**Supporting Statement A**

**Evaluating Connections: BOEM’s Environmental Studies and Assessments**

**OMB Control Number 1010-NEW**

**Bureau of Ocean Energy Management, Interior**

**Terms of Clearance:** None.

**General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

**Justification**

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

The Bureau of Ocean Energy Management (BOEM) within the U.S. Department of the Interior (DOI) is requesting approval for a new information collection to conduct an online survey and virtual (phone or web-based) interviews with external contacts at agencies, institutions, and other organizations with whom BOEM collaborates on environmental studies and/or environmental assessment work. The survey and interviews will provide important information to understand how external program partners use BOEM’s study and assessment information, and the means through which this information is disseminated from BOEM to external partners. BOEM will use this information to identify areas where communication is strong and where improvements are needed.

Section 20 of the Outer Continental Shelf Lands Act (OCSLA) (43 U.S.C. 1346) requires the Secretary of the Interior to study any area or region included in an oil, gas, or other lease sale to gather information needed for assessment and management of impacts on the human, marine, and coastal environments of the Outer Continental Shelf (OCS) and the affected coastal areas. Additionally, subsequent to the leasing and developing on any OCS area, the Secretary may authorize further environmental studies to gather information that can be used for identifying significant changes and trends in the quality and productivity of such environments and for designing experiments to identify the causes of such changes.

This statutory authority is carried out through BOEM’s Environmental Studies Program (ESP). In fulfilling its mission, BOEM must comply with a range of environmental laws and regulations. To comply with relevant statutes and policies, BOEM develops environmental assessments, including National Environmental Policy Act (NEPA) analyses, consultation documents, and other analyses that require up-to-date and relevant scientific information. For purposes of the current project, the term “environmental assessment” encompasses the types of analyses that BOEM’s Environmental Assessment Program undertakes and is not restricted to NEPA environmental assessments. For example, the following types of documents are considered in the universe of BOEM environmental assessments:

* NEPA environmental impact statements.
* NEPA environmental assessments.
* National Historic Preservation Act (NHPA) documents (including section 106 evaluations of effects on historic properties and programmatic agreements).
* Essential fish habitat assessments for Magnuson-Stevens Fishery Conservation and Management Act consultations.
* Endangered Species Act (ESA) section 7 biological evaluations or biological assessments.
* Analyses and assessments prepared to comply with the Clean Air Act (CAA), Coastal Zone Management Act (CZMA), and Marine Mammal Protection Act (MMPA).
* Analyses and assessments such as engineering analyses, regulatory impact analyses, resource evaluations, additional NEPA-related analyses, site assessments, and cost-benefit analyses prepared for OCSLA and other regulatory requirements.

Environmental studies sponsored by the ESP provide scientific information to inform BOEM’s environmental assessments. BOEM describes the process by which environmental studies inform environmental assessments and environmental assessments inform environmental studies as a “feedback loop.”

To determine how well this feedback loop is functioning and to identify potential improvements in the science-to-policy process, BOEM is pursuing an evaluation of the linkages between the scientific research it is funding and the information needs within its assessments. The evaluation is being conducted over approximately three years. The first two years (September 2019 – September 2021) focused within BOEM, including: how environmental studies inform assessments, how assessments inform studies, and how information is shared across the Bureau. The final year of the evaluation (September 2021-November 2022) looks outside of BOEM, including how BOEM’s science impacts external stakeholders and decision-makers.

The external evaluation will include surveys and interviews of external partners of BOEM’s ESP and assessment program (e.g., public agencies, academic institutions and scholars, and consultants). The information will provide insights into how external program partners receive and use the results of BOEM environmental studies and assessments, how external program partners inform BOEM environmental studies and assessments, and how BOEM study and assessment information influences external decision-making, including policy decisions. This information is not otherwise available and will help inform BOEM’s efforts to improve the feedback loop process and ultimately better inform agency decisions.

1. **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 evaluation team will use the survey results to understand how program partners use BOEM’s study and assessment information and the network through which this information is disseminated. Network analysis involves mapping and characterizing a network, which can be defined as relationships between people or organizations. Network analysis identifies pathways for transmitting ideas, knowledge, information, and/or resources. The survey results will provide information about the network structure. BOEM can use this network analysis to understand the network structure, and people or organizations that the Bureau could target or connect to in order to strengthen the use and influence of BOEM’s science. See Attachment 1 – Survey Letter and Questionnaire for specific questions and understanding of the survey.

