

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

OMB Control Number 1024-0236

**Research Permit and Reporting System Applications and Reports
(36 CFR 2.1 and 2.5)**

**NPS form numbers 10-741a (Application for a Scientific Research and
Collecting Permit); 10-741b Application for a Science Education
Permit; 10-226 (Investigator's Annual Report)**

3 NOVEMBER 2010

Terms of Clearance. None

- 1. Explain the circumstances that make the collection of information necessary.
Identify any legal or administrative requirements that necessitate the collection.**

The National Park Service Act (Organic Act) of 1916 (16 U.S.C. 1) provides that park resources are to be conserved for enjoyment of present and future generations of people. This act also (16 U.S.C. 3) authorizes the establishment of regulations to govern the use and management of units of the National Park System. The National Parks Omnibus Management Act of 1998 (NPOMA, Sections 201 (4) and 201 (5) - 16 U.S.C. 5931) encourages both use of parks for study to benefit park management and broader science, and also publication of information derived from studies conducted in the National Park System. Section 205 of the NPOMA (16 U.S.C. 5935) constrains use of parks for scientific study to those studies that are consistent with the laws and management policies of the parks and that can be conducted in a manner that poses no threat to park resources or public enjoyment. Appendix A provides the text of these sections of law. The National Park Service (NPS) has existing regulations that prohibit the disturbing, removing, or possessing of natural, cultural, and archeological resources (36 CFR 2.1) and that govern the collection of specimens in parks (36 CFR 2.5) for the purpose of research, baseline inventories, monitoring, impact analysis, group study, or museum display. Appendix B provides the text of these sections of the regulations. The NPS uses a permit system to manage the conduct of scientific research and collecting in parks and the Service's Museum Management Program to manage collected specimens or portions or derivatives of those specimens that are to be retained permanently.

Scientific studies and science education activities in parks that might disturb resources or visitors, require the waiver of any regulation, or involve the collecting of specimens generally are conducted under permit. NPS policy regarding studies and collections requires that studies, including surveys, inventories, monitoring, research, and data and specimen collection, conducted by other than NPS employees on official duty will require an NPS scientific research and collecting permit. This policy also requires that all studies conform to NPS policies and guidelines regarding collection, reporting, and publication of

accomplishments and data; conduct of studies; wilderness restrictions; and requirements identified in the terms and conditions of a permit. In addition, this policy requires that projects be administered and conducted by fully qualified personnel and conform to current standards of scholarship. Finally, this policy provides that researchers who apply for and receive scientific research and collecting permits may be asked, based on NPS analysis of the individual study proposal and as an agreed condition to the associated permit, to provide a variety of products to the park issuing the permit. In keeping with the public nature of parks, NPS expects that results of all scientific activities conducted in parks will be made available to the public through both technical and popular publication outlets, and that permanently retained natural resource collections and associated field records remain Federal property and will be managed as NPS museum collections. Appendix C provides the relevant sections of NPS Management Policies 2006. During the past nine years, NPS has found that the existing scientific research and collecting permit system is being used also by applicants seeking permission to conduct science education activities in parks.

The NPS has a long tradition of soliciting and disseminating annual progress reports from scientists holding NPS permits to conduct scientific research and collecting in parks. Section 201 (5) of NPOMA (16 U.S.C. 5931) encourages the publication and dissemination of information from studies conducted in parks. One mechanism for fulfilling this encouragement is the annual collection and publication by the NPS of information from permittees about the interim results and findings of their permitted research being conducted in the parks. A second mechanism for fulfilling this encouragement is to involve scientists who want to conduct science education activities in parks.

2. Indicate how, by whom, how frequently, 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.

An applicant seeking an NPS Scientific Research and Collecting Permit or a Science Education Permit has the option of submitting an application via the Internet or by paper copy. Before making a decision about whether or not to issue a requested permit, the park manager uses information collected in a scientific research and collecting permit application or a science education permit application to ensure that:

- a) the applicant is appropriately qualified;
- b) the proposed work is for the purpose of furthering scientific knowledge in the public interest;
- c) the proposed work is not inconsistent with any management plan or established policy, objectives or requirements applicable to management and use of the park concerned;
- d) the possible impacts of the proposed work are sufficiently well described to enable the park, as one basis for determining whether or not to issue the requested permit, to conduct whatever levels of review and analysis are needed to comply with such requirements as the amended National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327) and section 106 of the amended National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.);
- e) where the work proposed is also governed by permits issued by other authorities, the

applicant has obtained written consent from those other authorities;

f) any museum or other institution proposed as the repository of any specimens and other resources that are proposed for collection and permanent retention is appropriately qualified and willing to document, preserve, and provide appropriate public access to the collected resources and associated records; and

g) the applicant agrees in writing to make the results of the applicant's studies or science education activities appropriately available to the public.

Failure to collect information from applicants who are requesting permission to conduct scientific research and collecting studies or science education activities on park lands, and subsequent failure to issue permits to those applicants, would result in the prohibition of such studies or science education. Individuals who conduct scientific studies or science education activities without a valid scientific research and collecting permit or science education permit would be in violation of NPS policy and may be denied scientific research and collecting or science education permits in the future. Individuals who conduct studies or science education activities that disturb park resources or involve collecting of scientific samples or specimens without a permit would be in violation of the regulations regarding preservation of natural, cultural and archeological resources and the taking of research specimens (36 CFR 2.1 and 2.5) and may be subject to applicable criminal and civil penalties.

The park research coordinator reviews the information collected in the Investigator's Annual Report to ensure that the scientist is complying with the terms and conditions of the scientist's permit and that key findings of the scientific study or science education activity are being made available to the public. The park manager uses this information for park resource management and visitor education purposes.

Failure to collect information in an Investigator's Annual Report would limit the park manager's ability to conduct periodic reviews of the appropriateness of having the work conducted in the park and would prevent the park manager from disseminating to the public information about that work. Failure to collect information in interim or final reports or as copies of published articles would prevent the park manager from incorporating information gained about the studied resources into existing park resource inventories, plans, interpretation programs, management programs, and data bases. Failure to collect the information also would cause the park manager to have to conduct duplicative studies when the park manager needed information about the resources for program planning, management, and science education purposes.

Information collected by the three forms that constitute the Research Permit and Reporting System Applications and Reports Information Collection and an explanation of how the park uses the information provided by the three forms:

A. Explanation of questions contained in Form 10-741a, Application for a Scientific Research and Collecting Permit (Appendix D):

Page 1, first box –

Name of the National Park System area you are applying to:

Select one of the following: [] New application, [] Renewal of a previously issued permit [] Modification of a previously issued permit

Please enter numbers for permit renewal or modification requests: Previously assigned

NPS study number: Previously assigned NPS permit number:

These questions identify the park to which the applicant is applying; whether the application is for a new permit or is for a renewal or modification of a previously issued permit; and, for a renewal or modification, what are the previously assigned study and permit numbers. Note that, for permit renewal applications, previously assigned NPS study number and NPS permit number entries are automatically pre-filled when applicants use the on-line permit renewal application option. NPS uses this information to direct the application to the appropriate park, to determine what type of permit action is being requested, and to determine the application's relationship to previously issued permits.

