

**Supporting Statement for Paperwork Reduction Act Submission
Part A**

BIRD BANDING AND RECOVERY REPORTS

OMB Control Number 1028-0082

Terms of Clearance: None

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.**

In accordance with the Migratory Bird Treaty Act, 16 U.S.C. 703-712, the trapping and marking of wild migratory birds by persons holding Federal permits must be monitored. Formerly managed by the U.S. Fish and Wildlife Service (FWS), the bird banding program is now the responsibility of the U.S. Geological Survey (USGS) Bird Banding Laboratory (BBL). The primary role of the BBL is to support the use of banding and banding data by researchers and managers engaged in science, conservation, and management of birds, and not to play a lead role in original research. The BBL plays a significant role as a liaison between managers who require answers to particular questions, scientists with expertise in project design, field workers, and data analysts.

The BBL works towards achieving the following three objectives related to this information collection:

1. to improve mechanisms for verifying, accepting, storing, and managing bird banding data;
2. to maintain an automated, electronic system to efficiently verify, accept, store and manage data associated with individually marked or recaptured birds; and
3. to ensure through the permitting process that banders know how to safely handle birds, collect data accurately, and maintain birds in humane and healthful conditions.

The BBL collects information using two forms and one electronic database: 1) *Application for Federal Bird Banding or Marking Permit*, 2) *Reporting Encounter of Marked Bird with a Metal Federal Band (Recovery Report)*, and 3) *Bandit*. This program assists the Fish and Wildlife Service in fulfillment of its responsibilities designated by international migratory bird treaties with Canada, Mexico, Japan, and the Soviet Union.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The BBL has a critical role in storing and maintaining data on marked birds, particularly to facilitate coordination between banders and others who may later encounter the marked birds, as well as to ensure that the data are available for later analysis. The BBL works towards increasing the types and amounts of data that are being gathered and stored, at the same time that it increases the efficiency of data collection and storage by reducing overall costs.

The two forms and an electronic database described in this package are used for separate purposes. The

Application for Federal Bird Banding or Marking Permit is used to identify individuals and evaluate their purpose, need, and qualifications to hold a permit. If a permit is granted, then the identifying information about the individual is entered into the database, a permit is issued, and the application is stored in a permanent folder and maintained as a permanent record. The permit program is designed and carried out to protect birds covered by Federal statutes and to enhance research and management efforts. It assures that birds are captured and marked in an ethical and safe manner. BBL has a regulatory responsibility (50 CFR 13.41) to ensure that any wildlife possessed under a banding permit be “maintained under humane and healthful conditions.” The permit system is administered and is consistent with legal regulations. The program also encourages new applicants to become associated with other organized efforts to band birds in order to prevent the proliferation of permit applications.

The *Recovery Report* is used by individuals that encounter a banded bird to report the information to the banding lab. All of the information on the bird and the person reporting the bird are stored in the *Bandit* database. The information about individuals is used to generate certificates of appreciation as well as to contact them in the future if there are any discrepancies encountered with the bird report information. Because banders collect a variety of data at the time of banding and encounter, including information such as fat scores, biometrics, molt information, breeding condition, and so on, ancillary data can be used to verify core data (for example, determination of age and sex) as well as for researching many issues relevant to bird conservation and management (for example, determining the quality of stopover locations based on rates of gain in body weight, estimating condition-dependent survival rates, studying changes in breeding phenology in relation to climate change, and so on). Because there is no other central data storage repository in North America, the preservation of these data is a high priority.

Bandit is an electronic database and is the latest in a long series of programs aimed at helping bird banders manage and submit their data for any number of banded birds. The principal use of *Bandit* is to store and transfer banding data to the BBL and the Canadian Bird Banding Office (BBO) during bird banding operations. *Bandit* allows a bander to enter and edit data associated with bands obtained from the BBL/BBO as well as data for recaptured birds with bands not in the band inventory within *Bandit*. Recapture data are valuable for estimating survival and other population parameters, such as dispersal rates, especially for songbirds for which very few recovery data are typically available. This database will serve as a repository for all recapture data that banders wish to submit. In order to most effectively accomplish this objective, the BBL will initially prioritize which data will be submitted and give guidance to banders as experience is gained in this realm.

