

**SUPPORTING STATEMENT A FOR  
PAPERWORK REDUCTION ACT SUBMISSION**

**Federal Fish and Wildlife Permit Applications and Reports –  
Native Endangered and Threatened Species; 50 CFR 10, 13, and 17  
OMB Control Number 1018-0094**

**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 Endangered Species Act (Act, ESA, 16 U.S.C. 1531 *et seq.*) was established to provide a means to conserve the ecosystems upon which endangered and threatened species depend, to provide a program for the conservation of these endangered and threatened species, and to take the appropriate steps that are necessary to bring any endangered or threatened species to the point where measures provided for under the Act are no longer necessary. Section 10(a)(1)(A) of the Act authorizes us to issue permits for otherwise prohibited activities in order to enhance the propagation or survival of the affected species. Section 10(a)(1)(B) of the Act authorizes us to issue permits if the taking is incidental to the carrying out of an otherwise lawful activity. ESA Section 10(d) requires that such permits be applied for in good faith and, if granted, will not operate to the disadvantage of endangered species, and will be consistent with the purposes of the Act.

Our regulations implementing this statute are in Chapter I, Subchapter B of Title 50 of the Code of Federal Regulations (CFR) (50 CFR 13 and 50 CFR 17). The regulations stipulate general and specific requirements that, when met, allow us to issue permits to authorize activities that are otherwise prohibited. Upon receipt of a complete application, the Director may issue a permit authorizing any activity otherwise prohibited by §17.21, in accordance with the issuance criteria of this section, for scientific purposes, for enhancing the propagation or survival, or for the incidental taking of endangered wildlife. Such permits may authorize a single transaction, a series of transactions, or a number of activities over a specific period of time. (See §17.32 for permits for threatened species.)

**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.**

All Service permit applications are tailored to a specific activity based on the requirements for specific types of permits. We collect standard identifier information for all applications for permits, such as the name of the applicant and the applicant's address, telephone numbers, if applicable, tax identification number, email address, description of activity being requested under the ESA, and, after the permit has been issued, a report (description of activity that was conducted under that permit). Standardization of general information common to the application forms makes the filing of applications easier for the public and helps to expedite our review.

The information that we collect on applications and reports is the minimum necessary for us to determine if the applicant meets/continues to meet issuance requirements for the particular activity they are requesting to conduct with respect to endangered and threatened species. Respondents submit application forms periodically as needed. Submission of reports is

generally on an annual basis, but for some activities, (such as activities associated with sea turtles), may be on a more frequent basis, as needed (see those specific reporting forms). This information collection request (ICR) includes minor modifications to the layout and content of the currently approved application forms so that they:

- (a) Are easier to understand and complete,
- (b) Minimize the number of completed pages the applicant must submit, and
- (c) Accommodate future electronic permitting in the Service's new ePermits System **(See "Proposed Revisions" section below)**.

In addition to the application forms, permit holders must submit the reports in accordance with their permits issued based on 50 CFR 17. Some Service annual reports associated with permits are in the 3-202 series of forms, each tailored to a specific activity based on the requirements for specific types of permits. In some cases, we developed specific information collection forms to facilitate and standardize the reporting and review, and to facilitate development of electronic forms and electronic reporting and retrieval of that information.

Annual reporting of the results subsequent to the activity authorized by the permit is required in most cases (under the authority of section 10(a)(1)(A) and 10(a)(1)(B) of the ESA and its implementing regulations at 50 CFR 17.) These reports allow us to evaluate the success of the project, formulate further research, and develop and adjust management and recovery plans for the species.

NOTE: Due to the voluminous number of guidance documents associated with this information collection and the frequency with which they are updated, we are not providing .pdf copies via ROCIS. Specific supporting documents pertaining to species listing, sections of the Endangered Species Act, or anything else related to Endangered Species policy, may be access via the Service's [ESA document library](#).

### **SAFE HARBOR AGREEMENTS/CANDIDATE CONSERVATION AGREEMENTS WITH ASSURANCES**

**Application** – Form 3-200-54, "*Enhancement of Survival Permits Associated with Safe Harbor Agreements and Candidate Conservation Agreements with Assurances*". This application can be used for a single species or multiple species. Agreements may vary widely in size, scope, structure, and complexity, and in the activities they address.

As part of the application process, applicants are also required to submit either a Candidate Conservation Agreement with Assurances (CCAA) or a Safe Harbor Agreement (SHA) with their completed Form 3-200-54.

- **CCAAs** – Conservation of animal and plant resources on non-federal lands is important because many species rely heavily – or even entirely – on such lands. However, due to concern about potential land use restrictions that could occur if a species becomes listed under the ESA, some property owners have been reluctant to engage in conservation activities that encourage use of their land or water by a candidate species. A CCAA addresses these concerns by providing incentives for non-federal property owners to engage in voluntary conservation activities that provides a net conservation benefit to candidate species.
- **SHAs** – SHAs are voluntary agreements involving private or other non-federal property owners whose actions contribute to the recovery of species listed as endangered or threatened under the ESA. In exchange for actions that contribute to

the recovery of listed species on nonfederal lands, participating property owners receive formal assurances from the FWS that if they fulfill the conditions of the SHA, the FWS will not require any additional or different management activities by the participants without their consent. In addition, at the end of the agreement period, participants may return the enrolled property to the baseline conditions that existed at the beginning of the SHA.

