

**Supporting Statement for Paperwork Reduction Act Submission
Asian Elephant Conservation Fund Request for Proposals
(Form 3-2216)**

Section A. Justification

1. Explain why you need to collect this information. Identify any legal or administrative requirements that necessitate this information collection.

The Asian Elephant Conservation Act (16 U.S.C. 4261-4266) (“Act”) authorizes the establishment of the Asian Elephant Conservation Fund, and provides that those funds may be used as financial assistance for approved project for research, conservation, management, or protection of Asian elephants. Those eligible to apply for financial assistance under this program are delineated in the text of the Act. Eligible applicants must apply by submitting to the Division of International Conservation, assigned Fund oversight by the Secretary of the Interior, a proposal containing the required information as outlined in the Act. All proposals under this Act are competitively reviewed and ranked according to the degree to which the project would enhance programs for Asian elephant research, conservation, management, or protection. Funding decisions are made based on the proposal review results. This information collection ensures that we receive sufficient information to determine which project proposals should be funded in accordance with the Act.

2. Explain how FWS will use the information. If this is not a new collection, explain how FWS has used the information received.

Proposals submitted for funding under this Act are subject to a panel review, comprised of in-house and select outside technical experts. The information requested in our collection provides 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, additional information would have to be collected for the panel 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.

3. Does this information collection use automated, electronic, mechanical, or other technological techniques? Provide the reasons for the decision to adopt this means of collection. Describe any consideration you gave to using this information technology to reduce burden on the public.

This collection allows respondents to complete a portion of the response in a fillable on-line form, and allows respondents to submit all application documents by e-mail. However, in light of the fact that most of the eligible applicants, as defined by the Act, are located in remote Asian range countries where access to the Internet and/or computers is inconsistent, we do continue to allow respondents to submit their proposals in hard copy through the mail.

4. Describe any efforts to identify duplication. Show why similar information already available cannot be used or modified.

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 collection will have a significant impact on small entities, such as small businesses, describe methods used to minimize the burden on them.

The information requested has to be sufficient to fulfill the requirements of the Act, as well as sufficient for a competitive funding decision to be made. However, we have made efforts to keep

the amount of information requested to a minimum and to keep all forms as simple as possible. We do not feel 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 consequences of Federal programs or policies if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information requested is necessary to fulfill the responsibilities of the Secretary of the Interior under the Act. Without the collection and analysis of the requested information from as many sources as possible the spirit and intent of the Asian Elephant Conservation Fund cannot be effectively implemented.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not applicable. There are no special circumstances that would require our collection to be conducted in a manner inconsistent with OMB guidelines.

8. Cite and provide a copy of the 60-day Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received on the 60-day notice, and describe actions taken by FWS in response to these comments. Specifically address comments received on cost and hour burden. Describe your efforts to consult with persons outside of FWS to obtain their views on the availability of data; frequency of collection; clarity of instructions, disclosure or reporting format; and data elements to be recorded, disclosed or reported. Consultation should include obtaining their views on the amount of burden to be imposed and ways to minimize the burden. If circumstances prevent this consultation, describe them.

On December 10, 2003 we published in the Federal Register (68 FR 68939) a notice requesting public comment on the information collection (OMB 1018-0123). The comment period ended on February 9, 2004. We received no comments during the comment period. In addition to the Federal Register notice, we surveyed organizations, including Aaranyak (India) and the Wildlife Trust of India, who have expressed interest in our programs in the past. Each organization was provided a copy of our Request for Proposals and associated forms. These organizations were asked to respond to questions related to: the clarity of the submission instructions; the estimated length of time to complete a submission; and any suggestions for improving the documents. The comments we received included: (1) a suggestion to define length limit, font size, font type, and page and margin sizes for the narrative portion of the proposals; (2) a suggestion to rearrange the content of the Request for Proposals; (3) positive support for the use of on-line fillable forms; and (4) confirmation that our estimate of 12 hours to complete the request was appropriate.

We did not make any changes to our requests based on these comments. We believe that in the case of item (1) we cannot restrict items such as paper size and font type as our non-domestic respondents do not always have access to letter size paper (many foreign countries use A4 or metric size paper as the standard) and/or access to computers that would allow conformity to our word processing standards. In addition, our proposal requests range drastically in the amounts they request and in the complexity of the projects they intend to conduct. For this reason, we did not wish to limit the length of the narrative. We have, however, stated several times throughout the request the importance of brevity. As for item (2), we followed the standard proposal format and standard data elements prescribed by OMB for posting Federal financial assistance funding opportunities and do not feel ourselves responsible for considering public comment on the prescribed format.

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

We do not provide any assurance of confidentiality to respondents.

11. Provide justification for any questions of a sensitive nature. Include the reasons why the questions are necessary, the specific uses for the information, the explanation given to respondents, and steps taken to obtain respondent's consent.

Not applicable. We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the information collection. Include an estimate of the dollar value of the burden hours.

Approximately 50 proposals are submitted to the Asian Elephant Conservation Fund each year. We estimate that it will take 12 hours to complete a proposal under this collection. Therefore, the estimated annual burden 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 Asian countries is estimated to be no more than \$5.00 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 \$6,432.00:

Report Type	No. of annual Reports	Time per report	Total burden hours	\$ value of each hour	Total \$ value hours/year
Grant application	13 domestic	12 hours	156	\$27.00 USD	\$4,212.00
Grant application	37 non-domestic	12 hours	444	\$5.00 USD	\$2,220.00
					\$6,432.00

13. Provide an estimate for the total annual non-hour dollar cost burden to respondents or record keepers. Do not include the burden hours described in items 12 and 14.

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

14. Provide estimates of the annual cost to the Federal Government. Include a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal Government of processing Asian Elephant Conservation Fund proposals is estimated at \$21,000.00 (50 proposals at approximately \$420.00 per proposal). We used an estimate that each proposal takes approximately 12 hours at \$35.00 per hour to log, organize, review for administrative and technical merit, and process selected projects for funding.

15. Provide the reasons for any program changes or adjustments reported in items 13 or 14 of OMB 83-I.

That portion of the adjustment identified in Section 13 of OMB 83-I related to this particular grant application is two-fold. First, we are estimating slightly fewer annual responses (50 rather than 52). Second, we have, in accordance with OMB's Terms of Clearance and comments from responding organizations, increased our estimate of time burden associated with filling out this application. We originally estimated that it would take respondents 5 hours to complete a grant

application, but in this submission, we are estimating that it will take 12 hours for a respondent to complete a grant application.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Data on each proposal is maintained 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, is published on our website. (<http://international.fws.gov/grants/grants.html>). Formal summary reports on project results are published every two 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 of OMB 83-I.

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

Section B. Collections of Information Employing Statistical Methods

We do not employ statistical methods to collect the requested information.