

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number 1028-0056

**North American Reporting Center for Amphibian Malformations
(NARCAM)**

Expiration Date: October 31, 2007

Terms of Clearance: None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When statistical methods are used, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

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 issue of malformed amphibians has captured both scientific and public attention. Understanding of the phenomenon, its causes, and extent, have been hampered by the lack of a centralized database for malformation occurrences in amphibians; NARCAM has attempted to mitigate this lack by providing a centralized repository of amphibian malformation occurrence data that is available to researchers, managers, and the public. The Fish and Wildlife Act of 1956 [16 U.S.C. 742 et seq.] authorizes “protection of fisheries and wildlife through research....to prepare plans to protect wildlife resources.”

While federal and state researchers conduct surveys and monitoring to assess the health and status of amphibian populations residing there, the data collected often is held in disparate locations and databases. This presents impediments both to the sharing of information, and the awareness of potential hotspots. Additionally, researchers often are unaware of wildlife phenomena occurring on non-governmental lands. Often, it is a discovery by a private citizen that calls attention to a previously unknown problem. Amphibian malformations phenomena is a primary example: Minnesota middle-school students were the first to discover significant rates

of malformation occurrences during a field trip to a local pond.

Voluntary collection of malformations observation data through NARCAM provides the research community with a national dataset on malformation occurrences, preventing potential duplication of research effort, as well as offering an “early warning system” to potential hotspots.

- 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.]**

Information is used by scientists and federal, state, and local agencies to identify areas where amphibian malformations occur; to identify the types of malformations observed and the species in which they occur; to determine the rates of occurrence; and to identify potential causes. Correlation of that data with other information about hypothesized causes of malformation may lead to better analyses of those features.

The online collection form is available to any public citizen interested in providing information about malformation observations. A copy of the data collection form is attached. The form is available online at <<http://frogweb.nbio.gov/narcam/report.html>>.

The U.S. Fish and Wildlife Service [FWS] has tied into NARCAM its surveys for malformed amphibians on national wildlife refuges. The FWS uses protocols made available by NARCAM, and also shares with NARCAM data from its surveys.

- 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 collection of information is Internet-based, through the NARCAM Web site. Reports to NARCAM are submitted by volunteers through Web-based forms, and data and information that have undergone quality assurance reviews by experienced herpetologist are accessible from the NARCAM Web site. Use of online forms as the data submission mechanism directly supports the intent of sections 1703 and 1705 of the Government Paperwork Elimination Act [P.L. 105-277]. Collecting this information electronically reduces costs both for customers and for the NARCAM database managers, as the data is submitted directly to the NARCAM database for quality control/quality analysis. Reports can be submitted quickly, and review and publication of validated records occur more rapidly than with paper-based reporting.

Direct, voluntary end-user submission of malformation reports also reduces the potential for data

entry errors posed by paper-based data forms that would have to be hand-entered into the database by data transcribers.

Since its inception, NARCAM has collected occurrence reports through an online form on the NARCAM Web site. 100% of the universe is expected to respond electronically.

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 agency is aggregating and making publicly available amphibian malformations data on a comprehensive, national basis. Some states and provinces do collection similar information, and the responsible agencies have been contacted, and steps taken to ensure that NARCAM's efforts complement ongoing activities. In some cases, NARCAM has been used as an agency's official repository for all observation data collected. For purposes of identifying regional and national trends in malformations occurrences, researchers and managers require broader data beyond local and even state monitoring efforts.

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

This information collection does not affect small businesses or other 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.

Failure to collect malformation occurrences data will render the federal government unable to respond to basic questions about malformed amphibians, including the location, frequency, and potential causes of the malformations. The lack of consolidated data will make it difficult for scientists to identify "hot spots" for malformations phenomena, and to explore possible causes.

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 secret, 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.**

NARCAM is a completely voluntary reporting system for amphibian malformations observational data. None of these special provisions applies to this data collection effort.

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.

Federal Register notice requesting public comment was published on August 22, 2007 (Volume 72, Number 162, Page 47065-47066). No comments were received.

The USGS National Biological Information Infrastructure Program (NBII) worked with professional herpetologists both inside of and external to the USGS to review the existing NARCAM data submission form, the reporting format, and the data query and display tools. Changes were made to the NARCAM database, the customer reporting forms, and the data display tools, based upon this feedback. As a result, the data now reported by customers is more accurately geo-referenced, more precise, and more readily accessible.

The external consultant for the review of NARCAM data accessibility, frequency of data collection, and clarity and content of the data submission forms was Dr. Whitfield Gibbons, Professor of Herpetology at the University of Georgia, and Senior Research Scientist at the DOE Savannah River Ecology Laboratory:

Address: Mail Drawer E, Aiken, SC 29803

Phone Number: 803.725.2472

As a result of consultations, there was no need to adjust the hour burden estimate from the currently approved burden.