The interviews will provide additional depth and nuance to the survey responses. All agencies, organizations, and institutions that BOEM identifies as important for understanding the feedback loop will be contacted for an interview. Interviews will be semi-structured. Respondents will be asked questions tailored to their type of organization. Interviewers will ask respondents to provide insight into how and why linkages between BOEM and respondents are (or are not) present, and how and why respondents are or are not using study and assessment information from BOEM. As a semi-structured interview, the interviewer will have the opportunity to ask follow-up questions based on initial responses. The interviewers will ask about the respondents’ roles or positions within their organizations, how they use BOEM’s environmental studies and assessment information in their organizations’ work, and how their organizations contribute to studies and assessments. Additionally, the interviewers will request the respondents’ recommendations on ways to strengthen linkages moving forward. See Attachment 2 – Interview Letter and Guide for specific information related to the interviews.

1. **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.**

Information technology will be used when possible to reduce the burden on the public.

The survey will be administered online. The target population will receive a notification email that informs them of the survey and provides a link. Upon clicking the link, the survey will open automatically in the respondent’s internet browser. The survey will use skip logic to ensure that respondents only answer questions that are relevant to them. It will also use drop-down menus and categorical response options whenever possible to reduce burden. The survey will not require the submission of any forms or other paperwork; all responses will be submitted directly through the online survey platform.

The interviews will be administered via phone or a commonly used web-conferencing platform (i.e., Microsoft Teams). A cleanly formatted version of the interview questions will be emailed to respondents in advance to allow them time to review the questions and get an idea of the type of information being sought. The evaluation team believes that a phone administration of the interviews offers the best opportunity for obtaining a high response rate and for obtaining high-quality responses, given the semi-structured format of the interview and the potential to ask follow-up questions. The data collection does not use any other automated, electronic, mechanical, or other technological techniques or other forms of information technology.

**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.**

Use of surveys and interviews will not duplicate other surveys by BOEM or other State or Federal agencies on the OCS. The evaluation was initiated in September 2019. The first two years of the evaluation (September 2019-September 2021) focused on feedback loop within BOEM – i.e., how studies inform assessments, how assessments inform studies, and how information is shared across the Bureau. Although the first two years of the evaluation focused primarily within BOEM, these efforts generated some information about external connections, including key organizations in BOEM’s external network and general issues on which BOEM and external partners frequently collaborate. The evaluation team is leveraging this information as much as possible. The present data collection with external connections is focused on information that was not previously collected from persons not previously contacted.

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

The proposed collection of information will not have a significant impact on 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.**

If the information collection is not conducted, then the evaluation team will not be able to provide BOEM with information about how BOEM’s environmental studies and assessments affect external program partners and how the information is shared. Other research methods conducted for the evaluation will only provide simple counts of studies and assessments that identify contributions from an external partner, but will lack important insight regarding how or why these connections occurred, how BOEM’s science influences external program partners, or how external program partners make policy decisions or other decisions based on BOEM’s science. Without the survey and interview data, the evaluation team will also be unable to identify program improvement opportunities, such as organizations to target who are key users of BOEM’s science and/or methods for sharing study results that external program partners most frequently use. This type of knowledge is not recorded, tracked, or publicly available; it can only be gathered by posing the questions directly to BOEM’s external program partners.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

1. **Requiring respondents to report information to the agency more often than quarterly.**

Information will be collected one time only.

1. **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

This information collection will be obtained through an online survey and through interviews, and it is completely voluntary. Respondents will not be required to prepare a written response.

1. **Requiring respondents to submit more than an original and two copies of any document.**

Respondents will only be asked to submit one online survey or to participate in one interview session. No copies of any documents will be requested.

1. **Requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than 3 years.**

Respondents will not be required to retain any records associated with this information collection.

1. **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.**

The collection will not be conducted in connection with a statistical survey.

1. **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

The proposed information collection will not use a statistical data classification that has not been reviewed and approved by OMB.

1. **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.**

The proposed information collection will not include 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.

1. **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.**

The proposed information collection does not request information from respondents that can be considered proprietary or trade secrets.

**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.**

A Federal Register notice was published on April 28, 2021 (86 FR 22451, pages 22451-22453). No comments were received.

1. **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.**

As stated above, a Federal Register notice was published on April 28, 2021 (86 FR 22451, pages 22451-22453) to solicit comments on the proposed information collection. No comments were received.

1. **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.**

Since this is a one-time, voluntary data collection consisting of an online survey and interviews for purposes of obtaining respondents’ perspectives, experiences, and insights about the feedback loop, it was not practical to have any type of prior consultation.

