

**1Supporting Statement A for  
Paperwork Reduction Act Submission**

**Research Permit and Reporting System Applications and Report  
(36 CFR 2.1 and 2.5)**

**OMB Control Number 1024-0236**

**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 Organic Act of 1916 (54 U.S.C. §100101) provides that park resources are to be conserved for enjoyment of present and future generations of people. This act (54 U.S.C. 100751) 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, 54 U.S.C. 100705 and 100706) encourages use of parks for study to benefit park management and broader science. National Park Service Management Policies 2006 4.2 encourages publication of information derived from studies conducted in the National Park System. Section 205 of the NPOMA (54 U.S.C. 100705) 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. 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 (not repealed but omitted from the text of title 54 U.S.C.) 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 (IAR)] 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 substantive 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.

The change we have made to the Application for a Scientific Research and Collecting Permit form and the Application for a Scientific Education Permit form is to add check boxes in the Purpose of the Study component of the Scientific Study Information section of the research application and in the Purpose and Brief Description of the Activity component of the Proposed Science Education Activity section of the science education application. These check boxes seek to determine if the work proposed in the application may require additional levels of review or approval. Identifying these special cases will help the park research coordinator more quickly

assess the time needed for processing the application, identify any additional guidance the park research coordinator could offer to the applicant regarding the special circumstances of the proposed work, and be able to process the application more efficiently. These check boxes for the research permit application ask if the applicant seeks to work with Threatened and Endangered species or marine mammals (projects that require permits issued by the relevant federal or state agency prior to NPS being able to make a decision), and for both permit applications ask if the applicant seeks to handle migratory birds (projects that require permits issued by the relevant federal or state agency prior to NPS being able to make a decision), live vertebrates (may require an Institutional Animal Care and Use Committee review provided by the applicant's institution and concurred in by the NPS Institutional Animal Care and Use Committee), to use Unmanned Aircraft Systems for conducting the study (requires additional NPS review procedures), to conduct the study in NPS wilderness (may require additional NPS review), to conduct activities that could become hazardous because of methods or location in the park (requires additional NPS review), or to conduct ground disturbance (requires additional NPS review).

**Form 10-741a (Application for a Scientific Research and Collecting Permit):**

Does your study propose to involve any of the following (check all that apply):

handle live vertebrates ☐ T&E species ☐ migratory birds ☐ marine mammals ☐  
unmanned aircraft ☐ designated wilderness ☐ hazardous activity ☐ ground  
disturbance ☐

**Form 10-741b (Application for a Science Education Permit):**

Does your study propose to involve any of the following (check all that apply):

handle live vertebrates ☐ migratory birds ☐ unmanned aircraft ☐ designated  
wilderness ☐ hazardous activity ☐ ground disturbance ☐

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, through use of information technology. To facilitate this goal, 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 submitted 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>" through which respondents who have access to the Internet may create a protected account for the preparation and submission of both the permit application and the required Investigator's Annual Report. The Internet-based system gives a respondent the opportunity to draft and review the application and report prior to submitting the information to the National Park Service. The

respondent may access and print drafted and submitted applications from their account. . Additionally, the System automatically confirms submission of applications and reports by sending a copy of the submitted form to the email address which the respondent has provided in their 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 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 applicants to create and maintain a user account. The user account procedure follows standard credential protocol whereby the user creates a credential account to manage their 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 six new capabilities to System users:

- Account holders 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.
- Account holders 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.
- Account holders can track the status of NPS actions on their documents.
- Account holders have a secure method within the System to receive communications from the park research coordinator.
- Account holders may assign agent permissions to another account holder whereby the agent is assigned permissions administer the assigning users account.

- Account holders may transfer their transaction data to another account holder which facilitates the transfer of duties from one study lead to another.

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 8, 2016, we published in the *Federal Register* (81 FR 62175) 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 7, 2016. We did not receive any comments in response to that notice.

In addition to the Federal Register Notice, we consulted with nine (9) individuals familiar with this collection of information in order to validate our time burden estimates and asked for comments on the questions below the following table. Respondents included:

Title	Affiliation
Dr.	Dept. of the Interior, U.S. Geological Survey
Dr.	University of Utah
Postdoc. Research Associate	Dept. of Geology and Geophysics, University of Oklahoma
Biologist	University of Hawaii at Manoa
Long Term Seismic Monitoring Project Manager	University of Nevada Reno Nevada Seismological Laboratory, University of Nevada
Physical Scientist, Park Research Coordinator	Big Bend National Park
Botanist, National Park Service, Pacific Island Network	Hawaii Volcanoes National Park
Master of Philosophy, PhD Student and Teaching Assistant	Department of Communication, University of North Carolina at Chapel Hill
Professor	Montana State University

***“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”***

**Comments:** Representatives were supportive of the need to collect application and reporting information. Some respondents were not completely clear as to how the Investigator's Annual Report information is used.

