

**SUPPORTING STATEMENT**  
**MARINE DEBRIS PROGRAM PERFORMANCE PROGRESS REPORT**  
**OMB CONTROL NO. 0648-xxxx**

**A. JUSTIFICATION**

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

The NOAA Marine Debris Program (MDP) supports national and international efforts to research, prevent, and reduce the impacts of marine debris. The MDP is a centralized office within NOAA that coordinates and supports activities, both within the bureau and with other federal agencies that address marine debris and its impacts. In addition to inter-agency coordination, the MDP uses partnerships with state and local agencies, tribes, non-governmental organizations, academia, and industry to investigate and solve the problems that stem from marine debris through research, prevention, and reduction activities, in order to protect and conserve our nation's marine environment and ensure navigation safety. In large part, these partnerships are formalized through grants, cooperative agreements and contracts.

The [Marine Debris Research, Prevention, and Reduction Act](#) (33 U.S.C. 1951 et seq.) as amended by the [Marine Debris Act Amendments of 2012](#) (P.L. 112-213, Title VI, Sec. 603, 126 Stat. 1576, December 20, 2012) authorizes the MDP to enter into cooperative agreements and contracts and provide financial assistance in the form of grants to carry out the purposes of the Act – namely to identify, determine sources of, assess, reduce, and prevent marine debris and its adverse impacts on the marine environment and navigation safety. To date, both competitive and non-competitive funding opportunities have been implemented by MDP to conduct such program activities. These funding opportunities provide federal funding to non-federal applicants throughout the coastal United States and territories.

The terms and conditions of the financial assistance awarded through the above-mentioned grant programs require regular progress reporting and communication of project accomplishments to MDP. Progress reports contain information related to, among other things, the overall short and long-term goals of the project, project methods and monitoring techniques, actual accomplishments (such as tons of debris removed from an ecosystem, numbers of volunteers participating in a cleanup project, area of habitat restored, etc.), status of approved activities, challenges or potential roadblocks to future progress, and lessons learned.

Since 2006, the NOAA Restoration Center (RC) managed the MDP's grant program, meaning that appropriated funds were passed on to the NOAA RC from NOAA MDP, and NOAA RC staff ran the funding competition and subsequently managed all resulting awards. Reporting requirements for those grant awards were satisfied using the NOAA RC Performance Progress Report (OMB Control for OMB Control No. 0648-0472). Currently, after some program office changes, the NOAA RC no longer manages the NOAA MDP competition, and the NOAA MDP now conducts all grant award management. As such, the NOAA MDP now requests approval for the use of a standardized reporting form that has worked well for marine debris reporting purposes.

**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.**

As mentioned above, the terms and conditions of the financial assistance awarded by the MDP require regular progress reporting and communication of project accomplishments to MDP. For grants and cooperative agreements, the NOAA Grants Management Division (GMD) requires a semi-annual reporting frequency (twice per year), and that grantees report on both programmatic accomplishments and financial expenditures. While there is some degree of latitude on when in a calendar year reports are to be submitted to the agency, the NOAA MDP typically sets due dates as April 30 and October 31. At the end of an award, a final report comprehensive to the entire project is due to MDP.

This information collection enables MDP to monitor and evaluate the activities supported by federal funds to ensure accountability to the public and to ensure that funds are used consistent with the purpose for which they were appropriated. It also ensures that reported information is standardized in such a way that allows for it to be meaningfully synthesized across a diverse set of projects and project types. MDP uses the information collected in a variety of ways to communicate with federal and non-federal partners and stakeholders on individual project and general program accomplishments. It enables MDP staff, who are subject matter and technical experts on domestic and international marine debris issues to understand how effective projects are at accomplishing their objectives, and to provide technical assistance if needed throughout the life of an award so as to maximize the impact of MDP funds.

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. Prior to dissemination, the information will be subjected to quality control measures and a 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.**

Progress reports are form-fillable PDF files that are populated, saved, and updated using Adobe software and a personal computer. Grantees access the form either by going to the NOAA MDP website ([marinedebris.noaa.gov](http://marinedebris.noaa.gov)) or it is emailed to them by the project's Federal Program Officer. Grantees must have access to a personal computer and internet connection in order to fill out the form and submit it. At the very least a personal computer and internet connection are required to access the form so that it may be printed out if electing to submit a paper copy. NOAA strongly encourages that these forms are submitted electronically via the NOAA Grants Online system to facilitate the review, revision and approval processes. The forms themselves do not require that the grantee have access to any other additional technology beyond a PC and internet connection, although the quality of the report may be enhanced by such technology. For example, the reporting form does request that geographic coordinates of project locations be

provided. Internet mapping tools are powerful enough to provide a sufficient level of detail in this regard, however more precise measurements may be taken by hand held GPS units used in situ during project activities that would give NOAA a better representation of where a project takes place.

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

Because this information collection is directly linked to understanding progress of specific marine debris activities funding directly by the NOAA MDP, there is very little likelihood that this information collection would be a duplication of an existing tool. There is a small chance that NOAA's reporting requirements could duplicate reporting requirements that a grantee has to other funding sources for their project, if it is indeed being funded by multiple sources with similar progress reporting conditions. The duplication in such cases would likely be minimal however, or at least the burden would be insignificant since NOAA does not request any information that could not also serve a grantee's reporting requirements to their other sources.

