

**SUPPORTING STATEMENT**  
**NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION'S**  
**PAPAHANUMOKUAKEA MARINE NATIONAL MONUMENT INTERNSHIP**  
**PROGRAM**  
**OMB CONTROL NO. 0648-xxxx**

**A. JUSTIFICATION**

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

On June 15, 2006, President George W. Bush established the Papahānaumokuākea Marine National Monument (PMNM) by [Presidential Proclamation 8031](#)\* to ensure the comprehensive, strong, and lasting protection of the coral reef ecosystems and related resources of the Northwestern Hawaiian Islands (NWHI). At a time when ocean resources around the world are in major decline, the designation of PMNM enabled nearly 140,000 square miles of U.S. land and waters of the region to receive the highest form of environmental protection in the country, and created one of the largest marine conservation areas in the world.

As part of PMNM's mission to characterize its natural resources, PMNM conducts annual coral reef monitoring expeditions to the NWHI. Additionally, as part of PMNM's education mission, PMNM is committed to providing educational opportunities for students and educators. In order to accomplish these two missions, the National Oceanic and Atmospheric Administration's (NOAA) PMNM has partnered with the University of Hawaii to offer research internships. Each year, a limited number of research internships will be awarded to outstanding undergraduate students in the marine sciences at the University of Hawaii. These internships consist of training students in SCUBA surveys of coral reef fauna, a research expedition to PMNM aboard a NOAA ship, and the development of an independent research project with data from the expedition. Due to the fact that space is very limited for these internships, only a small number of internships can be offered each year. This request is for a new collection of information from internship applicants, in order to allow PMNM staff to select candidates which are best suited for its research internships.

**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.**

The collection of information will consist of an electronic application package, which will be solicited annually from undergraduate students applying for the internship. The application package will include (1) an application form with information on academic background and professional experiences, (2) reference forms by two educational or professional references, and (3) a support letter from one academic professor or advisor. All gathered information would be used only by staff of PMNM for the purpose of selecting interns, and would not be shared with any other party. None of the information collected will be disseminated to the public.

\*Under the authority of the [American Antiquities Act](#), 16 CFR 431

**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 proposed collection of new information will consist of electronic forms which will be submitted via email.

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

Marine science faculty at the University of Hawaii were contacted in order to determine whether the proposed collection represents a duplication of information collection already in progress. Since the proposed new collection is aimed at determining the unique suitability of students for PMNM's internships, including providing information on skills, knowledge and previous experiences that are relevant to the internship, there are no other alternatives to collect this information other than having students and their references fill out the information themselves.

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

The proposed collection of new information does not involve small businesses or other 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 proposed extension for collection of information would be conducted on an annual basis in order for PMNM help achieve its education and biological characterization missions. If this information collection is not conducted on an annual basis, or not conducted at all, students could not be selected for the research internships, thereby preventing PMNM to complete its education mission to help train the next generation of marine scientists and conservation managers. In addition to providing important educational opportunities for students, these internships help NOAA staff its research expeditions, which are federally mandated to collect data on the unique coral reef ecosystems and related marine resources of PMNM.

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

N/A. The proposed collection of new information will adhere to all OMB guidelines.

**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 May 11, 2018 (83 FR 22034) solicited public comments. No comments were received.

The draft application forms were distributed among faculty at the University of Hawaii in order to obtain their views on the clarity of instructions. Comments are below from Lisa Parr-University of Hawaii at Hilo Faculty:

(1) Marine Option Program (MOP) & PMNM have a great working relationship when it comes to the MOA & the internship selection process - the amount of paperwork is appropriate to provide the students with an opportunity to apply for the internship & provide references the opportunity to comment, but is not onerous. The instructions for the internship application are clear for students & for referees - the data collected are appropriate for determining which students will be selected - the selection process is transparent. MOP distributes the application widely via listserv, emails, Facebook & Instagram to reach the audience eligible for the internship.

(2) No other outside agency comments were received.

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

No payments or gifts will be provided to respondents, other than providing internships to those candidates that are selected.

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

All gathered information will be used only by PMNM staff for the selection of interns and will be deleted upon the start of the internship. Collected information will be stored in a password-protected database.

The information is covered by a Privacy Act System of Records Notice GSA/Govt-9, System for Award Management.

**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.**

N/A. The proposed new collection of information does not contain and questions of sensitive nature.

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

We expect approximately 20 applicants and an additional three respondents per request, for this proposed collection of information each year, and that each response per request (application form, two reference forms and support letter, totaling 80 responses) can be completed in less than one hour. Thus, we estimate a total annual burden of 80 hours.

**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).**

The total annual cost to the public is estimated at \$20 or less for copies.

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

The total annual cost to the federal government to process this collection of information is estimated at \$600 (20 hours of PMNM staff time x \$30/hour).

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

N/A.

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

The results of this new collection of information will not be published.

**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.**

N/A.

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

N/A.

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

This collection does not employ statistical methods.