1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

U.S. Fish and Wildlife Service CITES Master's Course OMB Control Number 1018-New

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.

Wildlife trafficking ranks as the second greatest threat to species survival after habitat destruction. The United States (U.S.) recognizes wildlife trafficking as a serious transnational crime that threatens thousands of plant and animal species and undermines U.S. priorities, including national security, human health, and economic growth. The Service employs a science-based approach to counter wildlife trafficking, including through the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES is the sole global treaty dedicated to preventing the unsustainable trade in plants and animals and is an essential component to counter illegal wildlife trade as it provides mechanisms and incentives to effectively manage natural resources. The U.S. has been a Party to the Convention since 1973. Under the Endangered Species Act (16 U.S.C. 1531 et seq.), the Service has been designated to carry out the provisions of CITES for the U.S.

As one of the largest and oldest environmental treaties in the world, CITES is a key conservation tool for the protection of 35,000 plant and animal species. Currently 183 countries have agreed to implement the Convention. However, realizing the full conservation impact of CITES remains challenging and is highly dependent on each country's financial and technical capacity. Even when a Party has the political will and desire to implement CITES, it may not have the resources, systems, or personnel to effectively follow the Conventions' mandate, such as evaluating permit applications or enforcing laws. This creates inequity between countries in how the Convention is implemented, with serious downstream impacts such as the degradation of wild populations and ecosystems, often resulting in negative implications for communities living among wildlife.

To help develop the technical expertise necessary to effectively implement CITES, the International University of Andalucía (UNIA) has offered a unique master's degree program entitled "The Management and Conservation of Species in Trade: The International Framework" (also known as the "CITES Master's Course"). The program, which was established in 1997, provides high-quality training focused on the scientific foundations, techniques and mechanisms of CITES implementation. Approximately 400 students have graduated from the program, many becoming leaders in CITES and global policy.

Recognizing the important potential offered through UNIA's CITES Master's Course, the Service provides scholarships to support wildlife professionals interested in furthering their CITES expertise by partaking in the CITES Master's Course, with a focus on countries most vulnerable to illegal and unsustainable wildlife trade. The competitive scholarships cover costs for tuition, lodging, and supplies, provide an opportunity for the scholars to participate in the CITES Conference of the Parties, and offer technical and financial research support.

The Service collaborates with the Department of Interior's International Technical Assistance Program (DOI-ITAP) through an interagency agreement to manage the numerous logistics associated with the scholarships. Scholarships support cohorts of students from Latin America, the Caribbean, and Central and East Africa. The Service and DOI-ITAP staff solicit recommendations from relevant CITES authorities, NGOs, and U.S. Government agencies working in those countries to select top candidates for the scholarships. Recommendations are provided through direct communication with project leads, most often via email communication. Project leads review application packages submitted by candidates for the program.

We choose candidates based on certain criteria such as the quality of their application, their present or future contribution to their country's CITES work, and their demonstration of a lasting commitment to wildlife conservation and CITES implementation. Selected candidates then follow a separate application process for acceptance into the International University of Andalucía CITES Master's Course. Although scholarship activities aid the candidates to assemble and submit application materials the University, the U.S. Government does not influence who is accepted into the graduate 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 in the form/questionnaire needs to be justified.

We ask the successful scholars accepted into the master's program to assist in project monitoring and evaluation by responding to periodic assessment surveys throughout the course of their one-year graduate experience so project officers can gauge the impact and effectiveness of the training. After graduating, the scholars are requested to fill out an assessment to further our understanding of the course's overall impact. We also ask students to help develop communication and outreach materials to share the impacts of the scholarships with partners and the public

Information collected by the Service from students to administer the CITES Masters Course includes:

Nomination/Application – Prospective students must complete the "Universidad Internacional de Andalucia (UNIA) Application and/or Enrollment Form" and submit it to the Service for consideration. The UNIA application/enrollment form collects the following information from prospective students:

- Trainee information, to include:
 - Full name,
 - Passport number,
 - Date and place of birth,
 - Nationality,
 - Sex,
 - Phone number(s),
 - Email address, and
 - Mailing address.
- Qualifications and professional background
 - Education information, to include level of education, degree/certificate information, school, and studies undertaken, and

- Employment information, to include professional status, name of employer, and job title.
- Enrollment information and type of enrollment for the requested course.
- Payment information.
- Supplemental documents to be attached to application
 - Photocopy of passport,
 - Payment receipt, and
 - Program-specific documents.

