

## Supporting Statement for Paperwork Reduction Act Submission

### Part A

#### BIRD BANDING AND RECOVERY REPORTS

OMB Control Number 1028-0082

Terms of Clearance: None

#### A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

In accordance with the Migratory Bird Treaty Act, 16 U.S.C. 703-712, the trapping and marking of wild migratory birds by persons holding Federal permits must be monitored. The bird banding program is the responsibility of the U.S. Geological Survey (USGS) Bird Banding Laboratory (BBL). The primary role of the BBL is to support the use of banding and banding data by researchers and managers engaged in science, conservation, and management of birds, but it does not play a lead role in original research.

The BBL attempts to achieve the following three objectives related to this information collection:

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

The BBL collects information using three forms and one electronic database: 1) *Application for Federal Bird Banding or Marking Permit*, 2) *Federal Bird Banding or Marking Permit Renewal Form*, 3) *Reporting a Bird with a Federal Band or Color Marker (Recovery Report)*, and 4) *Bandit*. This program assists the U.S. Fish and Wildlife Service to fulfill its responsibilities designated by international migratory bird treaties with Canada, Mexico, Japan, and Russia.

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

The BBL has a critical role in storing and maintaining data on marked birds, particularly to facilitate coordination between banders and people who later encounter the marked birds, and to ensure the data are available for later analyses. The BBL works towards increasing the types and amounts of data that are being collected and stored while increasing the efficiency of data collection and storage to reduce overall costs.

The three forms and an electronic database described in this package are used for separate purposes. The *Application for Federal Bird Banding or Marking Permit* is used to identify individuals and evaluate their purpose, need, and qualifications to hold a permit. If a permit is granted, then the identifying information about the individual is entered into the database, a permit is issued, and the application is stored and maintained as a permanent record. The permit program is designed and carried out to protect birds covered by Federal statutes and to enhance research and management efforts. BBL has a regulatory responsibility (50 CFR 21) to ensure that birds are captured and marked in an ethical and safe manner. The permit system is consistent with legal regulations.

The *Federal Bird Banding or Marking Permit Renewal Form* is used by permitted banders to renew their Federal banding permits. It only collects the same contact information as the original application. This form is a part of the BBL permit program with the same regulatory responsibility as described in the preceding paragraph.

*The Recovery Report is used by individuals that encounter a banded or marked bird to report the information to the BBL. All of the information on the bird and the person reporting the bird are stored in the BBL database. The information about these individuals is used to generate Certificates of Appreciation and may be used to contact them if any discrepancies are encountered with the reported information.*

*Bandit* is an electronic database and the latest program assisting bird banders to manage and submit their banding data. The principal use of *Bandit* is to store and transfer to the BBL and the Canadian Bird Banding Office (BBO) data collected during bird banding operations. *Bandit* allows a bander to enter and edit data associated with bands issued to them by the BBL/BBO. Because banders collect a variety of data at the time of banding including information such as fat scores, biometrics, molt information, and breeding condition, these ancillary data can be used to verify core data fields (for example, determination of age and sex) and to research many issues relevant to bird conservation and management (for example, determining the quality of stopover locations based on rates of gain in body weight). The preservation of these data within *Bandit* is a high priority. *Bandit* may also be used to maintain data for banded birds recaptured during banding operations. Recapture data are valuable for estimating survival and other population parameters, such as dispersal rates, especially for songbirds for which very few recovery data are typically available. *Bandit* will serve as a repository for all recapture data that banders may eventually wish to submit to the BBL.

#### **A. Application for Federal Bird Banding or Marking Permit**

This application is submitted by those parties who wish to become bird banders. These “parties”

include governmental agencies, businesses, universities, nongovernmental organizations and individuals. The data collected is used by the BBL to determine the applicant's qualifications for a Federal Bird Banding or Marking Permit. It is essential that the applicant be well qualified and has a valid research or management need for the permit.

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

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

### **B. Federal Bird Banding or Marking Permit Renewal Form**

This form is completed by permitted bird banders when their banding permits need to be renewed. As set by regulations, most BBL permits are renewed every 3 years. This form is only available electronically at: <http://www.pwrc.usgs.gov/bbl/homepage/renewalform.cfm>. The banders fill out the required fields and the submission process provides an electronic signature for the form. This process is used only for permit renewals and no changes to authorizations on the banding permit can be made through this form.