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

The NOAA MDP works with all grantees (regardless of organization type) at the start of a project to identify the most critical elements of the project on which they will be reporting, as such there is agreement at the outset of what the reporting parameters will be. This is to ensure that NOAA better understands the project implementation plan, and that grantees understand, agree to, and have a hand in shaping their reporting responsibilities under the award.

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

If the information collection is not conducted or is conducted less frequently, the ability to account for the expenditure of federal funds for the marine debris project activities supported by the NOAA MDP would be substantially diminished. Project evaluations would be informed only by periodic but infrequent site visits by regional program staff and ad hoc updates otherwise provided to NOAA. Additionally, it will not meet the standards of the NOAA Grants Management Division for semi-annual reporting, and would make it more difficult to determine and correct poor grantee performance, since less frequent collection provides insufficient information to monitor awards to ensure Federal monies are properly used

If the collection is not approved, standardizing what information NOAA MDP can collect on a project would be difficult, time-consuming, and may not be as meaningful especially if it is an incomplete picture of a project's progress.

The agency's ability to maintain the public trust and ensure accountability of public funds would be meaningfully reduced. The information used by NOAA to communicate to agency, executive and congressional leadership about the disposition and efficacy of program funds would be informed by an inferior level of detail and confidence.

Altering collection frequency may also inhibit timely responses to Freedom of Information Act requests that may be submitted.

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

Not applicable.

**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 April 2, 2015 (80 FR 17728) solicited public comments. No comments were received.

Prior to publishing the Federal Register Notice NOAA MDP staff asked four existing grantees to comment on the form and provide their opinions on approximate time it might take to fill out, along with any general comments they might have about the form. This process informed our burden estimate provided in the Federal Register Notice, and allowed us the opportunity to enhance the form with practical feedback prior to publication of the Notice. Grantee response was positive, suggesting that such a form provides good guidance, structure, and clarity to the progress reporting process.

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

No such payments or gifts will be provided to respondents, other than acceptable remuneration of contractors or grantees implementing projects supported by NOAA MDP.

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

The information collection does not request confidential information, or personally identifiable information beyond the name and organization details of the project's principal investigator. The information collection may be used by NOAA MDP to publicly communicate about the accomplishments of the project, and this is stated on the information collection form. As such, progress reports may be posted to the NOAA MDP website to accomplish those communication goals. As a matter of internal policy, NOAA MDP does not share publicly anything but final reports and documentation; interim reports are not made publicly available. During the initial scoping with grantees (described in Question 8 above), NOAA MDP asked grantees whether they had any issues with final reports being made public, and all agreed that such a policy was an acceptable practice.

**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 sensitive information is requested or collected.

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

Between new grantees and existing grantees, NOAA MDP estimates that about 70 respondents will each report twice per year. Grantees who were consulted during the initial scoping for the Federal Register Notice indicated that it would take, on average, between 8.7 and 11.3 hours to collect and report on all the information required by this collection. This equates to an overall average of 10 hours per report. Since reporting is required twice per year, we estimate that 20 hours per year is required, per grantee, to satisfy NOAA’s reporting requirements. The grantees that NOAA MDP consulted have experience in submitting a similar reporting form for their grants, as such these estimates are based on actual time requirements.

**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 Question 12 above).**

No additional costs are required to respond to this information collection beyond the time-value of personnel responsible for completing the form. Any cost requirements for a personal computer or internet connection may be supported through the NOAA grant. Reports are submitted through Grants Online, which does not require a paid subscription or any other cost to the grantee.

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

Annualized costs to the government due to the NOAA progress reporting process result from the amount of time it takes for NOAA staff to review and approve a report. Two NOAA MDP staff review each report submitted. It takes anywhere from 15 to 60 minutes to review a report, depending on the amount of detail provided, and the amount of supplementary materials (maps, PSAs, graphs, monitoring reports, etc...) provided. This is an average of 37.5 minutes per reviewer, per report. This leads to a total of 75 minutes of review, per report. Assuming an average FTE annual salary of \$70,000, this equals about 8% of an FTE for all 70 anticipated semi-annual information collections.

<b>Task</b>	<b>Number of NOAA Reviews / Year</b>	<b>Total Time per NOAA Review (mins)</b>	<b>Total NOAA Hours of Review / Year</b>	<b>Total NOAA Cost</b>
NOAA Report Review	140	75	175	\$5,889

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

No program changes or adjustments are being made.

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

NOAA will not use the information collected here to inform any publication. Final reports or other publications submitted as deliverables under the grant may also be published on the NOAA MDP website ([marinedebris.noaa.gov](http://marinedebris.noaa.gov)). It may also be housed in the NOAA Marine Debris Clearinghouse (<https://clearinghouse.marinedebris.noaa.gov>).

**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.**

We are not requesting this.

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

Not applicable.

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

This collection will not employ statistical methods.