In addition to completing the UNIA application/enrollment form, prospective students are asked to provide:

- Biography We request a short biography that includes:
 - Student's name,
 - Title,
 - Organization,
 - Their role in implementing CITES, and
 - What they currently do in their career (1-3 sentences).
- Information about their interest in the CITES Masters Course We ask the applicant to provide responses to the following question:
 - What is their goal in attending the CITES Masters Course?
 - How is the program impacting their career and views on conservation?
 - Are there are any additional comments or academic accomplishments they would like to share?
- Certification of agreement and compliance with course Code of Conduct.
- Photographs of applicant completing their thesis and research work to include in course materials.

<u>Pre-Training Assessment Questionnaire</u> – Course enrollees are asked to complete a pretraining assessment which collects the following information:

- Current role and trainee's expectations Questions are meant to gather information on the participant's professional connection to CITES work, and to assess their expectations of the graduate program prior to the start of the training.
- Knowledge of biodiversity and CITES Questions related to the participant's knowledge on biodiversity and CITES are meant to establish baseline data that can be compared to results from the post-training assessment survey once the training is complete.
- Capacity to apply knowledge on biodiversity and CITES Questions related to the participant's knowledge on how to apply science-driven conservation practices particularly in relation to species managed under CITES are meant to establish baseline data that can be compared to results from the post-training assessment survey once the training is complete.

<u>Post-Training Assessment Questionnaire</u> – Course enrollees are asked to complete a post-training assessment which collects the following information:

- Trainee's assessment of training Questions provide participants an opportunity to offer feedback on their training to help inform how we can improve project activities and goals.
- Potential effect of training on the trainee's job Questions provide an opportunity for participants to share how the technical training provided through the scholarships may

open professional opportunities.

- Knowledge of biodiversity and CITES Questions are designed to measure the impact of training by quantifying changes in each participant's knowledge of biodiversity and CITES between pre- and post-training assessments.
- Capacity to apply knowledge on biodiversity and CITES Questions are designed to measure the impact in training by quantifying changes in knowledge between pre- and post-training assessments.

The Service will use the information collected to ensure project activities are meeting high project standards and are achieving intended In addition, information collected for project outreach and communication will be used to inform the public on project outcomes and to garner interest in future scholarship opportunities.

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.

The collection of information involves both electronic (on-line surveys, email submission) and mechanical (hard copies) collection techniques. The use of email and surveys were adopted to enable collection of information from people living in different countries. Hard copies were used to obtain the signatures of participants for the code of conduct.

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 efforts related to the CITES Master's Course. Due to the unique nature of this program and the Service's designation to carry out the provision of CITES for the U.S., no 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 conduct the training. This information collection will not significantly 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.

If we did not collect the information, the Service would be unable to effectively evaluate the impact of the scholarship project.

- 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 February 14, 2023, we published in the *Federal Register* (88 FR 9533) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on April 7, 2023. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. <u>FWS-HQ-IA-2022-0142</u>) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received two comments in response to that notice. However, neither comment addressed the information collection requirements so no response is required.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

| Organization | Title |
|---|---|
| Office of the Garoua Wildlife School– | Water, Forests and Hunting Engineer; |
| Cameroon | Lecturer / Head of Research and |
| | Documentation |
| Ministry of Environment, Congo | Head of Litigation and Public Relations |
| Directorate General of Wildlife and Protected | Research Officer |
| Areas–Gabon | |
| Cameroon | Deputy Director of Valuation and Wildlife |
| | Exploitation / Water and Forest Engineer |
| Ministry of Blue Economy and Fisheries, | Planning Officer |
| Zanzibar, Tanzania | |
| Gabon | Director of Wildlife Management and Hunting |
| Rwanda | Wildlife Field Veterinarian and Wildlife |
| | Laboratory Manager |
| Cameroon | Lecturer - Garoua Wildlife School |
| Zanzibar, Tanzania | Wildlife Officer |

Responses to the following questions are listed in the tables below:

- "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"
- "The accuracy of our estimate of the burden for this collection of information"
- "Ways to enhance the quality, utility, and clarity of the information to be collected"
- "Ways to minimize the burden of the collection of information on respondents"
- Additional comments received during the outreach

| Nomination/Application | | | | | | |
|---|---|--|--|--|--|--|
| Was the collection of information necessary? | Yes, it is necessary (2 comments) Information gathering is always necessary in a scholarship application This document is necessary because it allows to have the maximum of information on the candidate and also, to judge his level of motivation. Yes, the information is necessary for recordkeeping. | | | | | |
| How long did it take you to complete this document? | 15min 2 days including to write the CV in accordance with European Union requirements No response 20 min 2-3 hours | | | | | |
| Do you have any suggestions to improve the clarity of the information? | To reduce the burden it is necessary that the questions are clear and concise. Document is clear No response The form should be clear (user friend) | | | | | |

