

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Nautical Discrepancy Reporting System
OMB Control No. 0648-0007

SUPPORTING STATEMENT PART A

Abstract

This request is for a revision and extension of the Nautical Discrepancy Reporting System information collection. This request proposes to add a Citizen Science component to the collection, which would allow boating groups or individuals to submit reports to update the charts.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

NOAA's Office of Coast Survey is the nation's nautical chart maker, maintaining and updating over a thousand charts covering the 3.5 million square nautical miles of coastal waters in the U.S. Exclusive Economic Zone and the Great Lakes. The marine transportation system relies on charting accuracy and precision to keep navigation safe and coastal communities protected from environmental disasters at sea.

Coast Survey also writes and publishes the *United States Coast Pilot*®, a series of nine nautical books that supplement nautical charts with essential marine information that cannot be shown graphically on the charts and are not readily available elsewhere. Subjects include, but are not limited to, channel descriptions, anchorages, bridge and cable clearances, tides and tidal currents, prominent features, pilotage, towage, weather, ice conditions, wharf descriptions, dangers, routes, traffic separation schemes, small craft facilities, and Federal Regulations applicable to navigation. Charts and Coast Pilots are purchased by all segments of the marine public, including U.S. and foreign commercial vessels and millions of recreational boaters. Government assets, including U.S. Navy and U.S. Coast Guard vessels and other government vessels and agencies, also rely on this information. Federal regulations ([33 CFR 164.33](#)) require all vessels of 1,600 gross tons and greater, while traversing U.S. waters, to carry marine charts and the U.S. Coast Pilot.

The marine environment and shorelines are constantly changing. NOAA makes every effort to update information portrayed in charts and described in the Coast Pilot. Sources of information include, but are not limited to: pilot associations, shipping companies, towboat operators, state marine authorities, city marine authorities, local port authorities, marine operators, hydrographic research vessels, naval vessels, Coast Guard cutters, merchant vessels, fishing vessels, pleasure boats, U.S. Power Squadron Units, U.S. Coast Guard Auxiliary Units, and the U.S. Army Corps of Engineers.

The purpose of ASSIST is to offer a formal, standardized instrument for recommending changes, corrections, and updates to nautical charts and the Coast Pilot, and to monitor and document the accepted changes.

Adding the Citizen Science component to the collection method will benefit Coast Survey by allowing the public to "adopt" a product or part of a product and provide annual data updates that directly affect that product or products.

Data obtained through ASSIST and the Citizen Science project will be used to update U.S. nautical charts and the *United States Coast Pilot*.

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.

When a user of a nautical chart or the Coast Pilot notices information is missing or has changed, he/she uses the <https://www.nauticalcharts.noaa.gov/customer-service/assist> webpage to report the discrepancy. The information is evaluated by cartographers in NOAA's Office of Coast Survey's Nautical Data Branch. Coast Survey ascertains that the information is germane and, if so, that it is complete. If the information requires clarification, Coast Survey will contact the respondent, by telephone or email, for more information. Once complete, the information is assigned a control number and routed to the applicable production branch to update the chart and/or Coast Pilot master files. If the change is critical to safe navigation, Coast Survey issues a change for publication in the Coast Guard's Local Notice to Mariners and the National Geospatial- Intelligence Agency's Weekly Notice to Mariners.

The Citizen Science project will allow the general public the opportunity to "adopt" an Electronic Navigational Chart (ENC) or part of an ENC. By "adopting" an area the person/persons or group will be responsible for submitting an annual report on the adequacy of the chart. To do this the interested person will notify Coast Survey (ocs.citizen.science@noaa.gov) of their intention to examine a certain product or area. Once approved the person/persons/group will examine the area they are responsible for visually on a computer, inspect by boat, and/or compare to satellite imagery noting any discrepancies or issues with the product. They will then fill out the Citizen Science reporting form and submit to Coast Survey (ocs.citizen.science@noaa.gov). Coast Survey will evaluate the report for any information that would result in a change to the product. If that information does exist it will be given a control number and routed to the applicable production branch to update the chart.

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 yields data that meet all applicable information quality guidelines. Prior to dissemination, the information is 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 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.

The submissions for the ASSIST information collection are provided electronically or via telephone. Discrepancy reporters may fill out the online form at <https://www.nauticalcharts.noaa.gov/customer-service/assist> or they may call Coast Survey directly (888-990-6622). The submissions for the Citizen Science reports are submitted to ocs.citizen.science@noaa.gov.

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 Question 2

Extensive databases catalog and document changes to nautical charts and *United States Coast Pilot*®, with electronic documentation extending back to the 1970s. Every change or germane report is entered into the databases and reviewed prior to making the document updates; therefore, there are no duplicate entries. There are no other federal or state sources that collect this data.

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

The use of this form is voluntary and has no significant impact on small businesses, organizations or government entities. The form requires no records to be kept by the respondent.

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.

If this collection is not conducted, critical information might not be brought to Coast Survey's attention, or the information might be incomplete. This could result in a maritime accident with possible loss of life or harm to the environment.

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 secret, 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.

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice published on January 15, 2020, (85 FR 2410) solicited public comments. No comments were received.

Coast Survey automatically solicits public comments whenever someone submits a correction notice through NOAA's Nautical Discrepancy Reporting System (<http://ocsddata.ncd.noaa.gov/idrs/discrepancy.aspx>) in order to verify the information.

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

No remuneration of any kind is provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

No confidentiality is offered to respondents other than the fact that individual data providers are not identified on charts or in the text of Coast Pilot.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
ASSIST Discrepancy Reports	General Public	900	1.5	1350	0.5	675	\$24.98	\$16,862
Citizen Science Discrepancy Reports	General Public	5	1	5	1	5	\$24.98	\$124.90
Totals				1355		680		\$16,986

* BLS's *Occupational Outlook Handbook* - <https://www.bls.gov/bls/blswage.htm>

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
ASSIST Discrepancy Reports	900	1.5	1350	0	\$0
Citizen Science Discrepancy Reports	5	1	5	0	\$0
TOTALS			1355		\$0

*There are no capital costs or operating and maintenance costs associated with this information collection.

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.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4	\$140,000	35%		\$49,000
Contractor Cost					
Travel					
Other Costs:					
TOTAL					\$49,000

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
ASSIST Discrepancy Reports	900	300	1350	300	675	150	The number of respondents and responses received have significantly increased resulting in a corresponding change to the number of burden hours. New Information Collection
Citizen Science Discrepancy Reports	5	0	5	0	5	0	
Total for Collection	905	300	1355	300	680	150	
Difference	605		1055		530		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
ASSIST Discrepancy Reports	\$16,862	0	\$0	\$0	Labor costs were not previously calculated. New Information Collection
Citizen Science Discrepancy Reports	\$124.90				
Total for Collection	\$16,986	\$0	0	0	
Difference	\$16,986		0		

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.

Individual submissions will not be published, although verified discrepancies will result in an update to the appropriate charts.

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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

Certification Statement for Paperwork Reduction Act Submissions

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).