Supporting Statement for Paperwork Reduction Act Submission

OMB Control Number 1018-0112

U.S. Fish and Wildlife Service Employee Exit Follow-Up, authorized by the Merit System Principles (5 U.S.C. 2301) FWS Form 3-2186 November 5, 2004

Specific Instructions

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 Fish and Wildlife Service (We/Service) is the principal Federal agency responsible for conserving, protecting, and enhancing fish, wildlife, and plant conservation. We help protect a healthy environment for fish and wildlife and their habitats for the continuing benefit of the American people. To accomplish this mission, the Service employs approximately 7,500 of the country's best biologists, wildlife managers, engineers, realty specialists, educators, law enforcement agents, and others who work to save endangered and threatened species; conserve migratory birds and inland fisheries; restore habitats; provide expert conservation advice to other Federal agencies, industry, private citizens, and foreign governments; and manage millions of acres of wildlife lands. The Service management has made it a high priority to recruit and retain these valued employees. As part of an active career development program, we have instituted an Employee Exit Follow-up Survey to collect feedback from former employees so that we may discover relevant issues that impact retention. If this survey were not used, there would be no way we could analyze the reasons for employee separation. The collection of information is authorized under the Merit System Principles (5 U.S.C. 2301).

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 survey questionnaire (FWS Form 3-2186) consists of 8 demographic questions, 1 multiple choice question on the reasons why the former employee left the Service, and 11 questions (with five possible responses) on the former employee's satisfaction/dissatisfaction with his/her work environment. The Division of Human Resources collects this information for the purpose of examining the range of reasons why former employees have separated from the Service. We compile the data to examine patterns of separations to create an informed and focused retention plan and effort. The current survey was conducted on employees who separated between FY

1999 and the first quarter of FY 2002. A report on the results was completed and recommendations presented to Service senior management in April 2003 and in October 2003.

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.].

We have not used automated, electronic, mechanical, or other means of automated information collection due to limited resources. However, we may automate responses once monetary and manpower resources are available.

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.

No other component of the Service collects this information; therefore, there is no duplication.

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.

This information collection will not affect small businesses or other small entities. Information is collected from former employees only.

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 this survey were not used, we would have no way to identify and analyze reasons for employee separation. We use the data collected to develop strategies for retaining a quality workforce.

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 associated with this information collection in terms of unnecessary burden on the respondents. Participation is voluntary. There are no circumstances that would require the collection to be inconsistent with the guidelines in 5 CFR 1320.5.

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 6, 2004, we published in the Federal Register (69 FR 47948) a 60-day notice of our intent to request renewal of this information collection authority from OMB. In that notice, we solicited public comments for 60 days ending on October 5, 2004. We received one comment. The commenter expressed a personal opinion concerning the mission of the Service and a general statement of opposition to the use of the survey, but did not provide specific reasons. We note the opposition of this individual; however, the Service management has made it a high priority to ensure that we retain the highest caliber employees possible. We can do this only if we examine and analyze the reasons for employee separation from the Service.

Two people who recently separated from the Service commented that the length of time estimated for completion of the survey (15 minutes) was accurate, and each provided editorial suggestions on how to improve the form. One person provided positive feedback stating that the

form was "a particularly useful instrument" and that it is a "way to tap into some significant feedback that might otherwise be lost." Recommendations from each were used to clarify the directions and questions, and changes to the form have resulted in a more useful and effective survey. The following former employees were contacted:

Carmen Andujar, U.S. Office of Personnel Management, Carmen.Andujar@opm.gov
Carol Haggerty, Transportation Security Administration

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

We will make no payment or gift to respondents.

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

Assurance of confidentiality is provided to respondents through the Privacy Act, and it is clearly stated in the opening directions to the survey that information provided by respondents will remain anonymous. In addition, no personal identifiers are asked with the exception of demographic data; the respondents have the option to provide as much or as little information as they choose.

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 collect sensitive information.

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.

We expect the information contributed by respondents to vary slightly based upon the extent of written information provided by the respondent. Different respondents may provide more or less information than others. The information will be collected one time after the employee has separated from the Service. The number of respondents will be approximately 400 per year. Respondents will provide the data on a paper survey; responses are tested to last an average of 15 minutes per respondent. The response time may vary slightly if respondents choose to provide additional comments. The total annual burden is 100 hours. Costs to individuals are estimated at $1,500 based on an estimated cost of $15 per hour for time spent completing the survey.

Number of respondents annually	**Average time per survey**	**Applicant costs (@$15/hour)**	**Total Annual Burden Hrs**
400	15 minutes	$1,500	100

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 annual cost burden to respondents or recordkeepers.

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.

We estimate that the cost of each response will be $5.30 per response. At 400 surveys, the total cost for the survey will be $2,120.00. This cost is figured to be postage and recordkeeping support staff. This will be an annual cost for the duration of approval.

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

Not applicable. There is no program change or adjustment.

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 analyze data and provide summary results to internal Service management annually or as requested. Collection dates will likely span 2 to 3 months at the beginning of the collection cycle. We expect to provide results to internal Service management within 8 months of the initial collection period. The compilation will show a summary percentage of responses to the questions and verbatim statements of written responses displayed. We will not use complex analytical techniques.

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 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 in item 19, OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

A questionnaire (FWS Form 3-2186) was designed with the purpose of determining if there are reasons that would explain why employees leave the Service. The potential respondent universe consists of all separated permanent employees including Transfers Out, Quits, Reductions-in-Force, Terminations, and Other Separations, but excludes Deaths and Removals (discipline/performance). Based on previous surveys, a response rate of 54 percent is expected. We believe we can achieve a higher response rate through a more informative introductory letter and a stronger reminder. However, since responses are voluntary, respondents may choose not to share the personal reasons for their departure. A response rate of 54 percent provides the documentation we require for reporting to management.

2. Describe the procedures for the collection of information including:
   * Statistical methodology for stratification and sample selection,
   * Estimation procedure,
   * Degree of accuracy needed for the purpose described in the justification,
   * Unusual problems requiring specialized sampling procedures, and
   * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The questionnaire consists of 8 demographic questions, 1 multiple choice question, and 11 questions with five possible responses (Likert scale). Responses to the survey will be tallied by question. Both the actual number of answers for each question response and the mean answer for each question will be identified. Question means will be compared to see if there are statistically significant differences between subgroups of interest, primarily race and gender. No unusual problems requiring specialized sampling procedures have been identified. We will send out the survey periodically throughout the year as employees separate from the Service.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

In order to maximize response rates, our survey will follow a modified version of the protocol of Don Dillman (1978), consisting of two steps: (1) the questionnaire, accompanied by an introductory letter explaining the purpose of the survey, and (2) a reminder postcard mailed 3

days after the questionnaire. If a response rate of at least 52 percent is achieved, accuracy and reliability of information collected will be sufficient for our purposes. [Dillman, Don A. 1978. Mail and Telephone Surveys: The Total Design Method. New York: John Wiley and Sons.]

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

No tests of procedures or methods will be undertaken. The methods used are straightforward and are standard for this type of analysis.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Individuals consulted on statistical aspects of the design: James Caudill, Ph.D; John Charbonneau, Ph.D; and Mike Hay, Ph.D; Fish and Wildlife Service, Division of Economics, 703-358-2082.