**NOTE:** *Approved Permits*

- *SHA Permit* – Once approved, the SHA permit also specifies that the FWS will not require any additional or different conservation measures management activities by participants without their consent.
- *CCAA Permit* – Once approved, the CCAA permit provides participating property owners with a permit containing assurances that if they engage in certain conservation actions for species included in the agreement, they will not be required to implement additional conservation measures beyond those in the CCAA. If the species is listed, additional land, water, or resource use limitations will not be imposed on them, unless they consent to such changes.

**Annual Reports** – Annual reports associated with SHAs/CCAAs are non-form requirements and are required by Federal permitting regulations under 50 CFR 13.45, unless otherwise specified in the permit. Reports contain information regarding the implementation of conservation measures and the amount of take that has occurred, both of which are essential to ensuring compliance with the permit. Permittees may submit the information in any format they choose.

**Notifications (Incidental Take)** – Private landowners who have an Enhancement of Survival Permit (and accompanying Safe Harbor Agreement or Candidate Conservation Agreement with Assurances) must notify us if their land management activities incidentally take a listed or candidate species covered under their permit.

**Notifications (Change in Land Owner)** – We issue Enhancement of Survival Permits to the landowners, and their name is printed on the permit. If ownership of the land changes, this permit does not automatically transfer to the new landowner. Therefore, we ask the permittee to notify us if there is a change in land ownership so that we may update the permit.

## **HABITAT CONSERVATION PLANS**

**Application** – FWS Form 3-200-56, *“Incidental Take Permits Associated with a Habitat Conservation Plan”*. Anyone whose otherwise-lawful activities will result in the “incidental take” of a listed wildlife species needs a permit. The permit allows the permit-holder to legally proceed with an activity that would otherwise result in the unlawful take of a listed species. The permit holder also has assurances from the FWS through the “No Surprises” regulation. The purpose of the incidental take permit is to exempt non-Federal permit-holders – such as States and private landowners – from the prohibitions of section 9, not to authorize the activities that result in take.

**HCPs** – As part of the application process, applicants are required to submit a Habitat Conservation Plan (HCP). HCPs are planning documents required as part of an application for an incidental take permit. They describe the anticipated effects of the proposed taking; how those impacts will be minimized or mitigated; and how the HCP is to be funded. They can apply to both listed and nonlisted species, including those that are candidates or have been proposed for listing. Conserving species before they are in danger of extinction or are

likely to become so can also provide early benefits and may prevent the need for listing. They provide a pathway forward to balance wildlife conservation with development. The primary objective of the HCP program is to conserve species and the ecosystems they depend on while streamlining permitting for economic development.

**Annual Reports** – Annual reports associated with HCPs are non-form requirements and are required by Federal permitting regulations under 50 CFR 13.45, unless otherwise specified in the permit. Reports contain information regarding the implementation of minimization and mitigation measures and the amount of take that has occurred, both of which are essential to ensuring compliance with the permit. Permittees may submit the information in any format they choose.

## **RECOVERY/INTERSTATE COMMERCE**

**Applications** – Forms 3–200–59, *Recovery Permit Application Form*; and Form 3-200-60, *Interstate Commerce Application Form*. On June 6, 2020, we requested and obtained approval from OMB to split the previously approved Form 3–200–55 to two separate permit applications (asking the applicant to select either Recovery Permit or Interstate Commerce) to reduce the overall form length and confusion. The new form fields match the original fields with no new instructions added; however, the text accompanying the fields on Forms 3–200–59 and 3–200–60 are not identical to the old form due to the clarifying nature of the split. We do not anticipate a burden change in conjunction with this approved change.

**Annual Reports** – Annual reports associated with recovery/interstate commerce permits are non-form requirements and are required by Federal permitting regulations under 50 CFR 13.45, unless otherwise specified in the permit. Reports contain information regarding the activities conducted under the permit and the amount of take that has occurred, both of which are essential to ensuring compliance with the permit. Permittees may submit the information in any format they choose, and they may elect to use a taxa-specific form if it is available (see **Annual Reports Associated with Native Endangered and Threatened Species under ESA** below).

**Request to Revise List of Authorized Individuals** – When a new, renewed, or amended permit is issued, the List of Authorized Individuals (LAI) is typically at the end of a permit on Regional Office letterhead. The LAI captures those expressly authorized to perform otherwise prohibited activities on an active permit.

When a permittee requests changes to the individuals authorized on a permit, the Field Office (FO) reviews the qualifications. It then issues an updated standalone LAI with the new and current qualified individuals. Issuance of a standalone LAI is considered an administrative change to maintain an up-to-date list of those authorized for the permit's species/activities. Since there are no revisions to the previously authorized species or geographic localities on the permit itself, the action is purely a streamlining measure for the regions to manage the high volume of personnel changes without issuing an amendment or new permit.

**Notification (Escape of Wildlife)** – If a recovery or interstate commerce permit authorizes activities that include keeping wildlife in captivity, for health and safety reasons, we ask the permittee to immediately notify us if any of the captive wildlife escape.

**Annual Reports Associated with Native Endangered and Threatened Species under ESA** – We use the following annual report forms specific to particular species for activities

associated with native endangered and threatened species permits under the ESA. The Service designed the forms to facilitate the electronic reporting specifically for each species. The Service will use the reported data to evaluate the success of the permitted project, formulate further research, and develop and adjust management and recovery plans for the species. The data will also inform 5-year reviews and Species Status Assessments conducted under the ESA. **(See “Proposed Revisions” section below):**

- Form 3-202-55b, “U.S. Fish and Wildlife Service Geographic Area: *Midwestern Bat Reporting Form*”;
- Form 3-202-55c, “U.S. Fish and Wildlife Service Geographic Area: *Southeastern Bat Reporting Form*”;
- Form 3-202-55d, “U.S. Fish and Wildlife Service Geographic Area: *Northeastern Bat Reporting Form*”;
- Form 3-202-55e, “U.S. Fish and Wildlife Service Geographic Area: *Plains/Rockies Bat Reporting Form*”;
- FWS Form 3-202-55f, “*Non-Releasable Sea Turtle Annual Report*”;
- FWS Form 3-202-55g, “*Sea Turtle Rehabilitation*”.