Some of respondent comments are copied below:

“It is completely reasonable for a Park to require the information collected in these forms, especially if it is reviewed to ensure that Park policies are enforced and Park assets are protected.”

In reference to the Investigator's Annual Report information collection form, one respondent stated “I don't know how the information is used. If statistics on the number of research opportunities provided, or the monetary value of research investment conducted on NPS property are summarized, then I think the paperwork is justified. If the permit numbers are cited in scientific publications, that would seem to help link Park contributions to research progress. All of the questions seem relevant and necessary. “

“the questions are reasonable, useful”

**NPS Response/Action Taken:** We are grateful to those respondents for communicating that they are not completely clear as to how Investigator's Annual Report information is used. We responded directly to their questions, and realize that it will be helpful to address this question in our communication with permit holders. The Investigator's Annual Report is submitted by permit holders each year their permit is active. We correspond with permit holders each year to remind and solicit their report. We will revise the communication to increase clarity about how their Investigator's Annual Reports contribute to a public record of scientific research in parks. We will point out that the Investigator's Annual Report record is

regularly queried to provide answers to questions such as the number of research opportunities provided and funding information related to scientific studies. This information would not be available without the Investigator's Annual Report record. Scientific research in the units of the National Park Service is cited in scientific publications. The Investigator's Annual Report record is used by parks to learn of scientific research which is applicable to their resource management requirements. The Investigator's Annual Report record is used by public to learn about the wide range of scientific research which takes place in units of the National Park Service. The Investigator's Annual Report record is used by the scientific research community to review and build upon past and present scientific research studies within units of the National Park Service.

***“The accuracy of our estimate of the burden for this collection of information:***

**Comments:** The respondent's time estimates to fill out the application form ranged from a little more than half of our estimate to about 3 times our estimate. The two respondents who had significantly larger estimates indicated that their time estimate included the customary and usual planning process for scientific studies and the usual and customary interaction with the park rather than input. Several respondents pointed out that they saw the application as part of the larger process of planning and interaction with park staff.

The actual time respondents estimated to fill out the Investigator's Annual Report form ranged from equal to double our estimate. Two respondents indicated that it was challenging to condense their findings into the Investigator's Annual Report a 4,500 character field and they might input additional information if the “Findings” field character limit were expanded.

**NPS Response/Action Taken:** One respondent who has a very large ongoing study indicated that the reporting challenge was to condense the information into the 4,500 character “Findings” field. But when I asked if he suggested we should increase the field capacity, he was non-committal, and indicated that he resolved the issue through the service whereby files may be attached to the report. NPS is considering expanding the character limit in the IAR “Findings Field”.

***“Ways to enhance the quality, utility, and clarity of the information to be collected”***

**Comments:** Two respondents felt that the IARs were a valuable but underutilized resource. One stated the IAR should be a “front page element”

One respondent stated the wish that they could go back and edit the application after submission.

One respondent stated that when proposed activities require permits beyond the NPS Scientific Research and Collecting permit (i.e. FWS Endangered Species permit) the process can become confused and delayed.

**NPS Response/Action Taken:** In aggregate, Investigator's Annual Reports are a public record of scientific research activities within units of the National Park System. We concur with respondent's assertion of the value of this resource, and agree that additional effort should be expended to reveal this resource to the public and scientific research community. We are investigating options for increasing the profile of this resource on the various NPS internet and social media platforms and within the RPRS site itself.

Parks may return submitted applications to draft so that applicants may edit. Generally the park will make that determination during the review process. But I suggested to the respondent that if they determine they are unsatisfied with their submitted application, they may contact and solicit the park (park contact information is available through the "Park" search page). The respondent was satisfied.

NPS recognizes that some scientific research activities may require permits or permissions beyond those granted by an NPS Scientific Research and Collecting Permit. We are addressing this issue by listing the most common instances and asking the applicant to check any that apply (a new question on the application form). Through this question both the applicant and park are less likely to be surprised by these requirements.