Page 1, second box –

[Dr., Mr., Mrs., Ms.] First name: Last name:

Mailing address

Name of the current institution represented

Office phone #:

Alternative phone #:

Office FAX #:

Office email address of principal investigator:

Additional investigators or key field assistants (first name, last name, office phone, office

email)

These questions request business contact information for the principal investigator (including title, first and last names, institution represented, phone, fax, and email information) and for additional investigators or key field assistants (first and last names, phone number, and email information). NPS uses this information to prepare the permit, to provide mechanisms for contacting applicants, and to know what people in addition to the applicant will be in the park working on the project if it is assigned a permit. Because Scientific Research and Collecting Permits grant permissions for activities in parks which might otherwise be illegal, this information is particularly important to park law enforcement staff.

Page 1, third box –

Project title (maximum 300 characters)

Purpose of the study (maximum 4000 characters)

Summary of proposed field methods and activities (extract from the study proposal where appropriate - maximum 4000 characters)

Initial starting date of the study:

Estimated date the entire study may end:

Date to begin study within the park this application year:

Date to end study within the park this application year:

Will field study need to continue within the park next year (Yes/No):

Activity Type (select one): Research Inventory Monitoring Other

Do you anticipate receiving funding assistance from the U.S. Federal Government for this study? (Yes or No) If "Yes," specify the agency(s):

Where will data, maps, photos, etc. (not specimens) reside upon completion of this study?

Location(s) where you propose activities will take place within this National Park System

area:

Your proposed method of access (vehicles, aircraft, boat, snowmobile, foot, etc.):

These questions request information about the proposed scientific study, including title, purpose, summary of field methods and activities, schedule for the entire study, schedule for the study to be active in the park in the year for which the application is being submitted, whether or not the field portion of the study will continue in a future year, type of activity to be conducted, Federal agency providing funds for the study, if any, repository for non-specimen products of the study, proposed study locations within the park, and proposed methods of access to those locations. NPS uses this information to assess appropriateness of having the study be conducted in the park; possible impacts caused by the study to park resources, visitors, and operations; type of Federal role, if any, in the study; and location of study findings to assist the park in obtaining information about those findings for use in park interpretive and resource management activities.

Page 2, first box –

Would you like to handle or collect specimens? (Yes or No)

If you respond "Yes," please complete this entire section of the application (otherwise you may skip the remainder of this section). Note that all specimens collected and material originating from such specimens remain Federal property.

Scientific description of specimens to be handled or collected (include taxonomic group or name, or type of material; sample size, quantity, frequency, and location):

Proposed disposition of specimens identified for handling or collection and material originating from such specimens (mark all that apply):

Temporarily captured or handled (may include marking) and then released undamaged in place

Temporarily retained, then destroyed through analysis or discarded after analysis (If your analysis later determines that temporarily retained specimens or material originating from such specimens in fact warrant permanent retention, contact the park research coordinator for further instructions)

Permanently retained in National Park Service collection, maintained in NPS repository

Permanently retained in National Park Service collection, maintained in one or more non-NPS repositories identified in attached Appendix A (complete and submit an Appendix A for each proposed repository)

These questions determine whether or not the applicant seeks to handle specimens and, if so, what specimens and for what types of handling. NPS uses this information to assess the possible impact of the study on park resources and to establish the proper process for tracking over time the disposition and care of the specimens and material originating from such specimens that are accountable Federal property.

Page 2, second box –

I certify that this application is accurate and complete. I understand a formal study (research) proposal for new or modified studies must be provided to NPS before this application can be considered. I authorize the National Park Service to seek peer reviews of my proposal.

Signature of principal investigator: _____ Date: ____

These questions obtain certification by the applicant that the application is accurate and complete, that the applicant understands the requirement for submission of a study proposal, and that the applicant authorizes NPS to obtain peer review of the applicant's study proposal. NPS uses this information to accept the applicant's submission of the application to NPS and

then, based on that accepted submission, to conduct a review of the submission and determine whether or not to issue the applicant a permit.

Page 3, Appendix A, – Appendix A provides the applicant the opportunity to request that specimens collected as part of the applicant's study and material originating from such specimens that are permanently retained in NPS museum collections be loaned by NPS to a repository that the applicant recommends.

Page 3, Appendix A, first box –

Principal Investigator:
Office phone #:
Office FAX #:
Office email address:
Project title (maximum 300 characters):
Scientific description of collected specimens and/or material originating from such specimens proposed to be loaned to the non-NPS institution identified below (include taxonomic group or name, or type of material; sample size, quantity, frequency, and location):

These questions give the applicant the opportunity to provide to the applicant's proposed repository manager information about the applicant, means for contacting the applicant, title of the study, and description of the specimens proposed for collection and then, together with any material originating from such specimens, for loan to the repository. NPS uses this form to have the applicant provide to the proposed repository manager pertinent information about the applicant and the applicant's study. The Internet-served application option pre-fills all data in this box, as the data have been submitted at an earlier point in the application process.

Page 3, Appendix A, second box –

Non-NPS institution where specimens and/or material originating from such specimens identified in the box, above, are proposed to be deposited:
Organization Information:
Institution:, Address:, Office Phone #:, Office FAX #:, Responsible official Email:
(Signature of responsible official at custodial institution) (Date)
(Name of responsible official – please print) (Title of responsible official – please print)

These questions identify business name, address, and contact information of the institution that the applicant proposes as a repository to receive on loan from NPS the specimens or material originating from such specimens, and obtain from the proposed repository the name, title, and signature of the repository official who agrees to the repository receiving the specimens or material originating from such specimens on loan from NPS. NPS uses this information to determine whether or not to have the permit designate that institution as an approved, non-NPS repository.

B. Explanation of questions contained in Form 10-741b, Application for a Science Education Permit (Appendix E):

Page 1, first box –

Name of the National Park System area you are applying to:
Select one of the following: [] New application [] Renewal of a previously issued permit [] Modification of a previously issued permit

Please enter numbers for permit renewal or modification requests:

Previously assigned NPS activity number: _

Previously assigned NPS permit number:

These questions identify the park to which the applicant is applying; whether the application is for a new permit or is for a renewal or modification of a previously issued permit; and, for a renewal or modification, what are the previously assigned activity and permit numbers. Note that, for permit renewal applications, the previously assigned NPS activity number and NPS permit number entries will be automatically pre-filled when applicants use the on-line permit renewal application option. NPS uses this information to direct the application to the appropriate park, to determine what type of permit action is being requested, and to determine the application's relationship to previously issued permits.

Page 1, second box –

[Dr., Mr., Mrs., Ms.] First name: Last name:

Mailing address

Name of the current institution represented

Office phone #:

Alternative phone #:

Office FAX #:

Office email address of responsible official:

First and last name of person expected to back up the activity leader

These questions request contact information for the activity leader (including title, first and last names, mailing address, institution represented, phone, fax, and email information) and for the person expected to back up the activity leader during visits to the park (first and last name). NPS uses this information to prepare the permit, to provide mechanisms for contacting applicants, and to know what person in addition to the applicant will be working on the project if it is permitted. Because Science Education Permits grant permissions for activities in the park which might otherwise be illegal, this information is particularly important to park law enforcement staff.

