

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

**U.S. Fish and Wildlife Service Law Enforcement Training Program
OMB Control Number 1018-0180**

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

The Training and Development Unit (TDU) at FLETC collects the required information necessary to administer training programs as authorized by the following:

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

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

We collect the information specified below in conjunction with the Service's law enforcement training program at FLETC :

Account Registration Process

The TDU collects the below listed information from prospective domestic trainees requesting

attendance in a training program (see “***Proposed Revisions***” below):

- Applicant’s full legal name, contact, and identifying information;
- Emergency contact name and phone number;
- Photograph;
- Biography;
- Highest education level; and
- Law enforcement affiliation information, to include title/rank, experience, and agency contacts.

Training and Development Unit Post Course Evaluation Form

Course participants automatically receive the post-course evaluation form soliciting feedback on the following:

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

We use the information collected to administratively record, track, and manage training records of domestic and foreign students affiliated with law enforcement agencies who attend training offered by the Service. The information also allows us to verify the records of previous attendees (upon official inquiry only) by name, country of origin, or specific identifying number.

PROPOSED REVISIONS

The Service is proposing to revise this information collection as follows:

1. (DISCONTINUE) Account Registration (Foreign Students): We will request OMB approval to discontinue the previously approved information collection associated with the registration of international students attending TDU training as the USFWS OLE has determined not to utilize the previously approved Acadis software. Currently, the Department of State (DOS) provides the participant information and this process is sufficient to conduct the training program. The DOS also coordinates the vetting and selection process for all prospective students. They rely on the host country to vet the prospective students and uses a certification process for final selections which is exempt from the requirements of the PRA. Therefore, they do not have a control number for their selection/registration process.

The Service does not collect registration information for international students as it is the responsibility of the DOS to select them. Therefore, we will request OMB approve our request to discontinue this specific information collection within OMB Control No. 1018-0180. Approval of this request to discontinue the information collection associated with registration of international students will result in an annual burden decrease of 1,000 responses and 250 burden hours. We will continue to request OMB approval of the burden associated with international students completing the post course evaluation forms identified above.

2. (NEW) International Conservation Chiefs Academy Pre-Test: We also propose to request OMB approval of the pre-test administered prior to the start of training. The pre-test

gauges the participant's knowledge on topics such as adaptive leadership, adaptive challenges, use of intervention techniques, how to manage disequilibrium while exercising leadership, the use of interpretation during the diagnostic process, and systems thinking. At this time, we use Microsoft Office to deliver the pre-test. A link is sent to the participants and they click on the link, take the test and submit. This is an anonymous test as we do not ask their name and it is used to compare the level of knowledge of the curriculum gained during the program. We included burden for both domestic and international students completing this pre-test.

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 USFWS uses Microsoft Office Suite to build the pre-test and then sends an email to the participants that contains a link to the test. The participant clicks on the link, takes the exam, and submits the exam for grading purposes. The pre-test is an anonymous test with no names being assigned to the test. The objective is to determine the class average prior to the program and then after. The post-test is done in the paper format while the participants are attending the training program.

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 and the International Conservation Chiefs Academy (ICCA) program. Due to the unique nature of this program, no other division of the Service or any other Federal agency collects this information from the public.

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

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

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The ICCA pre-test facilitates a performance element that the DOS requires from the USFWS. The ICCA is funded by the DOS and one of the funding requirements is that the USFWS demonstrates knowledge is obtained or gained through attendance in the program. The pre-test which is facilitated electronically establishes a baseline for the specific Cohort. If it were not collected, the USFWS could not record the performance measure required.

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 August 17, 2023, we published in the *Federal Register* ([88 FR 56046](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on October 16, 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. [FWS-HQ-LE-2023-0105](#)) to provide the public with an additional method to submit comments. We received one comment which did not address the information collection requirements; therefore, 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
Training participant	Technical Officer
Training participant	Director of Customs Control
Training participant	Wildlife Agent
Training participant	Inspector
Training participant	Superintendent of Police
Training participant	Deputy Director
Training participant	Doctor
Training participant	Wildlife Coordinator
Training participant	Senior Police Commissioner

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

Comments: All of the surveyed ICCA Alumni felt that the information that was collected was useful and necessary to the USFWS staff and instructors. They felt that all of it had practical utility in the management, execution and for future program enhancements. They did not identify any questions that should be removed and made a couple of suggestions to improve or to enhance a question.

Agency Response/Action Taken: No action required.

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

Comments: The USFWS estimate of the burden is consistent with the results of the survey. The RTI took on an average of 5.25 minutes, the Pre-Test took on average of 18.4 minutes and the Survey took an average of 7.3 minutes to complete.

Agency Response/Action Taken: No action required.

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

Comments: The USFWS has a broad range of international students who may or may not speak English. Some of the comments from the alumni survey suggested that clarification be provided for comprehension.

