**Supporting Statement A for**

**Paperwork Reduction Act Submission**

**Research Permit and Reporting System Applications and Reports**

**(36 CFR 2.1 and 2.5)**

**OMB Control Number 1024-0236**

**Terms of Clearance.** None.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The National Park Service Organic Act of 1916 (54 U.S.C. §100101) provides that park resources are to be conserved for enjoyment of present and future generations of people. This act The National Parks Omnibus Management Act of 1998 (NPOMA, 54 U.S.C. 100705 and 100706) encourages use of parks for study to benefit park management and broader science. National Park Service Management Policies 2006 4.2 encourages publication of information derived from studies conducted in the National Park System. Section 205 of the NPOMA (54 U.S.C. 100705) constrains use of parks for scientific study to those studies that are consistent with the laws and management policies of the parks and that can be conducted in a manner that poses no threat to park resources or public enjoyment. The National Park Service (we, NPS) has existing regulations that prohibit the disturbing, removing, or possessing of natural, cultural, and archeological resources (36 CFR 2.1) and that govern the collection of specimens in parks (36 CFR 2.5) for the purpose of research, baseline inventories, monitoring, impact analysis, group study, or museum display. We use a permit system to manage the conduct of scientific research and collecting in parks and our Museum Management Program manages collected specimensor portions or derivatives of those specimens that are to be retained permanently.

Scientific studies and science education activities in parks that might disturb resources or visitors, require the waiver of any regulation, or involve the collecting of specimens generally are conducted under permit. NPS policy regarding studies and collections requires that studies, including surveys, inventories, monitoring, research, and data and specimen collection, conducted by other than NPS employees on official duty, requires an NPS scientific research and collecting permit. This policy also requires that all studies conform to NPS policies and guidelines regarding collection, reporting, and publication of accomplishments and data; conduct of studies; wilderness restrictions; and requirements identified in the terms and conditions of a permit. In addition, this policy requires that projects be administered and conducted by fully qualified personnel and conform to current standards of scholarship. Finally, this policy provides that researchers who apply for and receive scientific research and collecting permits may be asked, based on NPS analysis of the individual study proposal and as an agreed condition to the associated permit, to provide a variety of products to the park issuing the permit. In keeping with the public nature of parks, we expect that results of all scientific activities conducted in parks will be made available to the public through both technical and popular publication outlets, and that permanently retained natural resource collections and associated field records remain Federal property that will be managed as NPS museum collections. During the past 19 years, we have found that the existing scientific research and collecting permit system is being used also by applicants seeking permission to conduct science education activities in parks.

We have a long tradition of soliciting and disseminating annual progress reports from scientists holding NPS permits to conduct scientific research and collecting in parks. Section 201 (5) of NPOMA (not repealed but omitted from the text of title 54 U.S.C.) encourages the publication and dissemination of information from studies conducted in parks. One mechanism for fulfilling this encouragement is the annual collection and publication by the NPS of information from permittees about the interim results and findings of their permitted research being conducted in the parks. A second mechanism for fulfilling this encouragement is to involve scientists who want to conduct science education activities in parks.

**2. Indicate how, by whom, how frequently, 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.**

National Park Service Forms 10-741a (Application for a Scientific Research and Collecting Permit) and 10-741b (Application for a Science Education Permit) collect information from persons seeking a permit to conduct natural or social science research and collection activities in individual units of the National Park System. The information we collect includes, but is not limited to:

* Names and business contact information.
* Project title, purpose of study, summary of proposed field methods and activities, and study and field schedules.
* Location where scientific activities are proposed to take place, including method of access.
* Whether or not the study proposes that specimens will be collected or handled, and if yes, scientific descriptions and proposed disposition of specimens.
* If specimens are to be permanently retained, the proposed repositories for those specimens.

Persons who receive a permit must report annually on the activities conducted under the permit. Form 10-226 [Investigator’s Annual Report (IAR)] collects the following information:

* Reporting year, park, and type of permit.
* Names and business contact information and names of additional investigators.
* Project title, park-assigned study or activity number, park-assigned permit number, permit start and expiration dates, and scientific study start and ending dates.
* Activity type, subject discipline, purpose of study/activity during the reporting year, and finding and status of study or accomplishments of education activity during the reporting year.

We have not made any substantive changes to the existing forms for this submission. We use the above information to manage the use and preservation of park resources and for reporting to the public via the Internet about the status of permitted research and collecting activities.

