**Supporting Statement A**

**Alaska Beak Deformity Observations**

**OMB Control Number 1028-0116**

**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.**

As part of the USGS Ecosystems mission to assess the status and trends of the Nation's biological resources, the Alaska Science Center Landbird Program conducts research on avian populations within Alaska. Beginning in the late 1990s, an outbreak of beak deformities in Black-capped Chickadees emerged in southcentral Alaska. USGS scientists launched a study to understand the scope of this problem and its effect on wild birds. Since that time, researchers have gathered important information about the deformities but their cause still remains unknown. Members of the public provide observation reports of birds with deformities from around Alaska and other regions of North America. These reports are very important in that they allow researchers to determine the geographical distribution and species affected. Data collection over such a large and remote area would not be possible without the public’s assistance.

16 U.S.C. 742(a)-742d, 742e-742j-2 Fish and Wildlife Act of 1956 authorizes the Secretary of the Interior to conduct investigations, prepare and disseminate information, and make periodic reports to the public regarding the availability and abundance and the biological requirements of fish and wildlife resources; provides a comprehensive national fish and wildlife policy and authorizes the Secretary of the Interior to take steps required for the development, management, advancement, conservation, and protection of fisheries and wildlife resources through research, acquisition of refuge lands, development of existing facilities, and other means.

**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.**

The bird observation data is used to assess the geographic scope of deformities and to determine whether there are apparent changes in the frequency of occurrence. Such information will be used to inform partners at meetings and conferences, guide future research of USGS and other organizations on the health of Alaskan birds. Results from this data collection will also be included in scientific publications and reports.

Here is specifically how each piece of information will be used:

Contact information (name, email address, phone number, street address, city, state, zip code, country) will be used to contact the observer to verify observation and to obtain any additional details needed about the bird with the beak deformity.

Date of observation will be used to understand interannual and seasonal patterns of beak deformities to determine if there are changes in prevalence or temporal patterns that might determine what is causing the deformities.

Species will be used to determine what species of birds are being affected by the beak deformities.

Number of deformed individuals will be used to determine if there are spatial or temporal clusters of birds affected by beak deformities and to calculate total number of individuals reported each year or season.

Number of banded individuals will allow us to determine patterns of movements and survival of birds that we have captured and tagged with numbered and colored leg bands in various places as part of our research on beak deformities. Many of these birds have normal beaks but this form allows observers to report them to us.

Location of observation (address or cross streets, city, state) will be used to map the location of the bird with the beak deformity or band.

Description of deformity will be used to determine the nature and severity of the beak deformity.

Band combination will allow us to determine potential movements and survival of individual birds that have been banded with numbered or colored leg bands in other locations as part of our research.

Habitat will allow us to determine if birds with beak deformities are associated with specific types of habitat, which might help us narrow down potential sources of whatever is causing the deformities.

Behavior will allow us to understand how beak deformities might be compromising the normal health and behavior of affected individuals, such as their ability to feed or preen.

Flock composition will allow us to understand patterns of association of individuals and determine possible routes of disease transmission or shared exposure.

Other information will allow observer to share additional information that might be useful in documenting unusual behavior of the birds or anything else that may help us determine what is causing the beak deformities.

Photos of affected birds will allow us to discriminate among different individual birds being reported from nearby locations and to document the nature and severity of the beak deformities.

**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 through a web-based form, which significantly reduces burden of collecting paper copies, entering data manually, and then uploading into a database. Instead, it is possible to streamline collection efforts by importing electronic records directly into a database. We decided to adopt an electronic collection of information to reduce government costs and increase efficiency, as the alternative method was to respond to a large number of telephone calls, emails, or letters from the public reporting observations on this ongoing epidemic of beak deformities. Additionally, cooperation from the public is presumably much higher with a web-based form versus having to submit reports over the phone or by mail. The online form uses a math calculation to ensure that a human is entering information, rather than a computer robot.

**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.**

No other information source is available for collection of beak deformity reports.

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

The public impacted by this information collection is individuals and households so small business and other small entities are not impacted.

**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.**

Without collection of beak deformity reports, we cannot maintain our knowledge of the current status of the health of bird populations in Alaska, as mandated by the USGS mission. Information on DOI trust species, including landbirds, is also relevant to USFWS, NPS, and other federal agencies responsible for managing wildlife resources. Research on beak deformities (avian keratin disorder) is ongoing and reports collected from the public help us to determine the frequency and geographic scope of this disorder. Such information is also used to inform future USGS and USFWS research and prepare funding requests.

**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.**

Reporting is completely voluntary and no response is ever required. Because of the short seasons with intense activity by wild birds it is possible for observers to make zero to ten observations in a week. If multiple affected birds are observed or a single affected bird is seen multiple times, observers may report them as frequently as they would like to do so. One quarter may have many voluntary contributions with few contributions for the rest of the year.

**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 December 6, 2018, at 83 FR 62881. No comments were received during the 60-day public comment period.

We consulted with the individuals listed in the table below to obtain their views on the information presented in our instrument. A few modifications to the format and design of the data form were suggested during the testing period and these have been incorporated. Specifically, we added a small section so observers could report ‘Other information’ not included on the form and we included a convenient way to upload digital photos of affected birds. We also added a query where interested individuals could request additional information from USGS scientists on the research project.

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| --- | --- |
| U.S. Fish and Wildlife ServiceWildlife BiologistAnchorage, Alaska | Audubon AlaskaWildlife BiologistAnchorage, Alaska |

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

No payments or gifts are provided as part of this information collection.

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

As part of the online reporting system, an individual’s phone number, email address, and mailing address are requested. This PII is extremely helpful in that it allows researchers to request additional information or verify reports if necessary, but is not required for submission. The SORN Reference (USGS-18 Computer Registration System—Interior) (74 FR 23430) and Privacy Act statement are provided at bottom of the first page of collected forms on weblink.

**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.**

There are no questions of a sensitive nature in this information collection.

**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 are using the Bureau of Labor Statistics *Employer Costs for Employee Compensation*, USDL-18-0451, published on 3/20/2018, to determine our dollar value for burden hours. The value used is $35.87 for public respondents.

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| --- | --- | --- | --- | --- |
| **Participant / Activity** | **Number of Responses** | **Minutes per response** | **Burden Hours** | **Dollar Value for Burden Hr** |
| Public reads instructions and completes form | 250 | 15 | 63 | $2260 |

**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**.

No additional non-hour costs have been identified.

**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.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Position** | **Grade/****Step** | **Hourly Rate** | **Annual Hrs** | **Fully Loaded Hr Rate** | **Total Labor Value** |
| Research Biologist | 13/1 | $46.39  | 40  | $74.22  | $2969  |

We used the Office of Personnel Management Salary Table [2019-AK](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/AK_h.pdf) to determine the hourly wage rate for a GS-13, step 1. To calculate benefits, we multiplied the hourly rate ($46.39) by 1.6 to account for benefits, resulting in an hourly cost factor of $74.22.

One research biologist will routinely upload reports into a database and complete basic data summaries for research purposes. There are no additional costs associated with the collection of the data for an annual total of $2969 Federal expenses.

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

There is no change to amount of work. Increased costs reflect increase in salary rate.

**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.**

Reports will be recorded in a database to be used as part of the research program on beak deformities in Alaskan birds. The project is ongoing until outbreak of deformities is resolved. No completion date is estimated. Publications and reports will be provided as new information becomes available. No PII will be included in such reports, and only relevant summarized observation data (general location, description of deformity, species affected) will be used.

**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.**

The OMB control number and expiration date will appear on the collection form.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions.