

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Federal Migratory Bird Hunting and Conservation Stamp (Duck Stamp) and Junior Duck Stamp Contests OMB Control Number 1018-0172

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.

On March 16, 1934, Congress passed, and President Franklin D. Roosevelt signed, the Hunting and Conservation Stamp Tax (16 USC 718 – 718k). Popularly known as the Migratory Bird Hunting Stamp Act (or Duck Stamp Act), it required all waterfowl hunters 16 years or older to buy a stamp annually. Originally earmarked for the Department of Agriculture, the revenue generated by the Duck Stamp Act was transferred to the Department of the Interior and the Service 5 years later.

In the years since its enactment, the Federal Duck Stamp Program has become one of the most popular and successful conservation programs ever initiated. Today, some 1.5 million stamps are sold each year, and as of 2024, Federal Duck Stamps have generated more than \$1.3 billion for the conservation of more than 6 million acres of waterfowl habitat in the United States. Numerous other birds, mammals, fish, reptiles, and amphibians have similarly prospered because of habitat protection made possible by the program. An estimated one-third of the Nation's endangered and threatened species find food or shelter in refuges preserved by Duck Stamp funds. Moreover, the protected wetlands help dissipate storms, purify water supplies, store flood water, and nourish fish hatchlings important for sport and commercial fishermen.

Jay N. "Ding" Darling, a nationally known political cartoonist for the Des Moines Register and a noted hunter and wildlife conservationist, designed the first Federal Duck Stamp at President Roosevelt's request. In subsequent years, noted wildlife artists submitted designs. The first Federal Duck Stamp Contest was opened in 1949 to any U.S. artist who wished to enter, and 65 artists submitted a total of 88 design entries. Since then, the contest has been known as the Federal Migratory Bird Hunting and Conservation Stamp Art (Duck Stamp) Contest and has attracted large numbers of entrants and supporters.

The Duck Stamp Contest (50 CFR part 91) remains the only art competition regulated and sponsored by the U.S. Government. It is considered one of the top wildlife art competitions in the world. The Secretary of the Interior appoints a panel of noted art, waterfowl, and philatelic authorities to select each year's winning design. Winners receive no compensation for their work from the U.S. Government, except a pane of their stamps. However, artists retain the copyright to their entries and may sell their originals as well as prints of their art, which are sought by hunters, conservationists, and art collectors. To date there have only been 62 individual Federal Duck Stamp artists and many of these have gone on to become well known after winning the contest.

The Federal Junior Duck Stamp Conservation and Design Program (Junior Duck Stamp Program) began in 1989 as an extension of the Migratory Bird Conservation and Hunting Stamp. The National Junior Duck Stamp Art Contest started in 1993, and the first stamp design

was selected from entries from eight participating states. The program was recognized by Congress with the 1994 enactment of the Junior Duck Stamp Conservation and Design Program Act (16 U.S.C. 719). All 50 states, Washington D.C., and two of the U.S. Territories currently participate in the annual contest.

The Junior Duck Stamp Program introduces wetland and waterfowl conservation to students in kindergarten through high school. It crosses cultural, ethnic, social, and geographic boundaries to teach greater awareness and guide students in exploring our nation's natural resources. It is the Service's premier conservation education initiative.

The winning artwork from the national art contest serves as the design for the Junior Duck Stamp, which the Service produces annually. This \$5 stamp has become a much sought-after collector's item. One hundred percent of the revenue from the sale of Junior Duck Stamps goes to support recognition and environmental education activities for students who participate in the program. More than \$1.25 million in Junior Duck Stamp proceeds have been used to provide recognition, incentives, and scholarships to participating students, teachers, and schools. The program continues to educate youth about land stewardship and the importance of connecting to their natural worlds. Several students who have participated in the Junior Duck Stamp Program have gone on to become full-time wildlife artists and conservation professionals; many attribute their later interest and success to their early exposure to the Junior Duck Stamp Program.

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

FEDERAL DUCK STAMP CONTEST

All U.S. citizens, nationals, or resident aliens are eligible to participate in the annual Federal Duck Stamp Contest. However, all entrants must be 18 years of age by June 1st. Entries are accepted beginning June 1st of each year and must be postmarked no later than August 15th. A Federal Duck Stamp Contest art entry consists of a two-dimensional design. The regulations for the contest do not specify a medium, except to prohibit photographs or computer-generated artwork.