Page 1, third box –

Name or title of proposed science education activity (maximum 300 characters)

Purpose and brief description of the activity (maximum 4000-characters)

Proposed field methods and activities (summarize from the proposal where appropriate – maximum 4000 characters)

Planned number of instructors and leaders:

Planned number of students:

Indicate educational levels of this activity (select all that apply): K-6 7-12 Higher

Initial starting date of the activity:

Estimated date the entire activity may end:

Date to begin activity within the park this application year:

Date to end activity within the park this application year:

Number of times the field activity will be conducted this application year:

Will the field activity need to continue within the park next year (Yes/No):

Do you anticipate seeking any waiver of fees or other NPS assistance in conjunction with this activity? (Yes or No): If "Yes," please explain:

Location(s) where you propose activities will take place within this National Park System area:

Your proposed method of access (bus, van, car, other vehicle, aircraft, boat,

snowmobile, foot, other):

These questions request information about the proposed science education activity, including title, purpose, summary of field methods and activities, planned number of instructors and leaders, planned number of students, education levels of students, schedule for the entire activity, schedule for the activity to be active in the park in the year for which the application is being submitted, number of times the activity will be conducted in the park during the application year and whether or not the field portion of the activity will continue in a future year, whether or not the applicant will seek a fee waiver or the provision of NPS assistance, proposed activity locations within the park, and proposed methods of access to those locations. NPS uses this information to assess appropriateness of allowing the activity to be conducted in the park; possible impacts of the activity on park resources, visitors, and operations; and type of Federal role, if any, in the activity. NPS uses this information to assess appropriateness of having the science education activity be conducted in the park and to assess possible impacts of the activity on park resources, visitors, and operations.

Page 2, first and second boxes –

Would you like to temporarily handle or collect specimens? (Yes or No)

Scientific description of specimens to be handled or collected (include taxonomic group or name, or type of material; sample size, quantity, frequency, and location):

A) Specimens to be handled and returned unmodified to the place of collection:

B) Specimens to be handled and used up in the activity:

The first question determines whether or not the applicant seeks to handle specimens as part of the requested science education activity. For requests that include handling of specimens, the second box asks for information about the kinds of specimens and handling methods involved. NPS uses this information to assess the possible impact of the study on park resources, visitors, and operations.

Page 2, third box –

I certify that this application is accurate and complete. I understand a formal science education activity proposal may have to be provided to NPS before this application can be considered. I authorize the National Park Service to seek peer reviews of my proposal.

Signature of activity leader: _____ Date: _____

These questions obtain the certification by the applicant that the application is accurate and complete, that the applicant understands the requirement for possible submission of a science education activity proposal, and that the applicant authorizes NPS to obtain peer review of the applicant's science education activity proposal, if such a proposal is required. NPS uses this information to accept the applicant's submission to NPS and then to conduct a review of the submission and determine whether or not to issue the applicant a permit.

C. Explanation of questions contained in Form 10-226, Investigator's Annual Report (Appendix F):

Page 1, first half of first box –

Reporting Year:

Park:

Select the type of permit this report addresses: Scientific Study Science Education
Activity

Name of principal investigator or responsible official: [Dr. Ms. Mr. Mrs.] First name:
Last name:
Office Phone:
Mailing address:
Office FAX:
Office Email:
Additional scientific study investigators (first name, last name):

These questions identify the reporting year, the park to which the permit holder is submitting the report; the type of permit for which the permit holder is submitting a report; contact information for the responsible official (including title, first and last names, mailing address, phone, fax, and email information); and first and last names of additional study investigators. All information in this section is automatically carried from the permit data record and entered into the Investigator Annual Report form when the permit holder uses the on-line report submission option. NPS uses this information to ensure reports are connected to permits, to track and update contact information, and to provide contact information to the public when the reports are made publicly available on the Internet.

Page 1, second half of first box –

Project Title (maximum 300 characters):
Park-assigned Study or Activity #:
Park-assigned Permit #:
Permit Start Date:
Permit Expiration Date:
Scientific Study Starting Date:
Estimated Scientific Study Ending Date:
For either a Scientific Study or a Science Education Activity, the status is (select *one*):
Completed (for a study, check only if all specimens are cataloged)
Continuing Suspended Terminated before completion
For a Scientific Study that is completed, please check each of the following that applies:
A final report has been provided to the park or will be provided to the park within the next two years Copies of field notes, data files, photos, or other study records, as agreed, have been provided to the park All collected and retained specimens and retained material originating from such specimens have been cataloged into the NPS catalog system and NPS has processed loan agreements as needed
Activity Type (select one): Research Inventory Monitoring Education Other
Subject/Discipline (maximum 60 characters):

These questions provide information about the project for which the report is being submitted, including title, study or activity number, permit number, permit start and expiration dates, scientific study start and estimated end dates, project status, status of deliverables for a scientific study, activity type, and subject or discipline. All information in this section of the IAR (with the exception of the status and completion questions) is automatically carried from the permit data record and entered into the Investigator's Annual Report form when the permit holder uses the on-line report submission option. NPS uses this information to ensure that report submissions relate to permits and to update NPS records regarding the status of the study or activity being reported.

Page 1, second box –

Purpose of Scientific Study or Science Education Activity during the reporting year

(maximum 4000 characters):

The initial response to this question is entered automatically by the software from the application and permit database, with the respondent being given the opportunity at the time of preparing this report to change the description to reflect any changes made during the reporting year. NPS uses this information to track changes in the objectives or methodologies over time.

Page 2, first box –

Findings and status of Scientific Study (including collections made and catalog status of retained specimens and retained material originating from such specimens) or accomplishments of Science Education Activity during the reporting year (maximum 4000 characters):

The applicant reports findings and status or accomplishments of the applicant's activities in the park during the reporting year. NPS uses this information to track the progress of the study and to inform the NPS interpretation programs and the public about the findings of research being conducted in the park.

Page 2, second box –

For Scientific Studies (not Science Education Activities), do you still retain any specimens collected from the park or material originating from such specimens that have not been destroyed during analysis? Y N

If "Yes", identify each institution and type of material where the specimens or material originating from such specimens currently are housed:

Funding specifically used in this park this reporting year that was provided by NPS (enter dollar amount): \$

Funding specifically used in this park this reporting year that was provided by all other sources (enter dollar amount): \$

List any other U.S. Government Agencies supporting this study or activity and the funding each provided this reporting year:

These questions ask about status and location of specimens or material originating from such specimens and amounts and sources of funding. NPS uses this information to track the status and locations of specimens removed from the park and material originating from such specimens (Federal property) and to compile information about funding which is of use in preparing annual reports NPS is expected to submit.

Automation helps the respondent complete the Investigator's Annual Report because data for most of the data fields in the first page of the report are entered automatically by the software system from information contained within the Research Permit and Reporting System database. The respondent completes the status questions, has the opportunity to verify the other information, and, for some of the pre-filled fields, can make corrections on line. For making corrections to contact information, NPS security procedures require that the respondent's email address on record be current or that the respondent contact NPS to arrange for corrections. The respondent completes the findings and status information requested on the second page of the Investigator's Annual Report.

The public uses all of the information contained in the Investigator's Annual Reports to learn about the performers, purpose, nature, and interim findings of studies or activities conducted in units of the National Park System.

NPS serves the checked-in Investigator's Annual Reports on the Research Permit and Reporting System website. Because the information contained in the Investigator's Annual Reports is the work of the permittees and not the NPS, NPS does not vouch for the quality of the reports but instead points out to the permittees that the reports are the permittees' work and therefore reflect the quality of what they do. To clarify the responsibilities regarding quality assurance, NPS provides the following information on the Research Permit and Reporting System website:

A. In the section of the website that provides Frequently Asked Questions:

Q: Should I notify NPS staff that a correction is needed in previously saved Investigator's Annual Report?

A: Yes. Please contact the appropriate park research coordinator and explain the change that is needed. If they fail to act on your request within a reasonable period of time, please communicate the problem to the manager of this system at Bill_Commins@nps.gov.

