

**SUPPORTING STATEMENT
MONITORING PROGRAMS FOR VESSELS
IN THE PACIFIC COAST GROUND FISH FISHERY
OMB CONTROL NO. 0648-0500**

INTRODUCTION

This request is for extension of the current collection for the Monitoring Programs for Vessels in the Pacific Coast Groundfish Fishery.

The Pacific Coast groundfish fishery in waters off the West Coast (Washington, Oregon and California) is managed pursuant to the [Magnuson-Stevens Fishery Conservation and Management Act](#) (Magnuson-Stevens Act) as amended in 2006, and the Pacific Coast Groundfish Fishery Management Plan (FMP). The Magnuson-Stevens Act at 16 U.S.C. 1853(b) (8) allows one or more observers be carried on board a vessel of the United States engaged in fishing for species that are subject to an FMP, for the purpose of collecting data necessary for the conservation and management of the fishery.

The Pacific Coast groundfish fleet is comprised of vessels ranging in size from 18 feet to nearly 700 feet. These vessels harvest a diverse array of bottom and midwater species with a variety of fishing gear including midwater trawl, bottom trawl, and fixed gears (longline, trap or pot, set net, stationary hook-and-line gear including vertical hook and line, troll, and trammel net). Processing vessels in the at-sea whiting trawl fishery fish for weeks or months before returning to port. Trawl vessels delivering catch to shore-based processors often fish for three to five days per trip. In comparison, the small fixed gear vessels take single day trips on fair weather days and fish primarily in nearshore areas.

Observers are a uniformly trained group of scientists who are stationed aboard vessels to gather fishery conservation and management data that would otherwise not be available for managing the fisheries. The groundfish regulations at [§ 50 CFR 660](#) establish frameworks for certified observers for the trawl fisheries. Trawl fishery participants obtain the services of certified observers by working directly with permitted providers. In addition to certified observers, NMFS works cooperatively with Pacific States Marine Fisheries Commission to provide observers in the limited entry fixed gear (LEFG) and open access (OA) fisheries.

In January 2011, NMFS implemented a catch share program for the Pacific Coast groundfish fishery's trawl fleet. Trawl vessels delivering to shore-based processors (first receivers) are managed under the Shorebased Individual Fishery Quota (IFQ) Program. Trawl harvesting and processing vessels in the at-sea whiting fisheries are managed under fisheries cooperatives, including the Mothership Coop and Catcher/processor Coop. The regulations at §§ 660.140 (h), 660.150 (j), 660.160 (g), specify observer coverage requirements for the trawl vessels and define the responsibilities for observer providers, including reporting requirements. Regulations at § 660.140 (i) specify requirements for catch monitor coverage for first receivers. Trawl vessels in the IFQ program and catcher vessels in the Mothership Coop program are required to carry one certified observer on all fishing trips. Processing vessels in the Mothership Coop and Catcher/processor Coop fisheries are required to carry one certified observer on all fishing trips if the vessel is less than 125 feet in length and two certified observers if the vessel length is 125 feet or over. In addition to the rationalized trawl fisheries, regulations at § 660.216 and 660.316

require certified observers for vessels that process catch in the LEFG and OA fisheries. Processing vessels under 125 feet are required to carry one certified observer and processing vessels 125 feet and over are required to carry two certified observers. Regulations at § 660.140 (i) specify requirements for certified catch monitor coverage for first receivers. First receivers accepting trawl IFQ program catch must have a catch monitor present whenever IFQ catch is landed. Certified observers and certified catch monitors are provided by businesses referred to as permitted providers. The permitting process for these providers is addressed within OMB Control No. 0648-0619.

For the trawl IFQ fishery, certified observers primarily focus on verifying the composition of catch discarded at sea, while the composition of retained catch is verified by certified catch monitors when the retained catch is landed at the first receivers. All IFQ landings must be monitored by a catch monitor. Catch monitors verify that all landed catch is sorted to the correct groups and that the weights reported on electronic fish tickets are accurate. As with certified observers, catch monitors are funded by the industry and are employees of third-party service providers.