Entrants must complete and submit a "Display, Participation, & Reproduction Rights Agreement", along with the official "Entry Form for Federal Duck Stamp Contest" with their artwork. Information requested on the forms include:

Display, Participation & Reproduction Rights Agreement – All entries must include a completed Display, Participation, & Reproduction Rights Agreement Form and an entry fee (currently \$125). Failure to submit the signed agreement form will result in disqualification.

We ask for...	So that we can...
Artist's signature, mailing address, and home phone number	Artist signs that they have read and agree to the display, participation, and reproduction rights agreement. Mailing address and phone numbers are needed so we can contact artist and to return artwork after the contest/exhibit period.
Species information	Identify their art piece and ensure that it meets qualifications.

Entry Form for Federal Duck Stamp Contest – The entry form must be attached to the back of the entry.

We ask for...	So that we can...
Basic contact information (name, address, phone numbers, and email address)	Identify artists and contact them with information on the contest, announce winners, and return artwork after the contest/exhibit period.
Date of birth	The Service asks for the DOB, rather than age, to verify artists are at least 18 by June 1 of the contest year. As artists have a 10-week period in which they can submit artwork, they need to be eligible by June 1 – not on the day they send their artwork in.
Species portrayed and medium used	Verify eligibility and for press coverage and identification.
Name of hometown newspaper	Target press coverage.

The Service selects five or fewer species of waterfowl each year; each entry must employ one of the Service-designated species as the dominant feature (defined as being in the foreground and clearly the focus of attention). In years in which a theme has been designated there may also be requirements for mandatory elements integrated into the composition. Designs may also include other design elements including hunting dogs, hunting scenes, waterfowl decoys, national wildlife refuges as the background of habitat scenes, non-eligible species, or other scenes that depict uses of the stamp for sporting, conservation, and collecting purposes. Entries may be in any media EXCEPT photography or computer-generated art. Designs must be the contestants' original hand-drawn creation and may not be copied or duplicated from previously published art, including photographs, or from images in any format published on the Internet.

Each artist should have a working knowledge in three major areas of special interest to Federal Duck Stamp Contest judges:

- Basic Waterfowl Biology — for example, are the bird's plumage and the habitat correct for the indicated season?
- Artistic Composition — is the image artistically interesting and does it “pop” when viewed?
- Suitability for printing at a reduced size — the image provides the design for a 1-3/4” L x 1-1/2” W stamp. How well will the details show in the reduced size?

Entries must be uniform in size. Each entry must be 7” x 10” and matted over with bright white matting. The matting must be 1” wide. Total size (entry with matting) must be 9” x 12”. We recommend using a 1/8” Masonite board or foam core with 1/8” matting to equal the total width of 1/4” thick. Any entry exceeding 1/4” thick will be disqualified.

JUNIOR DUCK STAMP CONTEST

All individuals enrolled in kindergarten through grade 12 may participate in the Junior Duck Stamp Conservation and Design Program. Eligible students are encouraged to participate in their state's annual art and conservation message contest as part of the program curriculum. Students may enter through public, private, and homeschools, as well as through non-formal educational experiences such as those found in scouting, art studios, and nature centers. Entry dates are set by the individual States but all occur on or prior to March 15. A Junior Duck Stamp Art Contest entry consists of a two-dimensional design in any art style (photorealistic, ethnic, abstract, impressionistic, caricature, etc.) of any native North American waterfowl species. Any medium except computer generated artwork or photography is allowed.

The Junior Duck Stamp Program is a dynamic art- and science-based curriculum. This non-traditional pairing of subjects brings new interest to both the sciences and the arts. The program introduces students across the nation to conservation through the arts, using scientific and wildlife observation principles to encourage visual communication about what they learn. Four curriculum guides, with activities for use as a year-round study plan, discovery kits, and outdoor field trips are employed to assist students in exploring science in real-life situations.