### **C. Recovery Report**

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

Recovery Reports can be submitted electronically (via the Internet) or by calling toll-free to 1-800-327-BAND (2263) from anywhere in Canada, the United States and most parts of the Caribbean. The same information is collected by both reporting methods.

The BBL sends electronic Certificates of Appreciation to everyone reporting a banded bird. Additional information such as email address is collected in case the BBL has questions concerning the band encounter. This form is available on the BBL website in:

- English at: <http://www.reportband.gov>;
- Spanish at: [http://www.pwrc.usgs.gov/bbl/bblretrv/index\\_fs.cfm#espanol](http://www.pwrc.usgs.gov/bbl/bblretrv/index_fs.cfm#espanol); and
- French at: [http://www.pwrc.usgs.gov/bbl/bblretrv/index\\_fs.cfm#français](http://www.pwrc.usgs.gov/bbl/bblretrv/index_fs.cfm#français)

### **D. Bandit**

The *Bandit* is a relational database replacing the paper version of the Bird Banding Schedule that is no longer accepted by the BBL. The principal use of *Bandit* is to store data obtained during banding operations and facilitate the transfer of banding data to the BBL and BBO. *Bandit* allows banders to enter and edit data associated with bands obtained from the BBL/BBO as well as data for recaptured birds. *Bandit* includes the ability to email the banding data directly to the BBL.

Users of *Bandit* must download (or request a free CD ROM) the software from the BBL website (<http://www.pwrc.usgs.gov/bbl/resources/bandit/Software/index.cfm>). The *Bandit* user manuals (<http://www.pwrc.usgs.gov/bbl/resources/bandit/Documentation/index.cfm>) are also available on the BBL website.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology; e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets Government Paperwork Elimination Act requirements].**

The Permit Application is currently available on the BBL web site as a printable pdf file that must be submitted on paper. The Permit Renewal Form, Recovery Report and *Bandit* data can be submitted electronically.

The permit renewal process formerly required the bander to print a permit application and submit the paper copy to the BBL. By converting to an entirely electronic renewal form, the same information is being collected with less effort because the banders do not have to deal with the preparation and submission of paper forms for this process.

- 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 duplication of efforts because banding activity in the United States is regulated only by the BBL. The information collected by the BBL is not being collected by any other Federal agency.

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

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

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

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

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

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On July 13, 2012, we published a 60-day Federal Register notice (77 FR 41442) announcing that we would submit this ICR to OMB for approval. In that notice we solicited public comments for 60 days, ending September 11, 2012. We received one comment in response to that notice. This comment reflected concerns about the general practice of bird banding but made no substantive remarks relative to the information contained in this notice. Because this comment was not relevant to this notice, the BBL has not taken any actions to respond to their concerns.

Each year, the BBL receives numerous comments from bird banders on the entire permit application process and the lab uses this feedback to improve its operations. The initiation of the electronic permit renewal form has been very favorably received by bird banders who consider this electronic form to be a vast improvement over the previous process of submitting a paper renewal application.

The new Recovery Reporting website was released in September 2012 and the BBL has received few comments about its operation. To date, the few comments have been favorable especially with regards to the new mapping feature that is available on this website.

Based on the experiences of a sample of banders, the average length of time required to complete the paper permit application is normally 25-35 minutes. Based on feedback from banders, the average time required to complete the electronic permit renewal page is 1-2 minutes. Completing the recovery reporting form over the internet requires 2 minutes on average, also based on user experience. The amount of time required to submit data using *Bandit* varies with a number of factors, primarily with the number of banding records, the amount of data collected by the bander, and the use of time-saving features including bulk data uploads and automatic filling features in the software. In general, the manual entry of the basic banding data for a single record can be completed in 20-30 seconds. Many users uploading groups of data at a time take advantage of software features (such as bulk uploads) that greatly reduce the data entry time.