This collection pertains to the collection of the following information from observer providers:

- Training/briefing Registration
- Notification of observer's Physical Examination
- Debriefing registration
- Safety checklist submission to NMFS (actual completion of the checklists is covered under OMB Control No. 0648-0593)
- Certificate of insurance
- Observer provider contracts
- Observer status reports
- Informational materials
- Other reports on Observer harassment, safety concerns or performance problems

This collection also pertains to the burden on vessels in the limited entry and open access sectors that provide the following information necessary for observer coverage when required:

- Departure notification
- Cease fishing notification

This collection pertains to the collection of the following information from catch monitor providers:

- Training/briefing Registration
- Notification of catch monitor's Physical Examination
- Certificate of insurance
- Catch monitor provider contracts
- Catch monitor status report
- Informational materials
- Other reports on harassment, prohibited actions, illness or injury, or performance problems

A. JUSTIFICATION

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

Data collected by certified observers are used by the National Marine Fisheries Service (NMFS) to estimate total landed catch, discards, monitor the attainment of annual groundfish allocations, estimate catch rates of prohibited species, and in stock assessments. Observer data is necessary to comply with the Magnuson-Stevens Act requirements to prevent overfishing. In addition, observer data is key to maintaining the integrity of the trawl rationalization program such that total catch mortality stays within the trawl allocations and bycatch remains lower than the pre-rationalized fishery. Observer data is also used to assess fishing-related mortality of protected and endangered species.

Information submitted by observer and catch monitor providers (training/briefing registration, notification of physical examination, debriefing registration, safety checklist, certificate of insurance, provider contracts, status reports, informational reports, and other reports on harassment, safety concerns or performance problems) is used to efficiently and effectively determine the eligibility of trainees such that well-qualified individuals are trained and deployed as fisheries observers and catch monitors. The materials are also used to ensure the wellbeing of observers and catch monitors.

Some vessels, such as LEFG and OA vessels, do not have a 100% observer requirement. A portion of those vessels, approximately 30% of the fleet annually, are required to carry observers if they are selected in a random process by the Northwest Fisheries Science Center Observer Program at the beginning of the fishing year. The captains are notified of the observer requirement, and they must call and inform the observer program 24 hours in advance of departure.

Departure and cease fishing notifications submitted by LEFG and OA vessels are necessary for NMFS to: 1) identify which vessels need to carry observers, and 2) to coordinate the placement of observers aboard vessels. The cease fishing notification is necessary to identify which vessels are in the pool of vessels being sampled. Knowing which vessels are no longer part of the sample pool will allow NMFS to adjust selection methods to meet the desired observer coverage levels while allowing observer effort to be used efficiently. It is necessary for a vessel owner, operator or representative to submit these reports because only they can make statements about their future intent.

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.

Information submitted by the observer providers will be used as follows:

Observer Training/Briefing Registration. Prior to the beginning of a scheduled observer certification training session, observer providers send the following information to the Observer Program Office: date of requested training; a list of observer candidates that includes each candidate's full name, date of birth, gender, and length of contract; a copy of each candidate's academic transcripts and resume; and a statement signed by the observer candidate under penalty of perjury which discloses the candidate's criminal convictions. The requested information

ensures that sufficient class space will be reserved for the candidates during the training session requested and that each potential, new observer meets the observer educational qualification standards.

Notification of Observer's Physical Examination. Physical examinations are necessary because working as an observer aboard fishing vessels or on processors is a physically demanding and dangerous occupation. An individual must be physically fit. Unfit observers could endanger the wellbeing of themselves and the safety of others. Notification of the physical examination allows NMFS to verify that all observers meet the program standards.

Observer debriefing registration. This information allows for an efficient and effective debriefing process of an observer with Observer Program personnel. Observer debriefing registration information must include: the observer's name, current port assignment and requested debriefing date.

