Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number 1028-0078
North American Amphibian Monitoring Program
Expiration Date: March 31, 2008
Terms of Clearance: None

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 North American Amphibian Monitoring Program (NAAMP) collects anuran (frog and toad) population data for eastern and central United States. These data will be used by scientists and federal, state and local agencies to identify anuran populations demonstrating significant declines in order to direct conservation and research efforts towards those species before their numbers have reached critically low levels. This is part of the USGS responsibility to provide for the management and conservation of the nation's biological resources (The Balanced Budget Downpayment Act, I (110 Stat. 26).

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.]*

The data are to be used to track anuran population status and trends. Data will be used, along with other indicators, to assess anuran species management priorities in the eastern and central United States. Partnering state government agencies plan to use the data to assess anuran state management priorities. In addition researchers, educators, and the general public may use these data to define research goals and/or to learn more about anuran distributions and population fluctuations. Data are collected in the field by volunteer observers on forms provided by the partner organizations.

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.].

Field data collection is completed on paper due to the use of volunteer observers who are geographically widely dispersed. After initial data collection in the field, submission is electronic. In 2001 an Internet-accessible data entry system was created for the calling survey. All data are entered via the new Internet-accessible system. Volunteers may enter the data or send the paper copies to their state coordinator for submission.

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 group gathers this type of anuran information at this scale. The Frogwatch USA project is somewhat similar, but it lacks the scientific sampling design and regional coordination, which reduces the utility of its data.

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

This information does not affect small businesses or other 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.*

Not collecting this information will leave the federal government and its partner agencies unable to characterize rates of change of many anuran populations and unable to explore causes of these declines.

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.*

None of these special provisions applies to this study.

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 January 25, 2008 (73 FR 4620). Two responses in support of continuing this collection have been received, resulting in no change to the collection. In 2001-2002, NAAMP underwent a scientific peer review, the review panel included USGS and non-USGS representatives. The panel found the data availability and reporting format to be excellent, as data are accessible via the Internet and downloadable in format compatible with spreadsheets and other software. The panel assessed the survey design and no recommendations were made to reduce the amount of collection or types of data currently collected. In addition, NAAMP, as a partnership with state agencies and other organizations, collaborates regularly with these partners. NAAMP partner agencies and organizations are involved in decision-making about data collection. These partners were involved in the development of the NAAMP survey and most recently met in 2001 and 2005 to discuss record-keeping and other processes associated with this data collection.

Examples of contacts between 2004 and 2007 that identify persons who were consulted on this Information Collection are listed below. Their input verified existing estimates; therefore, burden hours were not adjusted.

- Susan Gallo, Maine NAAMP Coordinator, Maine Audubon, P.O. Box 6009, Falmouth, ME 04105. Phone: 207.781.2330.

- Holly Niederriter, Delaware NAAMP Coordinator, Delaware Department of Natural Resources and Environmental Control, Division of Fish and Wildlife, 4876 Hay Point Landing Road. Phone: 302.653.2880.
- Scott Jackson, Massachusetts NAAMP Coordinator, University of Massachusetts, Holdsworth Hall, Box 34210, Amherst, MA 01003-4210. Phone: 413.545.4743.
- Yvette Monstad, Minnesota NAAMP Coordinator, Minnesota Department of Natural Resources,500 Lafayette Road, St. Paul, MN 55155. Phone: 651.259.5120.
- Zack Walker, Indiana NAAMP Coordinator, Indiana Department of Natural Resources, Division of Fish & Wildlife, 553 East Miller Drive, Bloomington, IN 47401. Phone: 812.334.1137.

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

Currently no payment or gift is given to respondents by the federal government. Some state partner agencies may provide gifts.

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

No assurances of confidentiality are given to participants.

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.*

No questions of a sensitive nature are asked.

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.*

Burden estimate is based upon the time to conduct and enter data from NAAMP calling survey routes. Each calling survey takes approximately 3 hours to collect data (on the form) and enter data via the Internet. A calling survey route is typically surveyed three times per year. Each route may have one to three respondents per year, depending on whether the same individual conducts all the surveys for the year. The annual number of respondents will vary, but the average number of respondents would be 500. Total burden hours is 4,500 hours (calculated by 500 respondents x 3 surveys = 1500 responses x 3 hours per response = 4,500 burden hours). From 2005-2007, the average number of respondents was 464 with average number of responses of 1344. These were rounded up to 500 and 1500 to account for growth, as additional states are participating in 2008.

