

# 1 Supporting Statement A for Paperwork Reduction Act Submission

## OMB Control Number 1024-0236 Research Permit and Reporting System Applications and Report (36 CFR 2.1 and 2.5)

**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 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 (16 U.S.C. 3) also 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 (we, 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. We use a permit system to manage the conduct of scientific research and collecting in parks and our Museum Management Program manages 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 requires 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, we expect 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 that will be managed as NPS museum collections. During the past 12 years, we have 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.

We have 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.**

National Park Service Forms 10-741a (Application for a Scientific Research and Collecting Permit) and 10-741b (Application for a Science Education Permit) collect information from persons seeking a permit to conduct natural or social science research and collection activities in individual units of the National Park System. The information we collect includes, but is not limited to:

- Names and business contact information.
- Project title, purpose of study, summary of proposed field methods and activities, and study and field schedules.
- Location where scientific activities are proposed to take place, including method of access.
- Whether or not the study proposes that specimens will be collected or handled, and if yes, scientific descriptions and proposed disposition of specimens.
- If specimens are to be permanently retained, the proposed repositories for those specimens.

Persons who receive a permit must report annually on the activities conducted under the permit. Form 10-226 (Investigator's Annual Report) collects the following information:

- Reporting year, park, and type of permit.
- Names and business contact information and names of additional investigators.
- Project title, park-assigned study or activity number, park-assigned permit number, permit start and expiration dates, and scientific study start and ending dates.
- Activity type, subject discipline, purpose of study/activity during the reporting year, and finding and status of study or accomplishments of education activity during the reporting year.

We have not made any changes to the forms for this submission. We use the above information to manage the use and preservation of park resources and for reporting to the public via the Internet about the status of permitted research and collecting activities.

We encourage respondents to use the Internet-based, automated Research Permit and Reporting System (RPRS) to complete and submit applications and reports. For those who use RPRS, much of the information needed for the annual report is generated automatically through information supplied in the application or contained in the permit.

**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, we created the Research Permit and Reporting System website to facilitate preparation and submission of information via the Internet. The Research Permit and Reporting System also accepts electronically attached files containing preexisting 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.

We provide an Internet-based, automated process at "<https://irma.nps.gov/rprs>" 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 is intended to give a respondent the opportunity to review the information entered into applications 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. However, at the moment the new version of the software does not yet provide this option. 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 the respondent's account. 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 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 through setting up their account in the upgraded System because the electronic system automatically enters data into many of the data fields on these forms whenever the respondents access the System to prepare the forms. Once an applicant has created a user account, the electronic system automatically pre-fills on each new Investigator's Annual Report or permit application those data fields that are not unique to the new submission. For example, applicant contact information is stored in a profile table which automatically populates contact information fields in the forms. 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 an automated permit renewal application option that uses the data on the existing permit to pre-fill most fields on the renewal application when a permittee uses the System to apply for a permit renewal to continue a project. The Internet-supplied application process allows the applicant to change information in pre-filled fields and, by leaving fields that require new information blank, prompts the applicant 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.

In 2013, as part of upgrading the software behind the Research Permit and Reporting System,

we strengthened the security of the System by adding a requirement for users of the System to create and maintain a user account. The user account procedure follows standard protocols for having the user establish the user's identity and create a username and password – the latter two steps did not exist in the previous version of the software. The addition of this new account feature allows the System to offer four new capabilities to System users: Users have a “dashboard” that gives them access in one place to all of the documents they have submitted over time and to links to useful System information, users now can save application and Investigator's Annual Report documents in draft and return to the System at a later time to complete the documents and submit them into the System; users can track the status of NPS actions on their documents; and users can have a secure method within the System to receive communications from the park research coordinator. The “dashboard” approach also created a processing approach and screen layout that are new to experienced System users but, because they are commonly used techniques in the Internet world, the user can adjust quite quickly.

**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 when 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.**

We collect only the minimum information necessary. 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.**

We collect the information 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. 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.

- 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.**

There are no special 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.**

**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.**

On September 19, 2013, we published in the Federal Register (78 FR 57654) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on November 19, 2013. We did not receive any comments in response to that notice.

In addition to the Federal Register notice, we contacted eight RPRS users and asked for comments on the information collection requirements. We also reviewed email support messages exchanged with RPRS users since the RPRS was upgraded in the summer of 2013.

Christy Philippoff starscmh@yahoo.com	Ailene Kane Ettinger, PhD ailene@u.washington.edu
Mr. Kevin Buhl kevin_buhl@usgs.gov	Suzanne Koptur, PhD <a href="mailto:kopturs@fiu.edu">kopturs@fiu.edu</a>
Ms Cathi Boze cboze@mariposacounty.org	Dr G. Lynn Wingard Lwingard@usgs.gov
Scott Paterson paterson@usc.edu	Chris Briggs cbriggs@parksconservancy.org

Comment 1: It took 15 minutes to respond to the Investigator Annual Report form and about 5 minutes to become familiar with the reporting procedure via the on-line instruction.

