

# **1Supporting Statement A**

## **ISO Geospatial Metadata Editors Registry**

### **OMB Control Number 1028-0110**

**Terms of Clearance:** None.

#### **General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked “Yes,” then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

#### **Specific Instructions**

#### **Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Office of Management and Budget (OMB) established the Federal Geographic Data Committee (FGDC) in 1990 and chartered the committee in its August 2002 revision of Circular A-16, “Coordination of Geographic Information and Related Spatial Data Activities.” The FGDC is a 32-member interagency committee composed of representatives from the Executive Office of the President, and Cabinet level and independent Federal agencies. The Secretary of the Department of the Interior chairs the FGDC, with the Deputy Director for Management, Office of Management and Budget (OMB) as Vice-Chair. Numerous stakeholder organizations participate in FGDC activities representing the interests of state and local government, industry, and professional organizations.

Executive Order (EO) 12906 of April 11, 1994 directs the FGDC to coordinate the development of the National Spatial Data Infrastructure (NSDI), which is described as the technology, policies, standards, and human resources necessary to acquire, process, store, distribute, and improve utilization of geospatial data. Two key elements in Sec. 4. Data Standards Activities provide the framework in which the ISO Geospatial Metadata Editors Registry is being developed:

(a) General FGDC Responsibility. The FGDC shall develop standards for implementing the NSDI, in consultation and cooperation with State, local, and tribal governments, the private and academic sectors, and, to the extent feasible, the international community, consistent with OMB Circular No. A-119 ("Federal Participation in the Development and Use of Voluntary Standards"), and other applicable law and policies.

(d) Agency Adherence to Standards. Federal agencies collecting or producing geospatial data, either directly or indirectly (e.g. through grants, partnerships, or contracts with other entities), shall ensure, prior to obligating funds for such activities, that data will be collected in a manner that meets all relevant standards adopted through the FGDC process.

The ISO Geospatial Metadata Editors Registry provides a mechanism for the FGDC to help Federal agencies and the broader community use the standards developed consistent with OMB Circular No. A-119 and that have been adopted through the FGDC process. The Registry provides the geospatial data community to identify the different applications/editors that can be used to create ISO compliant metadata records, which are an important component of the NSDI.

Circular A-16 - [https://www.whitehouse.gov/omb/circulars\\_a016\\_rev](https://www.whitehouse.gov/omb/circulars_a016_rev)

Executive Order 12906 - <http://govinfo.library.unt.edu/npr/library/direct/orders/20fa.html>

Circular A-119 - [http://www.whitehouse.gov/omb/circulars\\_a119](http://www.whitehouse.gov/omb/circulars_a119)

**2. Indicate how, by whom, 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.**

Information is used by Federal, State, Local and Tribal governments and the Private Sector to identify key features of the applications/editors, its functionality, supported standards, and point of contact information identify that can be used to create ISO compliant metadata records to meet standards requirements and support the development of the NSDI. This has enabled users to identify key features to meet their needs for developing ISO metadata.

**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.**

The collection of information is managed through the FGDC Web site. Information about the applications/editors in the ISO Geospatial Metadata Editors Registry on the FGDC Web site are submitted by the tool developers through Web-based forms. The collected information is available on the Web in the form of a simple registry type database and are accessible from the FGDC Web site. Use of online forms as the data submission mechanism directly supports the

intent of sections 1703 and 1705 of the Government Paperwork Elimination Act [P.L. 105-277]. Collecting this information electronically reduces costs both for the developers and for the FGDC database managers, as the data is submitted directly to the database for quality control/quality analysis. Application/editor information can be submitted quickly, and review and publication of validated records occur more rapidly than with paper-based reporting.

Direct, voluntary end-user submission of application information also reduces the potential for data entry errors posed by paper-based data forms that would have to be hand-entered into the database by transcribers.

**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.**

The FGDC Metadata Working Group (MWG) ([www.fgdc.gov/participation/working-groupsubcommittees/mwg/](http://www.fgdc.gov/participation/working-groupsubcommittees/mwg/)), whose membership represents Federal, State, Local and Tribal governments and the Private Sector, has requested the development of the registry as a useful tool to learn about available ISO Geospatial Metadata Editors because a similar resource does not exist elsewhere.

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

We do not believe the amount of information requested will have a significant impact on small entities, as they will be providing the information they already have that is needed to understand their applications/editors.

**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.**

Failure to collect the information or collecting it or less frequently would make it more difficult for the Federal Geographic Data Committee (FGDC) to fulfill coordination responsibilities for the Federal agency members and other stakeholders to effectively implement the NSDI.

**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 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 once 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.**

The 60-day FRN was published 11/21/2017 at 82 FR 55391.

We consulted with the programs listed in the table to obtain their views on the information presented in our instrument. Several modifications to the format and design of the application were suggested during the testing period and these have been incorporated.

Table 1: Collaboration on Design

<p>Metadata Specialist National Oceanic and Atmospheric Administration, National Geophysical Data Center Boulder, CO 80305</p>	<p>GIS Specialist State of New Jersey Office of Information Technology Trenton, NJ 08625</p>
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**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are made to respondents.

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

No assurance of confidentiality is given to respondents.

**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.**

The collection does not include 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.**

We estimate that approximately 5 responses (i.e., additions to the registry) are expected annually. A response to document a single editor for inclusion in the registry takes an average of 1 hour to complete. This figure is based upon our estimate of the average completion times of the form in the registry by someone familiar with the editor and also based on the consultation cited in item 8 above. Based upon the 1 hour average response time calculated, and an estimate of 5 responses annually, the total estimated burden time is approximately 5 hours.

Table 2 was created using information from Bureau of Labor Statistics USDL-17-0321, Employer Cost for Employee Compensation, published March 17, 2017. BLS reported employee compensation for Private Industry averaged \$32.76 per hour and for state and local government employees averaged \$47.85 per hour. These values include benefits and overtime.

Table 2: Responder Burden

Participant / Activity	Number of Responses	Minutes per response	Burden Hours	Burden Value
Private industry completes and submits registry form	4	60	4	\$131
Government Agency completes and submits registry form	1	60	1	\$48
Total	5	60	5	\$179

**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 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 non-hour cost burden, recordkeeping nor any fees associated with collection of this information.

**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.**

The total annual cost to the Federal Government is \$6009. The operational cost of maintaining the registry is \$4950 and cost for processing and reviewing information received as a result of this collection is \$1059 (Table 3). This includes Federal & Contractor employee salaries and benefits. We used the Office of Personnel Management Salary Table 2017-DCB (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/DCB.aspx>) to determine the hourly rate (Table 2). We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-16-1150).

Table 3: Federal Labor Table

Position	Grade /Step	Hourly Rate	Annu Hrs by Fed	Fully Loaded Hr Rate (x 1.6)	Total Labor Value
Program Analyst (Federal Employee)	14/8	\$66.20	10	\$105.92	\$1059
		TOTALS	10		\$1059

Table 4: Other Federal Government Expenses

Software Developer (contractor)	\$4950

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

No changes or adjustments are requested.

**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.**

Once developers have provided their information, the Registry will be available on the FGDC website.

**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.**

Not applicable. We will display the 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.