

1 Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-XXXX

National Wildlife Refuge System Evaluation: Surveys of State Agencies, Indian Tribes, and Local Partners

Terms of Clearance. None – this is a new collection.

1. Explain the circumstances that make the collection of information necessary.

The National Wildlife Refuge Improvement Act of 1997 (RIA), which amended the National Wildlife Refuge System Administration Act (16 U.S.C. 668dd-668ee), guides planning and management of the National Wildlife Refuge System (NWRS, Refuge System). With the passage of the RIA, the Refuge System is operating under an “organic act” for the first time. The RIA establishes the mission and objectives for the NWRS and clearly defines a hierarchy of uses. The mission is “to administer a national network of lands and waters for the conservation, management and where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.” To accomplish its mission, the NWRS has developed a strategic plan and 12 strategic outcome goals.

Although the NWRS has existed for more than 100 years, it has never undergone an independent evaluation of its overall effectiveness in achieving its conservation mission. We are now seeking such an evaluation to identify program strengths and weaknesses, as well as gaps in performance information. Such evaluations are an important element of the Administration’s Program Assessment Rating Tool (PART) assessments, and this evaluation is intended to help satisfy the PART requirements. The Indian Tribe and State Agency and Local Partner surveys will solicit the views of key partners and stakeholders as to the NWRS’ effectiveness in achieving its mission. The proposed surveys are one aspect of the overall program evaluation.

Information about the Administration’s PART program can be found at:

- <http://www.whitehouse.gov/omb/part/index.html>
- http://www.whitehouse.gov/omb/part/fy2007/2007_guidance_final.pdf

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

We have contracted with Management Systems International (MSI) to perform an independent evaluation of the NWRS. The evaluation includes two data collection components involving the public:

(1) An online survey of local partners (e.g., volunteer groups, local conservation organizations, hunting and fishing groups, and other civic organizations).

(2) An online survey of Indian tribes and State fish and wildlife agency officials.

The perspective and observations of NWRS partners are critical to fully understand the issues and questions that the independent evaluation will explore. The surveys will collect data in two broad categories:

- (1) The quality of NWRS partnerships with external organizations, and
- (2) Partnering organizations' views as to the effectiveness of the NWRS in achieving NWRS objectives.

One individual - the director or his/her designee – from each organization selected for the sample – will complete the survey. The surveys will be “open” (i.e., online and available for completion) for a 2- to 3-week period. Respondents are only expected to complete the information request one time at an estimated time of 20 minutes per respondent.

The surveys being conducted will not be representative or be generalizable to the community of overall NWRS partners. The surveys, however, will provide additional information on the role and views of NWRS partners in regard to the performance of the NWRS. This data will be used, in combination with other analysis, to help provide an assessment on the performance of the NWRS and, in particular, on the NWRS' performance in accomplishing Strategic Objective Goal number 6, under its current strategic plan:

- SOG6: Facilitate partnerships and cooperative projects to engage other conservation agencies, volunteers, friends, and partners in the refuge system mission.

Other information being collected and analyzed as part of the independent evaluation includes:

- Information from interviews with partners and refuge staff;
- Review of the NWRS performance reporting information system – RAPP (Refuge Annual Performance Plan);
- Data quality review of the NWRS' performance data reporting system;
- Review of internal and external literature, including various assessment studies;
- Survey of refuge managers; and
- Observations from field visits to 18 refuges.

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].

The surveys will be self-administered and web-based to take advantage of information technology. Respondents will complete survey questionnaires online. Once a completed questionnaire is submitted, response data will automatically populate an existing data file. This method allows for efficient administration of the survey instruments and greatly facilitates the management and eventual analyses of the survey data while at the same time reduces respondent burden.

