Supporting Statement for Paperwork Reduction Act Submission

OMB Control Number 1018-0128

Marine Turtle Conservation Fund Grant Program

Terms of Clearance. OMB granted emergency approval for this information collection in July 2005 with the following terms of clearance: This approval does not extend to DI-2010.

Response: All applicants must indicate compliance with the applicable certification requirements under 43 CFR Parts 12 and 18. In the past, we used DI-2010 for these simple certifications, which do not require OMB approval. The Department has discontinued use of this form. We have deleted the requirement for applicants to submit the DI-2010 and inserted text in our Notice of Funding Availability that indicates that submission of a proposal under this program automatically indicates compliance with the applicable certification requirements under 43 CFR 12 and 18. We also include a link to the Departmental website where these terms and conditions are easily located- http://www.doi.gov/pam/TermsandConditions.html.

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 Marine Turtle Conservation Act (P.L. 108-266) (Act) authorizes the establishment of the Marine Turtle Conservation Fund, and provides that those funds may be used as financial assistance for approved projects that conserve nesting populations and habitat and address other threats to the survival of marine turtles in foreign countries. The Secretary of the Interior has assigned oversight of the fund to the Division of International Conservation, Fish and Wildlife Service. The Act specifies who may apply for financial assistance under this program. Eligible applicants must submit to the Division of International Conservation a proposal containing the required information as outlined in the Act. A panel of experts reviews and ranks all proposals according to the degree to which the project enhances the conservation of nesting populations and habitat and/or otherwise addresses other threats to the survival of marine turtles in foreign countries. We make funding decisions based on the proposal review results. This information collection ensures that we receive sufficient information to determine which project proposals we should fund.

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.]**

   Proposals submitted for funding under this Act are subject to a panel review, comprised of in-house and select outside technical experts. The information collected under this

program's Notice of Funding Availability includes: a project summary and narrative; letter of appropriate government endorsement, brief curricula vitae for key project personnel, complete standard forms 424, 424a and 424b.
U.S. applicants must:

(1) Include a copy of the organization's Negotiated Indirect Cost Rate Agreement (if applicable) and;

(2) Certify compliance with the requirements of 43 CFR Parts 12 and 18.

The project summary and narrative are the basis for this information collection. They allow the review panel to assess how well the project addresses the priorities identified by the Act. As all of the projects under this Act will be conducted outside the United States, the letter of appropriate government endorsement ensures that the proposed activities will not meet with local resistance or work in opposition to locally identified priorities and needs. Brief curricula vitae for key project personnel allow the review panel to assess the qualifications of project staff to effectively carry out the project goals and objectives. Although the standard forms are only required for U.S. financial assistance applicants, we ask all applicants to submit these forms to allow for uniformity across all proposals. As all Federal entities must honor the indirect cost rates an organization has negotiated with their cognizant agency, we require all organizations with a NICRA to submit the Agreement paperwork with their proposal to verify how their rate is applied in their proposed budget.

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.].**

This collection allows respondents to submit all application documents by email. However, because most eligible applicants, as defined by the Act, are located in remote countries where access to the Internet and/or computers is inconsistent, we allow respondents to submit their proposals in hard copy through the mail. We receive approximately 10% of our responses by email. Due to unresolved complications with applications from non-domestic entities we are not currently set up to receive applications through grants.gov.

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.**

Due to the unique nature of the requirements of the Act, no other division of the Service or any other Federal agency collects this information.

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.**

We have made efforts to keep the amount of information requested to a minimum. The information has to be sufficient to fulfill the requirements of the Act, as well as sufficient to make a competitive funding decision. We do not believe the amount of information requested will have a significant impact on small entities, as they will be providing the minimum amount of information needed to compete for financial assistance under this Act.

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.**

The information is necessary to fulfill the responsibilities of the Secretary of the Interior. Outside of the required standard forms, the information that we collect for this grant program is the minimum necessary to allow the review panel sufficient technical, financial, and administrative information to determine the merits of each proposal and to select the best projects for funding. If a proposal did not contain all of the information required by this information collection and by the Act, the panel would not be able to make a fully informed funding decision. Acceptance of proposals results in the issuance of Assistance Awards that provide financial support for the selected projects.