Agency Response/Action Taken: We will work to identify any questions that require clarification to ensure that the questions are comprehended by the participants.

And

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

Comments: None, they felt that the information was necessary.

Agency Response/Action Taken: No action required.

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

We will not provide any payment or gifts to respondents.

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

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

- Investigative Case File System (FWS-20), (Published May 28, 1999, [64 FR 29055](#)); Modifications published June 4, 2008, [73 FR 31877](#) and March 16, 2023, [88 FR 16277](#)), and
- Incident Management, Analysis and Reporting System (Interior/DOI-10), (Published June 3, 2014, [79 FR 31974](#); Modification published September 7, 2021, [86 FR 50516](#); associated Final Rule for Privacy Act Exemptions published September 2, 2014, [79 FR 51916](#)).

We provided OMB with copies of the PIA, as well as the referenced SORNs, as supplemental documents to the ICR in ROCIS. Due to the discontinuance of the Acadis software system, the previously referenced LETS PIA is no longer applicable to this information collection. NOTE: The LEMIS PIA is currently under review for necessary updates. Once finalized and approved, we will provide the updated LEMIS PIA to OMB as a nonsubstantive change request in ROCIS.

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

We will not ask any questions of a sensitive nature.

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

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

We estimate that we will receive **164 annual responses** and **29 annual burden hours**

(rounded). The total dollar value of the annual burden hours is approximately **\$604** (rounded).

To calculate the domestic government rate, we used the Bureau of Labor Statistics (BLS) Occupational Employment and Wages (May 2022), [Table 33-3051](#) – Policy and Sheriff's Patrol Officers, which lists a mean hourly rate of \$34.32. In accordance with BLS [News Release](#) USDL-23-1971, September 12, 2023, Employer Costs for Employee Compensation—June 2023, we multiplied this rate by 1.42 to account for benefits, resulting in a fully burdened hourly rate of \$48.73.

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

Table 12.1

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours*
<i>Account Registration</i>							
US Governments	8	1	8	10 mins	1	\$ 48.73	\$ 48.73
<i>International Conservation Chiefs Academy Pre-Test (NEW)</i>							
US Governments	8	1	8	20 mins	3	48.73	146.19
Foreign Govts.	70	1	70	20 mins	12	15.00	180.00
<i>Training and Development Unit Post Course Evaluation Form</i>							
US Governments	8	1	8	10 mins	1	48.73	48.73
Foreign Govts.	70	1	70	10 mins	12	15.00	180.00
TOTALS:	164		164		29		\$ 603.75

*Rounded

Justification for Burden Reduction – When the TDU originally acquired the Acadis system, there were plans to expand the international and domestic training offerings and those programs would include all of the administrative requirements similar to the ICCA. The new burden estimates above reflect the new estimated annual respondents and burden hours associated with this information collection.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital

equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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

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

The estimated annual cost to the Federal Government associated with this collection of information is **\$10,422** (rounded) for salary costs. As a result of discontinuing the use of Acadis, we are no longer reporting any costs associated with software maintenance.

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2023-RUS](#) as an average nationwide rate. In accordance with BLS [News Release](#) USDL-23-1305, we multiplied the annual salary by 1.61 to account for benefits.

Position/Grade	2023 Annual Salary	Annual Salary, Incl. Benefits (x1.59 multiplier)*	Time Spent on Information Collection	Total Annual Cost*
Training Technician (GS-09/05)	\$ 64,732	\$ 104,219	10%	\$ 10,422

*Rounded

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

We are reporting discretionary changes of -922 annual responses and -235 annual burden hours, as well as a change in agency estimate of -1,114 annual responses and -278 annual burden hours as detailed below (see justification provided in question 12):

IC Title	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Account Registration - Domestic Students (Government)				
Annual Responses	8		-92	100

Annual Burden Hours	1		-16	17
Account Registration International Students (Government) <i>DISCONTINUE</i>				
Annual Responses	0	-1,000		1,000
Annual Burden Hours	0	-250		250
Training and Development Unit Post Course Evaluation Form - Domestic Students (Government)				
Annual Responses	8		-92	100
Annual Burden Hours	1		-24	25
Training and Development Unit Post Course Evaluation Form - International Students (Government)				
Annual Responses	70		-930	1,000
Annual Burden Hours	12		-238	250
International Conservation Chiefs Academy Pre-Test - Domestic Students (Government)				
Annual Responses	8	8		0
Annual Burden Hours	3	3		0
International Conservation Chiefs Academy Pre-Test - International Students (Government)				
Annual Responses	70	70		0
Annual Burden Hours	12	12		0
TOTALS - ANNUAL RESPONSES:	164	-922	-1,114	2,200
TOTALS - ANNUAL BURDEN HOURS:	29	-235	-278	542

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information we will collect will not be published.

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

Not applicable.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.