

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

U.S. Fish and Wildlife Service Agreements with Friends Organizations OMB Control Number 1018-0193

Terms of Clearance: We highlighted changes made to this Supporting Statement A since OMB's initial approval of the collection on 04/21/2023 in yellow.

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.

About 80% of the Service's Friends groups are very small, with annual gross receipts totaling \$50,000 or less. This means that they do not file Internal Revenue Service (IRS) Forms 990 or 990 EZ on which organizations must declare all donations and revenues. Rather, these smaller groups, which represent the majority of our partners, are only required to file the 990 N or "postcard". The 990 N simply asks for confirmation that the organization has annual gross receipts totaling \$50,000 or less. This means that the information that the Service needs to collect, per the Office of Inspector General Audit, is not duplicative of what the IRS is requiring for 80% of our Friends groups, nor is it information that the Service could obtain via the public information housed on the IRS website. Therefore, we do need to request this information on our annual reporting form.

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), and
6. Bylaws.

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. 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 (copies of Forms 990 do not need to be submitted with the annual report):

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 amount donated to the Service.
5. Description of donations to the Service.
6. 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 the past 5 years of IRS 990 forms submitted by the organization from the IRS' public facing website for review.
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.

PROPOSED REVISIONS

With this submission, we are proposing the following revisions to the existing information collection:

1. **(New IC) National Friends Program: Friends Academy Application (Form 3-2565)**
The Service uses the Friends Academy Application form with the Friends Academy, an advanced training program for board members and staff of Friends organizations who are beyond the formative stages of development. The overarching purpose of the Academy is to cultivate emerging Friends leaders by providing a broader understanding

of the Service and enhancing skills to increase the effectiveness of Friends/Service partnerships.

This program is exclusively offered to Friends board members and staff, who have been serving for at least one year. In addition, people who have at least two years of involvement as a Friends members or volunteers may be considered. People eligible for the program fall into two application pools—Service staff or other Friends may nominate a Friend, or a Friend may self-nominate. These application forms will be completed and submitted directly to the National Friends Coordinator specified in the “Application Submission Instructions” section.

- **Part I (Region and Application Type)** of each application simply gathers the servicing regional office and specifies the type of nomination (Self-nomination or Staff nominating a Friend) that dictates which sections will be filled out.
 - **Part II (Self-Nomination)** and **Part III (Nominating a Friend)** both gather basic information to identify the nominee (name, address, phone number, email address) and specify the nominee’s baseline credentials for gaining entry to the Academy program (Friends organization affiliation, years of affiliation, service programs supported, volunteer history, board position, committees served). In addition, these sections also solicit professional information that helps the Academy’s selection personnel evaluate the nominee’s merits as a candidate. Each of these parts gather identical information regarding the nominee.
 - **Part IV (Required Service Site or Program Manager Endorsement and Signature)** requires gathering endorsements and signatures from both the nominee’s Service Site Program Manager and from a member of the nominee’s Friends Organization.
 - **Part V (Required Service Site or Program Manager Endorsement and Signature Continued)** compiles the signatures of all the individuals involved in preparing the application: self-applicant or nominating official, project leader or manager, and Friends Organization representative.
2. **(New IC) National Friends Program: Friends Mentoring Visit Form (Form 3-2566)**
Friends groups use the Mentoring Visit Form to request a mentor visit. The Service typically issues a call for mentoring visit request forms one to two times a year. The form is completed by the Friends group, but the Service staff at the field station which the Friends support must be consulted and must sign the form before it is submitted to Service headquarters.
 3. **(New IC) National Friends Program: Friends Mentor Application (Form 3-2567)**
The National Friends Mentoring Program is open to both Service staff and members of the public (e.g., retired Service Employees, Friends members). Applicants volunteer to serve in a cadre of trained mentor professionals. These professionals use the National Friends Program Mentor Application form to apply to enter into mentoring relationships with current Friends groups who request this service. The mentor relationship typically lasts for one full year and involves an on-site visit to the Friends group and Service site which the Friends group supports in an official capacity (i.e., has a Friends Partnership Agreement). The Service generally issues a call for mentor applications every 3 to 5 years, at most.
 4. **(Revised) Internal Financial Control Documentation (Forms 990 or 990-EZ Filers)**
We reduced the number of respondents (see question 12) to reflect only those Friends groups that file Forms 990 or 990-EZ. Tax information for this collection will be retrieved

by Service members from information published on the IRS website. We will not request the information from the Friends groups.

