

# SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## Urban Bird Treaty Program Requirements OMB Control Number 1018-0183

**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.**

The Urban Bird Treaty Program (UBT Program) is administered through the Service's Migratory Bird Program, under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661–667e). The UBT Program aims to support partnerships of public and private organizations and individuals working to conserve migratory birds and their habitats in urban areas for the benefit of these species and the people that live in urban areas. The UBT partners' habitat conservation activities help to ensure that more natural areas, including forests, grasslands, wetlands, and meadows, are available in urban areas for birds, and so that historically excluded and underserved communities have improved access to green space and opportunities to engage in habitat restoration and community science as well as bird-related recreation and educational programs. These habitat restoration activities, especially urban forest conservation, also contribute to climate resiliency by reducing the amount of carbon dioxide in the atmosphere and reduce the urban heat island effect. Lights-out programs in UBT cities help reduce energy costs and greenhouse gas emissions by reducing the use of electricity when people and businesses turn off their lights between dusk and dawn during the fall and spring periods of bird migration in order to reduce bird collisions with building glass.

The UBT program benefits city partners in many ways, including:

- Helps city partners achieve their goals for making cities healthier places for birds and people.
- Provides opportunities to share and learn from other city partners' tools, tactics, successes, and challenges, to advance city partners' urban bird conservation efforts.
- Strengthens the cohesion and effectiveness of the partnerships by coming together and working under the banner of the UBT program.
- Gives city partners improved access to funding through the National Fish and Wildlife Foundation's Five Star and Urban Waters Restoration grant program, as UBT cities receive priority in this program. (NOTE: *All information collection requirements associated with Service-administered grant programs is approved under OMB Control No. 1018-0100*)
- Helps partners garner additional funds through other urban conservation grant programs that have shared goals and objectives.
- Helps partners achieve green building credits, reduced energy costs, green space requirements, environmental equity, and other sustainability goals.
- Promotes the livability and sustainability of cities by spreading the word about the city's UBT Federal designation and all the benefits of a green and bird-friendly city.

**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 designates Urban Bird Treaty cities or municipalities through a process in which applicants submit a nomination package, including a letter of intention and an implementation plan, for approval by the Service's Migratory Bird Program. Within 3 months, the Service reviews the package, makes any necessary recommendations for changes, and then decides to either approve or reject the package. If rejected, the city can reapply the following year. In most cases, when the Service designates a new UBT city partnership, the Service and the new city partners hold a signing ceremony, during which a representative from both the Service and the city sign a nonbinding document that states the importance of conserving birds and their habitats to the health and well-being of people that live in and visit the city. To maintain the UBT city partnership designation, the partnership must submit information on the activities it has carried out to meet the goals of the UBT program, including those related to bird habitat conservation, bird hazard reduction, and bird-related community education and engagement. By helping make cities healthier places for birds and people, the UBT Program contributes to the Administration's priorities of justice and racial equity, climate resiliency, and the President's Executive Order 14008 to protect 30 percent of the Nation's land and 30 percent of its ocean areas by 2030.

We collect the following information from prospective and successful applicants in conjunction with the UBT Program:

- **Nomination Letter** – Prospective applicants must submit a letter of intention from the city's partnership that details its commitment to urban bird conservation and community engagement in bird-related education, recreation, conservation, science, and monitoring. Support and involvement by the city government is required.
- **Implementation Plan** – The required implementation plan should contain the following (see the UBT Program Guidebook attached as a supplemental document in ROCIS <https://www.fws.gov/media/us-fish-wildlife-service-urban-bird-treaty-program-guidebook-v4-making-cities-healthier> for full descriptions of requirements):
  - Detailed description of the importance of the city to migrating, nesting, and overwintering birds; bird habitats; human population size of the city; and socioeconomic profile of the human communities present and those historically excluded and underserved communities that will be the focus of education and engagement programs.
  - Map of the geographic area that is being nominated for designation.
  - List of individuals and organizations, and their contact information that are active in the partnership.
  - The mission, goals, and objectives of the partnership applying for designation, organized by the three UBT goal categories.
  - Description of accomplishments (e.g., activities, products, outcomes) that have been completed over the last 1-3 years, the audiences and communities reached/engaged through those activities, and the partner organizations that have achieved them, organized by UBT goal categories.
  - Description of objectives, actions, activities, tools/products that are being planned for the next 3-5 years under the UBT designation, the audiences and communities targeted for engagement, and the partners who will complete the work, organized by UBT goal categories.
- **Ad Hoc Reports (Non-form)** – The Service will also request information updates on UBT city points of contact, activities and events, and other information on an ongoing basis

for urban bird conservation in the city, as needed by the Service for storytelling, promotion, and internal programmatic communications, education, and outreach.