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 our collection to be conducted 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. [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 16, 2005, we published in the Federal Register (70 FR 48186) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending October 17, 2005. We received comments from one individual. The commenter did not address the necessity, clarity, or accuracy of the information collection, but instead provided general commentary on how the funds provided to this Federal program could be better used if given to a nonprofit organization. We did not make any changes to our information collection based on this comment.

In addition to the Federal Register notice, the Division of International Conservation solicited comments from several current applicants related to: the clarity of the submission instructions; the estimated length of time to complete a submission; and any suggestions for improving the documents. Most of the comments received related to difficulties encountered filling in the standard Federal forms where English was not the applicant's first language. To provide better service to this worldwide program, we decided to develop additional instructions for filling in the standard forms in a variety of languages including Spanish, French and Portuguese. We will publish these instructions on our website- http://www.fws.gov/international.animals/marineturtleprogram.htm- in the near future. Contact information for persons providing comments follows:

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

Not applicable. We do not provide gifts or payments other than remuneration of grantees.

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 to respondents.

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.**

Not applicable. 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 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 we will receive approximately 55 proposals under the Marine Turtle Conservation Fund and that it will take 12 hours to complete a proposal under this collection. The annual burden for grant applications is 660 hours.

We anticipate awarding an average of 20 grants per year to a subset of the applicants, 5 of which will be to domestic recipients and 15 to non-domestic recipients. All assistance awards under this program have a maximum reporting requirement of a:

(1) Mid-term report (performance report and a financial status report) due within 30 days of the conclusion of the first half of the project period, and

(2) Final report (performance and financial status report and copies of all deliverables, photographic documentation of the project and products resulting from the project) due within 90 days of the end of the performance period.

We estimate that the respondents will submit 40 reports annually (mid-term and final) and that it will take approximately 15 hours to prepare each report. Therefore, the estimated annual burden for report preparation is 600 hours.

The estimated dollar value of the burden hours must take into account the nature of our respondents. The value of an hour for applicants from the United States and other advanced countries is estimated to be $27.00 USD. The same hour for applicants from many other countries (Asia, Latin America, Pacific islands) is estimated to be no more than $9.00 USD. As the applicant base is on average 25% domestic and 75% non-domestic, we submit the following formulas to estimate an annual burden dollar value of $17,064.00:

Report Type	No. of annual Reports	Time per report	Total burden hours	$ value of each hour	Total $ value hours/year
Domestic Grant application	14	12 hours	168	$27.00 USD	$4,536.00
Non-domestic Grant application	41	12 hours	492	$9.00 USD	$4,428.00
Domestic Reporting	10	15 hours	150	$27.00 USD	$4,050.00
Non-domestic Reporting	30	15 hours	450	$9.00 USD	$4,050.00
Total	95		1,260 hours		**$17,064.00**

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 non hour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

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 total cost to the Federal Government of processing Marine Turtles Conservation Fund proposals and reports is $28,700.00

ACTION	NO. OF RESONSES	ESTIMATED TIME/RESPONSE	EST. COST/HR	EST. COST/RESPONSE	ANNUAL COST
Process Proposals	55	12 hours	$35.00	$420.00	$23,100
Review Reports	40	4 hours	$35.00	$140.00	$5,600
Total Cost					$28,700

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 annual burden hours to 1,260 (an increase of 600 hours) to account for time needed to prepare mid-term and final 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 will maintain data on each proposal in a database. Once all projects are reviewed, a list of the projects selected, as well as the amount of FWS funding and a description of each project, will be published on our website-http://international.fws.gov/grants/grants.html. Formal summary reports on project results will be published every 2 years in a report distributed to Congress, cooperators and the general public.

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.

Not applicable. We will display the expiration date.

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

Not applicable. There are no exceptions to the statement in item 19.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.