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

There are no plans to provide any payment or gift to respondents.

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

Survey respondents will be assured that all responses will be presented at the organization level. Interview respondents will be assured that responses will be aggregated and presented by type of respondent (e.g., state agencies, research institutions, academics/universities, tribes, etc.). For both the survey and the interviews, respondents will be assured that individual names will not be disclosed in the presentation of findings or analysis.

After consulting with the BOEM Privacy Officer, it was determined that a System of Records Notice (SORN) will not be required because the DOI Bureaus are not responsible for storing or safeguarding the information (see Privacy Impact Assessment attached in ROCIS as supplemental documents).

**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.**

No sensitive information will be gathered.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

1. **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.**

Number of Respondents: 70 interviews; 300 online surveys.

Frequency of Response: One time.

Estimated Completion Time per Response: 60 minutes per interview; up to 20 minutes per survey.

Total Estimated Number of Annual Burden Hours: 70 hours for interviews; up to 100 hours for surveys.

Explanation of How the Burden was Estimated: The burden was estimated based on the evaluation team’s professional judgment and experience conducting surveys and interviews of a similar format, topic, and length. Notably, the time estimates were validated through the internal evaluation, which was limited to BOEM employees but included similar topics and was administered in the same formats (online survey and telephone/web interviews) as the proposed new data collections.

1. **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

Please refer to the response for Question 12a.

1. **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.”**

The Department of Labor (Bureau of Labor Statistics) reports a mean hourly wage of $60.45 for General and Operations Managers (Occupation Code 11-1021).[[1]](#footnote-2) The evaluation team identified General and Operations Managers as the appropriate occupational category for answering survey and interview questions about the use and influence of BOEM’s environmental studies and assessments.[[2]](#footnote-3)

The total annualized cost to interview respondents is $4,232 (70 hours x $60.45). The total annualized cost to survey respondents is $6,045 (100 hours x $60.45). Therefore, the total annualized cost to the public is $10,277. As noted in the response to Question 12a, this is a one-time data collection.

**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.**

(a) The total capital and start-up cost is $0.00. BOEM will not require any purchase of equipment or allocation of records storage space in conducting these surveys or interviews.

(b) The total operation and maintenance and purchase of services component costs associated with the surveys and interviews are $0.00. BOEM does not charge a filing fee for survey or interview responses.

**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 cost to the Federal government associated with the completion of the evaluation is approximately $273,000. This cost is the amount set aside to pay contractors to perform the external evaluation.

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

This is a new data collection, so no changes or adjustments have been made to previous estimates of burden.

**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.**

The evaluation team will use the survey results to conduct a network analysis focusing on the information exchange between BOEM environmental studies and assessment programs and their external program partners. The evaluation team will export the survey results into a commonly used network analysis package (i.e., Gephi) to look at the ties (connections) between organizations (nodes) and quantify the number and characteristics of those relationships, using standard measures of network structure (e.g., measures of centrality). The evaluation team will present maps and metrics that illustrate the presence and strength of relationships in the network, and how information flows from BOEM to external program partners. Results will be presented at the organizational level; individual names will not be disclosed. Also, the evaluation team will provide response frequencies for questions with categorical response options (e.g., for multiple-choice questions about the means through which respondents obtain information about BOEM study results).

The evaluation team will analyze the interview results using a qualitative data analysis software package (i.e., NVivo). The evaluation team will present the frequencies of qualitative responses for the coded categories.

The overall schedule for the project is as follows:

Collect survey and interview data March-April 2022

Draft report to BOEM September 2022

Final report to BOEM November 2022

It is anticipated that the evaluation report will be posted on BOEM’s Environmental Documents webpage: <https://www.boem.gov/environment/environmental-documents>.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date and OMB control number will be displayed on all survey questionnaires.

**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 list of topics in item 19 of the Paperwork Reduction Act submission.

1. [May 2020 National Occupational Employment and Wage Estimates (bls.gov)](https://www.bls.gov/oes/current/oes_nat.htm#11-0000) [↑](#footnote-ref-2)
2. General and Operations Managers “plan, direct, or coordinate the operations of public or private sector organizations, overseeing multiple departments or locations. Duties and responsibilities include formulating policies, managing daily operations, and planning the use of materials and human resources, but are too diverse and general in nature to be classified in any one functional area of management or administration, such as personnel, purchasing, or administrative services.” [General and Operations Managers (bls.gov)](https://www.bls.gov/oes/current/oes111021.htm) [↑](#footnote-ref-3)