**PROPOSED REVISIONS** – All newly proposed ICs are labeled “NEW” in the burden table in question 12 of this Supporting Statement.

#### **PROPOSED FWS Form 3-2531**

Although the Service announced in the published 60-day *Federal Register* notice, its intention to seek OMB approval of a new Form 3-2531, “*General Recovery Permit Reporting Form*”. We no longer plan to proceed with this form. Should the Service decide to move forward with this new form at a later date, we will initiate a new revision to this collection by publishing the required 60-day FRN to solicit comments from the public in accordance with 5 CFR 1320.

#### **SAFE HARBOR AGREEMENTS/CANDIDATE CONSERVATION AGREEMENTS WITH ASSURANCES**

The Service is proposing to revise Form 3-200-54, “*Enhancement of Survival Permits Associated with Safe Harbor Agreements and Candidate Conservation Agreements with Assurances*”. We propose to remove program contact information currently in this application forms, and instead link to a permanent website. This website will be frequently maintained and will provide the public with the most accurate contact information.

#### **HABITAT CONSERVATION PLANS**

The Service is proposing to revise Form 3-200-56, “*Incidental Take Permits Associated with a Habitat Conservation Plan*”. We propose to remove program contact information currently in this application forms, and instead link to a permanent website. This website will be frequently maintained and will provide the public with the most accurate contact information.

#### **RECOVERY/INTERSTATE COMMERCE**

**Revisions to Existing Forms** – Additionally, we seek approval to revise and rename the following four forms associated with bat surveys:

- Form 3-202-55b, “U.S. Fish and Wildlife Service Geographic Area: *Midwestern Bat Reporting Form*”;

- Form 3-202-55c, “U.S. Fish and Wildlife Service Geographic Area: Southeastern Bat Reporting Form”;
- Form 3-202-55d, “U.S. Fish and Wildlife Service Geographic Area: Northeastern Bat Reporting Form”; and,
- Form 3-202-55e, “U.S. Fish and Wildlife Service Geographic Area: Plains/Rockies Bat Reporting Form”.

The Service is proposing changes to the bat forms to address comments received from the respondents. These changes include adding columns to increase flexibility for user data entry, to increase accuracy of Global Positioning System data, and to add three fields specifically requested by State natural resource agencies in order to unify their State databases with that of the Service. These additions eliminate the need for filing a separate reporting form with the State and reduces the overall reporting burden on the respondents. Completion of the information on the forms regarding the activity(ies) to be authorized by the permit is required in most cases (under the authority of section 10(a)(1)(A) of the ESA and its implementing regulations at 50 CFR 17).

**NOTE:** Form 3-202-55a, “U.S. Fish and Wildlife Service Geographic Area: Southwestern Bat Reporting Form” was added in conjunction with the realignment of the geographical areas covered in the revisions to the geographical areas covered by the above referenced 3-202-55 series bat reporting forms.

**New Forms** – We also propose to revise this collection to request OMB approval of the following seven new reporting forms associated with the Recovery/Interstate Commerce portion of this information collection:

- Form 3-2523, “Midwest Geographic Area: Freshwater Mussel Reporting Form”;
- Form 3-2526, “Midwest Geographic Area: Bumble Bee Reporting Form”;
- Form 3-2530, “California/Nevada/Klamath Basin, OR Recovery Permit Annual Summary Report Form”;
- Form 3-2532, “U.S. Fish and Wildlife Service Geographic Area: Alaska Bat Reporting Form”;
- Form 3-2533, “U.S. Fish and Wildlife Service Geographic Area: Northwestern Bat Reporting Form”; and,
- Form 3-2534, “U.S. Fish and Wildlife Service Geographic Area: Western Bat Reporting Form”.

### **EPERMITS INITIATIVE**

The Service requests OMB approval to automate certain forms approved under 1018-0094. The new “ePermits” initiative is an automated permit application system that will allow the agency to move towards a streamlined permitting process to reduce public burden. Public burden reduction is a priority for the Service; the Assistant Secretary for Fish, Wildlife, and Parks; and senior leadership at the Department of the Interior. The intent of the ePermits initiative is to automate the permitting process to improve the customer experience and to reduce time burden on respondents. This new system will enhance the user experience by allowing users to enter data from any device that has Internet access, including PCs, tablets, and smartphones. It will also link the permit applicant to the Pay.gov system for payment of the associated permit application fee. Users of the ePermits System will register for an account which will then automatically populate the forms they complete with the required identification information, thus preventing the need for them to enter it multiple times when they apply for separate permits and reducing burden on the applicant. The account registration process will also provide private sector users an opportunity to self-

identify as a small business which will enable the Service to more accurately report burden associated with information collection requirements placed on them. Our preliminary burden estimates for the ePermits versions of forms are contained in the burden table in question 12.