In addition to our Federal Register notice, we attempted to solicit comments from individuals outside the agency to obtain their views on the functioning and the annual hour burden for the forms, recovery report, and *Bandit*. The individuals contacted are listed in Table 1 below. We incorporated their suggestions, edits, and comments in the final instruments. The respondents also agreed with our estimated burden time for the instruments.

Additional efforts to receive comments from individuals outside the BBL include suggestions from bird banders to improve *Bandit*. These suggestions are routinely incorporated into future versions of the software. The BBL Permit office also contacted banders who have used the permit renewal form to document the actual burden time for this form.

**Table 1. Individuals Contacted**

Michael Quinlan 12508 Caswell Lane Bowie, MD 20715	Dr. Robert Cohen 31760 Hilltop Road Golden, CO 80403	Dr. Gordon Howard P.O. Box 8097 Seneca, SC 29678
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**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There is no monetary value associated with this collection. The BBL provides an electronic Certificate of Appreciation to people reporting bands to the BBL via the *Recovery Report* website.

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

We do not provide any assurance of confidentiality. However, it is our policy not to use respondent names for any purpose other than completing our banding records. All names and identifying information are protected by the Privacy Act of 1974.

This activity was previously covered by the Fish and Wildlife Service (FWS) System of Records Notice (SORN) ‘‘Migratory Bird Population and Harvest Systems—Interior, FWS–26. FWS eliminated the bird banding category from that SORN. USGS is currently working to issue its own SORN to cover this activity.

**11. Provide additional justification for any questions of a sensitive nature such as: sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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

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

We estimate the total burden for this collection will be 21,068 hours, including time to read instructions, gather information, and complete the forms or enter information in the database. The burden estimates in this supporting statement are based on our prior experience with the permit application forms and permit renewal website; the known average time for submissions via the toll-free phone number and the recovery reporting page; our prior experience with *Bandit*; and the outreach described in item 8.

We expect to receive approximately 100 new permit applications requiring each respondent approximately 30 minutes to complete, totaling 50 burden hours. We expect to receive approximately 600 permit renewal forms annually requiring each bander 2 minutes to complete, totaling 19 burden hours. On average, we anticipate receiving approximately 90,000 recovery reports annually requiring approximately 2 minutes to observe and complete the form, totaling 2,999 burden hours.

For *Bandit* data, we expect to receive 4,000 data files requiring an average of 4.5 hours to enter, totaling 18,000 annual burden hours. The completion time for data files varies from 40 minutes to 12 hours as discussed below.

- We estimate 500 annual schedules for game bird bands (each consisting of 800 records). Each schedule will take approximately 40 minutes. Most of the data collected are similar and the software allows for columns of repeated information to be auto-filled to expedite data entry. Following this process, banders should be able to enter 100 banding records in 5 minutes.

- We expect to receive 3,500 annual schedules averaging 300 records per response for birds other than game birds waterfowl. Most banders make multiple data submissions annually and their submission files will contain fewer than 500 records. We estimate that each record can be entered in 0.5 minute and most files will require 4 hours or less to complete. A few banders may submit 1,000-2,000+ records per submission file, but many of these records contain similar data where the auto-fill process can expedite data entry. A maximum of 12 hours would be necessary to complete the largest submission files.

We estimate the dollar value of the annual burden hours to be \$624,648 (see Table 2). The hour cost is based on BLS news release USDL-12-1830 of September 11, 2012, for average full compensation per hour including benefits. The particular values utilized are:

- Individuals. Average hourly wage is \$20.27 multiplied by 1.4 to account for benefits (\$28.38).
- Private sector. Average hourly wage is \$20.27 multiplied by 1.4 to account for benefits (\$28.38).
- States/tribal/local governments. Average hourly wage is \$26.70 multiplied by 1.5 to account for benefits (\$40.05).



