

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

U.S. Fish and Wildlife Service Agreements with Friends Organizations OMB Control Number 1018-New

Terms of Clearance: This is a request for a new OMB control number (existing collection in use without an 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 U.S. Fish and Wildlife Service (Service) enters into agreements and partnerships with nonprofit Friends groups to facilitate and formalize collaboration between the parties in support of mutual goals and objectives as authorized by:

- The Fish and Wildlife Act of 1956 (16 U.S.C. 742a-742j);
- The National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-ee), as amended;
- The Refuge Recreation Act of 1962 (16 U.S.C. 460k *et seq.*), as amended;
- The Anadromous Fish Conservation Act (16 U.S.C. 757a-757g), as amended;
- The Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661-667e), as amended;
- The National Wildlife Refuge System Volunteer and Community Partnership Enhancement Act of 1998 (16 U.S.C. 742f), as amended; and
- The National Fish Hatchery System Volunteer Act of 2006 (16 U.S.C. 760aa), as amended.

In September 2020, the Office of Inspector General (OIG) at the Department of the Interior (DOI) delivered its final audit report of the Service's Friends Program. The audit outlined six recommendations, including a requirement for Friends group to report related data to the Service on a regular basis. In order to collect this information legally, we must complete the Information Collection Clearance process. The Service addressed and completed all audit recommendations and commitments (other than completion of the Information Collection Clearance process). For example, the Service amended and re-issued agency policies (Service Manual chapters [633 FW 1](#), [633 FW 2](#), [633 FW 3](#), and [633 FW 4](#)) which guide the program. We also trained Service staff and Friends on the new policies.

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 Service collects the information listed below in conjunction with the administration of the Friends Program to verify compliance with agency policy and to allow the Service to gauge the impact of the program as a whole. All information collected will be kept in a secure manner by the Service and will not be shared except as an aggregate report. If the Service wishes to share specific details to illustrate the strength of the Friends program, individual groups will be asked for their permission to do so.

The Service will collect this information online through widely available forms programs (currently Microsoft Forms). Information can be entered either by Friends groups or Service staff.

The Service uses the information collected to establish efficient and effective partnerships and working relationships with nonprofit Friends organizations. The agreements provide a method for the Service to legally accept donations of funds and other contributions by people and organizations through partnerships with nonprofit (and non-Federal) Friends organizations. The partnership agreements identify roles and responsibilities and identify mutual projects over the term of the agreement. Quarterly reviews provide an opportunity to update contact and financial information. Annual reporting documents contributions to the Service.

AGREEMENTS

Partnership Agreement – The Service utilizes a standardized agreement which describes the substantial involvement of both parties in mutually agreed-upon activities and ensures that both parties have a mutual understanding of their respective roles, responsibilities, rights, expectations, and requirements within the partnership. The agreement, pre-approved by the DOI Office of the Solicitor, provides the suggested language common to most Service Friends partnerships. The content is based on DOI and Service policies, but the Friends and Service sites/programs may thoughtfully add and delete certain language to meet their varying partnership roles and responsibilities wherever Department and Service policies do not dictate otherwise.

All Friends Partnership Agreements must contain the following sections:

1. Authority,
2. Purpose,
3. Background,
4. Authorization and Terms of Agreement,
5. Service and Friends Responsibilities,
6. Supplemental Agreements (if applicable) – A supplemental agreement is required only for those Friends that use Service-managed land, facilities, or equipment. The supplemental agreement provides additional terms and responsibilities beyond the general terms of the partnership agreement.
7. Liability and Indemnification,
8. Insurance related to the agreement,
9. Assignment,
10. Miscellaneous, and
11. Agreement Officers.

Attachments to the Friends Partnership Agreements include:

1. Articles of Incorporation,
2. Internal Revenue Service (IRS) determination letter (or a copy of a letter from the IRS confirming an application has been filed if the organization is in process of applying for incorporation) which is verified annually,
3. Copies of insurance policies,
4. Supplemental agreement (if applicable)
5. Fundraising agreement (if applicable),
6. Bylaws, and
7. Current IRS form 990 (if applicable, for renewing agreements).

Renewal of Partnership and Supplemental Agreements – The partnership agreement and supplemental agreement are effective for 5 years, with four annual modification options during the 5-year period of performance. Each time the agreement is up for its 5-year renewal, the Refuge or Fish Hatchery Project Leader and the Friends President or Board will meet to review, modify, and sign the agreement as described above. To become effective, the Regional Director (or designee) must review, approve, and sign a new agreement every 5 years.