A. Application for Federal Bird Banding or Marking Permit

This application is submitted by those parties who wish to become bird banders. These “parties” include States, businesses, universities, organizations and individuals. The data collected is used by the BBL to determine the applicant’s qualifications for a Federal Bird Banding or Marking Permit. It is essential that the applicant be well qualified by abilities and also have a valid research or management need for the permit.

The current version of this application is not a modifiable form. The applicant must print the form and return it by mail to the BBL office in Laurel MD.

New permittees must fill out all applicable sections of the application. If the permittee requires any type of auxiliary marking (colored leg bands, transmitters, etc.), they are required to attach a page summarizing the details for any auxiliary marking requests. The categories of inclusion are described at: <http://www.pwrc.usgs.gov/BBL/manual/aarequs.htm>.

Applications for Subpermits should be submitted by the Master permittee. We require a cover letter from the Master permittee concurring with the request and vouching that the subapplicant is fully trained.

B. Recovery Report

This form is submitted by anyone who finds a banded bird and wishes to report the find to the BBL. The data collected are used by Federal, Provincial, and State personnel and scientific cooperators to aid in the study of population size, mortality and survival rates, longevity, and migration patterns of birds. The use of banding and band recovery information is also one of the most important tools used in the preparation of annual U.S. and Canadian hunting and shooting regulations.

Recovery Reports can be submitted as an electronically (via the Internet) or by calling toll-free to 1-800-327-BAND (2263) from anywhere in Canada, the United States and most parts of the Caribbean. The operator will need to know the band number and how, when and where the bird or band was found.

The BBL will mail a Certificate of Appreciation to all persons reporting a banded bird. Additional information such as email address is optional in case the BBL has questions concerning the band encounter that should be directed to the person who reported the bird. This form is available on the BBL website in:

- English (at: <http://www.reportband.gov>);
- Spanish (at: <http://www.reportband.gov/#espanol>); and
- French at: <http://www.reportband.gov/#français>

C. *Bandit*

The *Bandit* database replaces the paper version of the Bird Banding Schedule used in 2006. The principal use of *Bandit* is to store data obtained during banding operations and facilitate the transfer of banding data to the BBL and the Canadian Bird Banding Office (BBO). *Bandit* allows the bander to enter and edit data associated with bands obtained from the BBL/BBO as well as data for recaptured birds, including those banded with bands not in the band inventory within the database. *Bandit* includes the ability to email the banding data directly.

Bandit is a relational database that allows the bander to manage their bird banding data. Users of *Bandit* must download (or request a free CD ROM) the software from the BBL website (<http://www.pwrc.usgs.gov/BBL/homepage/resource.cfm>). The software is needed to electronically submit data to the BBL.

- 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 Government Paperwork Elimination Act requirements].

The Permit Application is currently available on the BBL web site as a printable pdf file that must be

submitted on paper. The Recovery Report and *Bandit* data can be submitted electronically via the BBL web site.

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.

There is essentially no duplication of efforts because banding activity is heavily coordinated among various wildlife agencies, including those from Canada.

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

We only collect the minimum information necessary to meet our legal responsibilities and research objectives.

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.

Without this information collection, the Department of the Interior could not meet its legal responsibilities under the Migratory Bird Treaty Act. The data collected are also essential to setting annual bird hunting/harvest regulations and as a basis for important research reports by the FWS and State agencies. The frequency of collection is that necessary to achieve the legal requirements and research objectives.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (i) requiring respondents to report more often than quarterly, (ii) requiring respondents prepare written responses in fewer than 30 days after receipt, (iii) requiring respondents to submit more than an original and two copies of any document, (iv) retain records for more than 3 years; (v) 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; (vi) the use of a statistical data classification that has not been reviewed and approved by OMB; (vii) that includes a pledge of confidentiality not supported by authority established in statute or regulation; requiring respondents to submit proprietary trade secrets or other confidential information.

There are no circumstances that require us to collect the information 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 February 6, 2009, we published a 60-day Federal Register notice (74 FR 6304) announcing that we would submit this ICR to OMB for approval. In that notice we solicited public comments for 60 days, ending April 7, 2009. We did not receive any comments in response to that notice.