Three hours per survey is an estimate based on drive time to/from survey site (80 minutes) and the average time to conduct collect the data and complete the datasheet (98 minutes). This is calculated as: 98 minutes + 80 minutes = 178 minutes, and rounded up to 3 hours. The drive time would depend on factors such as traffic, distance from the person's home or work to the survey location, etc. This information is not part of the data collection, but is estimated through a consultation with a sample of respondents at 80 minutes (40 minutes to and from the survey route). The 98 minutes for data collection and completion of datasheet, was the average calculated from 2005-2007 data provided by respondents.

We estimate the total annualized cost for this collection to be $121,500. We used the Bureau of Labor Statistics (BLS) website to calculate the hourly wage and multiplied by 1.4 for benefits (http://www.bls.gov/bls/wages.htm). We used the figures for the national average hourly pay rate for all occupations from the June 2006 estimate. See table below.

Respondents	**Hourly Pay Rate ($/hr est.)**	**Hourly Rate Including Benefits (1.4 x hourly pay rate) rounded**	**Total Annual Burden Hours**	**Total Annualized Cost**
Individuals	$19.29	$27	4,500	$121,500

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.*

Estimate of total annual cost burden to respondents:

i. Capital and start-up costs: $15.00 per respondent
ii. Operation and maintenance costs: $ 6.07 per survey
iii. Individual respondent annual cost burden range (see table) $11.07-$33.21
iv. **Total annual cost burden for respondents** **$11,500**

A thermometer to read air temperature is needed to conduct the surveys. The cost of such thermometers is approximately $15. The total operational costs consist of mileage estimate in accomplishing a survey. Calculate by using the mileage reimbursement rate of 40.5 cents per mile (as used in travel reimbursement for federal employees) times 15 miles (the approximate distance of a calling survey route), for a total of $6.07 per survey. The thermometer cost is a one-time expense per respondent (assuming not already in their possession), but respondents may participate over multiple years and conduct 1-3 surveys per year (see table below). Looking at 2005-2007 data, 52% of respondents participated for 1 year, 23% for 2 years, and 25% for all 3 years.

2005-2007 data	Annualized capital costs	Operational costs based on number of surveys per year			Annualized cost range		
	Thermometer	1	2	3	Minimum estimate	Maximum estimate	Average annual estimate
1 year participant	$15.00	$6.07	$12.14	$18.21	$21.07	$33.21	$27.14
2 year participant	$7.50	$6.07	$12.14	$18.21	$13.57	$25.71	$19.64
3 year participant	$5.00	$6.07	$12.14	$18.21	$11.07	$23.21	$17.14

Average Annual cost range	% of participants	Number of respondents (500)	Cost estimate
$27.14	52%	260	$7,056.40
$19.64	23%	115	$2,258.60
$17.14	25%	125	$2,142.50
		total	$11,457.50
		Total (rounded)	**$11,500.00**

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 $74,110 based on costs for the below expenses which include actual federal salaries, estimated benefits cost (1.5 percent of salary), and other associated expenses.

Annual total cost to the Federal Government:

Cost description	Cost
Program administration salary and benefits*	$58,580
Operational costs	$3,700
Total project costs	**$62,280**
Indirect costs: center overhead (19%) rounded	$11,830
Annual cost to Federal government	**$74,110**

* The annual federal salary and benefits cost is $58,580.00 (rounded), as calculated from the table below. The Federal cost is broken out in the below table using the 2008 Office of Personnel Management Washington-Baltimore-Northern Virginia pay schedule. Operational costs cover a Student Contractor’s time spent on the information collection, calculated as: 252 hours x $14.63/hour = $3,700 (rounded).

Federal Staff	Grade			Percent of	Number of	

		Hourly Pay Rate	Hourly Pay Rate including Benefits (Hourly Pay Rate x 1.5))	Staff Time Spent on Collection	Hours (2080 hours =1 FTE)	Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)
Wildlife Biologist	GS-12, step 2	$34.54	$51.81	40%	832 hours	$43,105.92
IT Specialist (programmer / database manager)	GS-13, Step 5	$45.05	$67.58	10%	208 hours	$14,056.64
Wildlife Biologist (supervisor)	GS-13, step 5	$45.05	$67.58	1%	21 hours	$1,419.18
				Sum	1061 hours	$58,581.74 or $58,580 rounded

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

This submission requests an adjustment increase of 900 hours due to the increased number of volunteers and states involved in the surveys. The submission also requests an adjustment increase of $4,500 due to the increased number of responses.

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.

Data are available for download from the program's website. The first trend analysis for a multi-state region is underway. Once such analyses are completed, summary reports will be published in scientific journals at periodic intervals and presentations made at scientific conferences, as appropriate. A website for reporting analytical results is planned.

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.

This project seeks no exemption to displaying the expiration date.

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

This project seeks no exemption to the "Certification for Paperwork Reduction Act

Submission."