Fundraising Agreement – We require fundraising agreements if a Friends organization or other partner leads a specific fundraising effort on our behalf with the intent of raising more than \$25,000 on or off-Service-managed property (in accordance with Service Manual chapter 212 FW 8, Donations, Fundraising, and Solicitation).

REQUIRED DOCUMENTATION

Internal Financial Control Documentation – We collect internal financial control documentation from partners only to the same extent as what is already being reported to and collected by the IRS. We may occasionally inquire into cash handling procedures or other processes that may pose a risk for the Service in order to properly account for funds collected on Federal refuges or hatcheries for the benefit of the Service.

Assurance Documentation – We collect assurance documentation from partners to ensure donations, revenues, and expenditures benefit the applicable refuge or hatchery.

REQUIRED REVIEWS AND REPORTS

Supplemental Documentation Requirements

Quarterly Reviews – Quarterly reviews will occur during regularly scheduled board meetings and will encompass the following:

1. Friends board members and key staff should verify contact information.
2. Key Service employees should verify contact information.
3. Friends groups should review financial reports that compare actual to budgeted expenses. Project Leaders, Friends Liaison, or both should be present during these reviews.

Annual Reports – Annual reports document donations, revenues, and expenditures, and number of members (if applicable), to show contributions to the Service from the Friends groups. This allows us to roll up the data across the Friends Program as a whole and demonstrates the impact of Friends groups on the Service. By requiring annual reports, the Service can quantify the impact and benefits that the Friends groups provide on a nationwide basis.

Annual reports will be submitted electronically using a standardized form collecting the following information based on the Friends group's most recent IRS Form 990 filing, along with additional information on Friends' accomplishments and projects with the Service:

1. Identifying information (field station name, Regional office, name of Friends group, and name and email of person reporting).

2. Number of members (if applicable).
3. Year the organization's most recent 990 was filed.
4. Total revenue (from most recent 990).
5. Total expenses (from most recent 990).
6. Total amount donated to the Service.
7. Description of donations to the Service.
8. Accomplishments and highlights.

Recordkeeping Requirements – We impose recordkeeping requirements to document accountability of donations and expenditures to show how the Friends group is supporting the local Service site or program with which they are affiliated. These will be used only to identify any issues and assess risk.

Annual In-Depth Program Reviews – In-depth program reviews will occur for five to ten Friends groups each year. The regions will select the specific groups to reflect the diversity of Friends organizations and Headquarters and Regional staff will conduct the reviews. The annual in-depth reviews will be more involved to ensure that groups are following policy.

The reviews will cover previously submitted documents/information. We do not anticipate the groups will need to provide any new information (other than to possibly clarify previously submitted information). Therefore, we are including this requirement for information but we are not including it as a stand-alone IC.

The process for the annual in-depth program reviews includes:

1. Service staff will retrieve and review the past 5 years of IRS 990 forms submitted by the organization.
2. Service staff will review the Friends Partnership Agreement and up to 5 years of annual reports to ensure programs and projects are consistent with the activities outlined in the Friends Partnership Agreement.
3. Service staff will review any additional agreements (Supplemental Agreement, Fundraising Agreement, etc.) to ensure consistency.
4. Service staff will meet with the Friends Board of Directors to discuss internal financial controls concerning collections, deposits, and/or expenditures.

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, we expect most applicants will submit reporting information to the Service via email and online submission (e.g., Microsoft Forms). For agreements, we estimate receiving approximately 70% electronic/30% hard copy. Annual reports will be submitted 100% electronically.

All records will be retained in a safe and secure manner in accordance with record keeping requirements. Annual reports will be received electronically only, contain public information, and will not be accessible to anyone outside of the Service's Division of Visitor Services.

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's partnerships. Due to the unique nature of this program, no other Federal agency collects this information from the public.

Although much of the requested information is already reported to the IRS, there is good reason to request that the Friends or Service site report it directly to the Service as well. If each site/Friends group answer the same set of questions, the answers to which will automatically be entered into one central and secure spreadsheet, then this will allow the Service to roll the data up across the entire program and tell a complete story of how the Friends' activities directly benefit the Service. It may be possible for the Service to download or access the information which Friends also report to the IRS, but the overall time it would take to then roll up that data would be higher, and the burden ultimately greater. In addition, the IRS does not collect qualitative data (i.e. success stories we are asking for in this information collection) which give a more robust picture of how the Friends support the Service.