B. In the opening page of the section of the website on Investigator's Annual Reports, NPS provides the following statement:

Disclaimer:

The views and conclusions contained in accomplishment reports are those of the authors and should not be interpreted as representing the opinions or policies of the U.S. National Park Service. Mention of trade names or commercial products does not constitute their endorsement by the U.S. National Park Service.

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.

NPS seeks to make the application and reporting processes as efficient as possible, including through use of information technology. As a result, NPS created the Research Permit and Reporting System website to facilitate preparation and submission of information via the Internet. NPS also accepts electronically attached files containing pre-existing research or science education proposals and peer reviews rather than requiring that applicants create duplicative proposals and reports of peer reviews they previously have obtained.

The NPS provides an Internet-based, automated process at "https://science.nature.nps.gov/research" that respondents who have access to the Internet may use to prepare and submit electronically both the permit application and the required Investigator's Annual Report. The Internet-based system gives a respondent the opportunity to review the information that the respondent has entered into application or report forms, which review is presented in the format of the form, immediately prior to the respondent submitting the information into the system data base. Once the respondent's information is submitted into the data base, the system provides an opportunity for the respondent to print

the completed form. Additionally, the system automatically sends a copy of the completed form to the email address which the respondent has provided in a submission. Respondents may also contact the park research coordinator to request a copy of a submitted form. For those few respondents who are unable to supply the requested information through the Internet, upon request park research coordinators make electronic or paper copies of the information collection forms available by FAX or mail.

The collection of information for the application for a permit and for the annual report is streamlined to keep projects that are not complex from having to submit more information than is necessary to enable the park manager to make a decision about the application request or the submitted report. The electronic linkage of the two information collections (permit application and Investigator's Annual Report) benefits respondents once they have entered the data base because the electronic system automatically enters data into many of the data fields on these forms whenever the respondents next access the system. Once an applicant has submitted the first application, the electronic system automatically pre-fills on each new Investigator's Annual Report or permit application those data fields which are not unique to the new submission. For example, applicant contact information is stored in a profile table which automatically populates contact information fields. Additionally, if the applicant wishes to submit an application for the same project to multiple parks, the system provides a streamlined method whereby the data from the initial application are ported into the subsequent applications that the applicant prepares for the additional parks. The system also provides a permit renewal application option. When a park issues a permit, the data on that permit pre-fills most fields on the renewal application should the permittee need to apply for a permit renewal to continue the project. The Internet-supplied application process also prompts applicants seeking permit renewals to provide answers in those data fields that require new information. NPS provides the Internet-based submission opportunity both to streamline the submission process for the respondents and also to automate NPS preparation of permits and streamline NPS review of annual reports prior to releasing the annual reports for public access via the Internet. The system provides a print function so visitors to the Investigator's Annual Report data base have the option of downloading reports or printing them in a pdf format.

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.

Information requested by the Application for A Scientific Research and Collecting Permit form (Form 10-741a), by the Application for A Science Education Permit form (Form 10-741b), and by the Investigator's Annual Report form (Form 10-226) is unique to the applicant and no other source is available. Permit applications and the resulting reports are project-specific. No duplication would occur. Since circumstances for conducting scientific studies, collecting scientific specimens, and conducting science education activities in parks vary with each project, there is no available project information that can be used in lieu of that supplied on each application form or annual report form. However, data which an applicant has previously entered into the electronic data base, and which apply to later applications or Investigator's Annual Reports, are automatically transferred to the appropriate electronic form whenever the applicant uses the Internet-based system.

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

There are three types of small entities that could be affected by the information collection requirements associated with scientific research and collecting permits and with science education permits: academic institutions; small, independently owned scientific research organizations; and small-entity providers of field science education. The steps involved in applying for a scientific research and collecting permit or science education permit, and in submitting the Investigator's Annual Report, are not large in terms either of personnel time or materials cost. As a result, there is no significant economic impact on a substantial number of small entities within the meaning of the Regulatory Flexibility Act (5 U.S.C. 601, *et seq.*). Thus, no special provision has been made for small businesses.

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.

The information collection requests are made only in response to an applicant's expressed desire to conduct scientific research and collecting or science education in a park to address the applicant's own specific research question or science education purpose. The information cannot be collected less frequently than whenever a respondent seeks to apply for a permit or to submit the required Investigator's Annual Report. If the information is not collected at all, then NPS is unable to issue a permit and neither the respondent nor the NPS can achieve the mutually desired purpose of using parks for scientific research and collecting activities and science education. Failure to encourage use of parks for these scientific purposes would contradict both statute and NPS policy.

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.

The information collection is consistent with the provisions in NPS Management Policies and 36 CFR 2.5. An investigator applying for a single permit would rarely be required to submit

more than two information collection responses annually, although it is possible that the two responses could occur in the same quarter, should an applicant file the next application for a permit in the same quarter in which the applicant files the Investigator's Annual Report (IAR). Another scenario which could possibly result in reporting information to the agency more often than quarterly is the possibility that an investigator may wish to apply for multiple permits in a single quarter or that an investigator holding multiple different permits in a calendar year must file multiple different IARs at the end of the calendar year. The electronic system facilitates the process of submitting the IARs to the appropriate parks. If an applicant is applying at multiple parks for a single research project, even though the on-line system streamlines the process by carrying all appropriate data from the initial permit application to any additional permit request forms the applicant cares to submit, the applicant still has to submit each replicated application electronically through the Research Permit and Reporting System to the appropriate additional park in which the applicant wishes to work. Thus, in this example, an applicant who wishes to apply to conduct multiple unique research projects in a single quarter would need to submit multiple unique applications in that quarter.

Although the applicant is encouraged to complete the collection of information online upon accessing the Internet-served Research Permit and Reporting System web site, the applicant is not required to complete that collection of information in fewer than 30 days after receiving it – how long the applicant chooses to take to submit the application is solely the applicant's discretion. However, the applicant is required to complete and submit the application sufficiently prior to the proposed project start date to allow the park adequate time to conduct the necessary evaluation of the application and of any impacts that the requested work might be expected to have on park resources, park visitors, or park operations.

The applicant is encouraged to submit supporting documents as much as possible electronically and is not required to submit more than one copy of any document that must be submitted in paper copy.

The applicant is not required to retain records for more than three years.

This information collection is not a statistical survey designed to produce results that are generalizable to a universe of study, and it does not require the use of statistical data classifications that have not been reviewed and approved by OMB.

This collection of information is designed as much as possible to put information into the public record and so includes no pledge of confidentiality that is not supported by valid authority.

This collection of information will not require a respondent to submit proprietary or other confidential information except possibly when the research results in a commercial application and the researcher enters with NPS into a Cooperative Research and Development Agreement or a similar benefits-sharing agreement, in which case the NPS would be able to protect the confidential information.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least every three 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.

The Federal Register notice required by 5 CFR 1320.8 (d) was published Wednesday, July 21, 2010 (75 FR 42459). NPS used the Research Permit and Reporting System (RPRS) website home page to alert non-Federal and Federal permittees and permit applicants, park curators and park research coordinators, and other visitors to the website about the opportunity to submit comments. The first posting of this alert (posted 3/19/10) informed visitors about the NPS intention to publish the 60-day notice:

Special Notice:

NPS later this spring will prepare a request to the Office of Management and Budget for renewal of the information collection forms used by the Research Permit and Reporting System. Please watch this space for additional information.