***"Ways to minimize the burden of the collection of information on respondents"***

**Comments:** No specific suggestions for minimizing the burden were suggested by respondents. Nor were any specific elements of the forms identified as unnecessary.

**NPS Response/Action Taken:** No response required.

**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 (SORN) and has added a Privacy Act Statement to each form in this information collection package. The SORN 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. We will provide OMB with the title of the SORN and citation upon publication in the *Federal Register*.

**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 6,619 responses totaling 5,450 burden hours. We estimate that the dollar value of the annual burden hours is \$208,216 (rounded). We used the below listed rates in accordance with Bureau of Labor Statistics news release [USD-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the total annual burden. .

- Individuals. Table 1 lists the hourly rate for all workers \$34.15, including benefits.
- Private Sector. Table 5 lists the average hourly rate for private industry workers as \$32.27, including benefits.
- Government. Table 3 lists the average hourly rate for state and local government workers as \$45.93, including benefits.

Activity	Number of Respondents	Number of Annual Responses	Completion Time per Response	Total Annual Burden Hours	Hourly Rate Including Benefits	\$ Value of Annual Burden Hours
<b>Form 10-226, "Investigator's Annual Report"</b>						
Individuals	217	217	15 minutes	54	\$ 34.15	\$ 1,844.10
Private Sector	1,700	1,700	15 minutes	425	32.27	13,714.75
Government	1,300	1,300	15 minutes	325	45.93	14,927.25
<b>Subtotal</b>	<b>3,217</b>	<b>3,217</b>		<b>804</b>		<b>\$ 30,486.10</b>
<b>Form 10-741a, "Application for a Scientific Research and Collecting Permit"</b>						
Individuals	272	272	1.38 hours	375	\$ 34.15	\$ 12,806.25
Private Sector	1,600	1,600	1.38 hours	2,208	32.27	71,252.16
Government	1,400	1,400	1.38 hours	1,932	45.93	88,736.76
<b>Subtotal</b>	<b>3,272</b>	<b>3,272</b>		<b>4,515</b>		<b>\$ 172,795.17</b>
<b>Form 10-741b, "Application for a Science Education Permit"</b>						
Individuals	30	30	1 hour	30	\$ 34.15	\$ 1,024.50
Private Sector	50	50	1 hour	50	32.27	1,613.50
Government	50	50	1 hour	50	45.93	2,296.50
<b>Subtotal</b>	<b>130</b>	<b>130</b>		<b>130</b>		<b>4,934.50</b>
<b>TOTALS</b>	<b>6,619</b>	<b>6,619</b>		<b>5,449</b>		<b>\$ 208,215.77</b>

\*Figures rounded to match ROCIS.

**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 \$23,385,229 (rounded). This includes \$23,310,403 (rounded) in salary costs and benefits for reviewing and processing applications and reports (see tables below), and \$74,826 for software and administrative costs.

To determine average hourly rates, we used Office of Personnel Management Salary Table [2017-RUS](#) as an average nationwide rate. In accordance with Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, we multiplied the hourly rates by 1.57 to account for benefits.

Hourly Salary and Benefits by Position and Weighted Hourly Salary and Benefits

Position	Grade/Step	Hourly Pay Rate	Hourly Rate Including Benefits (1.57 x hourly rate)
Administrative	GS-07/05	\$ 22.09	\$ 34.68
Technician	GS-09/05	27.02	42.42
Scientist	GS-13/05	46.60	73.16
Curator	GS-11/05	32.70	51.34
Weighted Average (\$/hr)			\$ 50.40

Estimated salary (including benefits) / Cost of each activity per permit

Activity	Total hours	Weighted Average	Total cost (\$)
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		<b>Cost (\$/hr)</b>	
Process Application	40	50.40	\$ 2,016.00
Process specimen application (curator)	10	50.40	504.00
Monitor permit	24	50.40	1,209.60
Receive reports	4	50.40	201.60
Manage specimens	8	50.40	403.20
Total Weighted Cost per Permit			4,334.40
<b>Total [\$4,334.40 (Weighted Cost) x 5,378 (avg. number of active permits to administer annually calculated over a three-year span)]</b>			<b>\$ 23,310,403.20</b>

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

We are reporting a burden decrease of 4,171 responses and 3,187 hours. This burden decrease is the result of a decrease in requests to conduct scientific research and collecting activities within units of the National Park System. Conversations with parks and permit holders lead us to suspect that economic factors reduced funding availability, and as a result fewer studies were initiated.

**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.