- **Biennial Reporting** – The Service requires city partners to provide biennial metrics as well as written and photographic descriptions of activities for each goal category. City partners are required to submit this information to maintain their city's designation by ensuring that they are actively working to achieve the goals of the UBT Program.

The Migratory Bird Program (MBP) will use the information collected to assess the activity of UBT cities, for storytelling purposes to promote the urban bird conservation work of city partners, and to enable the MBP to develop UBT Program accomplishment summaries and other communications tools to share internally and with the public and conservation community at large. The reporting requirement ensures that the UBT city designation is meaningful and that city partners are accountable for the efforts that they agreed to undertake to earn their designation. Additionally, the MBP will use the information to promote the UBT program to other interested city partners and the benefits of urban bird conservation generally.

For more information, please see the UBT Program Guidebook at the following link: <https://www.fws.gov/media/us-fish-wildlife-service-urban-bird-treaty-program-guidebook-v4-making-cities-healthier> (we also provided a copy in ROCIS as a supplementary document).

**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.**

For the reporting requirement, the Service has developed a reporting form (Form 3-2550) that will facilitate partner submission of activity metrics and project descriptions. For information updates and the nomination package, the Service will accept documents as an email attachment only. Each year we estimate receiving 100% of the documents electronically.

**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 UBT Program. Due to the unique nature of the program, no other division of the Service or any other Federal agency collects this information from the public. Several of the metrics and some activity descriptions are collected by the National Fish and Wildlife Foundation (NFWF) Five Star grant program that the UBT Program participates in, but not all UBT cities participate in this grant program every year, only a limited number out of the 1 UBT city. The information collected by NFWF facilitates the Service's ability to collect the metric and activity information from UBT partners so it is advantageous to this reporting requirement. But it is not comprehensive enough to replace it.

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

The Service collects only the minimum information necessary for us to determine an applicant's eligibility for designation or to maintain designation as an Urban Bird Treaty city or municipality. This information collection does not significantly impact small businesses but does impact small

non-governmental organizations so the Service is providing flexibility in the types of metrics these entities need to provide and only a limited number and length of project descriptions every two years. The Service also provides flexibility in how the city partners develop their implementation plans so that it is not too burdensome. Several partners have commented that the reporting requirement is manageable because they already collect much of the information every year.

**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.**

There is a growing interest from partners in eligible cities to nominate their cities to become UBT cities and join the growing UBT city network. If we did not collect the designation information, the Service would be unable to approve new applications for designating Urban Bird Treaty cities or municipalities and thus unable to bring new UBT cities into the program. Moreover, if the reporting information and updates were not collected, there would be no way to ensure UBT city partners are working toward the goals of the UBT program and thus maintaining their commitment to the UBT program designation.

Partners are willing to provide this information to join the network and remain part of the network through redesignation every two years as they value the UBT designation. Without this process, the Service will be unable to support its partnerships with public and private organizations and individuals working to conserve habitat for migratory birds and their habitats in urban areas. Providing an online form, flexibility in reporting and implementation plan development, and requiring reporting every two years limits the burden on partners.

**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 January 26, 2024, we published in the *Federal Register* ([89 FR 5255](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on March 26, 2024. 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-MB-2024-0006](#)). We received the following comments in response to that notice:

**Comment 1:** Anonymous electronic comment received 02/02/2024 via Regulations.gov ([FWS-HQ-MB-2024-0006-0002](#)):

I recommend we keep all public lands in public hands, and continually add more lands to the public holding. The forest service land exchange in Summit County CO was a massive mistake and should never have happened. Summit County should have prevented the over development of second, third or more homes in the mountain valley. Over development, property investment speculation has brought more problems than just a housing shortage for workers. The Forest Service should have put the problem right on the county who should use eminent domain on hotels and condominiums to solve their problem.

Now you have radicals like Mike Lee of Utah who wants to give public lands to developers to continue to over develop Salt Lake Valley. The state of Utah has for decades failed to clean the air and created a water shortage by over developing. The Federal government should not contribute to the problems created by the State government. The public lands in urban, rural, and suburban areas should always have the priority of open space for wildlife.