The second posting (posted the last week of August 2010) informed the public about the 60 day comment period, solicited comments, and provided a link to a web page which provided both information about the Federal Register notice and electronic access to the notice, the three forms, and three guidance documents:

60-Day Notice of Intention To Request Clearance of Collection of Information; Opportunity for Public Comment, published July 21, 2010

NPS Research Permit and Reporting System requests renewal of Collection of Information Forms. To review the 60 day Federal Register Notices and related documents please use the following link: [Collection of Information document review](#).

No comments related to information collection were received from the public and no comments were received from NPS personnel in response to the Federal Register notice. However, two NPS personnel in March 2010 jointly suggested some minor wording changes in the Application for a Scientific Research and Collecting Permit (Form 10-741a) and in the Investigator's Annual Report (Form 10-226) to improve communication about, and tracking of, specimens and/or material originating from such specimens.

We contacted the individuals outside the agency shown below on the collections and the burden.

10-741a Application for a Scientific Research and Collecting Permit

First time applicant:

Robert Mahon
University of Montana

1945 Rattlesnake Dr.
Missoula MT 5980

Returning applicant :

Dr Andres Aguilar
School of Natural Sciences & Sierra Nevada Research Institute
UC Merced
5200 N. lake Rd.
Merced CA 95344
USA

10-741B Application for Scientific Education Permit

Dr Karen Kuers
735 University Ave
Sewanee TN 37383
USA

10-226 Investigator Annual Report

Dr Edith Allen
Dept. of Botany and Plant Sciences
UC Riverside
900 University Avenue
Riverside CA 92521
USA

Susan Bonfield
2129 13th Street
Boulder, CO 80302
United States

We contacted the five users of the Research Permit and Reporting System to ask them their assessments of the time it takes to carry out the various parts of responding to the information collection. The following paragraphs summarize what we learned:

One first time applicant for the Scientific Research and Collecting Permit estimated that it took less than a couple of hours to read the informational material and complete and submit the application, 10 to 20 minutes to sign and mail the permit, no time to copy documents because he had none to submit, and no time regarding the repository because he used a repository he is currently affiliated with but has not yet filled out the paper work (Appendix A).

One returning applicant for the Scientific Research and Collecting Permit reported that, for the first application, it took about 10 minutes to read the informational material to enter his contact information and for subsequent applications it did not require additional time; that it took not more than one half of an hour to complete and submit the application; that the permit was emailed to the investigator, who signed and faxed a copy to the park in a process that took 10 to 15 minutes; that the time it took the respondent to upload the proposal is counted as part of the time it took to complete and submit the application because the uploading capability meant there was no time

needed to copy and send documents; and that, because the permitted collections were to be retained at the university repository where the investigator works, the paperwork agreement was easy to procure, taking not long at all.

One respondent regarding the Investigator's Annual Report reported that to read the informational material or enter contact information took about a half hour to hour the first time after which there was no need to review the informational material and that, if the data are ready and analyzed, it takes an average of one hour to complete and submit the Investigator's Annual Report, although when reporting on a single project at multiple parks it is possible to use a single set of responses and copy/paste them into the reports for the various parks; this decreases the time per individual report. The respondent indicated that she does not find the IAR requirement burdensome.

A second respondent regarding the Investigator's Annual Report reported finding the process clear and did not recall needing to spend much time reading informational material; found there was no need to update contact information at the time of submitting her report; and found that it did not take long to complete and submit the Investigator's Annual Report – in her case, she conducted a single project at 5 different parks so the average time to input an Investigator Annual Report was about 15 minutes, with the first report taking a half hour to 45 minutes and the remaining reports being to a large degree a copy/paste job which took only about 10 minutes.

One experienced user of the Research Permit and Reporting System estimated that, as a new applicant, completing the Science Education Permit application would progress as follows: Since it is a new form, the respondent would read over all of the informational materials to make certain that there was not something new that she needed to do, but could not estimate the time without knowing which information materials would be included. The respondent would also read over the entire form to see what needed to be done to complete it. The respondent thought that gathering needed information should only take 10 minutes or so, and answering the contact information itself should not take over 5-10 minutes max. The respondent would assume that the informational material is relatively short and that reading it would only take 5-15 minutes. Thus the respondent assumed the total to be somewhere in the 20 to 35 minutes range. As a returning applicant, this respondent reported that, by copying and pasting, or editing and copying information for most of the questions from previous permits, completing the application would not be expected to take over 30 to 45 minutes. Proof-reading things several times to make certain there are no errors is factored into this time estimate. Because some of the questions are slightly modified and the requirement for listing taxa for samples asks for more information that she is used to with respect to the application for a Scientific Research and Collecting Permit, it is possible that some additional time would be needed. Signing and mailing the permit would take only a minute to sign and seal, but walking it to the university post office would take approximately 15 minutes roundtrip. Copying the documents would only take an additional 5 minutes over the time needed to sign and mail.-.thus about 20 minutes total. Overall the respondent did not think that this new document would take any longer to complete than the application for the research permit, and it might take less.

Based on this information, we have determined not to change our estimates of the time required for completing the various steps in the information collection.

In addition, NPS learned about user exchanges involving four public list serves that mentioned or discussed the NPS Federal Register request for comments. Although NPS is unaware of the total dialog contained on these websites (ENTOMO-L@listserv.uoguelph.ca, ECN-L@listserv.unl.edu, PERMIT-L@gold.sdsmt.edu, and the AIBS Public Policy listserv), the dialog NPS did observe indicated that the discussants were interested more in NPS policy regarding scientific research and collecting than in the information collection, itself. Comments in this dialog about the three collections of information forms are absent and about the complexity of using the website are rare (one states "I can put up with the permitting process (not odious by any means)"). Comments about working with NPS and about the NPS treatment of specimens are more common and range from appreciative to condemnatory.

NPS reviewed these exchange websites. In summary, even though the list serve dialogs clearly reveal the interested public had opportunity to be aware of the request for comments about cost and burden, NPS received no comments regarding cost or burden hours. Moreover, NPS experience with using the Internet-based system over the past nine years has yielded few complaints, has earned a number of kudos, and has not yielded any comments on the Paperwork Reduction Act statement associated with the forms, or any comments on the cost and hour burden estimates. This use over the years also has yielded a variety of suggestions from both respondents and government employees for making the software more efficient or more usable. Many of these suggestions have been considered and some have led to appropriate modifications being incorporated either as ongoing software improvements, through release of a second version of the software in December 2003, or through the changes to the collection of information forms that were adopted during the 2004 renewal request. Such receipt of, and action on, user suggestions constitutes ongoing consultation with those people from whom information is being collected and by whom the collected information is being applied. Should OMB approve the collection of information forms submitted with this supporting statement, NPS will seek to make additional software changes to improve the electronic coordination of these forms.

In response to the NPS review comments, NPS proposes minor changes of wording in two of the three collections of information forms [Application for a Scientific Research and Collecting Permit (Form 10-741a) and Investigator's Annual Report (Form 10-226)] to improve clarity regarding handling of specimens and related materials. NPS also proposes to develop better guidance, as appropriate, for use of all three forms.

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

Not applicable. No payments or gifts are provided to respondents. Once issued a permit, permittees may receive on a project by project basis logistic and other assistance from parks that issue them permits, subject to availability of such support in the park.

