

Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0118
Private Stewardship Grants Program
June 29, 2005

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.**

By Public Law 107-63 (Department of the Interior and Related Agencies Appropriations Act, 2002), Congress established the Private Stewardship Grants Program (PSGP). Each fiscal year since 2002, Congress has appropriated funding for the PSGP. The PSGP provides grants and other assistance on a competitive basis to individuals and groups engaged in private conservation efforts that benefit species listed or proposed as endangered or threatened under the Endangered Species Act, candidate species, or other at-risk species.

The information collection associated with the PSGP is necessary to gain a benefit in the form of a grant. The information collection associated with the PSGP is voluntary, but is required to receive benefits. The funding provided to private landowners through this program will address threats to many critically imperiled species.

- 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.]**

In Fiscal Year 2004, we (Fish and Wildlife Service/Service) awarded approximately \$7 million to 97 projects in 39 States through the PSGP. Eligible projects include those by landowners and their partners who need technical and financial assistance to improve habitat or implement other activities on private lands.

The annual PSGP request for proposals is the basis for this information collection request. Applicants must submit a narrative description of their project proposal, which specifically addresses each of the eligibility criteria and each of the ranking factors. The project proposal must identify which species will benefit, how they will benefit from the project, and the project's significance to each target species (goals and objectives for the project). We also encourage applicants to describe how the location of the project and its role in the landscape affects the conservation of the target species. The narrative must include a statement of work, which is an action plan of activities the applicant will conduct during the period of the project. The applicant must also submit a reasonably detailed budget for the project, indicating the breakdown of costs proposed for funding through the PSGP and other costs (e.g., cash/in-kind contributions). We

encourage applicants to include relevant documents and additional information (maps, background documents) that will help us to understand the project and the problem/opportunity the applicant seeks to address. The complete application package with detailed instructions and supplementary information is available on our Internet website at http://endangered.fws.gov/grants/private_stewardship.html

We use the information collected in the request for proposals in a competitive funding process to determine the eligibility and relative value of conservation projects as described in the project proposals. A diverse panel of representatives from State and Federal government, conservation organizations, agriculture and development interests, and the science community assesses project proposals and makes funding recommendations to the Service. Fish and Wildlife Service employees use information collected under this program to respond to such needs as: Government Performance and Results Act (GPRA) reporting, Standard Form 424 (Application for Federal Assistance), grant agreements, budget reports and justification, public and private requests for information, data provided to other programs for databases on similar programs, Congressional inquiries, and internal reports.

- 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.**

Information on the Private Stewardship Grants Program, including the annual request for proposals and award announcements, is available online. In addition, we post the annual notice of funding availability on the Grants.gov website (www.Grants.gov), and potential applicants can locate the funding opportunity information through the FIND function at Grants.gov. Additionally, we use electronic files to send information to applicants upon request, and we have established a PSGP email address (privatestewardship@fws.gov) to receive and respond to comments and inquiries regarding the program. We are moving toward electronic collection of most grant information. Applicants will be able to apply online for Private Stewardship grants and to provide required reports through the Federal Business Management System (FMBS), scheduled to come on line in October 2006.

- 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.**

We do not collect any duplicate information elsewhere that could be used to provide grants to private individuals and groups interested in implementing in private conservation efforts that benefit species listed as endangered or threatened under the Endangered Species, species proposed or candidates for such listing, or other at-risk species.

- 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.**

Information requested is limited to the minimum necessary to fulfill the reporting requirements for Federal grants and to ensure adequate oversight of project implementation.

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.

We have established the minimum process necessary to ensure the fair and effective implementation of the program. Elimination of the information collection would eliminate the program, as it would be impossible to determine eligibility and the scale of resource values or relative worth of the proposed projects. The information collection is associated with an annual request for proposals (RFP). We issue the annual RFP at the beginning of the fiscal year concurrent with an annual appropriation. Reducing the frequency of this information collection would reduce the frequency that the public is able to submit grant proposals for consideration, and would prevent us from issuing the RFP and making project selections within a given fiscal year. The funding provided to private landowners through this program will address threats to critically imperiled species.