Modeled after the Federal Duck Stamp Contest, the Service designed the annual Junior Duck Stamp Art and Conservation Message Contest (Junior Duck Stamp Contest) to be a visual assessment of a student’s learning and progression. The Junior Duck Stamp Contest encourages partnerships among Federal and State government agencies, nongovernment organizations, businesses, and volunteers to help recognize and honor thousands of teachers and students throughout the United States for their participation in conservation-related activities. Since 2000, the contest has received more than 580,000 entries; additionally, an average of 300,000 students, families, educators, and community members annually participate in Junior Duck Stamp activities outside of entering the actual contest.

Entrants in the Junior Duck Stamp Contest must complete and submit a “Junior Duck Stamp Program Conservation and Design Contest Entry Form” and a “Reference Form” with their artwork:

Junior Duck Stamp Program Conservation and Design Contest Entry Form - Each entry in the Junior Duck Stamp Contest requires a completed entry form that requests:

We ask for...	So that we can...
Basic contact information (student name and mailing address)	Identify artists and return artwork after the contest/exhibit period.
Age/Grade	To verify eligibility, assist in selecting proper grade group so they can be judged with their peers, and to identify graduating seniors eligible for additional recognition.
Parent’s name, email, and telephone number	Provide parent contact information for staff to request media, collector, and other requests as we do not give out contact information of students.
Whether the student has a Social Security or VISA immigration number	Students planning to enter the contest must be citizens of the United States or U.S. Territories or have an official Immigration Visa or green card as proof of legal residency. A valid SSN is required for the award of monetary prizes.
Whether the student is a foreign exchange student	In the case of foreign exchange students, their artwork may be judged at the state level, but if awarded State Best of Show, the entry will not be forwarded for entry into the national contest.
Title, species, medium/style used, and conservation message associated with the drawing	Information on species, medium, style and title aid in identification of entries if forms and artwork become separated. To encourage students to participate even if their preferred art style is not photorealistic acrylic painting, students are encouraged to provide the medium and style used to assist in recognition of superb talent. Each student is encouraged, but not required, to write a short conservation message that expresses the spirit of what they have learned through classroom discussions, research, and planning for their Junior Duck Stamp Art

	Contest entry.
Basic contact information for their supervising adult or teacher (name, address, phone numbers, school/studio/organization/troop name, and email address)	Recognize and contact educators and to assist in the return of artwork and recognition. Knowing where the artwork is coming from also assists in the ability to better meet students' educational needs for this program.
Authenticity and Liability Statement	To verify that the student has not infringed on copyright that would lead to the U.S. government being sued.

Reference Form – Students in grades 7-12 must include a Reference Form citing all resources used to create their entry. Failure to include a Reference Form will result in disqualification of their entry. Each entry in the Junior Duck Stamp Contest submitted by a student in grades 7-12 and all state best of show entries require a completed Reference Form that requests:

We ask for...	So that we can...
Grade	Determine if the form is mandatory or optional and to assist in the judging if they used resources appropriately for their age group.
Name and state of student's residence	Assist in identifying and matching up the artwork and forms.
Reference Information	To verify the student did not reproduce another artists' work and to ensure unique creations.

Technical requirements for design and submission of an entry in the Junior Duck Stamp Contest:

- Entries must be uniform in size. Each entry must be 9" x 12", less than ¼" thick, and must be in the horizontal (landscape) orientation.
- Image must be a live portrayal of a native North American duck, swan, or goose (selected from the list of eligible species).
- Entries may be rendered in any style including, but not limited to, photorealistic, abstract, impressionistic, ethnic, caricature or other preferred 2-dimensional art style.
- An entry may be multi-color, black and white, or a single color; it may be rendered in ink, paint, pastel, crayon, or pencil. Techniques may include scratchboard, airbrush, linoleum printing, paper collage, dry brush, crosshatch, pointillism, etc. No photography or computer-generated art is accepted.
- Design entries must be the contestant's original, hand-illustrated creation and may not be traced or copied from photographs or other artists' works.
- Photographs taken by the student may be used as references in the development of the design.
- No lettering, words, signatures, or initials may appear on the front of the artwork as they may influence judges and can interfere with the final stamp design.
- Entries may not be matted or framed and there should be no border around the image.
- The signed Entry Form must be taped to the back of entry and older students must include a completed Reference Form.