5. **(New IC) Internal Financial Control Documentation (Forms 990-N or Postcard Filers)**

About 80 percent of the Service's Friends groups are very small, with annual gross receipts totaling \$50,000 or less. This means that they do not file a 990 or 990-EZ (the Internal Revenue Service (IRS) forms on which organizations must declare all donations and revenues). Rather, these smaller groups, which represent most of our partners, are only required to file the 990-N, or "e-Postcard." The 990-N or e-Postcard simply asks for confirmation that the organization has annual gross receipts totaling \$50,000 or less.

Collection of this information from Friends groups filing the 990-N or ePostcard, as required by the Office of Inspector General audit, is not duplicative of what the IRS requires from 80 percent of our Friends groups, nor is it publicly available information on the IRS website. Therefore, we need to request this information on our Annual Report (for only those small entities filing the 990-N or e-Postcard).

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.

We will accept submissions of the forms via email or hardcopy. None of the forms are automated for fully electronic submission.

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.

We will not request any information that Friends are already reporting to the IRS. We will request information that is specific to the partnership between the Friends and the Service. This information 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. 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 September 25, 2023, we published in the *Federal Register* ([88 FR 65741](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on November 24, 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-NWRS-2023-0135](#)) to provide the public with an additional method to submit comments. We received the following five comments in response to that notice:

Comment 1: Electronic comment submitted via Regulations.gov (FWS-HQ-NWRS-2023-0135-0002) by Jean Publie on 09/25/2023:

Commenter requests that the Friends program be shut down and is inherently biased toward insider groups.

Agency Response to Comment 1: The commenter did not address the information collection requirements; therefore, no response is required.

Comment 2: Anonymous electronic comment submitted via Regulations.gov (FWS-HQ-NWRS-2023-0135-0006) received 11/19/2023:

The commenter asked us not to kill any wildlife.

Agency Response to Comment 2: The commenter did not address the information collection requirements; therefore, no response is required.

Comment 3: Electronic comment submitted via Regulations.gov (FWS-HQ-NWRS-2023-0135-0007) by A. Hill on 11/23/2023:

The proposed USFWS collection of information from Friends groups is supposedly being done to "reduce paperwork" of citizens under the Paperwork Reduction Act. At least our Friends group is already working very closely with our local USFWS manager, providing all relevant information. We provide all required information to the IRS, and that information is provided to members and our local USFWS manager. We provide all financial information to our membership, and any and all of that information is available to the public upon request. We are a small, all volunteer organization - absolutely no paid staff. All but a minimum portion of our raised money goes directly to refuge support, education programs, and other mission relevant expenses. It is already hard enough to recruit executive officers, particularly to positions overseeing record keeping. Any additional reporting requirements would further discourage participation. If your goal is to cripple smaller friends groups, your proposal is right on point. Otherwise, unless there is reason for concern, let the refuge manager and friends group work out reporting requirements.

Agency Response to Comment 3: We must collect Friends information per the

September 2020 audit by the Department of the Interior (DOI) Office of the Inspector General (OIG), who was concerned that the information was not available for the program as a whole. No information will be requested that isn't already being collected by the Friends and that should already be regularly reported to the refuge manager. We will allow the refuge manager and Friends to determine who reports the information to the Service. This standard reporting form will allow the Service to tell a fuller story of the contributions of all Friends across the country.

Comment 4: Electronic comment submitted via Regulations.gov (FWS-HQ-NWRS-2023-0135-0008) by Charles Paxton on 11/23/2023:

I am a board member at large for the friends of Black Bayou Lake NWR group, I'm writing on my own behalf as an individual in this instance and not representing the board with these opinions. I think it would be quite onerous for small groups to have to report in detail as if they were larger groups. I warn against that course. Our members are all volunteers and most of them are professionals working in other business areas and while they bring a wide variety of skills with them to the group, they may have very little time nor inclination for extra bureaucracy or other impositions. I wouldn't want any extra imposition to be made upon our officers.

I don't see that we would benefit from it really. Furthermore when questioning the relevance of such information collection in the document, I have to say that I didn't see anything in the proposal that justified the use of it therefore I do question the validity of collecting it.

Yes, I agree there's a need to develop future leaders within our organization but I'm not sure we need to be very formal about that, rather we attract people who are self-motivated. Remote micromanagement we don't need. The covid pandemic eroded our active support base but ours is a community conservation project and our leadership has been recently refreshed. NB there is already a national mentoring organization called ANROSP that is available to us.

Thank you for seeking our opinions.

Agency Response to Comment 4: We will not seek any information that is not already being collected and reported to the refuge manager and the IRS. The justification for the collection is in part because it is being required by the OIG per the September 2020 audit, and in part because we will be able to paint a full picture of the contributions of Friends on a national scale, which has never been possible without any standardized data collection.