Observer safety checklist. Observer provider responsibilities include the submission of the current Vessel Safety Checklists that are completed during a pre-cruise check. Submission of the completed checklist to the Observer Program is necessary to ensure that the vessels that observers are deployed on meet the minimum safety requirements specified for the issuance of a Commercial Fishing Vessel Safety Decal in the time between U.S. Coast Guard inspections.

Observer certificate of insurance. Copies of “certificates of insurance”, that name the NMFS Northwest Fishery Science Center Observer Program leader manager as the “certificate holder”, are to be submitted to the Observer Program Office by February 1 of each year. The certificates of insurance are to verify the provider has adequate coverage provisions for observers and that the insurance company will notify the certificate holder if insurance coverage is changed or canceled.

Observer provider contracts. If requested, observer providers must submit to the Observer Program a completed and unaltered copy of each type of signed and valid contract (including all attachments, appendices, addendums, and exhibits incorporated into the contract) between the observer provider and those entities requiring observer services. Observer providers must also submit to the Observer Program upon request, a completed and unaltered copy of the current or most recent signed and valid contract (including all attachments, appendices, addendums, and exhibits incorporated into the contract and any agreements or policies with regard to observer compensation or salary levels) between the observer provider and the particular entity identified by the Observer Program or with specific observers. Observer contracts are needed to evaluate the working conditions that observers are experiencing and to evaluate that deployments are handled fairly and consistently. Vessel contracts are needed to evaluate the cost of observing the fishery coast-wide and any disparities between ports. These contracts are also needed to verify they are meeting any and all federal regulations.

Observer status reports. An observer provider must provide the Observer Program access to an updated list of observer deployments. Trip information includes observer provider name, observer last name, observer first name, trip start date, trip end date, status of observer, vessel name, and vessel identification number. Accurate and timely observer deployment information is important for fisheries management. Observer providers handle the logistics of observer deployments and are the only ones who know this information real-time. Knowing where observers are at all times is also imperative should emergencies arise while an observer is

deployed at sea.

Observer Informational materials. Observer providers must submit to Observer Program, if requested, copies of any information developed and used by the observer providers distributed to vessels, such as informational pamphlets, payment notification, description of observer duties, etc. The training and duties of an observer are a responsibility of the observer program. It is important to maintain consistency within the fleet and represent the duties required of observers accurately.

Other reports on Observer harassment, safety concerns or performance problems.

Reports on the following topics must be submitted to the Observer Program by the observer provider within 24 hours after the observer provider becomes aware of the problem: 1) observer harassment, 2) any prohibited action against observers concerns about vessel or processor safety, 3) any illness or injury that prevents the observer from completing his/her duties, 4) any information, allegations or reports regarding observer conflict of interest or breach of the observer standards of behavior. Review of these reports provides NMFS with an effective tool to monitor and enforce standards of observer conduct and to identify problems on vessels that may compromise the observer's health and well-being.

LEFG and OA harvesting and processing vessel-departure reports. Vessel-departure reports (no form) can be submitted to NOAA Fisheries or its designated agent via a toll-free phone number (1-866-880-8064) to provide notice of expected departure dates and times. A call must be made at least 24 hours prior to departure for fishing. The information collected is whether a vessel plans to start or end fishing in 24 hours. Information from departure reports is used by the Observer Program to determine whether to place observers on selected vessels in order to obtain detailed information on fishing practices and the characteristics of the catch. These data are needed to estimate total catch by species, collect data necessary to assess the status of stocks, to determine protected species interactions, and to evaluate economic conditions in the fishery.

LEFG and OA harvesting and processing cease-fishing reports. Cease-fishing reports (no form) can be submitted to NOAA Fisheries or its designated agent via a toll-free phone number (1-866-880-8064) to provide notice, not less than 24 hours after ceasing all groundfish fishing, for the purpose of, leaving the fishery management area or to fish for species not managed under the FMP. This report would be made when a vessel in the observed portion of the fleet ceases to participate in the groundfish fishery. Cease-fishing reports are needed to define the population of vessels that are being sampled, and to adjust selection methods to meet the desired observer coverage levels so observer effort can be used efficiently.