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

NPS provides no promise of confidentiality, rather, NPS tells respondents that their information is public information or may become available to the public. NPS asks for neither confidential information nor social security number. Name and contact information are solicited, but are identified as official business information, not private information. Despite this distinction,

because information in the Scientific Research and Collecting Permit database can be retrieved by name of the applicant and permittee, NPS has initiated development of a system of records notice and has added a Privacy Act Notice to each form in this information collection package.

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 sensitive questions of this 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 under "Annual Cost to Federal Government."**

NPS receives permit applications and Investigator's Annual Reports from personnel in the Federal government, state governments, public universities and colleges, private universities and colleges, non-governmental organizations, large and small private business entities, and a few private individuals. NPS has no need to know in the aggregate what kind of institution or entity an applicant represents and so has not developed an efficient and effective quantitative way to identify accurately how many applicants belong to each type of organization group.

To inform this Supporting Statement, NPS has used an inexact and incomplete method to group permittees by email address to provide a general estimate of the distribution of permittees by general affiliation:

Approximate Numbers and Percentages of Research Permit and Reporting System Respondents by Email Address: Federal and State Government, Public and Private University, Commercial, and Other

Permit Holder Group by Email Address	3-Yr Avg. (2007-2009)	Est. Federal Government	Est. State Government	Est. Private Sector
No. permit holders who held active permits during the calendar year, who provided NPS with an email address	4487	763	763	2961
% of email addresses with a .gov or .mil address (Federal and state government)	22%	17%	5%	0
% of email addresses with a .edu address (public and private university)	48%	0	36%	12%
% of email addresses with a .com address (commercial)	12%	0	0	12%
% of other email types -organizations, generic net, nations: .org, net, .au, .us, .jp, .ca, .de, .nz, .it, .es, .tw, .fr, .uk	18%	0	0	18%
Total % Per Sector	100%	17%	41%	42%

Assumptions:

Of the Federal and state total (22%), approximately three quarters are Federal and one quarter are state.

Of the public and private university total (48%), approximately three quarters are public (state/local/tribal government) and one quarter are private (private sector).

Of the commercial, all are private, treated as not being small entity.

Of the other, all are private, treated as not being small entity.

None of the submissions comes from the individual/household sector.

Note that the data underlying the information in this table are inexact and incomplete because they were input by respondents without data entry constraints that would guarantee the consistency and accuracy of the data. Additionally, the data used are a subset of the complete data set because one park's data are not included due to park-specific administration of the process from which these data were derived. Finally, even though the methodology underlying this technique is imprecise, for the purposes of the analyses in this Supporting Statement, NPS has used the percentages in the "total" row to estimate the distribution of applications and IARs among the three categories "individuals/households", "private sector", and "state/local/tribal governments".

Summary of projected burden due to this collection of information:

Estimated by methodology used in this Supporting Statement:

- Number of non-Federal respondents expected annually: 5,395
- Frequency of their responses: 2 times/year
- Total number of responses expected: 10,790
- Average total response time per respondent: 1.6 hours
- Estimated total annual response time for the collection: 8,632 hours

Requested total burden –

8,632 hours

We found during the past nine years that NPS received and processed per year a range of between 2,500 and 3,300 park scientific research and collecting permit applications. A respondent completes an application whenever the respondent wishes to conduct a scientific study or science education activity in a park. As a condition in each permit, the permittee must submit an Investigator's Annual Report each year the permittee holds a valid permit, and in addition is expected to submit copies of reports and other materials as identified in any park-specific or permit-specific conditions contained in the permit. The Research Permit and Reporting System records show that during calendar years 2007-2009 an average of 266 of the then 392 parks in the National Park System experienced the following levels of activity:

Calendar year	No. applications submitted	No. permits issued	No. permits active during calendar year	No. Investigator Annual Reports submitted
2007	3040	2764	5232	4133
2008	3225	2850	5230	4162
2009	3306	2914	5255	4178

The number of active permits is higher than the number of permits issued because of permit end dates that extend past the end of the calendar year. An Investigator's Annual Report is due at the end of the calendar year for every permit that is active during the calendar year.

An applicant who successfully obtains a permit in most cases will submit two responses per year. The two responses consist of the application and the Investigator's Annual Report. The estimated average of total number of annual responses received from approximately 3,000 respondents per year during the past six years was 6,000 responses (or approximately 3,000 applications and up to approximately 3,000 annual reports).

Although we believe changes to the collection of information forms made in 2004 on average reduced the hour burden imposed on respondents that we estimated in 2001, we have retained for this renewal request our original 2001 estimate of the collection of information hour burden per respondent. This estimate includes several components. One of two basic components is that it will take a maximum of 0.75 hours for a respondent using the automated application form to read the guidance material for the research permit application, complete an application, electronically attach a copy of the applicant's proposal (if any) which sets forth the objectives and methods to be used to conduct a research project (it is standard practice for scientists to develop research proposals as a fund-requesting mechanism for the research they seek to conduct), and electronically submit the application package to NPS. The second basic component is that it will take 0.25 hours for the successful applicant to review the permit conditions attached to the permit issued to the applicant, sign the permit, and return the signed permit by mail or FAX to the park for the park manager's signature. We have estimated that approximately the same times will be required for responding to the collection of information regarding the science education permit application, recognizing that this application process may involve attaching a proposal that contains a syllabus and desired outcome for a science education activity, rather than a research proposal. These two basic components total 1.00 hours per response.

In addition to submitting completed application responses, some respondents may have to scan and email, mail, or FAX copies of documents that are not available electronically, such as

permits received from other agencies or copies of scientific papers published in scientific journals. We estimate that copying and sending such documents will involve approximately 1,500 respondents and take each of them no more than 0.25 hours per year to complete.

We estimate that no more than half of the research permit requests will involve an intent to make permanent collections that will require coordination with one or more non-NPS museums and possibly other repositories. We estimate that it will take a respondent a maximum of 0.5 hours to complete and obtain an appropriate signature on the portion of the application form that deals with specimens that are to be retained permanently. We prohibit science education permittees from making permanent collections and so no applicants for this permit will have to spend time coordinating with a non-NPS repository.

The last component is that it will take a maximum of 0.25 hours for a respondent to complete the automated Investigator's Annual Report (it is standard scientific operating practice for investigators separately to prepare draft and final reports that document the scientific work conducted).

In 2004, we identified a total annual burden of 4,875 hours (or 2,250 hours for completing applications, 750 hours for returning signed permits to issuing parks, 750 hours for obtaining specimen repository information, 750 hours for submitting annual reports, and 375 hours for providing non-automated information).

By 2007, we observed a gradual increase in total number of permitted activities from the original estimate of 3,000 to averages for the years 2004 and 2005 of 4,472 studies under permit and 3,657 Investigator's Annual Reports submitted. Based on the growth in use of the Internet system experienced to date, we estimated that by the year 2010, the system would be dealing with about 6,500 respondents per year who will submit an estimated 13,000 responses per year. Although we believe the burden per respondent for dealing with the science education permit process will be somewhat less than the burden per respondent for dealing with the research permit process, we used the same average annual burden for the two collections of information processes to estimate the total annual reporting burden. In 2007, using 1.625 hours per year per respondent and 6,500 respondents, we estimated the average annual reporting burden by the year 2010 would rise to 10,560 hours. Although the actual increase in number of information collections did not occur as rapidly as we had estimated in 2007, we expect there will be an ongoing growth in number of information collections during the next three years. In this Supporting Statement we have attempted to estimate the number of respondents who are Federal employees and have subtracted that number from the total number of respondents we reported in 2007. As a result, we are requesting in this renewal that the total annual hours requested be reduced from the 10,560 hours approved in 2007 to a new total of 8,640 hours.

