

SUPPORTING STATEMENT
MARINE DEBRIS PROGRAM PERFORMANCE PROGRESS REPORT
OMB CONTROL NO. 0648-0718

A. JUSTIFICATION

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

The NOAA Marine Debris Program (MDP) supports national and international efforts to research, prevent, and reduce the impacts of marine debris. The MDP is a centralized office within NOAA that coordinates and supports activities, both within the bureau and with other federal agencies that address marine debris and its impacts. In addition to inter-agency coordination, the MDP uses partnerships with state and local agencies, tribes, non-governmental organizations, academia, and industry to investigate and solve the problems that stem from marine debris through research, prevention, and reduction activities, in order to protect and conserve our nation's marine environment and coastal economies, and to ensure navigation safety. In large part, these partnerships are made through grants, cooperative agreements, contracts, MOUs or are simply informal technical assistance arrangements.

The [Marine Debris Research, Prevention, and Reduction Act](#) (33 U.S.C. 1951 et seq.) as amended by the [Marine Debris Act Amendments of 2012](#) (P.L. 112-213, Title VI, Sec. 603, 126 Stat. 1576, December 20, 2012) authorizes the MDP to enter into cooperative agreements and contracts and provide financial assistance in the form of grants to carry out the purposes of the Act – namely to identify, determine sources of, assess, reduce, and prevent marine debris and its adverse impacts on the marine environment and navigation safety. To date, both competitive and non-competitive funding opportunities have been implemented by MDP to conduct such program activities. These funding opportunities provide federal funding to non-federal applicants throughout the coastal United States and territories.

The terms and conditions of the financial assistance awarded through the above-mentioned grant programs require regular progress reporting and communication of project accomplishments to MDP. Progress reports contain information related to, among other things, the overall short and long-term goals of the project, project methods and monitoring techniques, actual accomplishments (such as tons of debris removed from an ecosystem, numbers of volunteers participating in a cleanup project, area of habitat restored, site conditions, debris characteristics, etc.), status of approved activities, challenges or potential roadblocks to future progress, and lessons learned.

Since 2006, the NOAA MDP has implemented aspects of its mission through awarding of grants, contracts and cooperative agreements. The NOAA MDP administers all grant awards. As such, the NOAA MDP requests approval for the continued use of a standardized reporting form that has worked well for marine debris reporting purposes and that clarifies reporting metrics for marine debris removal efforts. Reporting requirements for past grant awards were satisfied using a previous version of the Marine Debris Program's Performance Progress Report (OMB Control No. 0648-0718).

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.

As mentioned above, the terms and conditions of the financial assistance awarded by the MDP require regular progress reporting and communication of project accomplishments to MDP. For grants and cooperative agreements, the NOAA Grants Management Division (GMD) requires a semi-annual reporting frequency (twice per year), and that grantees report on both programmatic accomplishments and financial expenditures. While there is some degree of latitude on when in a calendar year reports are to be submitted to the agency, the NOAA MDP typically sets due dates as April 30 and October 31. At the end of an award, a final report comprehensive to the entire project is due to MDP. For all other (non-grant/contract) efforts conducted directly by the program or by its partners, data collection and reporting requirements are determined based on the specific effort.

This information collection enables MDP to monitor and evaluate the activities supported by the program (either through federal funding or technical assistance) to ensure accountability to the public and to ensure that funds are used consistent with the purpose for which they were appropriated. It also ensures that reported information is standardized in such a way that allows for it to be meaningfully synthesized across a diverse set of projects and project types. MDP uses the information collected in a variety of ways to communicate with federal and non-federal partners and stakeholders on individual project and general program accomplishments. It enables MDP staff, who are subject matter and technical experts on domestic and international marine debris issues to understand how effective projects are at accomplishing their objectives, and to provide technical assistance if needed throughout the life of a project so as to maximize the impact of MDP funds or technical assistance.

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.

Progress reports are form-fillable PDF files that are populated, saved, and updated using Adobe software and a personal computer. Grantees or other marine debris practitioners access the form either by going to the NOAA MDP website (marinedebris.noaa.gov) or it is emailed to them by the project's Federal Program Officer. Form users must have access to a personal computer and internet connection in order to fill out the form and submit it. At the very least a personal computer and internet connection are required to access the form so that it may be printed out if electing to submit a paper copy. For grants, NOAA strongly encourages that these forms are submitted electronically via the NOAA Grants Online system to facilitate the review, revision

and approval processes. The forms themselves do not require that the user have access to any other additional technology beyond a PC and internet connection, although the quality of the report may be enhanced by such technology. For example, the reporting form does request that geographic coordinates of project locations be provided. Internet mapping tools are powerful enough to provide a sufficient level of detail for this requirement, however more precise measurements may be taken by hand held GPS units used in situ during project activities that would give NOAA a better representation of where a project takes place.