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

**Comment 2:** Anonymous electronic comment received 03/17/2024 via Regulations.gov ([FWS-HQ-MB-2024-0006-0003](#)):

Please do your best to protect these birds and to care for them well.

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

**Comment 3:** Electronic comment received 03/25/2024 via Regulations.gov ([FWS-HQ-MB-2024-0006-0004](#)) from Kyara Garcia Rodriguez:

The Forest Service plays a crucial role in the management and protection of national forests and grasslands, which are essential for conserving biodiversity, storing carbon, regulating water quality, and promoting outdoor recreation. These ecosystems serve as homes for numerous plant and animal species, including those that are at risk of extinction. Through their responsible care, the Forest Service helps to guarantee the sustainable utilization of natural resources, lessen the effects of climate change, and preserve the ecological harmony of these significant landscapes.

The Urban Bird Treaty Program Requirements are crucial for supporting bird conservation in urban areas, where factors like habitat loss and pollution threaten bird populations. The program fosters partnerships between federal agencies, local governments, and community organizations to safeguard bird species, preserve urban habitats, and involve residents in conservation efforts. Recognizing the significance of the Urban Bird Treaty, Program emphasizes the importance of urban bird conservation and encourages collaborative efforts to address the unique challenges faced by birds in cities. Prioritizing the protection of urban bird populations can help preserve biodiversity, enhance urban ecosystems, and strengthen the bond between people and nature in urban settings.

**Agency Response to Comment 3:** No action was taken as this comment is a statement of support for the program.

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:

<b>Organization</b>	<b>Title</b>
The Nature Conservancy	Nashville UBT City Coordinator
D.C. Department of Energy and the Environment	Wildlife Biologist
Michigan Audubon	Conservation Manager
Detroit Audubon	Research Associate
NYC Audubon	Institutional Giving Manager
Executive Director	Park Watershed
University of New Orleans	Assistant to the Vice President for Research and Economic Development
Carnegie Museum of Natural History	Urban Conservation Coordinator
Audubon Mid-Atlantic	Urban Conservation Program Manager

***“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: One respondent indicated there aren’t any questions or requests that are

unnecessary. However, they also indicated uncertainty around knowing how much of the report is mandatory to fill out and what the minimum requirement is for fulfilling the needs of the UBT program. Another commenter indicated that they were unsure if they provided adequate information for the report. They also wondered if the UBT cities' respective reports would be shared amongst the other UBT cities. Another commenter thought the questions were fair but asking for challenges and lessons learned is a little excessive.

Another respondent said it would be helpful to understand how both USFWS and participating cities utilize the collected metrics and how the Service envisions these metrics being used to inform decision-making and evaluate program effectiveness.

Another respondent indicated that there are some metrics that will likely not be answerable for the city most years though this may change when a partner begins acquiring land. They are uncertain if they should be tracking and collecting information on conservation dollars spent and would like to have this information as a metric.

*Agency Response/Action Taken:* We collect the minimum amount of information necessary to submit in the spreadsheet to maintain UBT status and what the information will be used for. The minimum amount is at least one metric per goal category and these metrics will be used not only to maintain a city's UBT status but will be summarized across cities for infographics as well as accomplishment reports. It is understood that some metrics may not be collected by some cities, but a variety of metrics is listed to provide for diverse conservation efforts among cities. The UBT program is not tracking dollars spent by UBT city partners except through the NFWF-UBT grant program.

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

*Comments:* One commenter indicated that the report is definitely a burden, but not because USFWS is asking too much. Moreso, their partners are difficult to communicate with, which makes gathering the information difficult. To lessen this burden long-term, they are starting to meet with partners to plan out which metrics they are going to track and support along with which project narratives they are going to cover. Another commenter indicated that they did not find the reporting process burdensome in any way and found it relatively easy. Another said that the actual UBT reporting form is short and straightforward, however, if new stories are required every year, it could get burdensome.

Another responder indicated that trying to organize and separate the responses from partners and their own data, was very unwieldy utilizing the spreadsheet. They said that entering a lengthy text response in an excel spreadsheet cell is not the best format. Submitting photos as jpg minimum 300 psi required an additional burden of converting photos to the higher resolution. In the community engagement section, many times they are tabling at events, so it is difficult to determine how many K-12 youth vs adults attend those festivals.