The survey will be announced to participants via an email, which will contain a URL link to the survey. No password will be necessary to access the survey. To increase response rates, an email will be sent to survey participants mid-way through the survey time period reminding participants to complete the survey. The email will read:

“This is a reminder to request that you complete the Partner Survey being conducted to assess the effectiveness of the National Wildlife Refuge System. If you have not already completed the survey, we would appreciate you doing so. We will use the information from the survey in combination with other data to determine the effectiveness of the NWRS and to identify opportunities to strengthen performance.”

We have not previously undertaken a survey of this nature. However, when MSI undertook a *Visitor Satisfaction Survey* for the refuge system in 2002, the response rate was 79.6%.

4. Describe efforts to identify duplication.

This is the first time we have undertaken a comprehensive evaluation of the NWRS' overall program effectiveness. The basis of the evaluation is the *Final Strategic Plan for the National Wildlife Refuge System FY 2006 – 2010*. The information collection request specifically targets questions against this strategic planning document. This information is not duplicative because it is the first survey to collect information from partners on the effectiveness of the NWRS.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

The collection will not have a significant impact on small entities.

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.

While the collection of this data is not strictly necessary, we will use the results of the surveys in combination with other analysis to determine the overall effectiveness, and the strengths and weaknesses, of the performance of the NWRS' program. MSI is collecting the data as part of an independent evaluation of the performance of the refuge system, and to address the Administration's PART assessment guidance. PART guidance requires that independent evaluations be conducted for all Government programs every 5 years, or as appropriate to the program.

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.**

We will give respondents approximately 2 to 3 weeks to complete and submit the information. The rationale behind this timeframe is:

- Answering the survey questions will only require approximately 20 minutes per respondent;
- Respondents are not expected to have to refer to any records or documents while completing the surveys;
- Utilization of online survey instruments that can be submitted via the internet (or other electronic methods) reduces respondent burden;
- Given that these evaluation findings will help form the Administration's PART assessment of the NWRS, the report should be produced in a manner that will produce sound and justified information as soon as possible.

- 8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

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.]

On February 22, 2007, we published in the Federal Register a notice (72 FR 8004) of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60-days, ending on April 23, 2007. We received three comments that are summarized below.

Comment #1:

Individual questions if: (1) the evaluation team assembled has the required expertise to conduct a sound and independent evaluation; (2) the partners identified will be able to provide responses indicative of the American public and not be hand picked to provide glowing reports; and (3) the information collection is necessary and requests a copy of the survey instrument.

Response:

We provided a copy of the draft survey instrument to this individual as well as a link to Management System International's website so that biographical information of MSI technical staff could be accessed.

Comment #2:

The individual (same from Comment #1 above) acknowledges receipt of the survey instrument and then states that MSI does not have the proper experience to conduct this evaluation. The individual also states that hunting programs receive a disproportionate amount of attention in the Refuge System given the wider U.S. public.

Response:

Since 1995, MSI has been approved by the General Services Administration (GSA) to provide management related contracting services to Federal agencies under the Mission Oriented Business Integrated Services (MOBIS) contract and also has significant experience conducting evaluations for Federal agencies. MOBIS contractors offer a full range of management and consulting services that can improve a Federal agency's performance and their endeavor in meeting mission goals. MOBIS contractors possess the necessary expertise to facilitate how the Federal Government responds to a continuous stream of new mandates and evolutionary influences including the President's Management Agenda; Government Performance and Results Act; Federal Acquisition Streamlining Act; OMB Circular A-76; Federal Activities Inventory Reform Act; and government reinvention initiatives such as benchmarking and streamlining.

MSI will be investigating refuge usage of the six wildlife-dependent activities. These activities include hunting, fishing, environmental education, environmental interpretation, wildlife viewing and nature photography. These issues will be explored in terms of their fit with the Refuge System's mission and mandates and the quality of the programs provided.

Comment #3:

The individual states that the public groups identified as partners and stakeholders (including volunteer groups, local and national conservation organizations, nonprofit organizations, and State fish and game officials) that are to be included in the broader evaluation data collection efforts exclude an important group, Indian tribes. The individual volunteers that the tribe (s)he represents be included in the evaluation survey.