The probable pool of respondents applying for a scientific research and collecting permit will include all ranks of academics from graduate students to full professors and the full range of government and non-government researchers from entry level to senior scientist. The probable pool of respondents applying for a science education permit will include all ranks of academics from graduate students to full professors and the full range of public and private school teachers from kindergarten through high school. We used Bureau of Labor Statistics information for estimating salaries plus benefits for these different groups of possible respondents and, from those estimates, estimated the total annual cost for all respondents to apply for and report on the results of permitted scientific research and collecting or science education conducted in parks to be \$455,610. This estimate includes the time needed for

reviewing instructions and conducting the typing, photocopying, filing, mailing, and other standard office activities associated with requesting the permit and complying with permit conditions. This estimate indicates that, for 6,500 respondents, the estimated average total cost per respondent is \$70.09.

Detailed Tables Used for Estimating Burden Hours, Burden Hour Dollar Costs, and NPS Costs for the Research Permit and Reporting System

A. Estimated Burden Hour Reporting for Three Forms Used in the National Park Service Research Permit and Reporting System (A1 – Form 10-741a, A2 – Form 10-741b, A3 – Form 10-226)

A1. Completing and Submitting an Application for a Scientific Research and Collecting Permit (Form 10-741a)

Form	Est. Avg. No. of Rspndrs	Freq. Of Rspns.s	Est. Avg No. of Rspns.s	Est. Avg. Time Per Rspndr (hrs.)	Est. Total Annual Burden (hrs.)	Weighted Average Cost per Response	\$ Value of Ann. Burden Hours
Form 10-741a (no sample collection, no copies)	1,245	1 time	1, 245	1.00	1, 245	61.75	76,879
Form 10-741a (no sample collection, copies submitted)	1, 245	1 time	1, 245	1.25	1,556	61.75	76,879
Form 10-741a (includes sample collection, no copies)	1, 245	1 time	1, 245	1.50	1,868	61.75	76,879
Form 10-741a (includes sample collection, copies submitted)	1, 245	1 time	1, 245	1.75	2,179	61.75	76,879
Weighted Average Time Burden				1.375			
Total Burden Hours					6,872		
Total Dollar Value of Burden Hours							307,516

A2. Completing and Submitting an Application for a Science Education Permit (Form 10-741b)

Form	Est. Avg. No. of Rspndrs	Freq. Of Rsp.s	Est. Avg No. of Rsp.s	Est. Avg. Time Per Rspndr (hrs.)	Est. Total Annual Burden (hrs.)	Weighted Average Cost per Response	\$ Value of Ann. Burden Hours
Form 10-741b	415	1 time	415	1.00 hrs.	415	47.10	19,546

A3. Completing and Submitting an Investigator's Annual Report (Form 10-226)

Form	Est. Avg. No. of Rspndrs	Freq. Of Rspns.s	Est. Avg No. of Rspns.s	Est. Avg. Time Per Rspndr (hrs.)	Est. Total Annual Burden (hrs.)	Weighted Average Cost per Response	\$ Value of Ann. Burden Hours
Form 10-226	5,395	1 time	5,395	0.250 hrs	1,349	11.78	63,553

A4. Totals for this Collection of Information (Forms 10-741a, 10-741b, and 10-226 combined)

	Est. Avg Total Burden per Successful Applicant (hrs)	Total No. of Rspndrs	Total No. of Rspns.s	Est. Total Annual Burden (hrs)	\$ Value of Annual Burden Hours
Totals	1.6	5,395	10,790	8,632	390,615

Note: applicant submits 1 application + 1 IAR = 2 responses per applicant

B. Estimated Salary + Benefits Costs (B1 – Form 10-741a, B2 – Form 10-741b, B3 – Form 10-226)

B1. Completing and Submitting an Application for a Scientific Research and Collecting Permit

Position	Source	Hourly pay rate (\$/hr)	BLS Table 4 Total Compensation (\$/hr)	Wgtd. time per application (hrs.)	Percent of time spent on collection	Average \$ cost per response
Primary, Secondary Teacher	BLS Table 4	38.08	53.69	0.00	0	0
Graduate student	BLS Table 4 (Educational Services)	29.40	42.87	1.375	100	58.95
University scientist	BLS Table 4	30.21	44.50	1.375	100	61.19
State scientist	BLS Table 4	32.51	47.36	1.375	100	65.12
Weighted Average Cost per Response						61.75

B2. Completing and Submitting an Application for a Science Education Permit

Position	Source	Hourly pay rate (\$/hr est.)	BLS Table 4 Total Compensation (\$/hr)	Est. time per application (hrs.)	Percent of time spent on collection	Average \$ cost per response
Primary,	BLS Table	38.08	53.69	1.00	100	53.69

Secondary Teacher	4					
Graduate student	BLS Table 4 (Educational Services)	29.40	42.87	1.00	100	42.87
University scientist	BLS Table 4	30.21	44.50	1.00	100	44.50
State scientist	BLS Table 4	32.51	47.36	1.00	0	47.36
Weighted Average Cost per Response						47.10

B3. Completing and Submitting an Investigator's Annual Report

Position	Source	Hourly pay rate (\$/hr.)	BLS Table 4 Total Compensation (\$/hr.)	Est. time per report (hrs.)	Percent of time spent on collection	Average \$ cost per response
Primary, Secondary Teacher	BLS Table 4	38.08	53.69	0.25	100	13.42
Graduate student	BLS Table 4 (Educational Services)	29.40	42.87	0.25	100	10.72
University scientist	BLS Table 4	30.21	44.50	0.25	100	11.12
State scientist	BLS Table 4	32.51	47.36	0.25	100	11.84
Weighted Average Cost per Response						11.78

Assumptions

Applicants for a Scientific Research and Collecting Permit come from both non-Federal and Federal organizations and probably range in position title from graduate student to senior scientist and equivalent Federal grade from GS-7 technician to GS-15 scientist (an estimated 17% of these respondents are Federal employees)

Entry of an application or IAR into RPRS is handled by a single person, so that person's time is treated as 100% of the time required for submitting an application or report

The time to prepare the funding proposal and obtain peer reviews (if any) and to prepare the background information used in preparing the IAR is time that the scientist would have spent regardless of whether or not the scientist intended to submit an application for a permit or an IAR and so the preparation time is not included in the estimate of time the scientist spends responding to the collections of information

Hourly salary and total compensation costs are drawn from BLS News Release September 8, 2010 (<http://www.bls.gov/news.release/pdf/ecec.pdf>):

Private industry employers spent an average of \$27.64 per hour worked for employee compensation in June 2010, the U.S. Bureau of Labor Statistics reported today. Wages and salaries averaged \$19.53 per hour worked and accounted for 70.6 percent of these costs, while benefits averaged \$8.11 and accounted for the remaining 29.4 percent. Total compensation costs for **state and local government** workers averaged \$39.74 per hour worked in June 2010.

