

## **0.The Supporting Statement for OMB 0596-0210**

### Research Data Archive Use Tracking

2011

#### **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.**

##### **Laws, Statutes, and Regulations**

- **Public Law 95-307** - Forest and Rangeland Renewable Resources Research Act of 1978
- **16 USC 1645(c)** - Dissemination of knowledge and technology developed from research activities; cooperation with specified entities.

Section 1645(c) of 16 USC, states (in part): "The Secretary shall use the authorities and means available to...disseminate the knowledge and technology developed from research activities conducted under or supported by this subchapter..."

Forest Service Research and Development (FS R&D) has completed a data archive to store and disseminate data collected in the course of Forest Service scientific research. Research data sets collected by the FS R&D are shared with other researchers at the discretion of the collecting researcher or as a response to a Freedom of Information Act request.

Preparing data sets for the archive requires significant effort by researchers. The Forest Service has an obligation to encourage ethical use of these data sets and therefore needs to know how others are using the data sets. The information collected in the request will assist FS R&D personnel in evaluating the research program. By creating a data archive, FS R&D has broadened and simplified access to data sets while satisfying information requirements associated with scientist performance evaluations. Information about the use of the products of a Forest Service scientist's research is of significant importance in evaluating performance of the scientist.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

- a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

The following information is collected using form FS-4000-5:

- name (or alias);
- organization affiliation;
- e-mail address;

- *Statement of Intended Use; and Data Use Agreement:* The *Data Use Agreement* and associated information collection closely follow the data access structure used by the National Science Foundation's Long Term Ecological Research network.

The Forest Service believes this structure provides a sound balance between meeting obligations to scientific staff and ease-of-access by the public (research community). Forest Service archive staff will review the individual Data Use Agreements prior to approving release of the data set to the requester. This review ensures that submitted information is complete and correct.

**b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

The information will be collected from individuals who wish to obtain a copy of a research data set in the data archive. Generally, the interested population is expected to be scientists (in government agencies, nonprofits [including colleges and universities], and for profit companies) and graduate students. Private individuals or people associated with secondary education institutions may occasionally participate as well. The simple, Internet-based information collection process is the same for everyone.

**c. What will this information be used for - provide ALL uses?**

There are three known uses:

1. Assist the researcher who collected the data to describe the impact of this research accomplishment as part of the performance appraisal (under OPM's Research Grade Evaluation Guide panel process).
2. The collection of Data Use Agreements (via FS-4000-5) will be evaluated by the data archiving program staff to identify opportunities for improving the archive's function and offerings.
3. Assist FS R&D communications office in assessing the effectiveness of its research and technology transfer activities.

This information collection is a critical component in the campaign to encourage Forest Service scientists to deposit their research data in the archive system. Sharing research data is very useful to the broader research community and sharing well-documented FS R&D data sets via the archive will be impossible without this information collection. It has taken longer than expected to actually put the archive into production. Therefore, no information has been collected under this authority to date (January 27, 2011). The archive became available on the web in December 2010, but we do not currently have any data sets that use the information collection feature. Those data sets are expected to start appearing in April 2011.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the**

**information? If so, what are they?**

An Internet-based form (FS-4000-5) will collect the information. Those respondents unable to use the form may respond via telephone or e-mail. Archivists are available to assist respondents. An informational version of the form is available on the archive's web site ([http://www.fs.usda.gov/rds/archive/datauseinfo/useagreement\\_cpub.shtml](http://www.fs.usda.gov/rds/archive/datauseinfo/useagreement_cpub.shtml)).

**e. How frequently will the information be collected?**

Collection of the information occurs on a case-by-case basis when someone requests access to a particular data set. During the upcoming three-year period, the archive will be small, so it seems reasonable to estimate that a given individual would need to provide information no more than once per year. This may change in the future, as more data sets become available to the public. The software implementation of the information collection does retain knowledge of what an individual has provided. Therefore, in most cases, after the initial information collection, any subsequent collections from the same person will be even less burdensome than the initial collection.

**f. Will the information be shared with any other organizations inside or outside USDA or the government?**

The individual data use agreements will not be shared. Broad (statistical) summary information related to accomplishment reporting may be reported upward to USDA.

**g. If this is an ongoing collection, how have the collection requirements changed over time?**

Since the initial request in 2008, we have reduced the information collected. Instead of collecting information on the actual affiliation of the data user (e.g., U.S. Fish & Wildlife Service), we are only requesting the type of affiliation (e.g., Federal Government). Also, instead of collecting full contact information (email and physical address), we are only requesting an email address.

**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.**

This collection is intended to be entirely electronic using Internet-based forms. The basis for this decision is an interest in making the collection as easy and as fast as possible. Also, the data archive is accessed via the Web so using Web-based forms was the most logical approach.

**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 no similar information available for use by the Forest Service. A given

data set may be used in many ways, many of them unforeseen by the original researcher. Consequently, the collected information is unique to the researcher-data set combination.