Upon completion of the new e-permitting system referred to as “ePermits”, applicants applying for Recovery, Interstate Commerce, Habitat Conservation Plan Incidental Take Permits, Candidate Conservation Agreements with Assurances, and Safe Harbor Agreements Enhancement of Survival Permits will have the opportunity to apply directly online through a secure web-based platform. We provide OMB with our estimated burden changes associated with incorporating electronic submission of these forms in the burden table included in question 12, along with revised burden estimates for hard copy submissions which we plan to continue to accept for 18-24 months after deployment in ePermits (though this will remain an option for those who either don't have access to the internet or prefer to use mail-in applications).

**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.**

Forms in this collection are available to applicants in a fillable format on our forms and permits websites, by mail, or by fax. Applicants may complete the fillable portion of the application forms in Adobe Acrobat, but must send the application form with an original signature and the applicable processing fee by mail. Applicants may send supporting information by email or fax, if we already have their application and they are able to reference an application number.

Some reports are available on our website, see

<https://www.fws.gov/Midwest/endangered/mammals/inba/inbasummersurveyguidance.html>.

***ePermits Initiative***

We are actively developing a new automated permit application system, referred to as “ePermits.” The ePermits System will allow the agency to move towards a streamlined permitting process to more significantly reduce the information collection burden on the public, particularly small businesses. Public burden reduction is a priority for the Service; the Assistant Secretary for Fish, Wildlife, and Parks; and senior leadership at the Department of the Interior. The intent of the ePermits System is to fully automate the permitting process to improve the customer experience and to reduce time burden on respondents. This new system will enhance the user experience by allowing users to enter data from any device that has Internet access, including personal computers, tablets, and smartphones. It will also link the permit applicant to the Pay.gov system for payment of the associated permit application fee.

Once the new ePermits System is in place, we anticipate a reduction in the amount of time necessary for an applicant to apply for a permit, and perform regular actions related to that permit (e.g., amend, renew, report). Through the ePermits account registration, we will track and be able to more accurately report the numbers of small business applicants, along with the type of business (for-profit, farm, not-for profit). This information will allow the Service to be more responsive in identifying the possibility of additional burden reduction on small businesses.

We also plan to eliminate the necessity for physical mail-in applications (though this will remain an option for those who either don't have access to the internet or prefer to use mail-in applications), thus further reducing the burden on the public as well. With ePermits, an applicant will be able to establish an account, apply for multiple permits through a single interface, and track all their applications, permits and permit-related actions as well as all communications between Service staff and the permittee/applicant within the same interface, significantly reducing the burden on the government to process these applications and manage permit-related actions.

The Service anticipates the discontinuance of the paper-based versions of a large number of forms after the ePermits System has been in full operation for at least 18-24 months. The elimination of paper based forms is expected to reduce the government cost of administering and processing permit applications.

**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 is unique to the applicant and/or permittee with respect to the particular research, project, Habitat Conservation Plan (HCP), or Safe Harbor Agreement (SHA), and is not available from any other source. We do, when feasible, coordinate with State wildlife agencies, regarding collection of information. Other than the general information standard for each application, collection of duplicate information is minimal. We retain application information in the FWS permitting system (SPITS) to eliminate repeat or duplicate requests in the case of renewals, extensions, or repeat applications.

We retain information from original applications so permittees do not have to submit duplicate information that is unchanged for new permits or to amend existing permits. We developed an electronic permit issuance and tracking system that allows for retrieval of file information, further reducing duplicate information requests for use in renewals, extensions, and repeat applications.

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

This collection will not have a significant impact on small entities. The collection of information is voluntary, and we use the information collected to implement Section 10 of the Endangered Species Act. Descriptions of the types of permits under ESA Section 10 follow.

**HCPs** – An incidental take permit is required when non-Federal activities will result in “take” of threatened or endangered wildlife. A HCP must accompany an application for an incidental take permit. The purpose of the habitat conservation planning process associated with the permit is to ensure there is adequate minimizing and mitigating of the effects of the authorized incidental take. The purpose of the incidental take permit is to authorize the incidental take of a listed species, not to authorize the activities that result in take.

HCPs are planning documents required as part of an application for an incidental take permit. They describe the anticipated effects of the proposed taking, how those impacts will be minimized or mitigated, and how the HCP is to be funded. On June 28, 2016 (81 FR 41986), the Service and the National Marine Fisheries Service announced the availability of and requested public comment on a draft revision of its joint Habitat Conservation Plan (HCP) Handbook, which describes requirements, procedures, and guidance for permit issuance and



conservation-plan development. The HCP Handbook initially was released in 1996, and revised by addendum in July 2000. For additional information on HCPs, see <https://www.fws.gov/endangered/esa-library/pdf/hcp.pdf>.

**SHA and Candidate Conservation Agreements (CCAAs)** – On June 17, 1999, the Service issued two policies and published revisions of its regulations to add two categories of permits to enhance the propagation or survival of listed, proposed, candidate, and other at-risk species. On May 4, 2016, the Service published a proposed rule: “Revisions to the Regulations for Candidate Conservation Agreements with Assurances.” One category, called “permits for the enhancement of survival through Safe Harbor Agreements,” is detailed at 50 CFR 17.22(c) and 17.32(c) (for endangered and threatened species, respectively), and in the Safe Harbor Policy (64 FR 32717). The other category, called “permits for the enhancement of survival through Candidate Conservation Agreements with Assurances,” is detailed at 50 CFR 17.22(d) and 17.32(d) (for endangered and threatened species, respectively), and in the Candidate Conservation Agreements with Assurances Policy (64 FR 32726). The Safe Harbor policy and associated regulations are intended to facilitate the conservation of listed species through a collaborative approach with non-Federal property owners.

