year totaling **8,356 annual burden hours**. We estimate the total dollar value of the annual burden hours for this collection to be **\$322,542 (rounded)**.

Table 1 of the Bureau of Labor Statistics (BLS) News Release [USDL-21-0437](#), March 18, 2021, Employer Costs for Employee Compensation—December 2020, lists the hourly rate for all workers as \$38.60, including benefits. We multiplied this rate by the total annual burden hours to calculate the total dollar value of the annual burden hours above.

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>Duck Stamp Program Contest Entry Form</b>							
Individuals	200	1	200	7 min	23	\$ 38.60	\$ 887.80
<b>Junior Duck Stamp Program Contest Entry Form</b>							
Individuals	25,000	1	25,000	20 min**	8,333	38.60	321,653.80
<b>Totals:</b>	<b>25,200</b>		<b>25,200</b>		<b>8,356</b>		<b>\$ 322,541.60</b>

\*Rounded to match ROCIS

\*\*Burden for JDSP entry form is longer since both the parents and teacher must sign the form, and the student must provide references.

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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.

A total of **\$53,000** is associated with entry fees and mailing costs to participate in the annual contests.

For the Duck Stamp Contest, we estimate the costs as follows:

- 200 submissions to the Federal Duck Stamp Contest x \$125 = **\$25,000**
- 200 entries x an average \$15 for mailing costs = **\$3,000**.

There are no entry fees associated with the Junior Duck Stamp Contest submissions. We estimate the mailing costs associated with entering submissions to the Junior Duck Stamp contest to be approximately **\$25,000** annually. Most of the 25,000 entries are mailed directly by schools who utilize the bulk mail option reducing the amount of postage and packages received.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The total Federal cost to administer these Contests is **\$477,817 (rounded)**. This includes:

- \$425,354 (rounded) – Table 14.1 Fish and Wildlife Annual Salary/Benefits, and
- \$52,463 – Table 14.2 Other Annual Costs.

We used the Office of Personnel Management Salary Table [2021-DCB](#) (Washington-Baltimore-Arlington, DC-MD-VA-WV-PA) to determine average hourly Federal wages for National Positions and [2021-RUS](#) (Rest of US) for non-Headquarters' positions. In accordance with BLS News Release [USDL-21-0437](#), March 18, 2021, Employer Costs for Employee Compensation—December 2020, we multiplied individual hourly wages for the Federal employees by 1.59 to calculate the fully burdened hourly rate shown below in Table 14.1. We calculated the other

associated costs from average expenditures for the past three years at the national level and from the annual reports provided by State Junior Coordinators.

**Table 14.1 – Fish and Wildlife Annual Salary/Benefits**

Action	Position and Grade	Hourly Rate	Fully Burdened Rate (w/Benefits)	Number of Positions	Annual Hours/ Position	Total Annual Cost*
Implement Federal Duck Stamp Contest	Program Manager GS 14/05 (DCB)	\$66.54	\$105.80	1	350	\$ 37,030
	Graphic Designer GS 11/05 (DCB)	39.51	62.82	1	20	1,256
	Communications Spec. GS 13/05 (DCB)	56.31	89.53	2	20	3,581
	Program Assistant GS 07/05 (DCB)	26.69	42.44	1	100	4,244
	Administrative Officer GS 12/05 (DCB)	47.35	75.29	1	10	753
Implement National Junior Contest	Program Manager GS 14/05 (DCB)	66.54	105.80	1	350	37,030
	Graphic Designer GS 11/05 (DCB)	39.51	62.82	1	40	2,513
	Communications Spec. GS 13/05 (DCB)	56.31	89.53	2	20	3,581
	Administrative Assistant GS 12/05 (DCB)	47.35	75.29	1	20	1,506
	Program Assistant GS 07/05 (DCB)	26.69	42.44	1	100	4,244
	Outreach Officer GS 12/05 (RUS)	42.08	66.91	3	10	2,007
Implement State Junior Contests	Outreach Specialist GS 11/05 (RUS)	35.11	55.82	14	80	62,518
	Outreach Specialist GS 09/05 (RUS)	29.02	46.14	35	100	161,490
	Outreach Specialist GS 07/05 (RUS)	23.72	37.71	7	80	21,118
	Administrative Assistant GS 07/05 (RUS)	23.72	37.71	40	40	60,336
	Administrative Assistant GS 09/05 (RUS)	29.02	46.14	12	40	22,147
<b>Subtotal:</b>					<b>1,380</b>	<b>\$ 425,354</b>

\*Rounded

**Table 14.2 – Other Annual Costs**

Action	Costs Per	Total
Contractor for AV for Federal Contest, closed captioning, interpreter		\$ 31,500
Travel for judges and contest officials for Federal Contest		14,000
Travel for judges and contest officials for National Junior Contest		2,000
Travel for judges and contest officials for State Junior Contests (x53)	15.00	795
Postage to return Federal artwork (x200)	6.00	1,200
Postage to return National Jr artwork (x53)	6.00	318
Postage to return State Jr artwork (x53)	50.00	2,650
<b>Subtotal:</b>		<b>\$ 52,463</b>

NOTE: Due to the COVID pandemic, travel costs associated with the contests were less expensive. We do not anticipate going back to the previous travel cost levels in the near future.

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

Changes to Junior Duck Stamp Contest Entry Form (Question 2):

- Several minor changes were made based on program needs and respondents' comments. "Grade Group" was replaced with "Grade". This cut down on the confusion and provided coordinators the ability to more easily distinguish grades for students aged 17 and 18. As a partner program offers a secondary scholarship recognition for graduating seniors this allows coordinators to sort entries more easily, cutting down on their burden to process the artwork.
- The second change was to add "Style" to the description of the artwork. This allows coordinators to sort student entries more easily for judging based on the students' preferred art style and media. The intent is to be more inclusive of students' preferred art styles, encourage a broader interest in the program, and better recognize talent in different artistic media and styles. Again, this change should cut down on cost burden.

Changes in annualized costs to the Federal government (Question 14):

- Changes in personnel have occurred which has changed the associated costs to implement the Federal and National Junior Duck Stamp Contests.
- The COVID pandemic limited travel, forcing the Junior Duck Stamp State and National Contests to be done virtually. This entailed more work on the part of the coordinators to conduct the National and State Junior Duck Stamp Contests but decreased travel costs by judges and contest officials.
- Federal Contest was also affected by COVID in that the contest was held locally without an audience and with more locally based judges; this too decreased travel costs.

In response to a request for Spanish versions of the Junior Duck Stamp Contest entry form, we now offer the entry form and instructions in both English and Spanish. We did not create a Spanish version of the Federal Duck Stamp Contest as we are prioritizing translating the Junior Duck Stamp Contest forms and instructions into another 10 languages, upon availability of funding. As we create these additional forms, we will provide copies of forms translated into other languages to OMB as a nonsubstantive change request.

**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 will not publish any 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 the form and other appropriate materials.

**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.