

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

**North American Woodcock Singing Ground Survey
OMB Control Number 1018-0019**

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 Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703–712) requires the Secretary of the Interior, delegated to the U.S. Fish and Wildlife Service (we, Service), to implement a viable and ongoing program for the protection and conservation of various migratory birds. The MBTA designates the Department of the Interior as the primary agency responsible for:

- Management of migratory bird populations frequenting the United States, and
- Setting hunting regulations that allow for the well-being of migratory bird populations.

These responsibilities dictate that we gather accurate data on various characteristics of migratory bird populations. The North American Woodcock Singing Ground Survey is an essential part of the migratory bird management program. Federal, State, Provincial, Tribal, and local conservation agencies conduct the survey annually to provide the data necessary to determine the population status of the American woodcock. In addition, the information is vital in assessing the relative changes in the geographic distribution of the 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.

The Service's Division of Migratory Bird Management (DMBM) uses the information to assess the status of woodcock populations and to develop recommendations for hunting regulations. The Service, State, and Provincial conservation agencies, university associates, and other interested parties also use the information for various research and management projects. The Canadian Wildlife Service, Provinces, and States rely on the Service to administer and coordinate this survey.

State, local, tribal, Provincial, and Federal conservation agencies, as well as other participants, use FWS Form 3-156 to conduct annual field surveys. Instructions for completing the survey and reporting data are on the reverse of the form. Observers can scan/email, scan/upload via link, mail or fax FWS Form 3-156 to the DMBM, or enter the information electronically through the Internet, <https://migbirdapps.fws.gov/woodcock>.

We collect observer information (name, telephone, email address, and mailing address) so that we can contact the observer if questions or concerns arise.

Observers provide information on:

- Sky condition, temperature, wind, and precipitation.
- Stop number.

- Odometer reading.
- Time at each stop.
- Number of American Woodcock males heard peenting.
- Disturbance level.
- Comments concerning the survey.

We use the information that we collect to analyze the survey data and prepare reports. Assessment of the population's status serves to guide the Service, the States, and the Canadian Government in the annual promulgation of hunting regulations.

Results from the survey collection are available to the public over the Internet at: <https://migbirdapps.fws.gov> or by contacting the USFWS (summarized, tabular format), and at <https://www.fws.gov/birds/surveys-and-data/reports-and-publications/population-status.php> (report format). The 2020 population status report (copy attached in ROCIS) does not contain the latest singing-ground survey results since we were unable to complete the survey in full due to Covid.

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 reporting procedure requires that respondents use pen or pencil to fill out FWS Form 3-156. A pdf version of FWS Form 3-156 is available to cooperators at a website. After completing the form in the field, respondents can voluntarily submit data electronically at a password-protected website. Given that many routes in the survey fall outside of cell reception range, the method of data collection is by using this survey form. We still require that observers send in their original survey forms because in almost all cases observers write more on the survey form than they do within the remarks section in the data entry website. This can help us catch hazardous conditions or explain why a person took too long driving between stops. Having the hard copy form in hand also helps the USFWS personnel identify possible data entry errors, typos, and helps answer questions about missing data. Many times, if there is a problem with the data in the database, we can find the answer on the form rather than having to contact the observer or state/provincial coordinator directly.

Respondents access the electronic data form through the Internet at the Service password protected website < <https://migbirdapps.fws.gov/woodcock/>>. As indicated in item 12, it takes approximately 8 minutes to enter the data from FWS Form 3-156 into the electronic survey form. Much of the electronic form is pre-filled, which reduces data entry time. Directly after submission, respondents receive an online confirmation that the data were successfully entered into the database.

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.

We are not aware of any duplication. Within the Federal government, DMBM is the sole organizational unit charged with monitoring the population status of migratory game birds. Also, the realm of migratory bird management is small. If similar sources of information were available or even possible, DMBM would be aware of them.

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

The survey does not impact small businesses or other small entities.

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.

Migratory game bird populations are dynamic and can change in size and status from year to year. For this reason, the promulgation of hunting regulations has traditionally been an annual activity, and, thus, annual assessments of the population status of the more important species, including woodcock, are desirable. Without information on the population's status, we might promulgate hunting regulations that are:

- Not sufficiently restrictive, which could cause harm to the woodcock population, or
- Too restrictive, which would unduly restrict recreational opportunities afforded by woodcock hunting.

Another consequence of not conducting the surveys is that we could be vulnerable to litigation charging mismanagement and failure to fulfill treaty and other obligations.

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 conduct this collection 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 August 3, 2020, we published in the *Federal Register* ([85 FR 46692](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on October 2, 2020. We received the following comments in response to that notice:

Comment 1: The Atlantic Flyway Council expressed its support for continuation of the survey. Continuation of the survey is critical for the responsible management of American woodcock, an important migratory game bird in the Atlantic Flyway and North America. The survey provides the only long-term, range-wide monitoring program for American woodcock. The results of the survey form the basis of the American woodcock harvest strategy used to set the annual hunting regulations for American woodcock in the Atlantic, Mississippi and Central Flyways. The data collection and reporting estimates provided by the U. S. Fish and Wildlife Service are reasonable and accurate.

Agency Response to Comment 1: No action was taken since the support was positive and there were no recommendations for improvement.

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

Organization	Title
Delaware Division of Fish and Wildlife	Waterfowl, Turkey & Upland Game Bird Biologist
Nova Scotia	Biologist
Virginia Department of Inland Fisheries and Wildlife	District Wildlife Biologist
Maine Department of Inland Fisheries and Wildlife	Representative
Vermont Fish and Wildlife Department	Representative
Canadian Wildlife Service	Biologist
Maryland Department of Natural Resources	Representative
Connecticut Department of Energy and Environmental Protection	Biologist
Illinois Department of Natural Resources	Wetland Wildlife Program Manager

“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: Every commenter thought the collection of information was necessary for harvest management and to gain a better understanding of woodcock populations and range in Canada and the U.S. It has practical utility. Many indicated that this is the only survey that collects information on and monitors population trends of the American woodcock and produces more accurate results. This data is used in models to set season bag limits and season lengths as well as utility in habitat management policy and decisions. Participants indicated the form is short and straightforward and only asks for the most pertinent and necessary information.

Agency Response/Action Taken: There was no action taken by the FWS since all thought there was practical utility and it is necessary.

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

Comments: The majority thought our estimates of burden for this collection were accurate, however a few indicated that the travel time to and from the route might take longer for some individuals who live farther away.

Agency Response/Action Taken: The travel time is so variable depending on where an observer lives or works in relation to their route location. The hour is an average estimate across the entire area for all observers. Some routes are only 10-20 minutes away from where an observer works or lives, while others, like mentioned above, are the more extreme. In the future, the FWS can certainly inquire to all state and provincial coordinators to ask them if they feel the travel time is an accurate estimate for their observers and update accordingly.

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

Comments: All of the respondents indicated everything seems to be working fine and that it has evolved into a very straightforward form and effort, even the data entry process. The survey instructions are clear and straightforward and one of the easier surveys to complete. Having the ability to submit data electronically has been a great addition to the survey protocol.

Agency Response/Action Taken: There was no action taken by the FWS since all thought current methods were satisfactory.

And

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

Comments: Most had no suggestions and thought the process was straightforward or streamlined. Recent changes with scanning datasheets and entering data electronically were good changes that save time as observers become accustomed to them. It remains necessary to go out in person to do the work, as it allows for greater coverage through the use of volunteers/citizen scientists that otherwise wouldn't be possible. One respondent within Canada was unaware that there was an electronic submission of field data sheets and indicated it would be good to be able to submit them as a PDF or JPG rather than having to mail them in. Another respondent indicated that moving to paperless would be a

great option. This way a GPS device would direct observers to the exact location without having to look at a map and potentially take your eyes off the road.

Agency Response/Action Taken: The FWS does have a way of submitting field data sheets/survey forms via pdf or jpg. They can do so through email or go to a FWS FileShare link that was created last year and upload the form to the appropriate sub folder for each state or province participating. Canada's survey instructions do not indicate this, however, because all other provinces want their observers to send the forms directly to a central office for data entry, then they get sent to the FWS as a large scanned pdf. An effort was made to reach out the respondent's province coordinator to see what he prefers observers do in the future and instructions can be adjusted, if necessary. The FWS agrees that having an option to allow observers to enter data on the fly and simultaneously follow along on a GPS device that allows them to stop at the exact stop locations would be helpful. Unfortunately, we are not in the position to develop such a tool at the current time given limited resources (e.g. staff time, funding, and an incomplete digital spatial record) to devote to such a project. When this becomes available the FWS will research available options with participating states and provinces to see if this is something the majority of participating observers will be able to utilize while in the field.

Additional comments received during the outreach:

Comments: A few comments indicated the FWS is doing a great job and to keep up the good work. A couple respondents did not add anything under this section. Another respondent indicated he will continue to volunteer even after he retires. Another added comments about developing an app in the future that was also described above in ways to minimize burden. However, there was concern that it would not be able to be utilized by all observers given proximity distances to cell phone reception so paper forms will still be needed. Another respondent indicated that swag (clothing such as a hat or vest) that identified an observer in the field as a survey participant would be helpful in the event an observer gets asked what they are doing by others when surveying the route. The respondent indicated it would also make the observers feel happy and involved in something special.

Agency Response/Action Taken: As mentioned above, the FWS agrees that having an option (e.g. a phone app) to allow observers to enter data on the fly and simultaneously follow along on a GPS device that allows them to stop at the exact stop locations would be helpful. Again, we are not in the position to develop such a tool at the current time given limited resources (e.g. staff time, funding, and an incomplete digital spatial record) to devote to such a project. When this becomes available the FWS will research available options with participating states and provinces to see if this is something the majority of participating observers will be able to utilize while in the field. Given that cell phone coverage is limited to nonexistent in many parts where the survey is conducted, other options might have to be explored. The FWS can certainly look into what it might take to provide swag to survey participants at a cost of no more than \$10 per participant (~800 participants the first year). If this is not approved perhaps the FWS can look into offering something for participants to purchase online themselves.