| | Keep as is |
|---|--|
| How can we minimize the burden of the collection of information on respondents? Any additional feedback? | To reduce the burden it is necessary that the questions are clear and concise. No suggestion No response You could minimizing by avoiding unnecessary and repetition questions Burden is minimal None (6 responses) |
| Agency Action | Program Officer will review the application, reduce redundancies. |

| Pre/Post Training Assessments | | | | |
|--|---|--|--|--|
| Was the collection of information necessary? | Yes, the collection of pre-training information was necessary insofar as it allows to know the candidate better and to understand the candidate's expectations; allows the funder to see the different successes and gaps during the training in order to improve the next sessions Yes it is important; The evaluation of a program after training is necessary for the improvement of this program so I maintain that it is necessary This document allows you to assess the relevance of the courses and assess what you have really learned during this master's degree. This is compulsory. This could help student to be more award in what they are going to study (psychologically) preparation and pre training is very important in cultural and social exposure; Yes the collection of information is necessary. This will help Donor to conduct the assessments, to measure their performance indicators, to make their goals be achievable. To improve the future training Yes | | | |
| How long did it take you to complete this document? | 15 min 30 minutes the time to fully understand what I am being asked; It was one of the longest and thought-provoking documents. I would say 30-40 mins No response 15 min 30 min | | | |
| Do you have any suggestions to improve the clarity of the information? | none I find it difficult to assess one's abilities when one is not or has never been confronted with the situations posed for me these are difficult questions. Revise the questionnaire from 5.0. I don't think that after 3 months of theory and 2 weeks of CoP we can answer objectively from 5.1 to 5.22. No response The question should be clear, simple language (user friend) concise Keep format as is | | | |
| How can we minimize the burden of the collection of information on respondents? | The questions of the pre-training evaluation must be clear and concise and must allow the candidate to express themselves Perhaps ask him what he is capable of doing in these areas in detail; Perhaps ask him himself what he is able to accomplish with what he has received No response By using straight forward question, simple question It is simple | | | |
| Any additional feedback? | The donor should take this information into consideration to help improve future training. More practice should be encouraged in the master's course. The responsible person must take every point into consideration | | | |

| | None (3 responses) |
|---------------|--|
| Agency Action | Program Officer will review the pre and post assessments and work with a |
| | social scientist to ensure information gathered is based on data driven |
| | outcomes and that content is clear and concise. |

| Code of Conduct | |
|--|--|
| Was the collection of information necessary? | The information on the code of conduct is very important not only for the student but for the university at which the candidate will have to do his training. The Code of Conduct informs us of our rights and duties during the training year. This is a commitment made that we must respect. Yes, it was necessary No response The code of Conduct is compulsory for both University management and the students. Yes |
| How long did it take you to complete this document? | 10 min 10 minutes time to read, complete and sign No response 15 min 30 min |
| Do you have any suggestions to improve the clarity of the information? | Information on the code of conduct must be known so that no one ignores it Information was very clear Could be shorter, in dash form for better reading and understanding This information must be well established and every body aware about code of Conduct Keep the format |
| How can we minimize the burden of the collection of information on respondents? | The questions are clear and concise Document is acceptable No response Must be clear and concise It is simple |
| Any additional feedback? | None (6 responses)The code of Conduct could be easy to implement |
| Agency Action | Program Officer will evaluate whether the document can be shorter without losing important content |

| Outreach question | าร |
|----------------------|--|
| Was the collection | Yes awareness is very important |
| of information | Yes, it is necessary |
| necessary? | • Very important steps and documents as submitted, can be maintained as is. |
| | The outreach information in very important |
| | • Yes |
| How long did it take | • 10 min |
| you to complete | • 10 min |
| this document? | No response |
| | • 15 min |
| | • 30 min |
| Do you have any | The structures or institutions must be widely aware to apply for the |
| suggestions to | scholarship |
| improve the clarity | It is clear |
| of the information? | All parts are relevant |

| How can we | The information must be transparency, well known Keep the format Raising awareness must be done through the media, social networks, etc. |
|--|--|
| minimize the burden of the collection of information on respondents? | This activity is very good No response The outreach should be in the way of media (T.V,radio,social media) It is simple |
| Any additional feedback? | None (6 responses) |
| Agency Action | No action needed |

Despite multiple attempts to solicit feedback, we did not receive responses from 2 of the 9 individuals contacted.