4. Describe efforts to identify duplication

Because this information collection is directly linked to understanding progress of specific marine debris activities funded or otherwise supported by the NOAA MDP, there is very little likelihood that this information collection would be a duplication of an existing tool. There is a small chance that NOAA's reporting requirements could duplicate reporting requirements that a user might have to other funding sources for their project, if it is indeed being funded by multiple sources with similar progress reporting conditions. The duplication in such cases would likely be minimal however, or at least the burden would be insignificant since NOAA does not request any information that could not also likely serve a user's reporting requirements to their other sources.

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

The NOAA MDP works with all partners (regardless of organization type) at the start of a project to identify the most critical elements of the project on which they will be reporting, as such there is agreement at the outset of what the reporting parameters will be. This is to ensure that NOAA better understands the project implementation plan, and that partners understand, agree to, and have a hand in shaping their reporting responsibilities under the award.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If the information collection is not conducted or is conducted less frequently, the ability to account for the expenditure of federal funds for the marine debris project activities supported by the NOAA MDP would be substantially diminished. Project evaluations would be informed only by periodic but infrequent site visits by regional program staff and ad hoc updates otherwise provided to NOAA. Additionally, it will not meet the standards of the NOAA Grants Management Division for semi-annual reporting, and would make it more difficult to determine and correct poor grantee performance, since less frequent collection provides insufficient information to monitor awards to ensure Federal monies are properly used

If the collection is not approved, standardizing what information NOAA MDP can collect on a project would be difficult, time-consuming, and may not be as meaningful especially if it is an incomplete picture of a project's progress.

The agency's ability to maintain the public trust and ensure accountability of public funds would be meaningfully reduced. The information used by NOAA to communicate to agency, executive

and congressional leadership about the disposition and efficacy of program funds would be informed by an inferior level of detail and confidence.

Altering collection frequency may also inhibit timely responses to Freedom of Information Act requests that may be submitted.

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

Not applicable.

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 21, 2018 (83 FR 23427) solicited public comments. No comments were received.

Comments were requested from five respondents, and three responded.

Respondent #1

For the progress report, I'd say it varies depending on where we are in the project cycle. For a report where on-the-ground work has not yet begun, it might take 15-30 min to update any new info different from the proposal and forward along. The first major progress report after a significant amount of work might take a 1-2 days to assemble (including writing the narrative, putting together GIS figures as attachments, updating totals, etc.). Additional progress reports usually take less time (1/2 day) – as we tend to save up narrative / quantifiable items along the way and add them to previous text / tallies. We spend a significant amount of time on the final report – perhaps a week (s) (most of this is additional attachments, figures, etc.). If you are just interested in the updating of project numbers on the form (not including narrative, additional attachments) – it probably takes 30 min to complete on average.

The form is easy to use, specific in what is being requested, and not a major burden to the PIs (in my opinion).

What length of time is the form meant to capture (individual item? a day of collections? full project?) If multiple items, the form might get tricky when there is mixed debris. On any given day, we might tick all of the boxes under Condition of Debris, likely find traps submerged and intertidal, as well as recover various types of debris (maybe 3-4 of the choices listed). Is the idea to check off all that apply – but most importantly provide a summary of item numbers and weights (i.e. 20 pieces of debris, weighing X pounds)? This would work for our main metrics – but might lose finer detail (i.e. differentiating a pot that is heavily degraded, abrading habitat, intertidal, disabled vs. one that is good, submerged, active, for example).

I think something like this is a great idea to standardize between different projects.

The ability to add additional rows makes all the difference. I did not catch that the first time around (now I see the add / delete button in both forms). The multiple rows could be used in a

number of different ways without modifying the form. For example, we might opt to add a row just for recreational traps, or other debris, etc. I do not think this form is adding an additional burden – it will help teams better track their metrics throughout a project...

