Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0109
Federal Assistance Grant Programs
50 CFR 80

Terms of Clearance. OMB approved this information collection in February 2004 with the following terms of clearance: OMB approval on 1018-0109 will be limited to 20 months, and the agency is directed to immediately begin work with the Grants.gov team to place this program application on the APPLY module of Grants.gov. OMB expects this transition to be completed no later than the expiration date of 10/2005, and future approvals will require use of the Grants.gov APPLY for this program application.

All of our discretionary grant programs are available on Grants.gov APPLY. In February 2006, we placed our two largest mandatory programs (SFR and WR) on APPLY, and in March we posted the APPLY package for the Endangered Species Program. We will place the Hunter Ed and Safety Program on APPLY and the Multistate Program on FIND/APPLY by May 30, 2006.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Division of Federal Assistance, Fish and Wildlife Service, administers the following grant programs:

GRANT PROGRAM	AUTHORIZED BY
Wildlife Restoration	Federal Aid in Wildlife Restoration Act (16 U.S.C. 669-669k)
Sport Fish Restoration	Federal Aid in Sport Fish Restoration Act (16 U.S.C. 777 et seq.)
National Coastal Wetlands Conservation	Coastal Wetlands Planning, Protection and Restoration Act (16 U.S.C. 3951 et seq.)
Clean Vessel Act	Clean Vessel Act (16 U.S.C. 777c)
Boating Infrastructure	Sportfishing and Boating Safety Act (16 U.S.C. 777g-1)
Hunter Education and Safety - Section 10	Section 10 of the Wildlife and Sport Fish Restoration Programs Improvement Act of 2000 (Pub. L. 106-408)
State Wildlife Grants	Department of the Interior and Related Agencies Appropriations Acts for FY 2002-2006 – State and Tribal Wildlife Grants (Pub. L. 107-63, 108-7, 108-108, 108-447, and 109-54)
Tribal Wildlife Grants	"
Landowner Incentive	Department of the Interior and Related Agencies Appropriations Acts for FY 2003-2006 – Landowner Incentive Program (Pub. L. 108-7, 108-108, 108-447, and 109-54)
Tribal Landowner Incentive	"
Multistate Conservation	Wildlife and Sport Fish Restoration Programs Improvement Act of 2000 (Pub. L. 106-408)
Cooperative Endangered Species Conservation Fund	Endangered Species Act (16 U.S.C. 1351 et seq.)
Wildlife Conservation and Restoration Program*	Title IX of the Commerce, Justice, State Appropriations Act (Wildlife Conservation and Restoration Account) of 2000
Wildlife Conservation and Appropriation Fund*	

*Although we no longer award grants under the Wildlife Conservation and Restoration Program and Wildlife Conservation and Appropriation Fund, we still have open grants under these programs that we will continue to administer until completed.

For our grant programs, we need to collect:

(1) Project narratives, which contain information relevant to eligibility, substantiality, relative value, and budget.

(2) Performance reports, which contain information necessary to track costs and accomplishments.

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

We no longer publish and distribute the Federal Aid Application Booklet. Materials that describe the program and assist applicants in formulating project proposals will be available on Grants.gov. Those who are unable to access a computer may still obtain instructional materials by regular mail.

Competing for grant funds involves applications that describe in substantial detail project locations, benefits, funding, and other characteristics to meet the requirement of our legislation. We use the application to determine eligibility, the scale of resource values or relative worth of the projects, and how well the proposed projects will meet the purposes of the legislation. We also use information collected under this information collection request to respond to such needs as: GPRA reporting, SF 424s, grant reporting requirements, budget reports and justification, public and private requests for information, data provided to other programs for databases on similar programs, Congressional inquires and reporting required by the legislation, etc. The narratives and performance reports are the basis for this information collection request.

Project Narratives. Project narratives will include:

(1) Objectives and need for assistance. Applicants will:

(a) Pinpoint any relevant physical, economic, social, financial, institutional, or other problems requiring a solution.

(b) Demonstrate the need for the assistance, address the selection or ranking factors, and state the principal and subordinate objectives of the project.

(c) Include, as applicable, supporting documentation or other testimonies from concerned interests other than the applicant.

(d) Include or footnote any relevant data based on planning studies.

(2) Results or Benefits Expected. Applicants will identify costs and benefits to be derived. As applicable, we may require supporting documentation.

(3) Approach. Applicants will:

(a) Outline a plan of action pertaining to the scope and detail how the proposed work will be accomplished for each assistance program.

(b) Cite factors that might accelerate or decelerate the work and reasons for taking this approach as opposed to others.

(c) Describe any unusual features of the project, such as design or technological innovations, reductions in cost or time, or extraordinary social and community involvements.

(d) Provide for each assistance program quantitative projections of the accomplishments to be achieved, if possible. When accomplishments cannot be quantified, list the activities in chronological order to show the schedule of accomplishments and target expected completion dates.

(e) Identify the kinds of data to be collected and maintained, and discuss the criteria to be used to evaluate the results and success of the project.

(f) Explain the methodology that will be used to determine if the needs identified and discussed are being met and if the results and benefits identified are being achieved. List each organization, cooperator, consultant, or other key individuals who will work on the project along with a short description of the nature of their effort or contribution.

(4) Geographic location. Applicants will give a precise location of the project and areas to be served by the proposed project and may include maps or other graphic aids.

In addition to the above information, applicants will include the following as applicable:

(1) For research and demonstration assistance requests, a biographical sketch of the program director with the following information: name, address, telephone number, background, and other qualifying experience for the project. Also, list the name, training and background for other key personnel engaged in the project.

(2) Describe the relationship between this project and other work planned, anticipated, or underway under Federal assistance.

(3) Explain the reason for all requests for supplemental assistance and justify the need for additional funding.

(4) Discuss accomplishments to date and list in chronological order a schedule of accomplishments, progress or milestones anticipated with the new funding request.

(5) Explain and justify any significant changes in the project objectives, location, approach or time delays. For other requests for changes, or amendments, explain the reason for the change(s). If the scope or objectives have changed or an extension of time is necessary, explain the circumstances and justify.

(6) If the total budget has been exceeded or if the individual budget items have changes more than the prescribed limits, explain and justify the change and its effect on the project.

(7) For purposes of clarity, we may request that applicants explain discrepancies or inconsistencies or unclear terms.

(8) Documentation of value and commitment of in-kind match or value of purchases made with grant funds and appraisals of land value and real property documentation for purposes of addressing real property requirements in 49 CFR 24 and 43 CFR 12.

Performance Reports. Applicants will provide annual (quarterly for multistate grants) performance reports that include:

(1) A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both. Whenever appropriate and the output of programs or projects can be readily quantified, such quantitative data should be related to cost data for computation of unit costs.

(2) Reasons why established goals were not met, if appropriate.

(3) Other pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

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.

The public may find and apply for grants at Grants.gov. Applicants have a choice of submitting their proposals electronically either through Grants.gov or through email or other electronic means. Applicants submit proposals for mandatory programs via email to the appropriate Regional Office or California/Nevada Operations Office (CNO) responsible for servicing the State submitting a proposal. While electronic options are available to applicants, more than 50 percent of our grant programs receive proposals electronically and grantees submit approximately 75 percent of the performance and financial reports electronically. We are working closely with Grants.gov to ensure that we maximize our use of that site and are moving toward electronic submission for all grant information.

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.

This information is not collected elsewhere within or outside the Service.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information has no significant impact on small businesses.

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.

Without this information collection, we would not be able to accept proposals for grants in the Federal Assistance programs.

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.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with OMB guidelines. However, if an applicant provides conflicting, inconsistent, or unclear information, we may ask for clarifying information in a time frame less than 30 days so that the applicant can remain competitive.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On August 3, 2005, we published in the Federal Register (70 FR 44678) a 60-day notice of our intent to request renewal of this information collection (in its previous form) authority from OMB. In that notice, we solicited public comments for 60 days ending October 3, 2005. We did not receive any comments regarding this notice.

Additionally, we contacted previous grantees to ask about the clarity and usefulness of instructions and about our burden estimates. The responses we received agreed with our burden estimates. In addition, the users liked the format of the previously formatted collection and used it often. The following is a list of people we contacted:

robert.clark@vdh.virginia.gov
mewing@dnr.state.md.us
marilyn.tabor@ngpc.ne.gov

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

No gifts or payments, other than grant money awarded to grantees, are made to respondents.

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

There is no assurance of confidentiality. Once submitted, this form becomes public information and is not protected under the Privacy Act.

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.

None of the information collected is considered to be sensitive.

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 in Item 13 of OMB Form 83-I.**
- **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. Instead, this cost should be included in Item 14.**

It is extremely difficult to make meaningful estimates of annual burden hours for application preparation because there are so many variables. Burden estimates vary significantly from project to project depending on technical competence, repetitive practice (applications), complexity of the project, and/or the level of grantsmanship that an applicant's grant writer may have invested in the application.

We estimate that approximately 200 applicants will complete approximately 4,000 grant proposals (applications) and 1,750 amendments during a 1-year period. A grant application package takes an average of 80 hours to complete, and an amendment takes about 2 hours to complete. Neither of these time estimates includes any burden hours requested under other OMB approved information collections (such as the SF-424 or previously OMB approved agency forms). We estimate the wage of persons completing these application packages and amendments to be $25.00 per hour.

Action	Time to complete	Total annual responses	Total annual burden hours	Value of each burden hour	Dollar value of burden hours
Initial proposal	80 hours	4,000	320,000	$25.00	$8,000,000
Amendment	2 hours	1,750	3,500	$25.00	$ 87,500
Performance Report	.5 hour	4,000	2,000	$25.00	$ 50,000
TOTALS	--	9,750	325,500	--	$8,137,500

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 shown in Items 12 and 14).

- **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]. 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 nonhour dollar cost burden to respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Service	Printing	Mailing	Mgt of Information Collection	Data entry	File maintenance
Non-electronic collection cost	$50 annually	$50 annually	No new costs	No new costs	$10 annually
Electronic collection cost	0	0	Negligible	0	Negligible
Management of Information at $35/hour	0	0	12 hours for each of 4,000 grant proposals $1,680,000 annually	0	0

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

We increased the total annual responses to 9,750 (an increase of 4,000) and total annual burden hours to 325,500 (an increase of 2,000) to account for the preparation and submission of performance reports, which our previous estimate did not include.

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 enter the information collected into the Federal Aid Information Management System (FAIMS) database and use it to generate reports on the programs for internal and external stakeholder use.

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 are not seeking a waiver of the requirement to display the expiration date of the OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement contained in Item 19 of OMB Form 83-I for the information being collected.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.