Catch Monitor training/briefing registration. Prior to the beginning of a scheduled certification training session catch monitor providers send the following information to the Catch Monitor Program Office: a list of catch monitor candidates and requested training dates, each candidate's full name, date of birth, and gender; a copy of each candidate's academic transcripts and resume; a statement signed by the candidate under penalty of perjury which discloses the candidate's criminal convictions. For briefings, providers need only send the candidates full name and requested briefing date. The requested information ensures that sufficient class space will be reserved for the candidates during the training session requested and that each potential, new catch monitor meets the educational qualification standards.

Catch Monitor notification of catch monitor's physical examination. Physical examinations

are necessary because working as a catch monitor is a physically demanding and dangerous occupation. An individual must be physically fit. Unfit catch monitors could endanger the wellbeing of themselves and the safety of others. Notification of the physical examination allows NMFS to verify that all observers meet the program standards.

Catch monitor certificate of insurance. Copies of “certificates of insurance”, that names the Catch Monitor Program coordinator as the “certificate holder”, are to be submitted to the Catch Monitor Program Office by February 1 of each year. The certificates of insurance verifies the coverage provisions and that the insurance company will notify the certificate holder if insurance coverage is changed or canceled.

Catch monitor provider contracts. If requested, catch monitor providers must submit to the catch monitor program a completed and unaltered copy of each type of signed and valid contract. Catch monitor providers must also submit to the catch monitor program upon request, a completed and unaltered copy of the current or most recent signed and valid contract between the catch monitor provider and the particular entity identified by the catch monitor program or with specific catch monitors. Catch monitor contracts are needed to evaluate the working conditions that catch monitors are experiencing and to evaluate that assignments are handled fairly and consistently. First receiver contracts are needed to evaluate the cost of monitoring the fishery coast-wide and any disparities between ports. These contracts are also needed to verify they are meeting any and all federal regulations.

Catch monitor status report Each Tuesday, catch monitor providers must provide the Catch Monitor Program with an updated list of deployments. Deployment information includes provider name, catch monitor last name, catch monitor first name, trip start date, trip end date, status of catch monitor, vessel name, and vessel identification number, date monitored offload, first receiver assignment. Accurate and timely deployment information is important for knowing that the coverage requirements are being met, and for knowing where catch monitors are at all times is also important should emergencies arise.

Catch monitor informational materials. If requested, catch monitor providers must submit copies of any information developed and used by the catch monitor providers and distributed to first receivers, including, but not limited to, informational pamphlets, payment notification, and description of catch monitor duties. The training and duties of catch monitors are the responsibility of the catch monitor program. It is important to maintain consistency within the fishery and represent the duties required of catch monitors accurately.

Other catch monitor reports on harassment, prohibited actions, illness or injury, or performance problems. Reports of harassment, prohibited actions, illness or injury or performance problems must be submitted in writing to the Catch Monitor Program by the catch monitor provider via fax or e-mail address designated by the catch monitor program within 24 hours after the catch monitor provider becomes aware. These reports are an effective tool for monitoring and enforcing catch monitor responsibilities and to identify problems that may compromise the observer’s health and well-being.

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.

The periodic reports and information submitted by observer and catch monitor providers consist of extractions of the required data from their existing database systems into a report form that is then submitted to the Observers and Catch Monitor Programs. The Observer Program utilizes a web-interface database in which observer providers enter training/briefing registration information, provide updated observer status reports and upload copies of vessel safety checklists. This system is used to reduce the time it takes for providers to report information, to organize all information in one secure location and provide immediate access for observer staff, providers and the office of law enforcement in the case of an emergency. The system also provides automatic notification if observer certification requirements are about to expire and allows debriefing interviews to be scheduled with observers and their providers. The Catch Monitor program will continue to receive submissions via e-mail.

Departure and cease-fishing notifications are made by telephone to NOAA Fisheries or its designated agent.