Respondent #2

I would estimate that it takes us about 6-8 hours to prep the reports, and another 2-3 for all the other project PIs to read, comment, edit it. So the approx. total is ~ 10 hours per PPR. Also, I would like to say that it was really SUPER helpful that Mark Manuel was able to upload all our relevant info into the PPR specific to HWF for our reports! This was a fabulous way to make sure that we reached our objectives and hit all those measurables we promised (in an organized way) and it likely saved us several hours on the initial progress report (which usually takes about 4 hours longer than the above estimate). However, this estimation of time burden does not count any of the time spent keeping track of incoming cleanup data for our various islands / organizations (which is compiled and sent to me at least quarterly) --> but this might be better captured with your new removal form.

Here are some comments from our team about the form. All and all we think this is a good idea to keep all the grantees collecting a similar type of data on each of their cleanup activities, and while this might cost us another 30-45 mins per event (including time to organize, compile the info into an appropriate database / folder) it should ultimately save us time in the long run.

1. I would certainly delete "# of items collected" from wherever it appears. It's a meaningless # for us* unless you really consider that 1 laundry basket = 1 plastic bucket = 1 small piece of plastic = 1 55g plastic drum = 1 cig butt. Total estimate of weight, but this # should come from actual weights OR an estimate, as we've done, using avg type of bag weights. (* except for during the MD-MAP surveys where we actually take the time to collect, identify, and tally all objects over 2.5 cm.) SO just do it for those or beach cleanups but not Net patrols
2. In the part of form where you check boxes, Instructions should clearly say "Check all that apply" to cleanup event.
3. "Fishing nets" should just be "nets" - most people cannot distinguish fishing nets from cargo nets (unrelated to fishing)
4. "Disposal method" options - A significant addition here might be to have space at each option to indicate approx %, e.g., 50% to landfill, 25% to energy, 25% to artists.
5. "Types of Debris".... Please define "white goods" - do you mean electronics? ..White goods are appliances like refrigerators, stoves, dishwashers... But only refrigerators float. How about cars? .
6. Thought they were interested in participants, adult v. kids.... could add this for each event also. Guess not..
7. Like above, other data they want summarized: length of coast. Then could just add event lengths to get total for the progress / final reports. OK, but really only for your MD_MAP surveys. If only one person goes wholelength of coast does that count same as if whole group did ?
8. Ideally (like #5 above) there would be a key somewhere with the definition of each of the subcategories (type of debris, habitat type, type of debris, location of debris, etc.) so that folks would know what was "submerged" vs "intertidal", and so forth. Key not on form...

9. Like the #2 comment, I think MOST of these categories should say "check all that apply". Since we usually have a mixed bag of debris items, and looking at this form I think for a typical HWF event at Kamilo we would be able to check all boxes but "shearing" and "submerged".
10. We used to try to track "cubic feet" (volume) of debris collected but this was hard for some of our contractors, and project partners to consistently provide. Instead, we started tracking "truckloads" assuming that a normal sized truck (4x6x1.5' bed) = 35 cu. ft or 1 truckload, whereas our modified HWF rigs and military trailers (or flatbeds with sides to the top) are at least double that capacity = 75 cu. ft of 2 truckloads. Just a thought. If we use Super Sacs then that becomes a useful unit except for big nets.. Our trucks are piled high with debris, not a good standard unit. Ditch volume...just use weight. I can calculate vol. from weight. Weight is easy to actually measure, volume is not unless it is inside a container (truck, SS)
11. How would you determine whether a pot / trap was active or disabled? If on beach it is not active.. Good only if they do open water recovery. Say for example a line on a crab pot buoy. Granted, it's no longer fishing for crabs, but it does have the potential to entangle / smother other types of marine wildlife. This category seems tricky / overly subjective to me to be useful. In other localities it is very good metric...
12. To habitat damage, what about adding a generic category for beach degradation (structure and heat carrying capacity with such a high % of plastics vs sand) for species utilizing that habitat including native coastal strand plants, nesting sea turtles, hauling monk seals, burrowing sand crabs, etc. (or I guess we can just usually select smothering and "other" to hit this type of degradation based on these accumulation hot spot zones. Really tricky guess in our situation. I don't like this item.. What if habitat is already degraded by pollution, then what effect would smothering have on bare rock?