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

This information collection does not impact 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.

Several of the facets of this information collection are required by the Department of the Interior OIG in order to provide greater oversight of the Service's Friends program. Other facets are required to identify roles and responsibilities, clarify activities, and ensure groups are meeting Service policy requirements. If we did not collect the information, the Service would be unable to administer the Friends groups to the satisfaction of the OIG.

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 November 9, 2020, we published in the *Federal Register* ([85 FR 71354](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on January 8, 2021. We received 59 comments in response to the questions posed in the *Federal Register* notice from the following:

Name	Position	Organization	Date Received
Christensen, Alan	Past President	Friends of Tualatin River NWR	1/4/21
Benton, Angela	Board Chair	Friends of Haystack NWR	1/8/21
LaBrake, Aryn	Executive Director	Friends of Valle del Oro NWR	1/8/21
VanHeel, Carol	Treasurer and Membership Chair	Friends of Sherburne NWR	1/8/21
Trainor, Cece	Board Member	Friends of Eastern Neck NWR	1/8/21
Craig, Cecilia	Treasurer	San Francisco Bay Wildlife Society/ Friends of San Francisco Bay NWR Complex	1/8/21
Hart, Cheryl	Board Member	Friends of Tualatin River NWR	1/8/21
Crumley, Chloe	Board Member	Friends of Balcones NWR	1/8/21
Stephens, Christena	Director	Friends of High Plains Refuge Complex	1/7/21
Puskar, Dan	President and CEO	Public Lands Alliance	1/8/21
Price, Daniel	Not Provided	Friends of Little Pend Oreille NWR	1/8/21
Bell, Dave	Vice President	Friends of Balcones NWR	1/8/21
Raskin, David	President	Friends of Alaska NWR	1/8/21
Anderson, Debbie	Vice President	Friends of Hakalau Forest NWR	12/29/20
Andersen, Ellen	President	Friends of the National Conservation Training Center	1/5/21
Draper, Harold	President	Friends of Loess Bluffs NWR	1/7/21
Lockridge, Jack	President	Friends of Bosque Del Apache NWR	1/8/21
Johnson, James	Not Provided	Friends of Neal Smith NWR	12/20/20
Larson, Jan and Rocky	Private Citizens		1/7/21