The policy and regulations are designed to create incentives for non-Federal property owners to implement voluntary conservation measures for certain listed species by providing certainty with regard to possible future restrictions should the covered species later become more numerous as a result of the actions taken by the non-Federal cooperator. Non-Federal property owners, who through a Safe Harbor Agreement commit to implement voluntary conservation measures for a listed species, will receive assurances that no additional future regulatory restrictions will be imposed. When the property owner meets the issuance criteria of the regulations we will issue an enhancement of survival permit under section (10)(a)(1)(A) of the Act, authorizing incidental taking of the covered species at a level that enables the property owner to return the property back to population levels or habitat conditions agreed upon as baseline. Before issuing such a permit, we must make a written finding that all covered species in the SHA will receive a net conservation benefit from management actions taken pursuant to the agreement.

Candidate Conservation Agreements with Assurances are voluntary agreements between us and non-Federal property owners to benefit proposed species, candidate species, and species likely to become candidates in the near future. Under a CCAA, non-Federal property owners commit to implement mutually agreed upon conservation measures which, when combined with benefits that would be achieved if it is assumed that those conservation measures were to be implemented on other necessary properties, would preclude the need to list the covered species. In return for the cooperator’s proactive management, we provide an enhancement of survival permit under section 10(a)(1)(A) of the Act, which, if the species were to become listed, would authorize take of individuals or the modification of habitat conditions to the levels specified in the CCAA. For additional information on SHAs or CCAAs, please see <https://www.fws.gov/endangered/esa-library/index.html>.

**Recovery and Research Permits** (FWS Forms 3-200-59, 3-200-60, and 3-202-55a/b/c/d/e, 3-2523, 3-2526, 3-2530, 3-2532, 3-2533, and 3-2534). For endangered species, permits may be issued for scientific research or interstate commerce. For threatened species, in addition to the above activities, permits also may be issued for zoological, horticultural, or botanical exhibition; educational use; and special purposes consistent with the ESA. Reports describing activities conducted and results are required and associated with these permits.

**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 we do not collect the information or if we collected the information less frequently, we could not implement many wildlife protection programs that are mandated by law. Further, we could not issue applicants a permit, certificate, or authorization letter, since the collected information is either required on the permit, certificate, or authorization itself, or is needed to make the necessary biological and legal findings under applicable statutes and treaties. In certain cases where programmatic, biological, and/or legal findings can be made as a result of an initial application, we can use a less burdensome process for subsequent requests, as long as the information provided to make the original findings remains the same.

- 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.**

No special circumstances exist 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 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.**

On July 6, 2020, we published in the *Federal Register* ([85 FR 40309](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on September 4, 2020. We received the following comment in response to that notice:

**Comment 1:** The respondent commented about the Southeast Geographic Area Bat Reporting Form (3-202-55c), the Mussel Reporting Form (3-2523), and the Bumblebee Reporting Form (3-2526). They supported the southeast bat reporting form and indicated it is useful and an improvement on their State reporting form. They also recommended providing forms in an electronic input format for use in the field.

**Agency Response to Comment 1:** We appreciate the respondent’s response on the utility of the Southeast Geographic Area Bat Reporting Form. The respondent is not within the geographic area where they would be using the Mussel or Bumblebee Reporting Forms, so their comments are not germane to the information collection at this time. We will update the form names accordingly to reduce confusion. At this time, we are not exploring creating an electronic input data form, but we will consider this as a potential streamlining tool for future information collection renewals.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified in Table 8.1 who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

**Table 8.1**

<b>Organization</b>	<b>Title</b>
Washington State Department of Fish and Wildlife	Listing and Recovery Section Manager
Redwing Ecological Services, Inc.	Biologist
Gulf Investments, LLC	Executive Vice President
Alabama Coastal Foundation	Biologist
West Virginia Division of Natural Resources	Natural Resource Program Manager
Camara Environmental Consulting	Biologist
Private Landowner	Private Citizen
Utah State University	Project Coordinator
Bastrop County, TX	HCP Administrator

***“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:** One respondent commented that the application form for Recovery/Interstate Commerce permits had a lot of information not applicable to their application situation. Another respondent commented that the supporting documentation collected as part of the permit application was appropriate for the purpose and need and was not onerous. Another respondent commented that, overall, the information is critical and necessary in order to maintain and keep track of populations of organisms.

**Agency Response/Action Taken:** One of the intentions of splitting the Recovery/Interstate Commerce application form into two separate forms was to address the concerns of the first

respondent.

We appreciate the remaining two respondents commenting that the collection is appropriate and necessary.

***“The accuracy of our estimate of the burden for this collection of information”***

Comments: The respondents agreed that 3 hours was an appropriate amount of time to complete an application form. One respondent commented that the amount of time to prepare an annual report for a scientific collecting permit was underestimated, as they estimated it takes them approximately 8 hours to create an annual report. They also acknowledged that it is difficult to estimate the amount of time that it takes to prepare the report. Another respondent commented that the amount of time it takes to fill out the forms is dependent on the amount of information that is collected during the animal surveys, which may vary greatly from year to year, making it difficult to estimate the amount of time it takes to prepare the report. They estimated between 8 to 24 hours to prepare the report.

Agency Response/Action Taken: We have revised the estimated burden for annual reports under Recovery/Interstate Commerce permits to 8 hours, as an average, to account for the variability in the amount of data collected by project on a nationwide basis.