A third commenter indicated that while receiving UBT designation is great and it's always important to summarize accomplishments, a lot of work is involved in summarizing the information required for the report, especially if a lot has been accomplished. Another found it difficult and time-consuming to organize metrics by fiscal year rather than calendar year.

Another respondent said that the only time they run into issues collecting information is

when agencies or partners associated with a certain metric don't track it and it takes a few emails and text messages, with a lot of lead time, and maybe a few follow-up reminder emails, but getting the data is not that difficult. Another commentor said the burden is decent and fair.

Agency Response/Action Taken: We work with partners to collect information and then organize the information across partners in the spreadsheet's metric description cells. A reduction in the psi level requirement for photos will be made, and the point that separating youth from adults in the community engagement metrics is not mandatory. Fiscal year reporting is a governmental requirement so this reporting period cannot be changed.

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

Comments: One commentor indicated that there are other local organizations that at minimum, plant trees in and around the city. So they were unsure if they provided adequate information for the report.

Another respondent also asked if only metrics from partner collaborations should be reported, or also when a partner acts on their own, but towards the goals of the UBT program. They said that clarifying who should report is important for quality and utility of the information and needs to be better explained.

Another commentor will be requesting information in advance from partners for activities that are relevant to the Hartford UBT spreadsheet reporting to make the information more accurate.

Another commentor indicated that once they began collecting certain data, partners became more aware and proactive about metrics, so quality and clarity took care of itself.

Another commentor indicated that the Hazards Section is collision/bird strike focused and that there are so many other hazards, such as rodenticide use, outdoor cats, off-leash dogs. They recommended that cities should be making effort to reduce these and other hazards as well, but they may be more controversial and harder to enforce or track. Their city is currently conducting a rodenticide study with bird mortality. They also asked if the number of species detected, surveys conducted, SGCN supported, or some other more species-specific aspects be added?

Agency Response/Action Taken: Partner and partnerships should be reporting to the UBT points of contact (POCs). City POCs should clarify up front which partners are part of the UBT network in their city and then solicit and include all UBT relevant activity metrics for those partners individually and where there is collaboration among partners. Other hazard metrics can and should be reported using the “other metrics” option. Likewise, species detected and supported, and number of surveys conducted are important and can be added in as an “other metric” or in the description.

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

Comments: One respondent indicated that switching to a form rather than an excel spreadsheet would make it easier for individual partners to fill out the report, rather than having one entity collect and synthesize all the data, though are unsure what the survey or

form would look like or what software to use.

Another respondent indicated that creating an electronic form would allow for multiple partner responses (i.e. multiple lines would be helpful), or something more user friendly than a spreadsheet. Another respondent recommended streamlining the reporting by simplifying it and focusing on the top three key metrics or outcomes that are most relevant and impactful. They also asked to ensure that the reporting framework accommodates qualitative assessments of policy changes and other non-quantitative outcomes like educational programs to capture the diverse range of actions undertaken by UBT cities, including anecdotal evidence of successes and challenges.

A third respondent indicated that to help respondents complete their reports more thoroughly and efficiently reporting should be done through an online portal so respondents could not submit a report until all essential information had been included. The online reporting system should have preloaded maps of the region that allowed you to then increase or reduce the scale as needed and draw the boundaries of the geographic area your work covered. That would make it easier for those who are less proficient at creating map images to submit a suitable map.

Another commenter said that they would not like going to an automated/electronic version unless the current version is difficult for processing on the USFWS side of things. Another commenter indicated that the most time-consuming part is to figure out the metrics for the federal fiscal year, since they track metrics by calendar year and asked for some kind of spreadsheet tool that makes the reporting period clearer.

Another commenter said that using an online system so partners in a city could enter data separately would be hard to accomplish as the metrics collected are spread out over so many partners and agencies. Another commenter requested a premade form for the written summaries section.

*Agency Response/Action Taken:* We will not be providing an online form as requested by several commenters, though it was previously considered and developed. An online form requires partners to fill it out in one sitting, which is not practical. However, the Service can look into other online options for the future. Gathering information among partners in a city is the responsibility of the UBT POC so that aspect of the reporting will not change. Clarifying the reporting period on the spreadsheet and providing more distinct and text friendly cells for descriptions can be done. The reporting requirement does allow city partners to select their top tier metrics to report on and does not require them to submit metrics for all categories. A wide variety of metrics is listed to allow for flexibility in choosing metrics to report on. In addition, there is an “other” metric category in the reporting spreadsheet as well as the requirement to submit written accomplishment summaries that allow for descriptions of qualitative accomplishments, anecdotal successes as well as challenges overcome.