Mayo, Jan	Volunteer	Friends of Hakalau Forest NWR	12/24/20
James, Janet	President	Friends of Mid-Columbia River NWR	1/7/21
Friday, J.B.	President	Friends of Hakalau Forest NWR	12/27/20
Public, Jean	Private Citizen		11/9/20
Keatinge, Jennifer	Board of Directors	Friends of Hart Mountain National Antelope Refuge	1/9/21
Edwards, Jim	President	Sandhill Prairies Refuge Association	1/2/21
Patterson, Joan and Brouwer, Caroline	Not Provided	Coalition of Refuge Friends and Advocates & National Wildlife Refuge Association	1/6/21
Van Aken, Joann	Executive Director	International Wildlife Refuge Alliance	1/7/21
Van Aken, Joann (2 nd)	Executive Director	International Wildlife Refuge Alliance	1/8/21
d'Alessio, Jon	Treasurer	Friends of Midway Atoll NWR	1/7/21
Cadore, Katelyn	Not Provided	Friends of Mashpee NWR	1/7/21
Bowman, Kathy	Private Citizen		1/5/21
Rhodes, Kathy	Chair - Board of Directors	Friends And Volunteers Of Refuges - Florida Keys	1/8/21
Cheroutes, Kip	Board Member	Friends of the Front Range Wildlife Refuges	1/8/21
Gould, Laurel	Treasurer	Friends of Great Swamp NWR	1/8/21
Culp, Jr., Lloyd	President	Friends of Bon Secour NWR	1/8/21
Springer, Marie (original and follow-up)	Private Citizen	John Jay College of Criminal Justice, City University of New York	12/23/20 1/5/21
Cole, Mark	President	Friends of Leadville Fish Hatchery	1/8/21
Nelson, Morton	Treasurer	Friends of Loess Bluffs NWR (Original and Duplicate of 11/11/2020 comment)	11/11/20
Krueger, Myrna	President	Friends of Sherburne NWR	1/8/21
Gehlhausen, Nancy	Private Citizen		12/25/20
Feger, Naomi	Board of Directors	Friends of San Pablo Bay NWR	1/8/21
Kupchak, Patty	Private Citizen	Friends of Assabet River NWR	12/18/20
Goodwin, Paula	President	Friends of Lower Suwannee & Cedar Key NWRs	1/8/21
Hall, Peg	President	Not provided	1/6/21
Millan, Phyllis	Board Member	Friends of Tualatin River NWR	1/8/21
Petzel, Robert	President	Minnesota Valley Refuge Friends	1/8/21
Crouch, Sally	Board Secretary	Muscatatuck Wildlife Society	1/7/21
Slagle, Sharon	Secretary	Friends of the Wildlife Corridor	11/18/20
Kenyon, Simon	President	Friends of Eastern Neck NWR	1/7/21
Kaufman, Stephanie	Not Provided	Friends of Patuxent Research Refuge	1/8/21
Byers, Steven	Chair	Friends of Hackmatack NWR	1/7/21
Chesney, Steven	Volunteer	Friends of Sherburne NWR	1/8/21
Hatleberg, Steven	Board Representative	Friends of the National Conservation Training Center	1/3/21
Hix, Sue	Volunteer	Friends of Sherburne NWR	1/7/21
Wilder, Sue	Treasurer	Friends of Louisiana Wildlife Refuges	1/7/21
Carlsten, Susan	President	Friends of Neosho National Fish Hatchery	11/19/20
Considine, Tom	Board Member	Friends of John Heinz NWR	1/8/21
Stoeller, Willem	Treasurer	Friends of Tualatin River NWR	12/17/20
Binnewies, William	Past President	Shoreline Education for Awareness	1/8/21

Below is a summary of the comments received in response to the questions indicated, and the agency response to those comments:

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

Summary of comments: Respondents raised concerns that there was substantial

overreach as far as what was being requested. Commenters felt that Friends are not subject to internal agency policy and direct administration and oversight by the Service. Specifically, many respondents mentioned that the Service's requests for Friends staff resumes was unnecessary and in conflict with Service policy not to become involved in Friends group administration and decision-making processes. Several commenters expressed overall frustration with the OIG audit and said it did not reflect that Friends groups are independent nonprofit organizations rather than Federal entities.

Agency Response: We understand the commenters' frustration about the process and timing of the information collection clearance. Based on the comments, we removed Friends staff resumes from the list of information we will collect, and substantially revised financial reporting requirements.

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

Summary of comments: Overall, respondents said that the request as presented was vague, especially the proposed methodology by which the information would be collected. Furthermore, respondents expressed an overwhelming concern that this information collection as presented would be extremely burdensome and would hobble many smaller Friends groups, especially those paid staff. Others stated that burden estimates were inaccurate, and that completion and submission of requested materials would take longer than the estimates projected.

Agency Response: The agency response was to overhaul the draft versions of the forms to significantly reduce the burden and simplify the reporting requirements, methodology, and instruments. In addition, the annual report, which will be a simple Microsoft form (or other electronic format to be substituted in the future, if need be), will be completable by either Service staff or a Friends group, and that decision will be made at the local level. This allows for the partnership to make the decision at the local level as to who should complete the form and requires strong communication within the partnership. Quarterly reviews will consist of Service staff verifying that board meetings include presentation of profit and loss sheets and updates on member and staff changes, if any, which should already be happening.

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

Summary of comments: Many responses focused on the frustration felt by the Friends groups due to the lack of clarity and specificity of what we were asking for, and the timeline with which it was being requested. Most respondents pointed out that the IRS already requests much if not all the same documentation the Service might require, and that reporting should not be duplicative, excessive, or follow a different tax year than what the organization would be reporting to the IRS. Furthermore, many suggested that the Service institute a tiered system of requirements based on the size (i.e., annual budget) of the nonprofit reporting, as the majority of Friends groups are extremely small with an annual budget of \$50,000 or less.

Agency Response: We acknowledge the difficulty of the responding to the information collection clearance before reviewing the policy on which it was based, because both activities were taking place concurrently. The Service was able to share and receive comments on the draft policy, which reduced the concerns significantly. Based on comments from both the Federal Register notice and the policy review, we re-designed the reporting system to address these concerns.

