

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

**U.S. Fish and Wildlife Service Bison Donations Request Program  
OMB Control Number 1018-0190**

**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 Service's "Bison Donations Transfer Protocol" (protocol) describes the process for the donation of the available surplus bison from the Service to eligible organizations, Tribes, or intertribal organizations as outlined in regulations at 50 CFR 30, as well as in Service Manual chapters 701 FW 5 and 701 FW 8. Surplus bison are offspring that exceed the ecological carrying capacity of the Service bison metapopulation. The primary purposes of donating these bison are to support conservation of the species as native North American wildlife and to assist in the restoration of bison herds on conservation partner lands, with special emphasis on restoring conservation herds to Tribal lands. Our authorities governing the Protocol include:

- National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd and 668ee; as amended);
- American Indian Religious Freedom Act of 1978 (42 U.S.C. 1996);
- Indian Self-Determination and Education Assistance Act (Public Law 93-638, as amended);
- Surplus Range Animals (50 CFR 30.1);
- Disposition of Surplus Range Animals (50 CFR 30.2);
- Native American Policy of the U.S. Fish and Wildlife Service (510 FW 1);
- Collections, Donations, and Disposals policy (701 FW 5); and
- Fenced Animal Management policy (701 FW 8).

In 2020, the U.S. Department of the Interior (DOI) Bison Working Group published the Department of the Interior Bison Conservation Initiative 2020 (2020 initiative), recognizing bison as a wildlife species in need of conservation. Consistent with this initiative, Service policy identifies the ecological and cultural values of bison as nationally and/or historically significant animals.

The Bison Conservation Genetics Workshop: Report and Recommendations (2010 report) identifies DOI bison herds as a valuable source with which to start new conservation herds proposed by other Federal, State/provincial, or Tribal governments. The DOI Bison Report: Looking Forward (2014 report) acknowledges the challenges to achieving bison restoration on DOI lands and emphasizes the importance of partnerships for achieving bison conservation and ecological restoration. Both the 2010 and 2014 reports also identify the potential for bison herds maintained by Indian Tribes to contribute to species conservation, and the Service recognizes that such bison may also support Tribal cultural rights and practices.

**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.**

Periodic reduction in the size of Service bison herds is required to remain within the ecological carrying capacity of Service lands. Live bison capture and removal assists in the restoration of bison to Tribal lands, supports the efforts of States and other conservation organizations, and ensures that the ecological needs of other species are met on limited-size refuges. To support maximum conservation of genetic diversity within and across Service herds, selection of young bison available for donation is coordinated across all refuges. From the surplus bison made available for donation from refuges, requests will be prioritized for bison restoration and conservation purposes.

#### **Form 3-2555, “Bison Donations Request Form”**

We propose Form 3-2555, “Bison Donations Request Form,” to request surplus bison. Respondents will generally be from Tribal governments and intertribal organizations, although we do expect to receive a small number of requests from States and private sector organizations (nonprofit and educational/research organizations). The request form provides details governing the protocol and collects the following information:

- Name of requesting Tribe, intertribal organization, State, or private sector organization.
- Documentation that the proposed project or program meets the definition of a conservation herd.
- Demonstration of the educational contribution of the donation to increasing public knowledge and appreciation of the wildlife values of bison (for educational and research organizations only).
- Total number (or percentage of total donation request) of bison and purpose of request:
  - Establish a free-ranging conservation herd;
  - Supplement or augment a free-ranging conservation herd;
  - Establish a self-sustaining herd for non-conservation purposes;
  - Supplement or augment a self-sustaining herd for non-conservation purposes;
  - Public display, educational purposes and/or research;
  - Tribal spiritual or cultural purposes; or
  - A description if “Other” purpose.
- Signature of requesting Tribe, intertribal organization, State, or private sector organization official.

#### **Required Notifications**

In addition to completion of Form 3-2555, recipients of donated bison must inform the Service of the destination State for donated bison no fewer than 30 days prior to a scheduled bison capture operation, to allow the Service time to meet interstate transport regulatory testing requirements. Recipients of donated bison must also inform the Service of the destination physical address for donated bison no fewer than 10 days prior to scheduled bison loadout, to facilitate timely completion of required interstate veterinary permit applications and veterinary inspection certificates.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

The fillable PDF request form provides opportunity for full electronic completion through the use

of an electronic signature, while also supporting those who wish to provide a handwritten wet-ink signature to submit the request by scanning and emailing, faxing or mailing the completed form. While some applicants utilize a fully electronic format, others do not. The form and submission process allows for a wide variety of submission formats to be used.

**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 efforts related to the conservation and protection of bison. Due to the unique nature of this program, no other Federal agency collects this information from the public.

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

We collect only the minimum information necessary to improve the Service's efforts to conserve and protect bison. This information collection will not significantly 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.**

If we did not collect the information, the Service would be unable to effectively work with our Tribal and other partners for the conservation of bison.