4. Describe efforts to identify duplication.

Relative to observer- and catch monitor-submitted data, no duplication has been identified. All information is unique to the Pacific Coast groundfish fishery. The departure and cease-fishing reports submitted by vessels in the LEFG and OA fisheries are information submissions that are unique to the needs of the observer program. Duplication with other collections does not exist. Data collected by the vessel monitoring system (VMS) can be used to identify when a vessel departs on a fishing trip, but cannot identify the operator's intent in advance such that arrangements can be made for the placement of an observer nor can VMS data identify a vessel operator's intent to cease fishing only for the remainder of the cumulative period or fishing year.

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

All of the observer and catch monitor providers and vessels affected by this collection are considered small businesses. Given the relatively small numbers of applicants, separate requirements based on size of business have not been developed. Only the minimum data required to meet the objectives of the overall monitoring program are requested from all applicants.

To minimize the burden on vessels in the LEFG and OA fleets, NMFS collects only the minimum data necessary to effectively place observers within the fleet in a manner that is consistent with a statistically-sound coverage plan. In addition a toll-free number is available for use in order to reduce the burden on small entities.

6. Describe the consequences to the Federal program or policy activities if the collection is

not conducted or is conducted less frequently.

The information required from providers is necessary for the efficient operation of an Observer Program and the Catch Monitor program and must be submitted in the time frames requested. Collecting this information less frequently would jeopardize the goals and objectives of the monitoring programs and the effective management of the West Coast groundfish fishery. NMFS believes that data quality will be maintained by creating a regulatory structure for managing observer, catch monitor and provider performance.

All information required from the LEFG and OA vessels is necessary to effectively place observers within the fleet in a manner that is consistent with a statistically-sound coverage plan. Collecting this information less frequently is likely to impair the ability to place observers according to the coverage plan and this would significantly reduce the usefulness of data collected for conservation and management purposes.

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

No special circumstances exist that would require information collection to be conducted in a manner inconsistent with OMB Guidelines except for the weekly reports which are needed more frequently for effective management of the program.

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 November 13, 2017 (82 FR 52284) solicited public comments. One comment was received on the information collection requirements. A compliance director for a fishing company commented that “The collection estimates for time and cost look accurate as described under 0648-0500 (Monitoring Programs for Vessels in the Pacific Groundfish Fishery), based on my knowledge of the 3 sectors of the catch share program, and the required reporting burdens therein.”

In addition, we solicited comments from staff at NMFS and the Pacific States Marine Fisheries Commission who regularly manage and process these information collections. We revised estimates slightly based upon their feedback (see Table 1 and the paragraph after Question 15).

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

No payments or gifts to respondents are provided under this collection.

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

Because the information collected is from commercial operations, under the Magnuson-Stevens Act (16 U.S.C. 1801 et seq.), all data submitted are treated in accordance with [NOAA Administrative Order 216-100, Protection of Confidential Fisheries Statistics](#). The information collected under this regulatory package is managed by NMFS on a computer network in accordance with relevant IT security policies and regulations such as the standards set out in Appendix III, A Security of Automated Information Resources, to [OMB Circular A-130](#); the [Computer Security Act](#); and the [Government Information Security Reform Act](#). These procedures have been implemented under the NMFS Operations Manual entitled, "Data Security Handbook for the Northwest-Alaska Region, National Marine Fisheries Service."

The information is covered by COMMERCE/NOAA-15, Monitoring of National Marine Fisheries Service (NMFS) Observers, published 7-31-14 (79 FR 44405) and became effective 9-15-14 (79 FR 57056. An updated system of records notice in the new OMB template was submitted to DOC for review on 12-29-17.

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 collection of information does not include any sensitive information other than reports of observer harassment and safety. This information is protected as described in A10.

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

In all, 268 respondents are expected to send a total of 3,710 responses, representing a total burden of 621 hours. Total labor costs, estimated at \$30 per hour, are \$18,515. The estimated burden hours for each element of the collection are outlined in Table 1.