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

Summary of comments: Many responses focused on the frustration felt by the Friends groups due to the lack of clarity and specificity of what we were asking for, and the timeline with which it was being requested. Most respondents pointed out that the IRS already requests much if not all the same documentation the Service might require, and that reporting should not be duplicative, excessive, or follow a different tax year than what the organization would be reporting to the IRS. Furthermore, many suggested that the Service institute a tiered system of requirements based on the size (i.e., annual budget) of the nonprofit required to do the reporting, as the majority of Friends groups are extremely small with an annual budget of \$50,000 or less.

Agency Response: The Service created a simple and free to use Microsoft Forms reporting system and will use another free, electronic system if Microsoft Forms becomes unavailable in the future. While we do recognize that this information is all public and already reported to the IRS, we do feel that there is a value to collecting this data within the Service and being able to aggregate the data to show the benefit provided by Friends groups to the agency on a national scale.

In addition to publication of the *Federal Register* notice, we held public meetings in early 2021 to communicate to key stakeholders about the Information Collection Clearance process (i.e., our desire to hear from them, expected timelines, etc.) and provided time for questions from attendees.

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

We did 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 disclosed pursuant to the Freedom of Information Act (FOIA) and the Privacy Act of 1974.

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 anticipate receiving **1,640 annual responses** and **22,100 annual burden hours**. The total dollar value of the annual burden hours is approximately **\$891,735**.

We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release [USDL-22-0469](#), March 18, 2022, Employer Costs for Employee Compensation—December 2021, which lists the hourly rate for private industry workers as \$40.35, including benefits.

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
Partnership Agreement							
Reporting	50	50	50	35	1,750	\$ 40.35	\$ 80,700
Recordkeeping				5	250		
Renewal of Partnership Agreement							
Reporting	150	1	150	5.5	825	\$ 40.35	48,420
Recordkeeping				2.5	375		
Supplemental Agreement							
Reporting	50	1	50	3	150	\$ 40.35	8,070
Recordkeeping				1	50		
Renewal of Supplemental Agreement							
Reporting	150	1	150	1.5	225	\$ 40.35	12,105
Recordkeeping				.5	75		
Fundraising Agreement							
Reporting	30	1	30	10	300	\$ 40.35	24,210
Recordkeeping				10	300		
Internal Financial Control Documentation							
Reporting	200	1	200	20	4,000	\$ 40.35	322,800
Recordkeeping				20	4,000		
Assurance Documentation							
Reporting	200	1	200	20	4,000	\$ 40.35	322,800
Recordkeeping				20	4,000		
Supplemental Documentation Requirements: Quarterly Review							
Reporting	200	4	800	1.5	1,200	\$ 40.35	64,560
Recordkeeping				.5	400		
Supplemental Documentation Requirements: Annual Review							
Reporting	10	1	10	2.5	25	\$ 40.35	8,070
Recordkeeping				17.5	175		
TOTALS:	1,040		1,640		22,100		\$ 891,735

*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.

There is no non-hour cost burden associated with this information collection.

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

The total estimated cost to the Federal Government as a result of this collection of information is **\$4,897,765**.

To determine hourly wage rates, we used the Office of Personnel Management Salary Table [2022-RUS](#) as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.59 in accordance with from BLS News Release [USD L-22-0469](#), March 18, 2022, Employer Costs for Employee Compensation—December 2021.

<u>Position/Grade</u>	<u>Annual Salary</u>	<u>Annual Salary (incl. Benefits)*</u>	<u>Time Spent on Collection</u>	<u>Number of Positions</u>	<u>Total Annual Salary Costs*</u>
Regional Friends Coordinator, GS-12/05	\$ 89,947	\$ 143,016	20%	8	\$ 228,826
Refuge Managers, GS-14/05	126,390	200,960	5%	190	1,909,120
Visitor Services Managers, GS-12/05	89,947	143,016	10%	190	2,717,304
National Friends Coordinator (HQ) GS-13/05	106,955	170,058	25%	1	42,515
			TOTALS:	389	\$ 4,897,765

*Rounded

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 (existing collection of information in use without

an 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.

We may publish aggregate information in annual reports or highlight accomplishments from individual groups.

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.