Comment 2: It took approximately 15 minutes to respond to the Investigator Annual Report form.

Comment 3: It took 30 minutes to respond to the Investigator Annual Report form.

Comment 4: It took 30 minutes to respond to the Investigator Annual Report form, and the process was “intuitive.”

Comment 5: It took a maximum of 30 minutes to figure out how to use the account. The investigator submitted a renewal application and reported that the process was “smooth,” and took about 15 minutes. The investigator reported that it took 30 minutes to respond to the Investigator Annual Report form.

Comment 6: The renewal application and Investigator Annual Report took about 30 minutes each to complete.

Comment 7: Commented that the Investigator Annual Report is easy relative to other reporting requirements, and that the funding questions took the longest to calculate due to a complex mix of funding sources.

Comment 8: Indicated that he had not submitted an Investigator Annual Report using the upgraded system. He had “glanced” at the procedure and found the setup “pretty intuitive”. He commented that the initial report for a study could take up to 2 hours to create “depending on how complicated the research is.” Subsequent reports are less time consuming as they are generally updates to the initial information.

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

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

We do not provide payments or gifts to respondents.

**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, in the Application Procedures and Requirements guidance document NPS tells respondents that their information is public information or may become available to the public. The link on the System available to the public for this document became broken during the software upgrade and needs to be re-established. 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. The system of records notice conforms to the current format for a system of records notice, has received DOI Privacy Office review, has been determined not to have been impacted by the upgrade of the Research Permit and Reporting System software, and is ready for final surnaming prior to being published.

**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.**

We do not ask questions of a sensitive nature.

**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."

We estimate that we will receive 10,790 responses totaling 8,636 burden hours. We estimate that the dollar value of the annual burden hours is \$244,239 (rounded). We used BLS News Release 13-2349, December 11, 2013, to estimate hourly wages and calculate benefits.

- Individuals - We used the wage and salary costs for all workers from Table 1 (\$21.54) and multiplied by 1.4 to calculate benefits, resulting in an hourly rate of \$30.16.
- Private Sector - We used the wage and salary costs for all workers from Table 5 (\$20.55) and multiplied by 1.4 to calculate benefits, resulting in an hourly rate of \$28.77.
- State/local/tribal Government - We used the wage and salary costs for all State workers from Table 3 (\$27.38) and multiplied by 1.5 to calculate benefits, resulting in an hourly rate of \$41.07.

ACTIVITY	NUMBER OF RESPONDENTS	NUMBER OF ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY RATE INCL. BENEFITS	\$ VALUE OF ANNUAL BURDEN HOURS
<b>Form 10-226</b>						
Individuals	495	495	15 minutes	124	\$30.16	\$ 3,739.84
Private Sector	2,600	2,600	15 minutes	650	28.77	18,700.50
Government	2,300	2,300	15 minutes	575	27.38	15,743.50
Subtotal	5,395	5,395		1,349		38,183.84
<b>Form 10-741a</b>						
Individuals	390	390	1.38 hours	538	\$30.16	\$16,226.08
Private Sector	2,400	2,400	1.38 hours	3,312	28.77	95,286.24
Government	2,190	2,190	1.38 hours	3,022	27.38	82,742.36
Subtotal	4,980	4,980		6,872		194,254.68
<b>Form 10-741b</b>						
Individuals	50	50	1 hour	50	\$30.16	\$ 1,508.00
Private Sector	215	215	1 hour	215	28.77	6,185.55
Government	150	150	1 hour	150	27.38	4,107.00
Subtotal	415	415		415		11,800.55
<b>TOTALS</b>	<b>10,790</b>	<b>10,790</b>		<b>8,636</b>		<b>\$244,239.07</b>

**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.

There is no nonhour burden cost to respondents.

**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.**

We estimate that the total cost to the Federal Government to administer this information collection is \$42,969,930. This includes \$42,803,930 in salary costs and benefits for reviewing and processing applications and reports and \$166,000 for software and administrative costs. We used the Office of Personnel Management Salary Table 2014-RUS to estimate hourly wages and calculated benefits in accordance by Bureau of Labor Statistics News Release USDL 13-2349.

.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)
Administrative	7(5)	21.28	31.92
Technician	9(5)	26.02	39.03
Scientist	13(5)	44.88	67.32
Curator	11(5)	31.49	47.24
Weighted Average (\$/hr)			46.13

Estimated Salary Plus Benefits Cost of Each Activity per Permit

Activity	Total hours	Weighted avg. cost (\$/hr)	Total cost (\$)
Process Application	40	46.13	\$1,845.20
Process specimen application (curator)	10	46.13	461.30
Monitor permit	24	46.13	1,107.12
Receive reports	4	46.13	184.52
Manage specimens	8	46.13	369.04
Total Weighted Cost per Permit			\$3,967.18
Total (\$3,967 x 10,790 applications/reports)			\$42,803,930

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

There are no 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.

**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 the OMB control number and expiration date.

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

There are no exceptions to the certification statement.