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 collected and maintained by the Service may be disclosed in accordance with the Freedom of Information Act, the Privacy Act of 1974 and the routine uses listed in System of Records Notice, INTERIOR/FWS-27, Correspondence, <u>58 FR 41803</u> (August 5, 1993); and modifications published <u>73 FR 31877</u> (June 4, 2008), and <u>88 FR 16277</u> (March 16, 2023)

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 **63 responses** totaling **43 burden hours**. We estimate the annual dollar value of the burden hours is **\$315** (rounded).

FOREIGN ENTITIES BURDEN CALCULATION HOURLY RATE:

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 conservation professionals on 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 utilized World Salaries to research the average annual salaries of participants from their home countries listed below to develop an average salary of \$10,589.46 or \$5.09/hour. We applied a benefits rate of 30% (which is likely high) for foreign private sector workers to obtain an average rate of \$6.62/hour. We applied a benefits rate of 45% (which is likely high) for foreign government workers to obtain an average rate of \$7.38/hour.

| | Average Annual | Average Annual |
|------------------------------|---------------------------------|---------------------|
| Country | Country Salary | USD Salary |
| Cameroon | 10,510,100 XAF | \$ 17,782.54 USD |
| Central African Republic | 9,466,400 XAF | 16,016.66 USD |
| Chad | 5,843,600 XAF | 9,887.07 USD |
| Democratic Republic of Congo | 5,686,100 CDF | 2,294.32 USD |
| Republic of Congo | 8,940,400 XAF | 15,126.69 USD |
| Equatorial Guinea | 5,735,900 XAF | 9,704.84 USD |
| Gabon | 6,635,400 XAF | 11,226.75 USD |
| Rwanda | 8,305,400 RWF | 7,082.77 USD |
| Tanzania/ Zanzibar | 15,118,700 TZS | <u>6,183.52 USD</u> |
| | Average Annual Salary: | \$ 10,589.46 USD |
| Avera | ge Hourly Salary (2,080 hr/yr): | \$ 5.09 USD |

| Requirement | Average Number of Annual Respondents | Average Number of Responses Each | Average Number of Annual | Average Completion Time per Response | Estimated Annual Burden Hours* | Hourly Rate | \$ Value of Annual Burden Hours |
|-------------------------------|---|---|--------------------------------|---|---|----------------|---------------------------------------|
| Nomination/Application | | Edili | Responses | Response | HOUIS | Rale | DUIUEII HOUIS |
| | | | _ | | _ | | |
| Foreign Private Sector | 3 | 1 | 3 | 1 hour | 3 | \$ 6.62 | \$ 19.86 |
| Foreign Government | 30 | 1 | 30 | 1 hour | 30 | 7.38 | 221.40 |
| Pre-Assessment Ques | stionnaire | | | | | | |
| Foreign Private Sector | 1 | 1 | 1 | 20 min | 0 | 6.62 | 0.00 |
| Foreign Government | 14 | 1 | 14 | 20 min | 5 | 7.38 | 36.90 |
| Post-Assessment Questionnaire | | | | | | | |
| Foreign Private Sector | 1 | 1 | 1 | 20 min. | 0 | 6.62 | 0.00 |
| Foreign Government | 14 | 14 | 14 | 20 min. | 5 | 7.38 | 36.90 |
| TOTALS: | 63 | | 63 | | 43 | | \$ 315.06 |

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 annual non-hour cost burden associated with this 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.

We estimate the total annual cost to the Federal Government to administer this information collection to be **\$294,880 (rounded)** (salary \$80,874 (rounded) plus interagency agreement \$214,006).

To determine average hourly rates, we used Office of Personnel Management Salary Table <u>2023-RUS</u> to determine the annual wages and multiplied the hourly wage by 1.61 to account for benefits in accordance with BLS <u>News Release</u> USDL-23-1305. The Service Project Officer (GS-13, step 5) allocated approximately 45% of time to this project (the employee is a remote worker in the state of New York). The fully burdened annual salary is \$80,874.49 (\$111,628 x 1.61 x .045)

This project was developed and carried out through an Interagency Agreement between the Service and the Department of Interior's International Technical Assistance Program. The total project cost was \$724,532. Of that, \$214,006 was budgeted to administer DOI-ITAP's program

costs (\$104,520) and 18% overhead (\$109,486).

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 in connection with an existing collection in use without OMB approval

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.

There are no plans to publish data from this project. Data collected from the assessment questionnaires are used to calculate response averages to help inform project monitoring and evaluation. There are no complex analytical techniques used for this project.

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 expiration date on the survey instrument and instructions.

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.