During a typical calendar year, the BBL receives dozens of comments from bird banders on the entire permit application process, and the lab uses this feedback to improve its processing of applications when necessary. Within the past year, all of the comments have been very complimentary on the speed at which the various permit renewals and new authorizations have been processed.

The recovery reporting website is relatively new so that the lab has received relatively few direct comments on its operation. The comments on the site have also been favorable.

Based on the experiences of a sample of banders, the average length of time required to complete the permit application is normally 25-35 minutes. Completing the recovery reporting form over the internet requires 3 minutes on average, also based on user experience. In addition to our Federal Register notice, we attempted to solicit comments from individuals outside the agency to obtain their views on the clarity of the survey and the annual hour burden for the application and report. The individuals contacted are listed in Table 1 below. We incorporated their suggestions, edits, and comments in the final instruments. The respondents also agreed with our estimated burden time for both instruments.

In an additional effort to receive comments from individuals outside the agency, Florence Soehnlein, BBL Permit Administrator, recorded the time it took to fill out a form for five random applicants calling the office during the months of March and April. The applicants called the office during this time period and the amount of time needed to fill out the form was approximately 25- 35 minutes. We averaged the time for this collection to be 30 minutes. During this same time, if a Recovery Report was called into the office, Ms. Soehnlein recorded the time it took to fill out the form. Nine reports were called into the office and the time used to fill out the form was about 3 minutes.

Table 1. Individuals Contacted

Juanita Winfield 225 Lander Road Egg Harbor Township, NJ 08234 (609) 927-6733	David C. Jones 310 Habitat Bay Windsor, CO 80550 (970) 443-7520	Barbara Hewins-Maroney, Ph.D. CB 123P 6001 Dodge St. University of Nebraska at Omaha Omaha, NE 68182
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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no monetary value associated with this collection, however, we provide an electronic Certificate of Appreciation to those who report recovery information to the BBL via the *Bandit* website. For those who call the report into the office, Ms. Soehnlein will send a mail a Certificates of Appreciation via US postal mail within 2 weeks after the report has been received and processed by the BBL.

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

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.

This collection does not ask for information of a sensitive nature.

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

We estimate that the total burden for this collection will be 28,048 hours, including time to read instructions, gather information, and complete the forms or enter information in the database. The burden estimates in this supporting statement are based on our prior experience with the permit application forms; the known average time for submissions via the toll-free phone number, and reported experiences using the recovery reporting page on the internet; and the outreach described in item 8.

We expect to receive 550 permit applications (this number has been consistent over the past 3 years), taking each respondent approximately 30 minutes to complete, totaling 275 burden hours.

We anticipate receiving 85,003 recovery reports annually, each taking approximately 3 minutes to complete, totaling 4,250 burden hours.

For *Bandit* data, we expect to receive 3,825 schedules, each taking an average of 6.15 hours (or 368.7 minutes) to enter, totaling 23,505 annual burden hours. The completion time for schedules varies from 28 minutes to 12.5 hours (or 750 minutes) as discussed below.

- We estimate 300 annual schedules for waterfowl bands (each consisting of 800 records). Each schedule will take approximately 40 minutes. Most of the data collected are similar, and the software allows for columns of repeated information to be filled in through a cut and paste process that expedites data entry. Following this process, banders should be able to enter 100 banding records in 5 minutes or less.
- We expect to receive 1,800 annual schedules (consisting of 750 records/responses each) for bird bands other than waterfowl. We estimate that it will take 1 minute to enter each record, or 750 minutes per schedule (12.5 hours, totaling 360 annual burden hours)).
- Although the number is decreasing, we expect to receive 1,725 annual schedules that will be handwritten and mailed to the BBL. These handwritten schedules consist of an average of 28 records/responses each and will take 28 minutes [one minute per record] to complete (totaling 805 annual hours)

We estimate the dollar value of the annual burden hours to be \$854,016 (see Table 2). The hour cost is based on BLS news release USDL 08-1802 of December 10, 2008, for average full compensation per hour including benefits for private industry. The particular values utilized are:

- Individuals. Average hourly wage is \$19.29 multiplied by 1.4 to account for benefits (\$27.01).