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.

Submission of the forms and artwork cannot be accomplished through automated or technological methods. Artwork is judged from the original entry. Signed forms must be attached to the original artwork and mailed to the appropriate receiving office.

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. No other government entity is authorized to conduct the Federal Duck Stamp or Junior Duck Stamp art contests.

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

The collection does not impact small entities.

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

If we do not collect the information, we would be unable to conduct the annual contests. We cannot collect the information less frequently because we only collect the information from contestants at the time they submit their entry for consideration. Only one entry is currently permitted per participant per year.

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.

We collect all information in accordance 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 March 18, 2024, we published in the *Federal Register* ([89 FR 19335](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 17, 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-2024-0042](#)). We received two comments in response to that notice; however, neither comment addressed the information collection requirements. No response to those comments is required.

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Table 8.1

Organization	Title
Individual	Artist
Individual	Artist
Individual	Artist
Individual	Artist/former Jr artist
Individual	Art collector
Individual – public school teacher	Jr artist educator
Individual – art studio teacher	Jr artist educator
Individual – state coordinator	Jr contest state coordinator
Individual – art/science museum	Museum exhibition curator

“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 respondents felt that the information requested was necessary, had practical utility and none indicated that any of the questions were unnecessary. Artists and those representing the Junior artists were concerned of how information was shared with the public when artwork was toured. The art collector and museum exhibition curator offered two additional comments: 1) include a space where the title of the painting could

be included (Federal Contest) and 2) make sure that the paperwork does not become separated from the original entries as this provides provenance necessary for originals to be verified and sold to high end collectors.

Agency Response/Action Taken:

Paperwork is attached by the artist to the back of the entries at the time the entries are submitted. Paperwork and contact information is not shared with any unauthorized persons. After judging, labels are added to the front of the entries that place during the contests and go on tour. Label includes name of artist, state of residence, age (for students), contest placement, media used, and species depicted.

Paperwork remains attached to the back of the Federal Contest entries even while the artwork is on tour. Paperwork for the students' artwork is removed and stored separately from the entries while the Junior Contest entries are on tour. This is to protect identifying information for students who are often underage at the time of their entry. Paperwork is returned with the entry when artwork is returned after being on tour.

Federal artists usually have a website that can be found by an online search inquiry of "name, state, 'artist'" providing direct contact by any member of the public. Inquiry regarding students and adult artists without an online presence are handled solely by the Federal Duck Stamp Office. Students are contacted only by providing their parent/guardian the inquirer's contact information and question. The parent is then asked to contact the inquirer and monitor any discussions between them and their student regarding the artwork. Adult artists are contacted directly by the Federal Duck Stamp Office with the contact information provided by the inquirer.

Many artist's work remains "untitled" while in the possession of the Federal Duck Stamp Office. Those who have a title for their entry may include it on their paperwork or provide it after the contest. A title is not necessary for entry into the Contest and is not printed on labels of touring artwork. Students entering the Junior contest do have the opportunity to include a title on their entry forms as this has been a previous request by art teachers.

The Service will maintain these practices of providing the art collectors and other interested parties with only pertinent, easily accessible information, while protecting privacy of the artists (especially if underage), fulfilling the bare minimum of information collected from the artists, and being able to identify each artists' entries in a responsible way.

"The accuracy of our estimate of the burden for this collection of information"

Comments:

Commenters agreed with the Agency's estimate of burden for information collection although some thought the time may be an overestimate for experienced artists

Agency Response/Action Taken:

No response is necessary.

"Ways to enhance the quality, utility, and clarity of the information to be collected"

Comments:

No comments were provided.

Agency Response/Action Taken:

No response is necessary.

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

Comments:

No comments were offered to minimize the burden of collection on the artists. However, the State Junior Coordinator commented that if the entry forms were online their (the coordinator’s) job would be easier when it came to returning the student’s artwork.