Table 2. Estimated Dollar Value of Annual Burden Hours

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Dollar Value of Burden Hour Including Benefits</i>	<i>Total Dollar Value of Annual Burden Hours</i>
<b>Permit Application</b>					
Individuals	40	30 minutes	20	\$28.38	\$568
Private Sector	50	30 minutes	25	\$28.38	\$710
State/local/tribal govt	10	30 minutes	5	\$40.05	\$200
<b>Subtotal</b>	<b>100</b>		<b>50</b>		<b>\$1,478</b>
<b>Renewal Form</b>					
Individuals	250	2 minutes	8	\$28.38	\$227
Private Sector	250	2 minutes	8	\$28.38	\$227
State/local/tribal govt.	100	2 minutes	3	\$40.05	\$120
<b>Subtotal</b>	<b>600</b>		<b>19</b>		<b>\$574</b>
<b>Recovery Report</b>					
Individuals	88,000	2 minutes	2,933	\$28.38	\$83,239
Private Sector	1,000	2 minutes	33	\$28.38	\$937
State/Local/Tribal	1,000	2 minutes	33	\$40.05	\$1,322
<b>Subtotal</b>	<b>90,000</b>		<b>2,999</b>		<b>\$85,498</b>
<b>Bandit</b>					
Individuals	2,500	4.5 hours	11,250	\$28.38	\$319,275
Private Sector	1,000	4.5 hours	4,500	\$28.38	\$127,710
State/local/tribal govt.	500	4.5 hours	2,250	\$40.05	\$90,113
<b>Subtotal</b>	<b>4,000</b>		<b>18,000</b>		<b>\$537,098</b>
<b>TOTAL</b>	<b>94,700</b>		<b>21,068</b>		<b>\$624,648</b>

**13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

There is no non-hour cost burden to applicants under this collection. There is no fee for any permit application and the *Bandit* software is provided at no cost to the banders

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

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$187,361 (Table 3). This total includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2012-DCB (<http://www.opm.gov/oaca/12tables/html/dcb.asp>) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the previously referenced BLS news release)

Approximately 100 new permit applications are currently processed annually by the BBL. The Application Examiner spends approximately one hour per form at \$37.43 per hour to assemble data and coordinate the permitting procedures (\$3,743). The BBL Chief spends approximately one-half hour per application at \$85.70 per hour to review the forms and contact applicants (\$4,285). Each wildlife biologist also spends approximately one-half hour reviewing and evaluating applicants at the rates indicated in Table 3 (\$8,643).

Approximately 600 existing banding permits are renewed annually by the BBL. The renewal process is the sole responsibility of the Application Examiner who currently spends approximately 10 minutes per renewal at \$37.43 per hour (\$3,743).

For the Recovery Report, most funds are used to cover the cost of the contract answering service for the 1-800 phone number. The volume of phone calls handled by this answering service is decreasing each year as more people use the website to report banded birds to the BBL. The cost of this service includes answering the calls, collecting the information and submitting the data to the BBL (\$100,000). Support for the BBL Band and Color Marker Reporting website requires approximately 80 hours of computer programming support each year (\$5,973) and 120 hours by a wildlife biologist who is responsible for the overall operation of this website (\$6,106).

For *Bandit*, new software versions are created at 3-4 year intervals. During most years when new versions are not created, the BBL programmer will spend approximately 80 hours annually fixing “bugs” and preparing minor upgrades to the system (\$5,973). The BBL also maintains a *Bandit* help desk to assist users with their questions and provide guidance on the use of the software. On average, a wildlife biologist spends approximately 5 hours per week in support of this help desk (\$9,968) and two BBL clerks each spends approximately 10 hours per week to support the help desk (\$38,927).

