

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

**Cooperative Research Units (CRU)
OMB Control Number 1028-0126 (renewal)**

Terms of Clearance: None

Justification

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

The Cooperative Research Units (CRU) Program is a unique collaborative relationship between States, Universities, the Federal government and a non-profit organization. The program is comprised of 43 Cooperative Fish and Wildlife Research Units on university campuses in 41 states. Since the original nine Units were established in the 1930s, additional Units were established by Congress at specified universities. The 43 units in the program are jointly supported by the US Geological Survey, Host Universities, State Natural Resource Agencies, Wildlife Management Institute, and the US Fish and Wildlife Service.

Cooperative Research Units were established with a trifold mission, a mission that is codified in the program's authorizing legislation and that has remained unchanged through time:

- Education - Provide advance training in fish, wildlife, and natural resource sciences, assuring a continuing supply of quality natural resource professionals for state and federal agencies.
- Research – Provide federal and state agencies access to the expertise, and facilities at leading universities around the country, to address the natural resource information needs expressed by Unit cooperators and partners.
- Technical Assistance - Provide technical assistance in the understanding and use of science and research findings, to State and Federal personnel and other natural resource managers.

This tri-fold mission is consistent with the Secretary of the Interior priorities of 1) Create a conservation stewardship legacy second only to Teddy Roosevelt, and 2) Strike a regulatory balance. This mission also facilitates the linkage of the research and information needs of federal, state and other natural resource managers and professionals with the expertise and facilities of leading research universities, and graduate student training. Federal Unit scientists, affiliated university faculty, and advanced students work in a variety of fields of cutting edge science to address issues of importance to the science and management of fish, wildlife and natural resources. Sponsoring agencies are provided assistance in the interpretation and application of the research findings as well as a talent pool of trained biologists graduating from the program.

Cooperative Fish and Wildlife Research Units were created in 1935 to fill the vacuum of wildlife management information and the shortage of trained wildlife biologists. In 1960, the Cooperative

Research Units Program was formally sanctioned with the enactment of the Cooperative Units Act (PL 86-686). The act specifies the participants in the program as well as its mission. All signatory parties to an individual Cooperative Fish and Wildlife Research Unit have joint ownership of the Unit and its direction. They all also contribute substantially to the partnership and by design, receive leveraged benefits from participating, allowing each to achieve more as part of a collective than would be achievable individually.

Statutory Authority of Program

Cooperative Research Units Act (16 U.S.C. 753a-753b), Public Law 86-686, Sec. 1, Sept. 2, 1960, 74 Stat. 733, as amended by the Fish and Wildlife Improvement Act of 1978, Public Law 95-616, Sec. 2, Nov. 8, 1978, 92 Stat. 3110.

Research Work Orders (RWOs)

Only CRU Cooperating Universities are eligible to apply to the RWO component of the Cooperative Research Unit Program. Each year the program announcement (FY24 #G24AS00500) opens for new Research Work Orders and modifications to be submitted from October 1 through the due dates stipulated by the USGS. All proposals are submitted electronically through Grants.gov. Applications include proposal and budget information.

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.

Only CRU Cooperating Universities (applicants/recipients) can apply to the RWO component of the CRU Program. All proposals & SF-424 forms (includes budgets) are submitted electronically through Grants.gov. USGS/Office of Acquisition and Grants uses this information to process the RWO award.

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.

USGS is participating in the Grants.gov initiative to provide the grant community with a single site to apply for grant funding opportunities. USGS requires applicants to submit their applications online through Grants.gov.

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.

Due to the unique nature of this program no duplication will occur.

5. If the collection of information impacts small businesses or other small entities,

describe any methods used to minimize burden.

N/A

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.

As mentioned above, Cooperative Research Units were established with a trifold mission, a mission that is codified in the program's authorizing legislation and that has remained unchanged through time:

This tri-fold mission is consistent with the Secretary of the Interior priorities of 1) Create a conservation stewardship legacy second only to Teddy Roosevelt, and 2) Strike a regulatory balance. This mission also facilitates the linkage of the research and information needs of federal, state and other natural resource managers and professionals with the expertise and facilities of leading research universities, and graduate student training. Federal Unit scientists, affiliated university faculty, and graduate students work in a variety of fields in support of scientific research to address issues of importance to the management of fish, wildlife and natural resources. Sponsoring agencies are provided assistance in the interpretation and application of the research findings as well as a talent pool of trained biologists graduating from the program.

All signatory parties to an individual Cooperative Fish and Wildlife Research Unit have joint ownership of the Unit and its direction. They all also contribute substantially to the partnership and by design, receive leveraged benefits from participating, allowing each to achieve more as part of a collective than would be achievable individually.

The CRU program delivers actionable science to cooperating agencies and organizations, develops the workforce of the future through applied graduate education, and fulfills the training and technical assistance needs of cooperators.

For a more detailed look at the CRU Program visit: <http://www1.usgs.gov/coopunits>

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 circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-day FRN was published _____ at _____.

CRU program is a mature program that uses Grants.gov as the announcement vehicle. Grants.gov has their own standards for publishing government program announcements. USGS has worked to reduce wording and meet the requirements of Grants.gov. Three individuals from USGS, Office of Acquisition and Grants as well as CRU staff review and revise the annual CRU Program Announcement to streamline the application process.

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

We do not provide gifts or payments other than the remuneration of awards.

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

There is no assurance of confidentiality in the announcements. Information is only used by USGS, Office of Acquisitions and Grants to process RWO awards.

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.

N/A

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.

Responder Burden

Participant / Activity	Number of Responses	Minutes per response	Burden Hours	Burden Value
Unit reads announcement	126	10	21	\$1,210
Unit prepares a proposal in response.	126	120	252	\$14,515
Awarded unit completes annual progress report	126	120	252	\$14,515
Awarded unit completes final report	50	2,160	1800	\$103,680
Total	428		2,325	\$133,920

Hourly rate for state and local workers is \$57.60 per Bureau of Labor Statistics (BLS) News Release USDL-23-0488, dated March 17, 2023.

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, 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.

We do not have any non-hour cost burden.

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 annual cost to the Federal Government is \$167,469. This includes salary and benefits for one federal employee to process the responses. We used the Office of Personnel Management Salary Table 2024-RUS ([General Schedule \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salary/)) to determine the hourly rate (Washington-Baltimore-Arlington, DC-MD-VA-WV-PA location). We multiplied the hourly rate by 1.6 to account for benefits.

Table 3: Federal Labor Table

Position	Grade /Step	Hourly Rate	Annual Hrs by Fed	Fully Loaded Hr Rate (x 1.6)	Total Labor Value
Supvy Contract Specialist	14/10	\$87.12	302	\$139.39	\$42,096
Grants Management Specialist	13/7	\$68.06	302	\$108.90	\$32,888
Grants Management Specialist	12/2	\$49.28	302	\$78.85	\$23,813
Administrative Officer	14/9	84.89	302	\$135.82	\$41,018
Program Analyst	12/7	\$57.23	302	\$91.57	\$27,654
		TOTALS	1510		\$167,469

Table 4: Other Federal Government Expenses

None	

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

This is an existing OBM approval with updated 2024 rates.

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 are not going to publish this information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date.

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.