Agency Response/Action Taken:

The Service does not currently have a process that would allow accurate and secure entry of information and signatures to be entered online by the student, their supervising adult, and parent/guardian. As the signed paperwork must be attached and matched with the physical art entries for up to 25,000 students each year and then must be accessible to all appropriate state and national coordinators and their teams (many of whom are volunteers, state and other nonagency employees), the practicality of online information entry does not appear to be a minimization of burden to the artists or their adult supervisors. Artists are allowed to input the information online, download and print the forms, and then attach the forms to the back of their art as stated in regulation. The Federal Duck Stamp Program does not have the resources or see the benefit to the artists to invest in an electronic data entry system.

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

The Federal and Junior artists will receive publicity and media recognition. They will also travel and be guest speakers at several prestigious national waterfowl festivals and wildlife art events. The Federal artist receives a pane of his or her Duck Stamps signed by the Secretary of the Interior. Finally, the winner can choose to market the winning image and any other works as “by the Federal Duck Stamp artist.”

NOTE: Any publishing contract offered to the winning artist is between the artist and publisher. The Federal Government does not guarantee the offer of a contract. The Government assumes no liability, responsibility, nor claims any interest in resulting publishing contracts.

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 Freedom of Information Act (5 U.S.C. 552). The Service’s Associate Privacy Act Officer conducted a review of the forms to review the collection and use of information associated with the contests. They subsequently determined that because each entry is given a unique number that is associated to the painting and not the individual, it is not a system of records. They only use the forms in case the entries are finalists, or when art is returned to the individual. Therefore, there is no need for a SORN or a Privacy Act Statement.

However, we handle the forms of winning entrants differently. We never disclose their information to anyone, and we do not use it for marketing purposes. We use the information from the winning entry forms to make the appropriate travel arrangements for the entrants. We maintain the information from the winning entrant’s forms in accordance with DOI Systems of Records Notice, “GSA/GOVT-4, Contracted Travel Services Program, 74 FR 26700 (June 3,

2009), modification published June 12, 2009 ([74 FR 28048](#)).

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 **20,200 applicants** will submit a contest entry form each year totaling **6,690 annual burden hours**. We estimate the total dollar value of the annual burden hours for this collection to be **\$309,145 (rounded)**.

Table 1 of the Bureau of Labor Statistics (BLS) [News Release](#) USDL-24-1863, September 10, 2024, Employer Costs for Employee Compensation—June 2024, lists the hourly rate for all workers as \$46.21, including benefits. We multiplied this rate by the total annual burden hours to calculate the total dollar value of the annual burden hours above.

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
Duck Stamp Program Contest Entry Form							
Individuals	200	1	200	7 min	23	\$ 46.21	\$ 1,062.83
Junior Duck Stamp Program Contest Entry Form							
Individuals	20,000	1	20,000	20 min**	6,667	46.21	308,082.07
Totals:	20,200		20,200		6,690		\$ 309,144.90

*Rounded to match ROCIS

**Burden for JDSP entry form is longer since both the parents and teacher must sign the form, and the student must provide references.

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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.

A total of **\$39,000** is associated with entry fees and mailing costs to participate in the annual contests.

For the Duck Stamp Contest, we estimate the costs as follows:

- 200 submissions to the Federal Duck Stamp Contest x \$125 = **\$25,000**
- 200 entries x an average \$15 for mailing costs = **\$3,000**.

For the Junior Duck Stamp Contest submission, there are no entry fees associated with the submissions. We estimate the mailing costs associated with entering submissions to the Junior Duck Stamp contest to be approximately **\$11,000** annually. Most of the 20,000 entries are mailed directly by schools who utilize the bulk mail option reducing the amount of postage and packages received.

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 Federal cost to administer these Contests is **\$511,672 (rounded)**. This includes:

- **\$447,812** (rounded) – Table 14.1 Fish and Wildlife Annual Salary/Benefits, and
- **\$63,860** – Table 14.2 Other Annual Costs.

We used the Office of Personnel Management Salary Table [2024-DCB](#) (Washington-Baltimore-Arlington, DC-MD-VA-WV-PA) to determine average hourly Federal wages for National Positions, [2024-RUS](#) (Rest of US) for non-Headquarters' positions, and the 2024 Basic Rates of Pay for Members of the Senior Executive Service for the Assistant Director position (level III

annual salary divided by 2,087 hours). In accordance with BLS [News Release](#) USDL-24-1863, we multiplied individual hourly wages for the Federal employees by 1.61 to calculate the fully burdened hourly rate shown below in Table 14.1. We calculated the other associated costs from average expenditures for the past three years at the national level and from the annual reports provided by State Junior Coordinators.