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

Comments: One respondent recommended using consistent naming for the same information requested throughout the same form. Another respondent commented that it was confusing to have multiple application types (i.e., new permit, renewal, amendment) on one form when they were only seeking one permit action (such as only seeking to renew an existing permit). They suggested separate forms for each type of permit request.

Agency Response/Action Taken: We reviewed the application forms to determine where a consistency could be created to address the first comment, and we did not find any situations where there is inconsistently named items in the collection. This comment may be a remnant of the combined Recovery/Interstate Commerce form.

We are creating the ePermits System in order to streamline the collection of information, which will address the second comment. ePermits will be clearer as to what type of permit the applicant is selecting, which will reduce the confusion that exists when filling out these application forms. Creating additional forms would increase the burden on the public.

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

Comments: Multiple respondents commented that an online application form would be helpful and would reduce the amount of time it takes to complete the application form. One respondent emphasized that an online system that maintains documentation from previous years' applications would be beneficial and greatly decrease the amount of time it takes to complete the application.

Agency Response/Action Taken: We are in the process of creating an online permit application and processing system (ePermits), which will address the recommendations of the respondents.

***Additional comments received during the outreach:***

Comments: One respondent commented that they would like to know what is done with the information contained in the reports.

Agency Response/Action Taken: As stated in our 60-day *Federal Register* notice, we will use the reported data to evaluate the success of the permitted project, formulate further research, and develop and adjust management and recovery plans for the species. The data will also inform 5–year reviews and Species Status Assessments conducted under the ESA.

Despite multiple attempts to solicit feedback via email and phone calls, four of the nine individuals contacted did not respond to our request for feedback.

**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. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records ([Permits System, FWS-21](#), September 4, 2003, 68 FR 52610; modification published June 4, 2008, 73 FR 31877).

**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.

We estimate that there will be approximately **4,258 annual responses** totaling **119,949 annual burden hours (rounded to match ROCIS)**. We estimate the total dollar value of the annual burden hours for this collection to be **\$5,024,588 (rounded)**. The completion times for each information collection vary substantially depending on the complexity and geographic scope of the activity, as well as the number of species covered under the activity.

We used the Bureau of Labor Statistics (BLS) News Release [USDL-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020, to calculate the total annual burden.

- Individuals. Table 1 lists the hourly rate for all workers \$38.20, including benefits.
- Private Sector. Table 5 lists the hourly rate for all workers as \$35.96, including benefits.
- Government. Table 3 lists the hourly rate for all workers as \$52.36, including benefits.

Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*	Hourly Labor Costs (Incl. Benefits)	Total Dollar Value of Burden Hours
<b>SAFE HARBOR AGREEMENTS/CANDIDATE CONSERVATION AGREEMENTS WITH ASSURANCES</b>						
<b>Application (Form 3-200-54)</b>						
Individuals	3	3	3	9	\$38.20	\$343.80
CCAAs	1	1	30	30	38.20	1,146.00
SHAs	2	2	30	60	38.20	2,292.00
Private Sector	11	11	3	33	35.96	1,186.68
CCAAs	8	8	30	240	35.96	8,630.40
SHAs	3	3	30	90	35.96	3,236.40
Government	4	4	3	12	52.36	628.32
CCAAs	3	3	30	90	52.36	4,712.40
SHAs	1	1	30	30	52.36	1,570.80
<b>Application (Form 3-200-54) ePermits</b>						
Individuals	3	3	2.75	8	\$38.20	\$ 315.15
CCAAs	1	1	30	30	38.20	1,146.00
SHAs	2	2	30	60	38.20	2,292.00
Private Sector	11	11	2.75	30	35.96	1,087.79
CCAAs	8	8	30	240	35.96	8,630.40
SHAs	3	3	30	90	35.96	3,236.40
Government	4	4	2.75	11	52.36	575.96
CCAAs	3	3	30	90	52.36	4,712.40
SHAs	1	1	30	30	52.36	1,570.80
<b>Annual Report (Non-form Format)</b>						
Individuals	10	10	8	80	\$38.20	\$ 3,056.00
Private Sector	40	40	8	320	35.96	11,507.20
Government	14	14	8	112	52.36	5,864.32
<b>Notifications (Incidental Take)</b>						
Individuals	1	1	1	1	\$ 38.20	\$ 38.20
<b>Notifications (Change in Land Owner)</b>						
Individuals	1	1	1	1	\$ 38.20	\$ 38.20
<b>HABITAT CONSERVATION PLANS</b>						
<b>Application (Form 3-200-56)</b>						
Individuals	15	15	3	45	\$ 38.20	\$ 1,719.00
Private Sector	20	20	3	60	35.96	2,157.60
Government	3	3	3	9	52.36	471.24
<b>Application (Form 3-200-56) ePermits</b>						
Individuals	15	15	2.75	41	\$38.20	\$ 1,575.75
Private Sector	20	20	2.75	55	35.96	1,977.80
Government	3	3	2.75	8	52.36	431.97
<b>Annual Report (Non-form Format)</b>						

