

## SUPPORTING STATEMENT

### Certification Requirements for NOAA's Hydrographic Product Quality Assurance Program OMB Control No. 0648-0507

#### A. JUSTIFICATION

##### 1. Explain the circumstances that make the collection of information necessary.

This request is for extension of a current information collection.

The National Oceanic and Atmospheric Administration (NOAA) provides nautical charts and other products for safe maritime navigation in the U.S. The [Hydrographic Service Improvement Acts of 1998/2002](#) mandated that NOAA develop and implement a Quality Assurance Program that is equally available to all applicants, under which the Administrator may certify hydrographic products, produced by non-Federal entities, that satisfy standards promulgated by the Administrator.

The Administration fulfilled this mandate by establishing procedures by which hydrographic products are proposed for certification; by which standards and compliance tests are developed, adopted, and applied for those products; and by which certification may awarded or denied. These procedures are the mandated Quality Assurance Program, and the implementation of the program would be the application of those procedures to specific hydrographic products. The procedures are codified in [15 CFR 996](#).

All requirements for information to be submitted under this Quality Assurance Program are in the nature of:

- application for certification;
- application for use of the NOAA logo on products certified under the Program;
- comments submitted in response to NOAA's publication in the Federal Register of Program activities;
- requests for reconsideration of a NOAA action or decision under the Program; or
- appeals for setting aside a NOAA decision.

##### 2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The Director, Office of Coast Survey, NOAA will use the information, or such other administrator of the Quality Assurance Program as shall be designated by NOAA, to administer the Program. The information will be used once as each hydrographic product advances through the Program. Written submission of collected information is specified.

A limited amount of the information will be distributed to the public, via the Federal Register or other appropriate means, to permit full participation of those affected by the implementation of the Program. For example, if a non-Federal entity submits a specific hydrographic product for

certification, NOAA will publicly announce its intention to develop standards, compliance tests, and to offer certification for that product or category of products. In making this announcement NOAA must make public the product or its category – information that may have been submitted by the applicant.

As explained in the preceding paragraphs, the information gathered has utility. NOAA will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

No such technology is being used.

**4. Describe efforts to identify duplication.**

Each application by a non-Federal entity is expected to be unique because of the nature of the Program.

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

Participation in the Quality Assurance Program is voluntary.

Only the minimum of information necessary for the administration of this Program is being requested. No on-going collection of information is planned.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Law mandates NOAA to establish and implement this Quality Assurance Program. Denying the ability for companies to apply for this federal benefit would preclude implementation of the law.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

NA.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.**

A Federal Register Notice published on January 24, 2011 (76 FR 491) solicited public comment on this request. No comments were received.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

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

No assurance of confidentiality is made. In the regulations establishing the program, NOAA stated, "All parties acknowledge and accept that information submitted to NOAA under this Program shall be deemed to be in the public domain, and no representation is made as to the protection of confidential, proprietary or otherwise restricted information."

**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.**

No such questions are being asked.

**12. Provide an estimate in hours of the burden of the collection of information.**

The average expected number of respondents for certification is one per year (previously estimated as two). Although there have been no applicants between 2004-2011, we are using one respondent as a placeholder, in the event that an application is received.

The total number of estimated hours per year for one participants is 12: 4 hours to prepare the initial application (one response), 4 hours for documentation to accompany an item submitted for certification (one response), and 4 hours for an assumed 1 request for reconsideration of a NOAA decision (one response).

Four (4) hours of burden are estimated for respondents to request information about the certification program (four responses, one hour per inquiry).

The total burden of the program on respondents is thus 16 hours, for 5 respondents and 7 responses.

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

For each response (application, supporting documentation and possible appeal) a maximum of \$10 for faxing and \$5.00 for copying, or \$15, is estimated, for a maximum of \$45. For four telephone calls, estimated at \$10 per call, the total cost would be \$40. Total costs: \$85.

**14. Provide estimates of annualized cost to the Federal government.**

Total annual estimated cost burden for NOAA collecting and processing the information submitted by respondents as described in Question 12 above: Six hours annually valued at \$230.40. This estimate assume a mid-grade GS-13 (\$38.40 per hour for salary + benefits), taking 2 hours to process the information in each application, each item submission, and each request for reconsideration for one applicant annually. ( $\$38.40 * 6 = \$230.40$ ).

Four (4) hours of annual cost to the Federal government are estimated for responding to inquiries about the certification program. The cost for these responses are  $4 * \$38.40 = \$153.60$ .

The total annualized cost to the Federal government is thus  $230.40 + \$153.60 = \$384$ .

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

We have adjusted the application burden down from 24 to 12, based on an estimate of one, rather than two, applicants. Four hours are added to account for any inquiries about the certification program. This is also an adjustment: inquiries have always been welcome, of course, but had not previously been counted in the burden. Net decrease: 8 hours.

Costs were not accounted for previously, but any responses would have incurred costs. Addition of estimated costs of \$85 is an adjustment.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

There are no plans to publish any of the results.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

NA.

**18. Explain each exception to the certification statement.**

NA.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection will not employ statistical methods.