Respondent #3

I would say the progress report usually takes around 4 hours, the biggest variable is how many PI's you have on a grant that are contributing information and how many times you have to remind them to send you things. The more people involved the longer it takes for sure. Looking at the Removal Form: I am thinking about this based on two methods we have used for recovery. If we are talking about the "grapple" method it's a little tricky because we would typically have 5-8 guys in their boats going in different spots to grapple the gear. It would be out of the same harbor but there would be several different "locations" so the number of rows needed on the form would be a lot. If you were looking at each row as a "Removal", or an individual fisherman's collection that day, we wouldn't be able to get the weight for each guy because all the gear from each guy would go into one bin and we would get a total for that whole day. If you just considered each row as the entire day we would give a ball park location. The other tough one is the condition of debris. If we are talking about lobster traps collected by grappling the condition of the traps is all over the map. Some are brand new, some barely resemble a trap anymore. And without diving we would have a hard time assessing habitat damage on the bottom. With the other collection using divers the location would be easy, weight, habitat etc. would work for this form. A suggestion would be to add a question about by-catch, was there

any, what type, how often etc. That is very useful information for trap collections especially because there is still a question of whether the traps are doing any harm by staying on the bottom and by-catch examples are good to have. I would say this form might take a couple hours to fill out for grapple collections. Just a lot more people involved so more data to gather and enter. The dive collections wouldn't take that long, maybe an hour.

Response sent to each commenter:

Thank you and your team for your feedback on these forms. It will be helpful in our approval process here and the comments on the different uses for the removal form gives us a lot to think about. I realize we are trying to make a form with as many uses as possible, and so it could be that some situations just don't fit each field perfectly. In any case, we'll keep you in the loop as it develops and be as clear as we can in how it is laid out.

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

No such payments or gifts will be provided to respondents, other than acceptable remuneration of contractors or grantees implementing projects supported by NOAA MDP.

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

The information collection does not request confidential information, or personally identifiable information beyond the name and organization details of the project's principal investigator. The information collection may be used by NOAA MDP to publicly communicate about the accomplishments of the project, and this is stated on the information collection form. As such, progress reports may be posted to the NOAA MDP website, Clearinghouse, or other data archive to accomplish those communication goals. As a matter of internal policy, NOAA MDP does not share publicly anything but final reports and documentation; interim reports are not made publicly available. During the initial scoping with grantees (described in Question 8 above), NOAA MDP asked grantees whether they had any issues with final reports being made public, and all agreed that such a policy was an acceptable practice.

The personally identifiable information is covered under [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.

No such sensitive information is requested or collected.

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

Between new grantees and existing grantees, NOAA MDP estimates that about 70 respondents will each report twice per year. Grantees who were consulted during the initial scoping for the Federal Register Notice indicated that it would take, on average, between 8.7 and 11.3 hours to

collect and report on all the information required by this collection. This equates to an overall average of 10 hours per report. Since reporting is required twice per year, we estimate that 20 hours per year is required, per grantee, to satisfy NOAA’s reporting requirements, totaling 1,400 hours per year. The grantees that NOAA MDP consulted have experience in submitting a similar reporting form for their other? grants, as such these estimates are based on actual time requirements.

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).

No additional costs are required to respond to this information collection beyond the time-value of personnel responsible for completing the form. If the effort is supported by NOAA funding, any cost requirements for a personal computer or internet connection may be supported through a NOAA grant. Reports are submitted through Grants Online, which does not require a paid subscription or any other cost to the grantee.

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

Annualized costs to the government due to the NOAA progress reporting process result from the amount of time it takes for NOAA staff to review and approve a report. Two NOAA MDP staff review each report submitted. It takes anywhere from 15 to 60 minutes to review a report, depending on the amount of detail provided, and the amount of supplementary materials (maps, PSAs, graphs, monitoring reports, etc...) provided. This is an average of 37.5 minutes per reviewer, per report. This leads to a total of 75 minutes of review, per report. Assuming an average FTE annual salary of \$70,000, this equals about 8% of an FTE for all 70 anticipated semi-annual information collections.

Task	Number of NOAA Reviews / Year	Total Time per NOAA Review (mins)	Total NOAA Hours of Review / Year	Total NOAA Cost
NOAA Report Review	140	75	175	\$5,889

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

No program changes or adjustments are being made.

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

NOAA will not use the information collected here to inform any publication. Final reports or other publications submitted as deliverables under the grant may also be published on the NOAA MDP website (marinedebris.noaa.gov). It may also be housed in the NOAA Marine Debris Clearinghouse (https://clearinghouse.marinedebris.noaa.gov).

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.

We are not requesting this.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection will not employ statistical methods.