Individuals	360	360	10	3,600	\$ 38.20	\$ 137,520.00
Private Sector	380	380	10	3,800	35.96	136,648.00
Government	25	25	10	250	52.36	13,090.00
<b>Plan</b>						
Individuals	10	10	2,080	20,800	\$ 38.20	\$ 794,560.00
Private Sector	20	20	2,080	41,600	35.96	1,495,936.00
Government	16	16	2,080	33,280	52.36	1,742,540.80
<b>RECOVERY/INTERSTATE COMMERCE</b>						
<b>Recovery Permit Application (Form 3-200-59)</b>						
Individuals	113	113	3	339	\$38.20	\$ 12,949.80
Private Sector	113	113	3	339	35.96	12,190.44
Government	55	55	3	165	52.36	8,639.40
<b>Recovery Permit Application (Form 3-200-59) NEW - ePermits</b>						
Individuals	113	113	2.75	311	\$38.20	\$ 11,870.65
Private Sector	113	113	2.75	311	35.96	11,174.57
Government	55	55	2.75	151	52.36	7,919.45
<b>Interstate Permit Application (Form 3-200-60)</b>						
Individuals	23	23	3	69	\$ 38.20	\$ 2,635.80
Private Sector	5	5	3	15	35.96	539.40
Government	5	5	3	15	52.36	785.40
<b>Interstate Permit Application (Form 3-200-60) NEW - ePermits</b>						
Individuals	23	23	2.75	63	\$38.20	\$ 2,416.15
Private Sector	5	5	2.75	14	35.96	494.45
Government	5	5	2.75	14	52.36	719.95
<b>Annual Report (Non-form Format)</b>						
Individuals	400	400	8	3,200	\$ 38.20	\$ 122,240.00
Private Sector	450	450	8	3,600	35.96	129,456.00
Government	620	620	8	4,960	52.36	259,705.60
<b>Request to Revise List of Authorized Individuals</b>						
Private Sector	30	30	0.5	15	\$ 35.96	\$ 539.40
<b>Notification (Escape of Wildlife)</b>						
Private Sector	1	1	1	1	\$ 35.96	\$ 35.96
<b>Annual Report - Form 3-202-55a (U.S. Fish and Wildlife Service Geographic Area: Southwestern Bat Reporting Form) NEW</b>						
Individuals	5	5	2.5	13	\$38.20	\$ 477.50
Private Sector	5	5	2.5	13	35.96	449.50
Government	5	5	2.5	13	52.36	654.50
<b>Annual Report - Form 3-202-55b (U.S. Fish and Wildlife Service Geographic Area: Midwestern Bat Reporting Form)</b>						
Individuals	15	15	2.5	38	\$38.20	\$ 1,432.50
Private Sector	15	15	2.5	38	35.96	1,348.50
Government	12	12	2.5	30	52.36	1,570.80
<b>Annual Report - Form 3-202-55c (U.S. Fish and Wildlife Service Geographic Area: Southeastern Bat Reporting Form)</b>						
Individuals	5	5	2.5	13	\$38.20	\$ 477.50
Private Sector	5	5	2.5	13	35.96	449.50
Government	5	5	2.5	13	52.36	654.50
<b>Annual Report - Form 3-202-55d (U.S. Fish and Wildlife Service Geographic Area: Northeastern Bat Reporting Form)</b>						
Individuals	5	5	2.5	13	\$38.20	\$ 477.50
Private Sector	5	5	2.5	13	35.96	449.50
Government	5	5	2.5	13	52.36	654.50
<b>Annual Report - Form 3-202-55e (U.S. Fish and Wildlife Service Geographic Area: Plains/Rockies Bat Reporting Form)</b>						
Individuals	5	5	2.5	13	\$38.20	\$ 477.50
Private Sector	5	5	2.5	13	35.96	449.50
Government	5	5	2.5	13	52.36	654.50
<b>Annual Report - Form 3-202-55f Non-Releaseable Sea Turtle Annual Report</b>						
Private Sector	2	2	0.5	1	\$35.96	\$ 35.96
Government	5	5	0.5	3	52.36	130.90
<b>Quarterly Report - Form 3-202-55g Sea Turtle Rehabilitation</b>						

Private Sector	20	20	0.5	10	\$ 35.96	\$ 359.60
<b>Annual Report – Form 3–2523 (Midwest Geographic Area: Freshwater Mussel Reporting Form) <b>NEW</b></b>						
Individuals	15	15	2	30	\$ 38.20	\$ 1,146.00
Private Sector	70	70	2	140	35.96	5,034.40
Government	15	15	2	30	52.36	1,570.80
<b>Annual Report – Form 3–2526 (Midwest Geographic Area: Bumble Bee Reporting Form) <b>NEW</b></b>						
Individuals	45	45	2	90	\$ 38.20	\$ 3,438.00
Private Sector	15	15	2	30	35.96	1,078.80
Government	15	15	2	30	52.36	1,570.80
<b>Annual Report – Form 3–2530 (California/Nevada/Klamath Basin, OR Annual Reporting Form) <b>NEW</b></b>						
Individuals	291	291	0.5	146	\$ 38.20	\$ 5,577.20
Private Sector	291	291	0.5	146	35.96	5,250.16
Government	173	173	0.5	87	52.36	4,555.32
<b>Annual Report – Form 3–2532 (U.S. Fish and Wildlife Service Geographic Area: Alaska Bat Reporting Form) <b>NEW</b></b>						
Individuals	5	5	2.5	13	\$ 38.20	\$ 496.60
Private Sector	5	5	2.5	13	35.96	467.48
Government	5	5	2.5	13	52.36	680.68
<b>Annual Report – Form 3–2533 (U.S. Fish and Wildlife Service Geographic Area: Northwestern Bat Reporting Form) <b>NEW</b></b>						
Individuals	5	5	2.5	13	\$ 38.20	\$ 496.60
Private Sector	5	5	2.5	13	35.96	467.48
Government	5	5	2.5	13	52.36	680.68
<b>Annual Report – Form 3–2534 (U.S. Fish and Wildlife Service Geographic Area: Western Bat Reporting Form) <b>NEW</b></b>						
Individuals	5	5	2.5	13	\$ 38.20	\$ 496.60
Private Sector	5	5	2.5	13	35.96	467.48
Government	5	5	2.5	13	52.36	680.68
<b>TOTALS:</b>	<b>4,258</b>	<b>4,258</b>		<b>119,949</b>		<b>\$5,024,588.46</b>