The information collection includes departure and cease-fishing reports which would be a toll-free phone call placed to the Observer Program, or its designated agent. The labor costs to the industry to provide this information increases as the number of vessels in the pool of potentially observed vessels increases. The maximum cost to the fleet to provide departure and cease-fishing reports is based on a coverage strategy in which 30 percent of the fleet would be required to report in a given year.

Table 1. Burden and Labor Cost

Type Of Response	Respondents	Annual Responses Per Respondent	Total Annual Responses	Time Per Response	Total Hours all Responses	Total Labor Cost
Observer training/briefing registration	5 Providers	30	150	15 minutes	38	\$1,125
Notification of observer physical examination		30	150	5 minutes	13	\$374
Observer debriefing registration		30	150	10 minutes	25	\$752
Observer safety checklist submission to NMFS		180	900	5 minutes	75	\$2,241
Certificate of insurance		1	5	10 minutes	1	\$25
Observer provider contracts		10	50	5 minutes	4	\$125
Observer status reports		52	260	15 minutes	65	\$1,950

Type Of Response	Respondents	Annual Responses Per Respondent	Total Annual Responses	Time Per Response	Total Hours all Responses	Total Labor Cost
Observer Informational materials		2	10	5 minutes	1	\$25
Other reports on Observer harassment, safety concerns or performance problems		16	80	15 minutes	20	\$600
Catch monitor training/briefing registration		16	80	30 minutes	40	\$1,200
Notification of catch monitor physical examination		10	50	15 minutes	13	\$375
Catch monitor debriefing registration		16	80	15 minutes	20	\$600
Certificate of insurance		1	5	10 minutes	1	\$25
Catch monitor provider contracts		25	125	5 minutes	10 (rounded up to 11 in ROCIS)	\$311
Catch monitor status reports		52	260	15 minutes	65	\$1,950
Catch monitor Informational materials		2	10	5 minutes	1	\$25
Other catch monitor reports on harassment, prohibited actions, illness or injury, or performance problems.		6	30	15 minutes	8	\$225
TOTALS						
Fishing departure reports	263 = 30% of the vessels in any one year (225 LEFG and 650 OA) vessels	3	789	10 minutes	132	\$3,953
Cease-fishing reports		2	526	10 minutes	87 (rounded to 88 in ROCIS)	\$2,635
TOTALS		268	3,710		621	\$18,515

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).

There are no additional capital or recordkeeping/reporting costs beyond the burden hours in Table 1 because we assume that each of the 5 observer/catch monitor providers will maintain a computer system with email capacity for general business purposes and that each vessel owner/operator has access to a telephone for toll-free calls. Computer costs are accounted for in other information collection packages for this fishery (OMB Control Number 0648-0619).

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

The total annual burden on the government for review and processing information from observer and catch monitor providers is estimated to be approximately 500 hours. At \$28 per hour, this would be an annual cost of \$14,000. The cost to support a toll free phone line is approximately \$3,600 annually. The sum of the approximate annual costs to NMFS is \$17,600.

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

By seeking input from staff at NMFS and the Pacific States Marine Fisheries Commission who manage and process these information collections, we made adjustments to the number of responses and burden hours.

In the 2015 submission, there are a couple of instances where three “Types of Responses” were grouped into one estimate of time. For the current submission, we received input from the

Observer Program and the Catch Monitor Program for each and every Type of Response (no grouping). This resulted in an additional 200 responses and 68 hours. See the Table on the next page.

ICs	Previous	Adjusted
Provider contracts	150 resp, 13 hr	175 resp, 15 hr
Training/briefing/debriefing registrations	265 resp, 51 hr	460 resp, 123 hr
	130 resp, 33 hr	110 resp, 28 hr
Physical exam notifications	0 resp, 0 hr	200 resp, 26 hr

Also in 2015, the physical exam notifications were inadvertently omitted from ROCIS. Making the adjustment to add them now added 200 responses and 26 hours.

As a result, there is a net increase in total annual burden hours from 526 hours to 621 hours. There is also a net increase in the number of total annual responses from 3,310 to 3,710 responses.

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

No plans exist for publishing the information collected.

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.

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.