Response:

Indian tribes are important stakeholders and partners to the Refuge System. We will include Indian tribes in the online survey and intend to collect information in such a way that will enable us to disaggregate responses by representatives of tribes. This will enable the evaluation team to analyze the satisfaction levels of tribes in interacting with the Refuge System and, as appropriate, provide a process to explore ways to improve the working relationship between tribes and the Refuge System.

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

We will not provide 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.

The online survey instruments will not keep a record of individual 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.

The surveys do not include questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate the total dollar value of the annual burden hours for these surveys to be \$3,930.09.

For the local partner survey, we estimate there will be 320 responses totaling 107 burden hours. Respondents will be representatives from groups that partner with a refuge at the local level. Such groups/organizations include, but are not limited to: volunteer groups, local conservation organizations, schools, Friends groups, grant recipients, etc. These groups are located throughout the United States, most often in rural areas. In estimating the dollar value of the burden hours, we used Bureau of Labor Statistics 2006 data (<http://www.bls.gov/bls/wages.htm>), which indicates that the average hourly wage for all U.S. workers was \$19.29. We have adjusted this to \$25.07 to include salary/benefits (1.3 x hourly rate) (source: USDL 07-1434, September 20, 2007, Employer Costs for Employee Compensation). Based on this, we estimate the total annual dollar value for burden hours associated with the local partner survey to be \$2,682.49.

For the State and Indian tribe survey, we estimate there will be 140 responses totaling 40 burden hours. Respondents will be the director or his/her designee of the State agency or Indian tribe. In estimating the dollar value of the burden hours, we used Bureau of Labor Statistics data, which indicates that the average hourly wage for State and local government workers across the United States was \$23.99 (http://www.bls.gov/oes/current/naics4_999200.htm) in 2006. We have adjusted this to \$31.19 to include salary/benefits (1.3 x hourly rate) (source: USDL 07-1434, September 20, 2007, Employer Costs for Employee Compensation). We were not able to locate wage information for tribes and have used the same wage estimate as for State workers. Based on this, we estimate the total annual dollar value for burden hours associated with the State and Indian tribe survey to be \$1,247.60.

ACTIVITY/REQUIREMENT	ANNUAL NO. OF RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HRS	TOTAL BURDEN COST TO PUBLIC
Local Partner Survey	400	320	20 minutes	107	\$2,682.49
State Fish and Wildlife Agency and Indian Tribe Survey	150	120	20 minutes	40	1,247.60
Totals	550	440		147	\$3,930.09

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

There will not be any costs incurred in addition to the time required to complete the survey.

14. Provide estimates of annualized costs to the Federal Government.

The estimated cost to the Federal Government for these surveys is \$26,677. We have contracted with MSI to conduct the surveys. The calculation below reflects that portion of the contract cost for conducting the surveys and analyzing the data. Costs are based on: 1) the number of days required for each task; 2) the cost per day of those doing the labor (based on GSA-approved MOBIS labor rates); and 3) the use of survey software. There are no additional Federal costs for conducting the surveys.

Tasks	No. Days Labor	
	Mid-level	Senior
Federal Register Approval Process	4.5	3
Survey Design and Programming	5	4
Survey Administration	2	1
Survey Analysis	5	4
	16.5	12
Labor - Cost per Day	778	1,120
Labor: Sub-total by Category	12,837	13,440
Labor Cost – Total (MOBIS Schedule)	26,277	
Software fee	400	
Total Cost	26,677	

Source: GSA MOBIS Schedule available at:
<http://www.gsa.gov/Portal/gsa/ep/channelView.do?pageTypeld=8211&channelPage=%252Fep%252Fchannel%252FgsaOverview.jsp&channelId=-12983>

15. Explain the reasons for any program changes or adjustments.

This is a new collection.

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

There is no plan to publish this data. The data, however, will be incorporated, as relevant, into the overall independent evaluation report on the effectiveness of the NWRS.

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 OMB control number and expiration date.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.