Table 14.1 – Fish and Wildlife Annual Salary/Benefits

Action	Position and Grade	Hourly Rate	Fully Burdened Rate (w/Benefits)	Number of Positions	Annual Hours/Position	Total Annual Cost*
Implement Federal Duck Stamp Contest	Administrative Clerk GS 07/05 (RUS)	\$ 26.62	\$ 42.86	1	40	\$ 1,714.33
	Program Analyst Assistant GS 11/05 (DCB)	44.94	72.35	1	100	7,235.34
	Administrative Officer GS 12/05 (DCB)	53.87	86.73	1	10	867.31
	Communications/Public Affairs Specialist GS 13/05 (DCB)	64.06	103.14	2	30	6,188.20
	Program Manager GS 14/05 (DCB)	75.70	121.88	1	350	42,656.95
	Supervisory Budget Analyst GS 14/05 (DCB)	75.70	121.88	1	40	4,875.08
	Supervisory Fish & Wildlife Administrator GS 15/05 (DCB)	89.04	143.35	1	40	5,734.18
	AD – SES (DCB)	97.75	157.38	1	20	3,147.55
Implement National Junior Contest	Administrative Clerk GS 07/05 (DCB)	\$ 30.37	\$ 48.90	1	40	\$ 1,955.83
	Program Analyst Assistant GS 11/05 (DCB)	44.94	72.35	1	120	8,682.41
	Administrative Officer GS 12/05 (DCB)	53.87	86.73	1	20	1,734.61
	Graphic Designer GS 13/05 (DCB)	64.06	103.14	1	5	515.68
	Communications/Public Affairs Specialist GS 13/05 (DCB)	64.06	103.14	2	20	4,125.46
	Program Manager GS 14/05 (DCB)	75.70	121.88	1	350	42,656.95
	Supervisory Budget Analyst GS 14/05 (DCB)	75.70	121.88	1	40	4,875.08
	Supervisory Fish & Wildlife Administrator GS 15/05 (DCB)	89.04	143.35	1	20	2,867.09
Implement State Junior Contests	Administrative Assistant GS 07/05 (RUS)	\$ 26.62	\$42.86	40	20	\$ 857.16
	Outreach Specialist GS 07/05 (RUS)	26.62	42.86	7	80	24,000.59
	Administrative Assistant GS 09/05 (RUS)	32.56	52.42	12	40	25,162.37

	Outreach Specialist GS 09/05 (RUS)	32.56	52.42	35	80	146,760.48	
	Outreach Specialist GS 11/05 (RUS)	39.40	63.43	14	80	71,046.08	
	Program Analyst Assistant GS 11/05 (DCB)	44.94	72.35	1	50	3,617.67	
	Outreach Specialist GS 12/05 (RUS)	47.22	76.02	4	80	24,327.74	
	Program Manager GS 14/05 (DCB)	75.70	121.88	1	100	12,187.70	
					Subtotal:	1,775	\$ 447,811.84

*Rounded

Table 14.2 – Other Annual Costs

Action	Costs Per	Total
Contractor for AV for Federal Contest, closed captioning, interpreter		\$ 31,500
Travel for judges and contest officials for Federal Contest		18,000
Travel for judges and contest officials for National Junior Contest		5,000
Travel for judges and contest officials for State Junior Contests (x53)	25.00	1325
Postage to return Federal artwork (x200)	15.00	3000
Postage to return National Jr artwork (x53)	15.00	795
Postage to return State Jr artwork (x53)	80.00	4240
		Subtotal:
		\$ 63,860

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

We are reporting burden decreases (due to change in agency estimate) of -5,000 annual responses, -1,666 annual burden hours, and -14,000 annual cost burden.

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 will not publish any information.

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

We will display the OMB Control Number and expiration date on the form and other appropriate materials.

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.