As an alternative to an online form, recommendations and a training will be provided on how to use the excel spreadsheet to organize incoming data from partners to be better able to summarize activity metrics and other information and fill out the spreadsheet.

***Additional comments received during the outreach:***

*Comments:* One commenter said that through the reporting process, they realized that the

USFWS UBT spreadsheet can help them communicate to partners the need to document and work towards measurable goals.

Another thought that the grant and reporting requests allowed them to forge a stronger relationship with their partners, the Orleans Audubon Society, and Audubon Delta.

Another said that compiling the information for their partnership is an opportunity for everyone to see what each other is doing, and it is also a way to compare their program activities against their counterparts within their organization and across the city.

Another commenter thinks it's very beneficial for conservation organizations to track program success with the kind of metrics the Service is requesting. They do this anyway for assessing program goals and for the annual report and grant reporting,

.Another said that it would be great if a funding stream available for UBT cities to utilize just for UBT work, that also had less stringent requirements than NFWF.

Another commenter said that compiling this information gives a broader view of what other bird focused work is being done in the city, by either the local government, state officials, non-profits, federal agencies, and other partners. They often operate in their own lanes and do not realize what other efforts are being put forward, or what issues and areas are not being addressed. Compiling this information increases communication between organizations and agencies that do not always work together. Another commented that compiling the information was helpful for being better in touch with their partners.

*Agency Response/Action Taken:* We acknowledge the benefits of gathering activity information among partners to strengthening the UBT partnerships, maintaining communications among partners, and increasing partner collaborations.

**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 is collected and protected in accordance with the Privacy Act of 1974 (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). Information may be shared in accordance with the Privacy Act and the routine uses listed in DOI-89, Grants and Cooperative Agreements: FBMS ([73 FR 43775](#) (July 28, 2008); modification published [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 do not ask 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 **121 responses** totaling **2,400 annual burden hours** for this information collection. The total dollar value of the annual burden hours is approximately **\$110,014** (rounded).

We used Table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-24-0485, March 13, 2024, Employer Costs for Employee Compensation—December 2023, to calculate the cost of the total annual burden hours:

- Private Sector - the hourly rate for all workers is \$43.11, including benefits.
- Government - the hourly rate for all workers is \$60.56, including benefits.

**Table 12.1**

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours
<b>Nomination Letter</b>							
Private Sector	2	1	2	4	8	\$ 43.11	\$ 344.88
Government	2	1	2	4	8	60.56	484.48
<b>Implementation Plan (Initial Submission)</b>							
Private Sector	2	1	2	40	80	\$ 43.11	\$ 3,448.80
Government	2	1	2	20	40	60.56	2,422.40
<b>Ad Hoc Reports</b>							
Private Sector	19	4	76	3	228	\$ 43.11	\$ 9,829.08
Government	3	4	12	3	36	60.56	2,180.16
<b>Biennial Reporting</b>							
Private Sector - Reporting	20	1	20	20	400	\$ 43.11	\$ 17,244.00
Private Sector – Recordkeeping				60	1,200	41.53	49,836.00
Government – Reporting	5	1	5	20	100	60.56	6,056.00
Government - Recordkeeping				60	300	60.56	18,168.00
<b>Totals:</b>	<b>55</b>		<b>121</b>		<b>2,400</b>		<b>\$ 110,013.80</b>

\*Rounded to match ROCIS

**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 for processing and reviewing reports from States as a result of this collection of information is **\$95,503** (\$90,503 – salary and \$5,000 travel). There are currently no other Federal government costs are associated with this information collection.

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2024-DCB](#) as an average nationwide rate. The annual salary rate for a part-time (50%) GS-12, step 5 is \$56,213 rounded (\$112,425 annually X 50%). In accordance with BLS [News Release](#) USDL-24-0485, we multiplied the annual salary by 1.61 to account for benefits resulting in a fully burdened annual salary of \$90,503 (rounded). The program also expects annual travel costs to average \$5,000/year.

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

We are reporting a change in estimate of 15 annual responses and 1,144 annual burden hours.

**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.**

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.