\* Rounded to match ROCIS

**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.

We estimate the annual nonhour burden cost to be **\$54,910** for fees associated with permit applications and amendments. There are no fees associated with submission of reports. We based our fee estimates on the following using the estimated responses from the burden table in question 12:

Requirement	Total Annual Responses	Amount	Total Estimated Fees
<b>SHA/CCAA</b>			
<b>Application (Form 3-200-54) <i>Hardcopy and ePermits</i></b>			
Individuals	6	\$50	\$ 300
Private Sector	22	50	1,100
<b>HABITAT CONSERVATION PLAN</b>			
<b>Application (Form 3-200-56) <i>Hardcopy and ePermits</i></b>			
Individuals	30	75	2,250
Private Sector	40	75	3,000
<b>RECOVERY/INTERSTATE COMMERCE</b>			
<b>Application (Form 3-200-59) <i>Hardcopy and ePermits</i></b>			
Individuals	226	95	21,470
Private Sector	226	95	21,470
<b>Application (Form 3-200-60) <i>Hardcopy and ePermits</i></b>			
Individuals	46	95	4,370
Private Sector	10	95	950
<b>TOTAL:</b>			<b>\$ 54,910</b>

**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 for processing and reviewing permit applications and reviewing reports as a result of this collection of information is **\$2,815,208 (rounded)**. These costs are primarily for staff time to review and process applications, issue permits, and review reports. For each permit application, we will receive forms, process information; determine eligibility for a permit; and advise applicants of their success, and review reports associated with permits. Time requirements to process applications and reports vary greatly (from 0.5 to 230 hours) depending upon the species, species status, number of species associated with applications and reports and the complexity of the requested activity as well as its geographic scope.

Depending upon their geographic location, some employees are paid under a Federal salary table that includes locality pay. To determine average hourly rates, we used Office of Personnel Management Salary Table [2020-DC](#) as an average nationwide rate. We used BLS News Release [USD-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.59 to obtain a fully burdened rate.

Position/Grade	Hourly Rate	Hourly Rate Inc. Benefits (x 1.59)	Time Spent on Information Collection	Weighted Average \$/Hour*
Clerical (GS-07/05)	\$ 26.43	\$ 42.02	5%	\$ 2.10
Professional/Technical (GS-11/05)	39.12	62.20	84%	52.25
Management (GS-13/05)	55.75	88.64	11%	9.75
<b>Weighted Average (\$/hr):</b>				<b>\$ 64.10</b>

Requirement	Total Annual Responses	Average Time per Response	Total Federal Hours	Total Dollar Cost to Federal Government (\$64.10 x hours)
<b>SHA/CCAA</b>				
Application (Form 3-200-54)	66	140	9,240	\$ 592,284.00
Annual report	64	1	64	4,102.40
Notifications (Incidental Take) - individuals	1	1	1	64.10
Notifications (Change in Landowner) - individuals	1	1	1	64.10
<b>HABITAT CONSERVATION PLANS</b>				
Application (Form 3-200-56)	75	8	600	\$ 38,460.00
Annual report	765	1	765	49,036.50
Plan	46	232	10,672	684,075.20
<b>RECOVERY/INTERSTATE COMMERCE</b>				
Recovery Permit Application (Form 3-200-59)	560	32	17920	\$ 1,148,672.00
Interstate Commerce Application (Form 3-200-60)	65	32	2080	133,328.00
Annual report	1470	1	1470	94,227.00
Request to Revise List of Authorized Individuals	30	1	15	961.50
Notification (Escape of Wildlife)	1	1	1	64.10
Annual Report – Form 3–202–55a	15	1	15	961.50
Annual Report - FWS Form 3-202-55b	42	1	42	2,692.20
Annual Report - FWS Form 3-202-55c	15	1	15	961.50
Annual Report - FWS Form 3-202-55d	15	1	15	961.50
Annual Report - FWS Form 3-202-55e	15	1	15	961.50
Annual Report - FWS Form 3-202-55f	7	1	7	448.70
Quarterly Report - Form 3-202-55g	20	0.25	5	320.50
Annual Report – Form 3–2523	100	1	100	6,410.00
Annual Report – Form 3–2526	75	1	75	4,807.50
Annual Report – Form 3–2530	756	1	756	48,459.60
Annual Report – Form 3–2532	15	1	15	961.50
Annual Report – Form 3–2533	15	1	15	961.50
Annual Report – Form 3–2534	15	1	15	961.50
<b>TOTALS:</b>	<b>4,249</b>		<b>43,919</b>	<b>\$ 2,815,207.90</b>

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

We report estimated burden increases (discretionary) of 207 annual responses and 5,874 annual burden hours, along with a burden reduction of \$4,840, associated with the new and revised information collections explained in questions 2.

The burden changes associated with the annual reports under recovery/interstate commerce is due to the change of being counted under the non-form annual report to the California/Nevada reporting form. The total overall should be the same as last year, but some reports are being captured in a form instead. We also adjusted the average completion time for these annual reports to 8 hours, as an average, to account for the variability in the amount of data collected by project on a nationwide basis.

**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.**

Not applicable; we do not publish the results of this information collection.

**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.