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 ([Migratory Bird Population and Harvest Surveys – Interior, FWS-26](#), 80 FR 27183, published May 12, 2015).

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 sensitive questions.

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 there will be **818 annual responses** totaling **1,533 annual burden hours** associated with this information collection, with a total annualized cost burden of **\$66,276** (rounded).

Approximately 818 non-Federal cooperators conduct the survey and submit forms annually. For each response, we estimate it will take cooperators an average of 1.75 hours to supply the needed information. This includes time for:

- Reviewing instructions, map and training presentation (10 minutes)
- Gathering data during survey stops (30 minutes)
- Completing and reviewing the survey form (5 minutes)
- Driving time to and from the survey site (1 hour)

Approximately 778 cooperators (95% percent) will voluntarily choose to submit data electronically, which adds an additional 8 minutes to the response time, or a total of 1.88 hours per response.

Table 12.1 – Annual Response and Burden Hour Calculations

Activity	Annual Number of Respondents	Total Annual Responses	Average Completion Time	Total Annual Burden Hours*
Survey (Electronic Submission)	778	778	1.88 hours	1,463
Survey	40	40	1.75 hours	70
Totals:	818	818		1,533

*Rounded

We calculated the benefits for both U.S. and Canadian cooperators in accordance with Bureau of Labor Statistics (BLS) News Release [USD-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020. We used the [Occupational Employment and Wages, May 2019](#) (19-1023 Zoologists and Wildlife Biologists) from the Bureau of Labor Standards website to determine the dollar value of the U.S. burden hours [\$27.51 (mean hourly labor cost for a state government zoologist/wildlife biologist) multiplied by 1.59 to account for benefits for state government employees, resulting in an annual cost factor of \$43.74 per hour].

We used the Statistics Canada website, [Table 14-10-0340-01 Employee wages by occupation, annual](#) on 2019-10-15 to determine labor cost information for Canadian cooperators (average hourly wage rate for natural and applied sciences and related occupations). We obtained 2019 labor cost information for full time (15 years and over) biologists in each Province (Ontario, Nova Scotia, New Brunswick, Quebec, Prince Edward Island, and Manitoba) participating in the survey, and then averaged all the Provinces together. We estimate the average dollar value of a Canadian burden hour to be \$34.75 CAD (see Table 12.3). Using the exchange rate in effect on October 15, 2020 (1.00 CAD = 0.76 USD), we estimate the dollar value of a Canadian burden hour to be \$26.41 USD, which we multiplied by 1.59 to account for benefits (\$41.99 USD).

Table 12.2 – Total Value of Annual Burden Hours

Respondents (Government)	Annual Burden Hours	Hourly Labor Costs	Hourly Labor Costs (Incl. Benefits)	Total \$ Value of Annual Burden Hours (Rounded)
United States	1,097.40	\$ 27.51	\$ 43.74	\$ 48,000.28
Canadian	435.24	26.41	41.99	18,275.73
Totals:	1,532.64			\$ 66,276.01

Table 12.3 – Calculation of Canadian Burden Hour Average

	Average Hourly Wage (\$)	Overall Average
Ontario	\$ 38.43	\$ 34.75
Nova Scotia	33.34	
New Brunswick	33.86	
Quebec	35.77	
Prince Edward Island	31.00	
Manitoba	36.07	
<i>Subtotal:</i>	<i>\$ 208.47</i>	

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.

There are no nonhour burden costs 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.

The total estimated annual cost to the Federal Government is **\$81,622** (rounded). (\$81,122 (rounded) for salaries and \$500 for operating costs).

We used Office of Personnel Management Salary Table [2020-DCB](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with BLS News Release [USD-20-1736](#), September 17, 2020, Employer Costs for Employee Compensation—June 2020.

Table 14.1 - Salary Costs

Federal Staff	Hourly Salary	Salary (Incl. Benefits)	Total Hours	Total Salary Cost
GS-12/step 8	\$ 51.02	\$81.12	1,000	\$81,121.80
Total:				\$81,121.80

Table 14.2 - Operating Costs

Activity	Cost
Materials	\$ 450
Postage	50
Total:	\$ 500

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

We are reporting a slight increase of 10 responses and 18 annual burden hours as changes due to adjustment in agency estimate.

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.

Analytical techniques are in the annual American Woodcock Population Status Report under METHODS. We distribute this status report both internally and externally.

Form 3-156 sent to cooperators	Early spring
Survey	April - May
Collection of forms	April - May
Data analysis	June
Report writing	July-August
Publication date	August
Service Regulations Committee Meeting (recommendations on hunting season)	October

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.