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.

Not applicable. There are no special circumstances placed on respondents.

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 January 21, 2005, we published in the **Federal Register** (70 FR 3221) 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 March 23, 2005. We received one comment regarding this notice. The commenter expressed opposition to giving grants to gun clubs and requested a list of the recipients of the 2003 PSGP grants. We note the concerns raised by this individual; however, under the PSPG, all private landowners are eligible to receive funding for on-the-ground conservation actions that benefit at-risk species. We have not made any changes to our information collection as a result of the comment. A list of the 2003 awards is available on our website at http://endangered.fes.gov/grants/private_stewardship/FY2003/index.html.

We asked four previous respondents about the availability of the information requested, the clarity of the instructions, and the annual hour burden for the application materials and the annual reports. All respondents said that the application instructions are clear and the information is easily available. The respondents estimated the hour burden for the application from 1 day to 3 weeks. We believe that this variance results from some respondents estimating the entire time it took them to develop the project as well as to present that information in the form of an application, whereas other respondents only included the actual time to write the application materials. The average hour burden estimated by respondents is approximately 40 hours. The names and addresses of the people we contacted are:

Becky Stinson The Nature Conservancy Grants Specialist, Southeast Division 144 Livingston Circle Prattville, AL 36066 Phone (334) 491-4519	Carol Denhof Conservation Coordinator Atlanta Botanical Garden 1345 Piedmont Ave. NE Atlanta, GA 30309 Phone (404)591-1719
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<p>Lyn Benjamin Executive Director, Friends of the Teton River 36 East Little Avenue PO Box 768 Driggs, ID 83422 Phone 208.354.3871</p>	<p>Warren Colyer Field Coordinator Trout Unlimited 230 West 100 North Logan, UT 84321 435-753-3132</p>
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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Other than to award grant monies to the successful applicants, we do not make any payments 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.

Not applicable. The information collection does not carry a promise of confidentiality.

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.

There are no 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 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 estimate that the average hour burden for respondents is 40 hours. The average number of applicants is about 300. The hour burden estimated by the respondents for the reporting requirements varied between 2 hours and 8 hours, with an average of about 4 hours. The average number of award recipients is about 100. The total annual burden hour is 12,000 hours for the project proposals and 400 hours for reporting activities.

Activity	No. of Respondents	Hours per Respondent	Annual Burden Hours
Project Proposal	300	40	12,000
Reporting	100	4	400
Total			12,400

The total cost for respondents is \$186,000 (12,400 hours at approximately \$15 per hour).

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, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no non-hour cost burden 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.

The cost to the Service for managing this information collection is \$19,550. This includes the costs of staff time and office support for posting the annual request for proposals on the Grants.gov website, reviewing the project proposals (approximately 1 hour per proposal for 300 proposals, plus additional office proposal review support costs such as copying), and reviewing the performance reports (approximately ½ hour per report for 100 reports).

	Notice of Availability	Proposal Review	Report Review	Totals:
Staff costs (\$50/hr)	\$50	\$15,000	\$2500	\$17,550
Office support	0	\$2000	0	\$2000
Total:	\$50	\$17,000	\$2500	\$19,550

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

We revised our estimates based on actual information from the past two funding cycles. During our outreach to previous award recipients, they reported that they spent an average of 40 hours developing the application package. Based on this new information, we have increased our estimate of burden hours from 4,000 hours to 12,000 hours (40 hours x 300 applicants). Our estimate of burden hours for the annual reporting requirements of grant recipients has doubled from 200 to 400 hours because we are awarding twice the number of grants anticipated when the program was new.

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.

Not applicable. No publication of information is anticipated.

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 of the OMB approval for 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

This collection does not employ statistical methods.