**New Requirements and Additional Burden**

The National Park Service proposes an additional burden: Permittee Field Check-In/Check-Out Report. The current permitting process does not provide parks real time knowledge of where and when permitted field work activities take place. The permitting process must start well before planned field work. The field start and end dates, locations, and methods of transport proposed in the application are generally estimations which are subject to change. However, a Permittee Field Check-In/Check-Out Report will provide park resource management personnel, law enforcement and safety personnel real time awareness of what, when and where activities are taking place within the park. Real time knowledge of permitted activities is crucial to law enforcement personnel who will use this information to account for activities that would otherwise be illegal; safety personnel to track, find or contact researchers if necessary; and park resource management personnel to monitor the impact of permitted activities. We anticipate that this report will account for about a third of permits issued.

The Permittee Field Check-In/Check-Out Report will be served through the same Internet-based, automated Research Permit and Reporting System (RPRS) used to apply for permits. Pre-filled information from the permit record will remain accurate and requires no input from the respondent. We encourage all respondents to use the Internet-based, automated Research Permit and Reporting System (RPRS) to complete and submit applications and reports. For those who use RPRS, much of the information needed for the check-in/check-out report and the annual report is pre-filled automatically from the permit record. At least half of the information in Check-in/Check-out from is pre-filled with the information in permit applications 10-741a and 10-741b. The following (new) information will be needed to complete the Check-in/Check-out form:

**Table 2.1 Check-In Report**

|  |  |
| --- | --- |
| **New Information**  | **Reason for Question** |
| Field Start and End dates | * Pre-filled on permit but can edited to update.
* This information will alert management staff that permitted research studies are active or ended.
 |
| Field Contact Phone Type(s) | * Informs the park whether the phone number will work when the field contact is in the field.
 |
| Residence during field work trip | * Enhances the parks ability to contact the field contact, and to verify whether field work is taking place.
 |
| Vehicle Make, Model and License Plate Number | * Allows park to account for vehicles parked in areas outside of normal visitor parking options and to locate field personnel in remote areas
 |
| Check boxes to acknowledge: 🞎 advanced permission to conduct field work during night-time hours 🞎 backcountry camping permit for this trip🞎 special permission to work in public view in the field 🞎 receipt of special permission to work in public view in the field 🞎 approved over fight (aerial survey, telemetry flights, remote sensing, etc.).🞎 permission to survey park visitors 🞎 permission to conduct scientific studies in wilderness or closed areas  | * Parks need to know when and where these activities, which without permit would be illegal, occur. Through this information parks may account for, track, manage, and mitigate.
 |

**Table 2.2 New Check-Out Report**

|  |  |
| --- | --- |
| New Information  | Reason for Question |
| Names of field work site(s) | * To confirm all field work site locations to account for equipment or site disturbances, verify site conditions were managed to permit requirements, and to protect visitor safety.
 |
| GIS or specific coordinate location of each field site | * Exact location of field work sites allows parks to track equipment left in the field, protect park resources, verify that site conditions were managed to park requirements and mitigation if they were not.
 |
| Number of days at each site | * Allows parks to calculate the potential impact of the permitted activities at each specific site, especially sites where resources are fragile and can sustain limited impact.
 |
| Number of researchers at each site | * Helpful information for the calculation of the impact of permitted activities. This information is especially important if site resources are fragile and can sustain only limited visitation.
 |
| Equipment left at each site | * Parks use this information to track exact location of equipment left in field. This information informs visitor experience and safety efforts, resource protection efforts, and is used to track compliance when equipment removal is a permit requirement.
 |
| Types and quantities of specimens from each site visited | * Provided at the end of the field activity to verify the scope of the collection. This information is required for parks to meet their responsibility to preserve park resources and to track all collections, which remain Federal Property.
 |
| Other Comments | * Optional field which gives the permit holder the opportunity to give NPS feedback on their scientific study experience, and the opportunity to make clarifications or comments to supplement information they have provided on the form.
 |

**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 Research Permit and Reporting System allows electronic submissions and automated, via the internet, to make the application and reporting process as efficient as possible. Applicants can upload preexisting proposals and peer reviews to reduce the burden of creating duplicative documents they previously have obtained. Respondents use (or create) a protected account to access all forms in this collection using the RPRS website at “<https://irma.nps.gov/rprs>. All applicants use RPRS to draft, print drafted and submit final versions of the applications, Investigator’s Annual Reports and the check-in/check-out forms from their account. Additionally, the System automatically Confirmations of receipt of documents are automatically sent to the respondent’s email address provided in their account. Respondents may also contact the park research coordinator (by email or phone) to request a copy of a submitted form. For those few respondents who are unable to supply the requested. A minimal number of paper applications and forms, less than 1% are submitted and accepted by FAX or mail.