Total Compensation per Hour:

State/Local Government primary and secondary teachers (Table 4):	53.69
State/Local Government junior colleges, colleges, and universities (Table 4):	44.50
State/Local Government professional and related (Table 4):	47.36

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * **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 for form processing). 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.**

Not applicable. There is no non-hour cost. There is no filing fee. Responding to the collection of information associated with applying for, and reporting the results of research and collecting permitted by, a Scientific Research and Collecting Permit will require no capital equipment or operations and maintenance costs that are due to the collection of information. Similarly, responding to the collection of information associated with applying for, and reporting the results of a science education activity permitted by, a Science Education Permit will require no capital equipment or operations and maintenance costs that are due to the collection of

information. Respondents will use equipment and services that already are available to them as part of their normal duty stations.

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.

The total annual cost to the NPS for processing a total of 6,500 scientific research and collecting permit applications, science education permit applications, and resulting permits, reports, and specimens and their associated documentation is estimated to be \$23,762,500, based on the Office of Personnel Management Year 2010 salary table. The partial cost of conducting this work specifically for the non-Federal applications is 83% of the permit processing total plus the 200,000 for the software management cost, or a total of \$19,756,875. This estimate is based on a direct software management cost of approximately \$200,000 plus \$23,562,500 (6,500 permits at an overall average cost of \$3,625 per issued permit) for permit processing activities to 1) review and process application materials, annual reports, specimen accession and catalog documentation, and loan agreements; 2) conduct monitoring reviews and field inspections as needed; and 3) perform necessary typing, data entry, photocopying, record-keeping, mailing, and other standard office activities. Given that some research projects and most science education activities will require very little review by only a small number of park staff while other, primarily research, projects will require a larger number of park staff to conduct an extensive review, prepare an environmental assessment, and curate specimens, the time estimates provided here are estimated averages of approximately 6 person days for processing each application, 3 person days for monitoring the work being conducted under the permit, 0.5 person days for reviewing and handling Investigator's Annual Reports and other reports produced by each permittee, and 1 person day for managing specimens collected by permittees for a total of approximately 10.5 person days per submitted application. This estimate does not include long term, post permit costs associated with the ongoing management and storage of specimens, associated records, and, where applicable, loans of specimens that are generated by those permitted scientific research and collecting studies that involve collection of specimens for permanent retention. Nor does this estimate include office and other costs for park employees, since their work processing permit applications in most parks constitutes collateral duty.

Processing activities include 1) responding to any park specific questions that prospective applicants may ask regarding the permitting process, 2) providing application forms and instructions to those few applicants who are unable to access the Internet and entering information from their paper copy submissions into the Research Permit and Reporting System, 3) reviewing applications for conformance with permit requirements and park protection standards, 4) providing collection management guidance and requirements to applicants proposing to collect specimens for permanent retention of the specimens and/or material originating from such specimens, 5) preparing permits and determining appropriate terms and conditions for permits, 6) notifying permit applicants of the park's decision to issue permits or deny applications, and 7) conferring with managers of proposed repositories of permanently retained collections.

Monitoring includes 1) inspecting research or science education field sites for conformance to the terms and conditions of permits, 2) reviewing reports submitted by permittees and, 3) tracking loan documentation and specimens and associated records to ensure they are

deposited in the repositories named in the permits, and 4) initial assessment of the status of specimens by checking catalog data, uploading catalog records into the NPS database, checking labeling, preparation, and storage techniques, and processing associated records.

Reviewing and handling reports includes 1) ensuring that Investigator's Annual Reports are collected; 2) for those few respondents who are unable to access the Internet, entering annual report information into the Research Permit and Reporting System database, 3) checking in Investigator Annual Reports, which consists of reading each report and determining its status (sensitive or non-sensitive); 4) distributing Investigator's Annual Reports and other reports to interested park interpretation, resource management, planning, and other staff; and 5) updating park permit files.

Processing applications that request permission to make collections includes: 1) reviewing the applications; 2) providing collection management guidance and requirements to applicants; 3) assigning and tracking accession and catalog numbers as appropriate; and 4) receiving associated data about specimens and receiving or arranging loans of the specimens.

The estimates provided in this section are derived from the following tables and assumptions:

A. Hourly Salary and Benefits by Position and Weighted Hourly Salary and Benefits

Position	Grade	Hourly pay rate (\$/hr est.)	Hourly pay + benefits rate (1.5 x hourly rate)	Hourly pay + benefits rate (1.5 x hourly rate)
Administrative	7(5)	21.07	31.61	31.61
Technician	9(5)	25.77	38.66	38.66
Scientist	13(5)	44.43	66.65	66.65
Curator	11(5)	31.17	46.76	
Weighted Average (\$/hr)				45.64

B. Hours and Per Cent of Time Spent on Each of Four Different Activities

Position	Grade	Time spent processing application		Time spent monitoring permit		Time spent receiving reports		Time spent managing specimens	
		Total hours	%	Total hours	%	Total hours	%	Total hours	%
Administrative	7(5)	40	100	24	100	4	100	0	0
Technician	9(5)	40	100	24	100	4	100	0	0
Scientist	13(5)	40	100	24	100	4	100	0	0
Curator	11(5)	10	100	0	0	0	0	8	100

C. Estimated Cost of Each Activity per Permit

Activity	Total hours	Weighted avg. cost (\$/hr)	Total cost (\$)
Process Application	40	45.64	1,826
Process specimen	10	46.76	468

application			
Monitor permit	24	45.64	1,095
Receive reports	4	45.64	183
Manage specimens	8	46.76	374
Total Weighted Cost per Permit			3,946

Total cost to the Federal Government: \$3,946/permit x 5,395 permits = \$21,288,670

Assumptions:

The grade and title of the park research coordinator who handles the application varies from park to park, ranging in position title and grade from probably GS-5 clerical to GS-14 scientist. The Research Permit and Reporting System does not collect information about what job series in a park is assigned the responsibility to process applications, permits, and IARs.

Applications and Investigator's Annual Reports to a single park usually are handled by only one park research coordinator, so that person's time is treated as 100% for purposes of calculating average hourly salary plus benefits costs.

Park research coordinator duties include reviewing the application and attached proposal and peer reviews (if any), obtaining review of the application by other park staff and external peer reviewers as appropriate, preparing the permit and obtaining applicant and park signatures, and reviewing and checking in the IAR at the end of the calendar year.

Many applications are reviewed by a variety of park staff, but that review process is treated as outside the immediate scope of the information collection and so is not accounted for here.

The park curator does not deal equally with all applications – for some, the curator may not be involved at all, for a few the curator may spend as much as a quarter of the time the park research coordinator spends. Overall, the park curator is assumed to spend on average slightly more than one day per permit.

Hourly Federal pay rates are drawn from OPM Salary Table 2010-RUS.

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

We are not requesting any program changes or adjustments.

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.

This collection of information package is not intended to produce any specific publication. Although they are part of the public record, the applications and permits are not published. The Investigator's Annual Reports prepared and entered into the Internet system by the permittees are released to public availability on the Internet site once park staff have reviewed

them and found them appropriate for posting in the system. There are no plans for any publication, tabulation, or analytical analysis, although there would be benefit to NPS and the public in analyzing the Investigator's Annual Report database to learn which scientific disciplines utilize parks for conducting their field activities.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This collection of information complies with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3). There are no exceptions to the certification statement.

Table of Contents of the Appendices

Appendix A: Text of relevant sections of law

Appendix B: Relevant sections from NPS regulations

Appendix C: Relevant sections from NPS Management Policies 2006

Appendix D: **Form 10-741a, Application for a Scientific Research and Collecting Permit**

Appendix E: **Form 10-741b, Application for a Science Education Permit**

Appendix F: **Form 10-226, Investigator's Annual Report**

Appendix G: 60-day Federal Register notice