Comment 5: Electronic comment submitted via Regulations.gov (FWS-HQ-NWRS-2023-0135-0009) by Charles Paxton on 11/23/2023:

The new regulations proposed here are not inclusive and do not facilitate improvements applicable to all friends groups, specifically those which operate and are managed by volunteers alone. Additionally, the proposal does not go into specifics regarding its "non-form" collection of information. And the stringency of the collection of the reports of activity from friends groups, applicable to what we assume is all friends groups, does not take into account that some groups are poorly staffed, underfunded, volunteer only, and limited in its capacity to report on the standards of groups who are of greater means and ability.

Agency Response to Comment 5: We will not collect any information outside of the new form. We are establishing a tiered system for what is expected to be reported for smaller groups versus larger ones, with no information being requested that should not already be collected per guidelines from the IRS for any 501(c)3 nonprofit organization.

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 estimates and asked for comments on the collection.

Organization	Title
International Wildlife Refuge Alliance	Former Executive Director
Friends of the Crystal River NWR	board member
Friends of the Kaua'i Wildlife Refuges	Executive Director
Friends of the Duck Stamp	Member
Friends of Ottawa NWR	Board member
Friends of Sherburne NWR	Board member
Friends of Great Swamp NWR	Board member
Friends of Balcones Canyonlands NWR	Executive Director
Friends of Ottawa NWR 9	Vice President of the board

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

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. The information that we collect from applicants is part of an existing Privacy Act System of Records (INTERIOR/FWS-27, Correspondence Control System - [64 FR 29055](#) (May 28, 1999); modification published [88 FR 16277](#) (March 16, 2023) or INTERIOR/DOI-58, Employee Administrative Records - [64 FR 19384](#) (April 20, 1999); modification published [73 FR 8342](#) (February 13, 2008) and [86 FR 50156](#) (September 7, 2021)).

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 **1,693 annual responses** and **20,285 annual burden hours**. We estimate the total dollar value of the annual burden hours to be **\$842,436 (rounded, 20,285 burden hours x \$41.53)**.

We used Table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-23-2567, December 15, 2023, Employer Costs for Employee Compensation—September 2023, which lists the hourly rate for private industry workers as \$41.53, including benefits.

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*
Partnership Agreement					
Reporting	50	50	50	35	1,750
Recordkeeping				5	250
Renewal of Partnership Agreement					
Reporting	150	1	150	5.5	825
Recordkeeping				2.5	375
Supplemental Agreement					
Reporting	50	1	50	3	150
Recordkeeping				1	50
Renewal of Supplemental Agreement					
Reporting	150	1	150	1.5	225
Recordkeeping				.5	75
Fundraising Agreement					
Reporting	30	1	30	10	300
Recordkeeping				10	300
Internal Financial Control Documentation (Forms 990 or 990-EZ Filers) (REVISED)					
Reporting	40	1	40	15	600
Recordkeeping				15	600
Internal Financial Control Documentation (Forms 990-N or Postcard Filers) (NEW)					
Reporting	160	1	160	15	2,400
Recordkeeping				15	2,400
Assurance Documentation					
Reporting	200	1	200	20	4,000
Recordkeeping				20	4,000
Supplemental Documentation Requirements: Quarterly Review					
Reporting	200	4	800	1.5	1,200
Recordkeeping				.5	400
Supplemental Documentation Requirements: Annual Review					
Reporting	10	1	10	2.5	25
Recordkeeping				17.5	175
National Friends Program: Friends Academy Application (Form 3-2565) (NEW)					
Reporting	30	1	30	2	60

National Friends Program: Friends Mentoring Visit Form (Form 3-2566) (NEW)					
Reporting	15	1	15	3	45
National Friends Program: Friends Mentor Application (Form 3-2567) (NEW)					
Reporting	8	1	8	10	80
TOTALS:	1,693		1,693		20,285
*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 **\$4,988,146.**

To determine hourly wage rates, we used the Office of Personnel Management Salary Table [2024-RUS](#) as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.61 in accordance with from [BLS News Release USDL-23-2567](#).

Position/Grade	Annual Salary	Annual Salary (incl. Benefits)*	Time Spent on Collection	Number of Positions	Total Annual Salary Costs*
Regional Friends Coordinator, GS-12/05	\$ 98,555	\$ 158,674	20%	8	\$ 253,878

Refuge Managers, GS-14/05	138,492	222,972	5%	190	1,672,290
Visitor Services Managers, GS-12/05	98,555	158,674	10%	190	3,014,806
National Friends Coordinator (HQ) GS-13/05	117,198	188,689	25%	1	47,172
		TOTALS:		389	\$4,988,146

*Rounded

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

We are reporting a discretionary burden increase of 53 hours and a discretionary burden decrease of -1,815 hours due to the revision of the Internal Financial Control Documentation ICs and the addition of three forms: 3-2565, 3-2566, and 3-2567, as described in this Supporting Statement A.

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.