**Table 3. Federal Employee Salaries and Benefits**

<b>Position</b>	<b>Grade/Step</b>	<b>Hourly Rate</b>	<b>Hourly Rate incl. benefits (1.5 x hourly pay rate)</b>	<b>Estimated time per task</b>	<b>Annual Cost</b>
<b>Permit Application</b>					
Application Examiner	GS-7/8	\$24.95	\$37.43	100 hrs	\$3,743
Chief, BBL	GS-14/5	\$57.13	\$85.70	50 hrs	\$4,285
2 Wildlife Biologists	GS-12/5	\$40.66	\$60.99	50 hrs (x2)	\$6,099
Wildlife Biologist	GS-11/5	\$33.92	\$50.88	50 hrs.	\$2,544
<b>Subtotal</b>					<b>\$16,671</b>
<b>Permit Renewal Form</b>					
Application Examiner	GS-7/8	\$24.95	\$37.43	100 hrs.	\$3,743
<b>Subtotal</b>					<b>\$3,743</b>
<b>Recovery Report</b>					
Contracted answering service					\$100,000
Annual maintenance for website (BBL programmer)	GS 13/6	\$49.77	\$74.66	80 hrs.	\$5,973
Wildlife Biologist	GS 11/5	\$33.92	\$50.88	120 hrs.	\$6,106
<b>Subtotal</b>					<b>\$112,079</b>
<b>Bandit</b>					
Annual maintenance for website (BBL Programmer)	GS 13/6	\$49.77	\$74.66	80 hrs	\$5,973
Wildlife Biologist	GS 9/2	\$25.56	\$38.34	260 hrs.	\$9,968
2 BBL Clerks	GS 7/8	\$24.95	\$37.43	520 hrs. (x2)	\$38,927
<b>Subtotal</b>					<b>\$54,868</b>
<b>Total</b>					<b>\$187,361</b>

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

Below are the details for all adjustments and changes:

**Bandit**

**Adjustments:** We expect to receive 4,000 BANDIT responses annually. This is an increase of 175 responses. The previously approved estimate was 3,825 responses. Although we anticipate an overall burden hour decrease for BANDIT use, because of the additional responses, we are reporting an additional 477 burden hours as an adjustment.

**Program Changes:** Software functionality was added to accommodate uploading bulk information allowing entries to be completed faster. The previously approved time per response was 6 hours, now it is 4.5 hours. The 1.5 hours difference was multiplied by the number of expected respondents to determine the overall program change resulting from the new software functionality.

The previously approved estimate for BANDIT was 23,523 burden hours. We are now requesting 18,000 hours or an overall decrease of 5,203 hours.

<b>Bandit Burden Hours</b>		
	<b>Program Change</b>	<b>Adjustment</b>
Individual	-3750	8647
Private	-1500	121
State Local Tribal	-750	-8291
<b>Total</b>	<b>-6000</b>	<b>477</b>

**Program Applications**

**Adjustments:** N/A for Program Applications

**Program Changes:** We expect to receive approximately 100 program applications annually, totaling 50 burden hours. This is a reduction of 450 responses and 225 burden hours. The previously approved estimate was 550 applications and 275 burden hours. The main cause of this reduction is due to the creation of the separate renewal form. Previously, renewal requests were processed on the same application form.

**Recovery Reports**

**Adjustments:** We expect to receive approximately 90,000 recovery reports annually. This is an increase of 4,997 responses and an adjustment of an additional 250 burden hours. The previously approved estimate was 85,003 responses.

**Program Changes:** Although we are anticipating an increased number of responses, we are reporting fewer burden hours because the recovery report was streamlined and now takes less time to complete. The completion time is reduced from three minutes to two minutes. The one minute difference was

multiplied by the number of expected respondents to determine the overall program change resulting from the streamlined form.

The previously approved burden hour estimate for recovery reports was 4,250 hours. We are now requesting 2,999 hours, or decrease of 1,251 hours.

Recovery Report Burden Hours		
	Program Change	Adjustment
Individuals	-1467	182
Private	-17	20
S,L,T Gov't	-17	48
<b>Total</b>	<b>-1501</b>	<b>+250</b>

### **Renewal Forms**

Since 2009, the BBL created the electronic permit renewal form to replace the use of paper application forms for the renewal process. This change was made to improve the efficiency of the renewal process and reduce the paperwork burden on the bird banders. The paper application process previously used for renewals took approximately 30 minutes. This process is now completed within 1-2 minutes using the electronic renewal form. This electronic renewal form has also greatly reduced the time spent by BBL staff processing this information.

**Adjustments:** N/A for renewal forms

**Program Changes:** The separate electronic renewal form was created and added as an information collection for this submission. The burden for this existed previously within the application information collection. We are now reporting it separately and as a program change. This added an additional 600 responses and 19 burden hours.

**Total Program Changes: 150 responses; -7,707 burden hours**

**Total Adjustments: +5,172 responses; 727 burden hours**

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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

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

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

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

There are no exceptions to the certification statement.