

1 Supporting Statement A

National Geological and Geophysical Data Preservation Program (NGGDPP)

OMB Control Number 1028-0087

Terms of Clearance: None

Justification

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

The U.S. Geological Survey (USGS) National Geological and Geophysical Data Preservation Program (NGGDPP) is authorized in Section 351 of the Energy Policy Act of 2005 (Public Law 109-58, 42 U.S.C. 15801). The objectives of the Program as outlined in the Act are to:

- (1) Archive geologic, geophysical, and engineering data, maps, well logs, and samples;
- (2) Provide a national catalog of archival material; and
- (3) Provide technical and financial assistance related to the archival material.

The USGS NGGDPP offers financial support to state geological agencies to preserve, archive, and provide access to geoscientific samples and data to inform science and decision-making now and in the future. The USGS provides guidance and support to state geological surveys, sharing information about use of common standards, procedures, and protocols for preservation efforts. The preserved holdings of state collections are described in metadata records that are publicly accessible through the National Digital Catalog, residing on the USGS ScienceBase data management platform. The National Digital Catalog exposes preserved geoscience assets publicly available for further research and investigation. State geological surveys submit proposals describing preservation projects for evaluation by a proposal review panel in the competitive grant process; and, upon project completion, states catalog metadata describing preserved assets in the National Digital Catalog and provide final technical reports describing project outcomes.

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.

State geological surveys submit proposals to acquire funding for preserving geological and geophysical data and samples. The proposals request funds to inventory and assess the condition of current collections and determine data preservation needs; describe and catalog collection items; digitize paper media; create or update digital infrastructure to preserve and expose preserved materials; and rescue fragile and deteriorating materials. Collection of information by the NGGDPP ensures that sufficient and relevant information is available to evaluate and select project proposals for funding. Financial assistance is awarded annually on a competitive basis following the evaluation and ranking of state proposals by a

review panel composed of seven representatives from the U.S. Department of the Interior (DOI), state geological surveys, and other federal organizations (for example, Smithsonian Institution), and final funding decisions are made by the NGGDPP Coordinator.

The respondents submit a final report and provide metadata records that describe the preserved assets to the National Digital Catalog. The report describes the preservation project and provides a comparison of actual accomplishments to the goals established for the period; reasons why established goals were not met, if applicable; and other pertinent information. This information is used by the USGS NGGDPP staff to evaluate current year success and determine the need to support additional state geological inventories and metadata. The final reports are made publicly available on the NGGDPP website. Metadata records cataloged in the National Digital Catalog are publicly available, exposing valuable physical samples and data for scientific investigation.

The NGGDPP uses Standard Forms 424, 424a, and 424b. Applicants submit proposals for funding in response to Notices of Funding Availability (NOFA) published in Grants.gov (<https://www.grants.gov>) and NGGDPP web pages. Applicants submit proposals through Grants.gov. The NGGDPP collects the following information under each NOFA:

- (1) The proposal narrative must include: the primary investigator's contact information, applicant organization, collaborating organizations, project description, project scope, technical approach, skills and capabilities of the applicant, strategies for long-term data and asset management for public access, commitment to the preservation effort, and organizational and managerial capacity.
- (2) Proposed budget breakdown must provide detailed information about how the funds will be used.
- (3) Letters of support and/or commitment that are used to demonstrate the project's viability.
- (4) Completed Standard Forms 424, 424a, and 424b

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.

All proposals must be submitted electronically at Grants.gov. All application instructions and forms are available at Grants.gov. Paper submissions are not accepted. Final reports are submitted by electronic mail. XML files and spreadsheets containing metadata that conform to NGGDPP metadata schema and describe preserved physical samples and data are electronically submitted to the National Digital Catalog.

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.

Due to the unique nature of this program and authorizing legislation, no other federal agency collects this information. No duplication occurs.

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

The NGGDPP keeps the amount of information requested to a minimum for all applicants. Since 2016, the NGGDPP has reduced the proposal page limit from 15 to 5 pages. The collected information has to be sufficient to fulfill the requirements of the authorizing statutes, as well as informative to make a competitive funding decision. Additionally, participants have been asked to reduce the final reports outlining project outcomes to five pages or less. The amount of information requested has an insignificant impact on small entities, as they are asked to provide minimum information needed to compete for financial assistance under this program.

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.

Section 351 of the Energy Policy Act directs the Secretary of the Interior, through the Director of the USGS, "to carry out a National Geological and Geophysical Data Preservation Program." Failure to collect this information would result in lost opportunities to improve access to and preservation of valuable earth science data and samples collected at great expense over decades by state geological surveys and U.S. Department of the Interior bureaus.

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 NGGDPP 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 on 4/18/2018 at 83 FR 17187.