**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 11, 2025, we published in the *Federal Register* ([90 FR 44083](#)) a notice of our intent to request that OMB approve this information collection. The Service published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-NWRS-2025-0023](#)) to provide the public with an additional method to submit comments (in addition to the typical email and U.S. mail submission methods). In that notice, we solicited comments for 60 days, ending on November 10, 2025. We received two comments in response to that notice; however, neither comment addressed the information collection requirements. Therefore, no response is required.

In addition to the *Federal Register* notice, we reached out via email to the individuals identified in Table 8.1 who are key representatives of the InterTribal Buffalo Council (ITBC), and are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below. ITBC represents 86 member Tribes, and this organization facilitates requests for NWRS donated bison using the FWS 3-2555 form.

Additionally, on August 6, 2025 prior to the publication of the *Federal Register* notice, we hosted a virtual meeting with these individuals to explore any questions they may have had about the form, the NWRS bison donation program and the process to request and receive donated bison from the NWRS. No comments or concerns were expressed during this meeting, nor were any received in response to the emailed solicitation for comments sent in September. Additional outreach/follow-up was not conducted due to the government shutdown.

**Table 8.1**

Organization	Title
InterTribal Buffalo Council	CeCe Big Crow, Herd Development Grant Compliance Officer/Bison Surplus Coordinator
InterTribal Buffalo Council	Michael "Bo" Vocu, Executive Director

***"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: No written comments were received in response to the outreach. Additionally, during a prior virtual meeting with 2 major form users in August 2025, the form and process were reviewed and no concerns, comments or questions were identified that could improve the form.

Agency Response/Action Taken: No action required.

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

Comments: No written comments were received in response to the outreach. Additionally, during a prior virtual meeting with 2 major form users in August 2025, the form and process were reviewed and no concerns, comments or questions were identified that could improve the form.

Agency Response/Action Taken: No action required.

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

Comments: No written comments were received in response to the outreach. Additionally, during a prior virtual meeting with 2 major form users in August 2025, the form and process were reviewed and no concerns, comments or questions were identified that could improve the form.

Agency Response/Action Taken: No action required.

And

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

Comments: No written comments were received in response to the outreach. Additionally, during a prior virtual meeting with 2 major form users in August 2025, the form and process were reviewed and no concerns, comments or questions were identified that could improve the form.

Agency Response/Action Taken: No action required.

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

We will not provide any payment or gifts to respondents.

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

We do not provide any assurance of confidentiality. Information may be disclosed in accordance with the Freedom of Information Act and the Privacy Act of 1974.

**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 routinely discuss FWS Form 3-2555 with users throughout the year and have received no comments, concerns or questions that indicate revision of this form would be beneficial; we therefore estimate that we will receive **33 responses** totaling **22 burden hours**. We estimate the annual dollar value of the burden hours is **\$1,347 (rounded)**.

We used the Table 1 of the Bureau of Labor Statistics (BLS) [News Release](#) USDL- 25-1358, September 12, 2025, Employer Costs for Employee Compensation—June 2025, to calculate the total annual burden:

- Private Sector - lists the hourly rate for all workers as \$45.65, including benefits.
- Government - lists the hourly rate for all workers as \$63.94, 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*	Hourly Rate	\$ Value of Annual Burden Hours
<b>Submission of Form 3-2555</b>							
Private Sector	1	1	1	1 hour	1	\$ 45.65	\$ 45.65
Government	10	1	10	1 hour	10	63.94	639.40
<b>Required Notifications</b>							
Private Sector	1	2	2	.5 hour	1	\$ 45.65	\$ 22.83
Government	10	2	20	.5 hour	10	63.94	639.40
<b>TOTALS:</b>	<b>22</b>		<b>33</b>		<b>22</b>		<b>\$ 1,347.28</b>

**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 annual non-hour cost burden associated with this 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 estimated annual cost to the Federal Government associated with this collection of information is **\$34,257** (rounded).

To determine average hourly rates, we used Office of Personnel Management Salary Table [2025-DCB](#) as an average nationwide rate. To account for benefits, we multiplied the hourly rate of a GS-12/05 biologist (\$55.07) by 1.62 in accordance with BLS [News Release](#) USDL-25-1358, to obtain the fully burdened hourly rate of \$89.21.

To calculate total government costs, we multiplied the fully burdened hourly rate of \$89.21 x 384 hours reviewing applications (32 responses x 12 hours to review each response) to obtain the total annualized government cost of \$34,256.64.

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

We are reporting a change in agency estimate of -27 annual responses and -18 annual burden hours. We made no changes to the previously approved form.

**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.**

A list of successful applicant organizations and number of bison donated is provided to support Service reporting and to respond to media inquiries (other than to add the control number).

**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 expiration date on the survey instrument and instructions.

**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.