A user accounts are protected by username and password, and account holders may save all documents as drafts with the ability to return to RPRS (at their convenience) to complete the process. RPRS provides account holders with a secure method to communicate with parks. assign permissions to other agents to use the account, and transfer information between accounts.

**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.**

The information collected using the forms and reports in this request is unique and project specific therefore no other source is available. Since circumstances for conducting research studies and activities in parks vary by project, there is no available information that can be used in lieu of that supplied by each applicant. With this, no duplication of effort has been identified.

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

The small entities that could be affected by the requirements of this information collection include: small, independently owned scientific research organizations and small-entity providers of field science education The steps involved in the application and reporting process are not do not exceed the same impact as for as any other entity. The burden is the same for small business as other entities applying conduct research in parks. As a result, there is no significant economic impact on small entities within the meaning of the Regulatory Flexibility Act (5 U.S.C. 601, et seq.). Thus, no special provision has been made for small businesses.

**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.**

Failure to collect information from and issue permits to applicants requesting permission to conduct studies or activities in parks be in violation of 36 CFR 2.1 and 2.5. Failure to have permitted scientists conducting scientific activities in parks would prevent compliance with the National Parks Omnibus Management Act of 1998 and NPS Management Policies 2006. Such failure also would reduce the availability of scientific study results for use in park management and public information programs.

**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.**

There are no special circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

**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 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.**

On March 18, 2020, we published in the Federal Register (85 FR 15495) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on May 18, 2020. We received one response to that notice from the State of Alaska on May 18, 2020. The State provided the following comment requesting changes to the application form.

**Comment #1**

… we request the following question be added to the application, under the section “Study Schedule.” • *Is your schedule time sensitive due to biological, weather, or other circumstances beyond your control?*

**Comment #2:**

To increase the utility and clarity of this application (as requested, we request it include a separate box (in item 3) under the section “*Does your study propose to involve any of the following?” • Alaska Park Units, subject to ANILCA*

**NPS Response**

We examined the requests from the State of Alaska in the context that RPRS is a national system that applies equally to all parks that receive applications for Scientific Research and Collecting Permits. With respect to the first comment, the NPS recognizes that many parks, whether in Alaska, the conterminous states, the Caribbean, or Hawaii and the Pacific Islands, are subject to biological, weather, or other circumstances beyond the control of incoming field teams. We conclude that all parks issuing Scientific Research and Collecting Permits, including the parks in Alaska, are acutely aware of factors that can affect field schedules and as a consequence maintain appropriate flexibilities to work with permittees to modify field schedules as necessary. Because of this awareness, park research coordinators do not require redundant notice. With respect to the second comment, there is already a section in the application titled, “*Does your study propose to involve any of the following? (check all that apply)*” which contains a check box regarding wilderness. We concluded that adding a second check box regarding wilderness in Alaska would be unnecessary and redundant.

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In addition to the Federal Register Notice, we consulted with three (3) individuals familiar with this collection of information in order to validate our time burden estimates and asked for comments on the questions below the following table. Respondents included:

|  |  |
| --- | --- |
| **Title** | **Affiliation** |
| Doctor, Director | Bonefish & Tarpon Trust |
| Doctor, Professor | University of Nevada Las Vegas |
| PHD Student | University of Tennessee - Knoxville |

***Question 1: “Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”***

**Comments:** Representatives were supportive of the need to collect application and reporting information. Some respondent comments are copied below:

* “All of the information requested in the forms is appropriate. I don't see any of the questions as unnecessary.”
* “the burden of completing these forms is not too onerous.”

**NPS Response/Action Taken:** No Response Required

***Question 2: “The accuracy of our estimate of the burden for this collection of information:***

**Comments:** Representatives were supportive of our burden estimates.

* ‘I think these estimates are more or less accurate’
* ‘These forms were very quick for me (less than 20 min)’
* ‘The completion of the forms is rather quick, typically 15 minutes’

**NPS Response/Action Taken:** No Response Required

***Question 3: “Ways to enhance the quality, utility, and clarity of the information to be collected”***

**Comments:** No specific suggestions for enhancing the quality, utility and clarity of the information to be collected were provided by respondents. Nor were any specific elements of the forms lacking quality, utility and clarity.

**NPS Response/Action Taken:** No Response Required

***Question 4: “Ways to minimize the burden of the collection of information on respondents”***

**Comments:**

* It would be nice to be able to electronically link the applications and reports. For example, perhaps assign an application number to an application. If the application is approved, that number would live with the project (like a key variable). This would enable autofill on the reports and applications for renewal, which would save the researcher some time.