We consulted with the individuals listed in Table 1 to obtain their views on the information collected, reported, and disclosed by the NGGDPP. The three respondents have had considerable involvement with the NGGDPP by proposing and evaluating proposed preservation projects. The three respondents complimented the Program's continuous improvements for maximizing efficiencies and minimizing onerous data reporting, enhancing transparency by sharing information about project funding and successful project practices, and engaging state representatives through educational webinars and outreach activities to encourage collaboration and knowledge exchange. Several modifications to reported data formats and development of recommended practices for data and collection preservation were suggested, which the NGGDPP is pursuing collaboratively with established working groups and the geoscience community of technical and preservation experts.

Table 1: Collaboration on Design

Director and State Geologist Montana Bureau of Mines and Geology Montana Tech of The University of Montana 1300 West Park Street Butte, Montana 59701-8997 Web: http://www.mbm.mtech.edu/	Geologic Hazards Program Manager Utah Geological Survey 1594 West North Temple, P.O. Box 146100 Salt Lake City, Utah 84114-6100 Web: http://geology.utah.gov/
Director and State Geologist Michigan Geological Survey Western Michigan University Kalamazoo MI 49008-5241 Web: https://wmich.edu/geologysurvey	

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

The NGGDPP does not provide payments or gifts other than the remuneration of grantees.

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 provided to respondents. The NGGDPP staff protect respondents' information considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and implementing regulations (43 CFR part 2), and under regulations of 30 CFR 250.197, "Data and information to be made available to the public or for limited inspection." Funded projects descriptions and identification of state awardees are announced on the NGGDPP website.

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 sensitive or private questions.

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.**

The estimated total burden hours for this collection, including proposal submission and final reporting, is 3,150 for all applicants. These estimates are based on knowledge and experience acquired by the USGS conducting the Program and the outreach described in question 8. Annually, the Program receives approximately 35 applications. Each application requires approximately 80 hours to complete the narrative, present supporting documents, apply institutional budgetary requirements, finalize the grant application with the organization’s administrative staff, and submit the proposal application through Grants.gov. Additionally, at project completion, the final reporting requirement is estimated to require 10 hours per participant.

Table 2 shows the annual burden hour estimates used to calculate the responder burden costs of \$154,949. The hourly cost is based on Bureau of Labor Statistics news release USDL-18-0451, March 20, 2018, (https://www.bls.gov/news.release/archives/ecec_03202018.pdf) for average full compensation per hour for state and local government workers. The specific values utilized are:

- State and local government workers: average hourly wage, including benefits, is \$49.19.

Table 2: Responder Burden

Participant / Activity	Number of Responses	Minutes per response	Burden Hours	Burden Value
Local government survey - proposal submission	35	4,800	2,800	\$137,732
Local government survey - reporting requirement	35	600	350	\$17,217
Total	70	5,400	3,150	\$154,949

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 to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

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 \$36,797. This includes salary and benefits for employees processing and evaluating proposals, and reviewing reports as a result of this collection of information. The Office of Personnel Management Salary Table 2018-DEN (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DEN_h.pdf) was used to determine the hourly rate shown in Table 3. The hourly rate was multiplied by 1.6 to account for benefits (reflecting the benefits to salary ratio implied by the BLS news release USDL-18-0451).

Table 3: Annual Cost to the Federal Government

Position	Grade/Step	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time spent by Federal Employees	Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)
NGGDP Program Coordinator	GS-15	\$63.20	\$101.12	80	\$8,090
NGGDP Grants Program Manager	GS-14	\$53.73	\$85.97	120	\$10,316
NGGDPP Program Analyst	GS-8	\$23.87	\$38.19	30	\$1,146
Grants and Acquisitions Specialist	GS-12	\$38.24	\$61.18	120	\$7,342
Federal employee – Review Panelist	GS-13	\$45.47	\$72.75	80	\$5,820
Federal employee – Review Panelist	GS-11	\$31.90	\$51.04	80	\$4,083
TOTAL				510	\$36,797

Table 4: Other Federal Government Expenses

None	
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15. Explain the reasons for any program changes or adjustments in hour or cost burden.

The NGGDPP has revised the number of hours required for the completion and submission of the proposal and the final technical report describing project accomplishments. While the requested proposals have been reduced in length, the administrative reviews and budgetary calculations at the applicants’ institutions have been added to the hour and cost burden.

Burden hours have been increased from previous years based on participants’ feedback. The NGGDPP staff obtained feedback from previous award winners and adjusted the burden estimates to what is now considered more accurate.

The number of applications anticipated, as well as the number of grants awarded, are based on previous three-year statistics, and therefore, have been adjusted as necessary.

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

The information collected will not be tabulated or published for statistical use. All awarded proposal abstracts will be published on the USGS NGGDPP 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

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.