- Private sector. Average hourly wage is \$18.56 multiplied by 1.4 to account for benefits (\$25.98).
- States/tribal/local governments. Average hourly wage is \$23.99 multiplied by 1.5 to account for benefits (\$35.99).

Table 2. Estimated Dollar Value of Annual Burden Hours

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Dollar Value of Burden Hour Including Benefits</i>	<i>Total Dollar Value of Annual Burden Hours</i>
Permit Application					
Individuals	148	30 minutes	74	\$27.01	\$1,999
Private Sector	138	30 minutes	69	\$25.98	\$1,793
State/local/tribal govt	264	30 minutes	132	\$35.99	\$4,751
Subtotal	550		275		\$8,543
Recovery Report					
Individuals	84,368	3 minutes	4,218	\$27.01	\$113,928
Private Sector	600	3 minutes	30	\$25.98	\$779
State/Local/Tribal	35	3 minutes	2	\$35.99	\$72
Subtotal	85,003		4,250		\$114,779
Bandit					
Individuals	1,033	6.15 hours	6,353	\$27.01	\$171,595
Private Sector	956	6.15 hours	5,879	\$25.98	\$152,736
State/local/tribal govt	1,836	6.15 hours	11,291	\$35.99	\$406,363
Subtotal	3,825		23,523		\$730,694
TOTAL	89,378		28,048		\$854,016

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).

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

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$ 275,930 (Table 3). This includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2009-DCB (<http://www.opm.gov/oca/08tables/html/dcb.asp>) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the previously referenced BLS news release)

For the Permit Application, the Application Examiner spends approximately one hour per form at \$41.06 per hour to assemble data and to coordinate the required permitting procedures and needs (\$22,583). The Chief, BBL, spends approximately one-half hour per application at \$83.67 per hour on review and contacting and evaluating applicants (\$8,367). Each wildlife biologist also spends approximately one-half hour reviewing and evaluating applicants at the rates indicated in Table 3 (\$18,869).

For the Recovery Report, the bulk of the cost is for maintaining a toll-free phone number (\$2,000) and for a contracted answering service to enter the data from the phone calls into the database (\$150,000).

For Bandit, new versions of the software are created when necessary and are not necessarily produced on an annual basis. On average, the BBL programmer will spend approximately 80 hours per year working on upgrades to the Bandit software. The BBL also maintains a Bandit help desk to assist users with their questions concerning the software. On average, four BBL clerks spend approximately 20 hours per week in various duties related to the Bandit help desk.

Table 3. Federal Employee Salaries and Benefits

Position	Grade/Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time per task	Annual Cost
Permit Application					
Application Examiner	GS-9/5	27.37	41.06	550 hrs	\$22,583
Chief, BBL	GS-14/5	55.78	83.67	100 hrs	\$8,367
Wildlife Biologist	GS-12/5	39.70	59.55	150 hrs	\$8,933
2 Wildlife Biologists	GS-11/5	33.12	49.68 (x2)	100 hrs. (x2)	\$9,936
Subtotal					\$49,819
Recovery Report					
Contracted answering service					\$150,000
Cost to Maintain BBL toll-free phone number					\$2,000
Annual maintenance for website					\$1,000
Subtotal					\$153,000
Bandit					
Annual maintenance for website (BBL Programmer)	GS 9/5	27.37	41.06	80 hrs	\$3,285
4 BBL Clerks	GS 7/5	22.38	33.57(x4)	520 (x4)	\$69,826
Subtotal					\$73,111
Total					\$275,930

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

During the past three years, the BBL eliminated the paper banding schedule and replaced it with computerized data management systems (*Bandit*) that automatically submit the data to the BBL in a standard format. Based on our experience over the past 3 years, we have adjusted our estimates for responses, resulting in a decrease of 8,172 responses and 4,911 burden hours.

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.

The data are utilized in at least two agency reports, the FWS Adaptive Harvest Management Report, which is used to establish annual bird hunting/harvesting regulations, and the FWS Annual Waterfowl Status Report.

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 OMB's expiration date on all information collection instruments associated with this request, including the websites for the *Bandit* database and recovery report.

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

There are no exceptions to the certification statement.