**NPS Response/Action Taken:** NPS currently links the application number to the permit and the permit data to reports and to the permit renewal process. The software pulls data from the permit into reports and into a permit renewal application which reduces burden. Existing applications may also be used as a template. We discussed these services and asked the respondent if there was anything additional that might be added or improved. The respondent replied, “What you describe is perfect.” While we intend to continually enhance our services to reduce burden, there is no response required to the specific comment we received.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. The guidance document for the process, is available on the RPRS Help page. The information in this collection may become available to the public. Name and contact information collected are for official business and personal. Despite this distinction, the information in RPRS can be retrieved by applicant and permittee contact information. NPS has initiated development of a System of Records Notice (SORN) as an effort to integrate into the *NPS Integrated Resource Management Applications Authority to Operate* declaration which is currently in process with the NPS and DOI Privacy Office and IT Security Office. We will provide OMB with the title of the SORN and citation upon publication in the *Federal Register*.

**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.**

We do not ask questions of a sensitive nature.

**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. Instead, this cost should be included under “Annual Cost to Federal Government.”**

We estimate that we will receive 8,590 responses totaling 5,684 burden hours. We estimate that the dollar value of the annual burden hours is $**239,592** (rounded). We used the rates listed below in accordance with Bureau of Labor Statistics news release [USDL-20-0451](https://www.bls.gov/news.release/pdf/ecec.pdf), March 19, 2020, Employer Costs for Employee Compensation—December 2019, to calculate the total annual burden. Table 1 lists the hourly rate (Including benefits) for all workers in the following categories as:

* Individuals: $37.10
* Private Sector: $34.72
* State and Local Government: $52.14

**TABLE 12. 1. Total Estimated Annualized Burden**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Activity** | **Number of Respondents** | **Number of Annual Responses** | **Completion Time per Response** | **Total Annual Burden Hours** | **Hourly Rate Including Benefits** | **$ Value of Annual Burden Hours** |
| **Form 10-226, “Investigator’s Annual Report”** |
|  Individuals | 270 | 270 | 15 minutes | 68 | $ 37.10 |  $ 2,523 |
|  Private Sector | 1,640 | 1,640 | 15 minutes | 410 | 34.72 | 14,235 |
|  Government | 1,360 | 1,360 | 15 minutes | 340 | 52.14 | 17,728 |
| ***Subtotal*** | ***3,270*** | ***3,270*** |  | ***818*** |  | ***$34,486*** |
| **Form 10-741a, “Application for a Scientific Research and Collecting Permit”** |
|  Individuals | 260 | 260 | 1.38 hours | 359 | $ 37.10 | $ 13,319 |
|  Private Sector | 1,600 | 1,600 | 1.38 hours | 2,208 | 34.72 | 76,662 |
|  Government | 1,330 | 1,330 | 1.38 hours | 1,835 | 52.14 | 95,677 |
| ***Subtotal*** | ***3190*** | ***3190*** |  | ***4,402*** |  | ***$ 185,658*** |
| **Form 10-741b, “Application for a Science Education Permit”** |
|  Individuals | 30 | 30 | 1 hour | 30 | $ 37.10 | $ 1.113  |
|  Private Sector | 50 | 50 | 1 hour | 50 | 34.72 | 1,736 |
|  Government | 50 | 50 | 1 hour | 50 | 52.14 | 2,607 |
| ***Subtotal*** | ***130*** | ***130*** |  | ***130*** |  | ***$ 5,456*** |
| **Form 10-741C, Field Work Check in Report** |
|  Individuals | 80 | 80 | 10 minutes | 13 | $ 37.10 | $ 482 |
|  Private Sector | 520 | 520 | 10 minutes | 87 | 34.72 | 3,021 |
|  Government | 400 | 400 | 10 minutes | 67 | 52.14 | 3,493 |
| ***Subtotal*** | ***1,000*** | ***1,000*** |  | ***167*** |  | ***$ 6,996*** |
| **Form 10-741D, Field Work Check out Report** |
|  Individuals | 80 | 80 | 10 minutes | 13 | $ 37.10 | $ 482 |
|  Private Sector | 520 | 520 | 10 minutes | 87 | 34.72 | 3,021 |
|  Government | 400 | 400 | 10 minutes | 67 | 52.14 | 3,493 |
| ***Subtotal*** | ***1,000*** | ***1,000*** |  | ***167*** |  | ***$ 6,996*** |
| **TOTALS** | **8,590** | **8,590** |  | **5,684** |  | **$** **239,592** |

\*Figures rounded to match ROCIS.

**13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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.**

There is no non-hour burden cost to respondents.