Prior to March 2004, NARCAM volunteer contributors were not required to submit personally identifying information in their reports. A large percentage of reports were thus anonymous, and we are unclear as to whether the previous curators of NARCAM were able to consult effectively with previous users of the database. The new form requires data providers to submit an email address so that herpetologists conducting quality assurance reviews of new submissions can contact the submitter in order to clarify any confusing, contradictory, or incomplete information associated with their submission. Only the quality control personnel have access to this personal information, and no identifying information associated with an individual person is accessible from the Web site. The NARCAM site also provides volunteers with contact information if they encounter problems with the online submission form, or have questions about a particular field.

The NBII will provide NARCAM data submitters with the means to communicate comments and concerns regarding data collection forms and processes, and data availability. These comments will be carefully reviewed for identification of needed improvements. Because users of the current NARCAM reporting system must now provide a name and email address when submitting reports, the NBII will have a vehicle for periodic consultation with customers and users, if those reporters indicate on their submission that they are willing to be contacted for such purposes. The NBII has built this into the business plan for NARCAM, and will initiate ongoing consultation with users through follow-up emails, to ensure that data reporting and data retrieval are straightforward and easy to accomplish.

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

No payments or gifts are made to respondents.

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

Names and addresses of all volunteer respondents are kept confidential. Personal contact information is accessible to, and used only by, quality control/quality assurance personnel to clarify or validate a particular piece of data contained within a report. Reporters may choose to “opt-out” of any follow-up contact from quality control/quality assurance personnel by

indicating this preference in their online submission. No personal information about a submitter is ever available to public users of the database; this information is not included in the online version of the database. These policies comply with the Privacy Act of 1974 [5 U.S.C. 552a] and the Department of the Interior Privacy Policy Program.

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.

Sensitive data are not sought.

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.**
- * 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.**

An estimated 150 individuals will respond voluntarily to the questionnaire in a given year. Frequency of response is variable. Many reporters submit a single report; however, multiple occurrence reports may be submitted voluntarily by an individual or an agency during a single accession of the Web form. A response takes an average of 30 minutes to complete. This figure is based upon the average completion times of 4 test subjects within the NBII Program Office who were unfamiliar with both NARCAM's data collection forms and with current research and data on amphibian malformations. Each was presented with a fictitious reporting scenario, and was asked to complete a malformations report to the NARCAM database. Based upon the 30-minute average response time calculated, and an historical average of 300 reports annually, the total estimated burden time is approximately 150 hours per year.

As a result of the consultation cited in No. 8 above, there was no need to adjust the hour burden in this renewal.

As NARCAM is a completely voluntary reporting system that is open to all sectors of government and the public to use, and because much of the reporting is done without submission of any demographic data, we have no means for estimating annualized costs to respondents for completion of the NARCAM data submission form.

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.**

- a. Total capital and start-up costs: \$0
- b. Total operation and maintenance costs: \$0

NARCAM is a completely voluntary reporting system that is open to all sectors of government and the public to use. Reports of malformation observations are made directly through voluntary submissions of anecdotal information to the NARCAM Web site. No operational or maintenance

costs to the submitter are applicable, as all data submitted online by volunteers are stored in the NARCAM database, managed and maintained by the U.S. Geological Survey.

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.

Annualized cost to the Federal Government is estimated at \$50,000 based on costs for the following expenses which include actual salaries, benefits, and overhead of Federal employees.

a. Total personnel, salaries, and fringe for	\$49,500
(Website and database development and maintenance:	\$5,500)
(Compliance monitoring for all federal IT security policies:	\$2,000)
(Quality control/quality assurance reviews of submitted reports:	\$17,000)
(Collaboration with and access to relevant external data holdings:	\$11,000)
(Development of query and visualization tools for data reported:	\$14,000)
b. Indirect costs	\$ 500
(Costs to produce and distribute fact sheets)	
Total project cost	\$50,000

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

No changes or adjustments are requested.

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.

County-level summary reports will be made available on the NARCAM Web site. Updates to the Web site are made at least twice monthly during peak periods of reporting activity in summer and fall. The USGS-NBII does not seek to perform any analysis on the data or to publish on it. The purpose of the data collection effort is to allow end users of NARCAM to

review existing data by means of download and visualization tools, and to perform their own interpretation, analysis or modeling.

NARCAM was initiated in 1997 by the USGS Northern Prairie Wildlife Research Center. It is an ongoing data collection effort that is open to the public. The project transitioned to the USGS Biological Informatics Office and the NBII program in 2002; the NBII now hosts the NARCAM site and maintains the online data collection forms, data access and visualization tools, and supporting documentation. Quality assurance by trained herpetologists is performed by the University of Georgia and the Savannah River Ecology Laboratory, under a cooperative agreement.

Because the issue of amphibian malformations phenomena continues to be of high interest, both to the research and management community and the public, NARCAM should persist as a mechanism for reporting and data warehousing. The NBII hopes to continue NARCAM as an ongoing project, as long as there is interest from the science and management community in seeking answers to, and potential ramifications of, malformations phenomena.

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.

18. Explain each exception to the certification statement, "Certification for Paperwork Reduction Act Submissions".

Not applicable.