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

The information collection primarily affects individuals, not organizations. Burden is minimized by collecting the information electronically and by keeping the collection of items small and relevant to the problem. Generally, people will know the answers to the questions before they come to the archive – this will either be part of their broader research planning activity or be an outcome of that planning.

**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.**

There are no known technical or legal obstacles to reducing the burden further; the obstacle is functional utility.

If the collection is not conducted at all, a reasonable outcome would be a much greater reluctance to contribute data sets to the archive. This would have negative consequences on long-term availability/utility of the data set and would leave in place the more burdensome current process of obtaining permission to use a data set from the original researcher or filing a Freedom of Information Act request.

**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;**

Collection of the information occurs on a case-by-case basis when someone requests access to a particular data set. For each request, an individual must provide information for the request to be processed. For this reason, multiple requests spread over time may occur more 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 au-**

**thority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 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 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 record keeping, 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 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.**

Notice was published in the Federal Register on 10/14/2010; citation: Volume 75, Number 198, Page 63141. One comment was received during the 60-day comment period. The comment did not address cost or hour burdens associated with this information collection; it focused on complaints about how national forests are managed.

This information collection is patterned on the successful structure used by the National Science Foundation's Long Term Ecological Research data access agreement, additional consulting was not considered useful. Since we have not deployed the authorized information collection yet, the agency did not consult with individuals on this renewal.

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

No gifts or payments are provided to respondents.

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

No confidential information is requested, so no assurance of confidentiality is provided.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

There are no questions of a sensitive nature as described in the question.

**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- a) Description of the collection activity
- b) Corresponding form number (if applicable)
- c) Number of respondents
- d) Number of responses annually per respondent,
- e) Total annual responses (columns c x d)
- f) Estimated hours per response
- g) Total annual burden hours (columns e x f)

Table 1 – Total Burden Estimates

| (a)<br>Description of the<br>Collection Activity | (b)<br>Form<br>Number | (c)<br>Number of<br>Respondents | (d)<br>Number of<br>responses<br>annually per<br>Respondent | (e)<br>Total<br>annual<br>responses<br>(c x d) | (f)<br>Estimate<br>of Burden<br>Hours per<br>response | (g)<br>Total Annual<br>Burden<br>Hours<br>(e x f) |
|--|-----------------------|---------------------------------|---|--|---|---|
| Data set usage info                              | FS-4000-5             | 100                             | 1   | 100  | 0.25  | 25  |
| Totals   | ---                   | 100                             | ---   | 100  | ---   | 25  |

- **Record keeping burden should be addressed separately and should include columns for:**
  - a) **Description of record keeping activity:** None
  - b) **Number of record keepers:** None
  - c) **Annual hours per record keeper:** None
  - d) **Total annual record keeping hours (columns b x c):** Zero
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 2 – Estimated Cost to Respondents

| (a)<br>Description of the Collection Activity | (b)<br>Estimated Total Annual Burden on Respondents (Hours) | (c)<br>Estimated Average Income per Hour | (d)<br>Estimated Cost to Respondents |
|---|---|--|--------------------------------------|
| Data set usage information                    | 25  | \$28.81*                                 | \$720.25                             |
| Totals  | 25  | ---                                      | \$720.25                             |

\* *Department of Labor, Occupational Employment and Wages, May 2009 (State Government Employees, mean hourly wage- \$28.81).*

<http://www.bls.gov/oes/current/oes131199.htm>

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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.**

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- **Employee travel costs**
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Assume 3-year life cycle due to need to obtain collection approval and rate of change of Web technology. There are no physical forms to design, print, or store. No travel costs are associated with the information collection. Collection of information is automated; there are no contractor or employee costs for collecting the information. Cost is for contractor to develop the IT systems to support the collection, which was finished in November 2010.

1. Start-up cost to develop screens and reports: 120 hours (15 days) x \$125/hr = \$15,000 in 2010 for a 3-year annualized cost of \$5,000/year.
2. Cost to analyze collected information: 10 minutes per entry x 100 entries x \$55.07\*/hr = \$917.83 annualized cost.

**Total annualized cost estimate = \$5,917.83**

*\*Cost to Government based on GS-13/step 8 salary multiplied by 1.30 (to factor in cost to Government) = \$42.36 x 1.30 = 55.07 \$/hour cost to government. Taken from: [http://www.opm.gov/oca/07tables/pdf/g\\_s\\_h.pdf](http://www.opm.gov/oca/07tables/pdf/g_s_h.pdf), cost to Government calculated as base salary multiplied by 130 percent*

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

The Agency is requesting approval for 25 annual burden hours, based on 100 annual responses. This is an increase of 0 burden hours from the previous approval period, and a 0% increase in respondents. The lack of change is the result of the data archive only being implemented in December 2010 with data sets that use this information collection scheduled to be deployed in April 2011.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans to publish the results of this information collection.

**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.**

No exemption to requirement to display the expiration date for OMB approval is sought.

**18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

There are no exceptions to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

## **B. Collections of Information Employing Statistical Methods**

This collection does not employ statistical methods.