**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.**

We estimate that the total cost to the Federal Government to administer this information collection is $**25,072,200** (rounded). This includes federal salary costs and benefits and the cost associated with reviewing and processing applications and reports based upon hourly rates (see tables below)

To determine average hourly rates, we used Office of Personnel Management Salary Table [2020-RUS](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/RUS_h.pdf) as an average nationwide rate. In accordance with Bureau of Labor Statistics news release [USDL-20-0451](https://www.bls.gov/news.release/pdf/ecec.pdf), March 19, 2020, Employer Costs for Employee Compensation—December 2019, we multiplied the hourly rates by 1.57 to account for benefits.

**Table 14.1 Hourly Salary and Benefits by Position and Weighted Hourly Salary and Benefits**

|  |  |  |  |
| --- | --- | --- | --- |
| **Position** | **Grade/Step** | **Hourly Pay Rate** | **Hourly Rate****Including Benefits** (1.57 x hourly rate) |
| Administrative | GS-07/05 | $ 23.49 | $ 36.88 |
| Technician | GS-09/05 | 28.73 | 45.11 |
| Scientist | GS-13/05 | 49.54 | 77.78 |
| Curator | GS-11/05 | 35.76 | 56.14 |
| **Weighted Average ($/hr)** | **$ 53.98** |

**Table 14.2** Estimated salary (including benefits) / Cost of each activity per permit

|  |  |  |  |
| --- | --- | --- | --- |
| **Activity** | **Total hours** | **Weighted Average****Cost ($/hr)** | **Total cost ($)** |
| Process Application | 40 | 53.98 | $ 2,159  |
| Process specimen application (curator) | 10 | 53.98 | 540 |
| Monitor permit | 24 | 53.98 | 1,296 |
| Receive reports | 4 | 53.98 | 216 |
| Manage specimens | 8 | 53.98 | 432 |
| Total Weighted Cost per Permit | $4,643 |
| **Total [$4,643 (Weighted Cost) x 5,400 (avg. number of active permits to administer annually calculated over a three-year span)]** | **$** **25,072,200**  |

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

The addition of the new Permittee Field Check-In/Check-Out Reports and the increased number of respondents completing Form 10-226 caused a net increase of 1,971 responses with corresponding increase of 235 burden hours.

**Table 15.1 Program Changes**

|  | **Previously Approved** | **Current Request** | **Net change** |
| --- | --- | --- | --- |
| **Form** | **Number of Annual Responses** | **Total Annual Burden Hours** | **Number of Annual Responses** | **Total Annual Burden Hours** | **Number of Annual Responses** | **Total Annual Burden Hours** |
| **10-226** |  |  |  |  |  |  |
|  Individuals | 217 | 54 | 270 | 68 | +53 | +14 |
|  Private Sector | 1,700 | 425 | 1,640 | 410 | -60 | -15 |
|  Government | 1,300 | 325 | 1,360 | 340 | 60 | 15 |
| **10-741A** |  |  |  |  |  |  |
|  Individuals | 272 | 375 | *260* | *359* | *-12* | *-16* |
|  Private Sector | 1,600 | 2,208 | *1600* | *2208* | *0* | *0* |
|  Government | 1,400 | 1,932 | *1330* | *1835* | *-70* | *-97* |
| **10-741B** |  |  |  |  |  |  |
|  Individuals | 30 | *30* | *30* | *30* | *0* | *0* |
|  Private Sector | 50 | *50* | *50* | *50* | *0* | *0* |
|  Government | 50 | *50* | *50* | *50* | *0* | *0* |
| **(NEW) 10-741C**  |  |  |  |  |  |  |
|  Individuals | *0* | *0* | *80* | *13* | *+80* | *+13* |
|  Private Sector | *0* | *0* | *520* | *87* | *+520* | *+87* |
|  Government | *0* | *0* | *400* | *67* | *+400* | *+67* |
| **(NEW) 10-741D**  |  |  |  |  |  |  |
|  Individuals | *0* | *0* | *80* | *13* | *+80* | *+13* |
|  Private Sector | *0* | *0* | *520* | *87* | *+520* | *+87* |
|  Government | *0* | *0* | *400* | *67* | *+400* | *+67* |
| TOTAL | *6,619* | *5,449* | *8,590* | *5,684* | *+1,971* | *+235* |

**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.**

This collection of information package is not intended to produce any specific publication. Although they are part of the public record, the applications and permits are not published. The Investigator’s Annual Reports, prepared and entered into the Internet system by the permittees, are released to public availability on the Internet site once park staff have reviewed them and found them appropriate for posting in the System. There are no plans for any publication, tabulation, or analytical analysis.

**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.**

We will display the OMB control number and expiration date.

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

There are no exceptions to the certification statement.