

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Papahānaumokuākea Marine National Monument & University of Hawaii Research Internship
Program
OMB Control No. 0648-0719

Abstract

This is a request for extension of an existing information collection.

Justification

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

On June 15, 2006, President George W. Bush established the Papahānaumokuākea Marine National Monument (PMNM) by [Presidential Proclamation 8031](#) under the authority of the American Antiquities Act, 16 CFR 431, to ensure the comprehensive, strong, and lasting protection of the coral reef ecosystems and related resources of the Northwestern Hawaiian Islands (NWHI). At a time when ocean resources around the world are in major decline, the designation of PMNM created one of the largest marine conservation areas in the world.

As part of PMNM's mission to characterize its natural resources, PMNM conducts annual coral reef monitoring expeditions to the NWHI. Additionally, as part of PMNM's education mission, PMNM is committed to providing educational opportunities for students and educators. In order to accomplish these two missions, the National Oceanic and Atmospheric Administration's (NOAA) PMNM has partnered with the University of Hawaii to offer research internships. Each year, a limited number of research internships will be awarded to outstanding undergraduate students in the marine sciences at the University of Hawaii. These internships consist of training students in SCUBA surveys of coral reef fauna, a research expedition to PMNM aboard a NOAA, chartered and/or partnership, and the development of an independent research project with data from the expedition. Due to the fact that space is very limited for these internships, only a small number of internships can be offered each year.

Internship space is very limited on research cruises and only a small number of opportunities can be offered each year. This collection of information from internship applicants allows PMNM staff to select candidates which are best suited for its research internships. If there was no information collected from candidates, then there would be no available information to compare with PMNM's intern selection criteria. PMNM aims to select the most qualified interns based on their diving, research, fieldwork experience in combination with goals and objectives which meet PMNM's Management goals.

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.

The information will be collected from potential internship candidates to identify which candidates are ideal for intern selection on research cruises with NOAA/PMNM. We ask for information on the candidates' scuba diving history, training and certifications; relevant coursework that relates to marine science and conservation; past fieldwork and research experience; and ask interview questions regarding how their future goals would benefit from their selection to this opportunity.

The collection of information will consist of an electronic application package, which will be solicited annually from undergraduate students applying for the internship. The application package will include

1. an application form with information on academic background and professional experiences,
2. reference forms by two educational or professional references, and
3. a support letter from one academic professor or advisor (see enclosed application forms).

All gathered information would be used only by staff of PMNM for the purpose of selecting interns, and would not be shared with any other party. None of the information collected will be disseminated to the public.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The proposed collection of new information will consist of electronic forms which will be submitted via email. All documents will be electronically transferred and no paperwork will be utilized.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

Marine science faculty at the University of Hawaii were contacted prior to the implementation of this information collection in order to determine whether the proposed collection represents a duplication of information collection already in progress. Since this collection is aimed at determining the unique suitability of students for PMNM's internships, including providing information on skills, knowledge and previous experiences that are relevant to the internship, there are no other alternatives to collect this information other than having students and their references fill out the information themselves.

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

The proposed collection does not involve 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.

This collection of information would be conducted on an annual basis in order for PMNM to achieve its

education and biological characterization missions. If this information collection is not conducted on an annual basis, or not conducted at all, students could not be selected for the research internships, thereby preventing PMNM to complete its education mission to help train the next generation of marine scientists and conservation managers. In addition to providing important educational opportunities for students, these internships help NOAA staff its research expeditions, which are federally mandated to collect data on the unique coral reef ecosystems and related marine resources of PMNM.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

The proposed collection of new information will adhere to all OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice published on March 8, 2021 (86 FR 13340) solicited public comments. No comments were received.

The draft application forms were re-distributed to four faculty at the University of Hawaii in order 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..

Comments are below from Lisa Parr-University of Hawaii at Hilo Faculty:

Marine Option Program (MOP) & PMNM have a great working relationship when it comes to the MOA & the internship selection process - the amount of paperwork is appropriate to provide the students with an opportunity to apply for the internship & provide references the opportunity to comment, but is not onerous. The instructions for the internship application are clear for students & for referees - the data collected are appropriate for determining which students will be selected - the selection process is transparent. MOP distributes the application widely via listserv, emails, Facebook & Instagram to reach the audience eligible for the internship

No additional comments were received.

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

No payments or gifts will be provided to respondents, other than providing internships to those candidates that are selected.

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

All gathered information will be used only by PMNM staff for the selection of interns and will be deleted upon the start of the internship. Collected information will stored in a password- protected database and will contain no PII beyond name, address and contact information.

The information collection is authorized under system of records notices [COMMERCE/NOAA-10](#), NOAA Diving Program, and [COMMERCE/NOAA-22](#), NOAA Health Services Questionnaire (NHSQ) and Tuberculosis Screening Document (TSD). The information is stored in [NOAA6602](#) and a current Privacy Impact Assessment is on file.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The proposed new collection of information does not contain any questions of sensitive nature

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

Estimated Number of Respondents: 100

Estimated Time per Response:

Scholarship application: 1 hour; Reference forms: 30 minutes; Support Letter: 30 minutes.

Estimated Total Annual Burden Hours: 62.5 hours.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Scholarship Application Form	Student	25	1	25	1	25	\$ 10.00	250
Character References	Postsecondary Teachers	50	1	50	0.5	25	\$ 49.29	1,232.25
Support Letter	Postsecondary Teachers	25	1	25	0.5	12.5	\$ 49.29	616.13
Totals				100		62.5		\$ 2,098.38

*The student hourly wage rate of \$10 is used as it is unlikely that the student will have a full time job (if any) or one that pays much over minimum wage. The Physical Sciences Teachers, Postsecondary (25-1050) labor category was used to determine the annual wage rate for Postsecondary Teachers (\$98,580) and divided by 2,000 hours to determine the hourly wage rate. <https://www.bls.gov/bls/blswage.htm>

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

There are no costs associated with this collection of information since all applications, references, and support letters are provided electronically.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4	\$171,151.50	2%		\$3,423.03
Contractor Cost		98,292	2%	16%	\$2,280.37
Travel					
Other Costs:					
TOTAL					\$5,703.40

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

There are no changes to the information collection since the last OMB approval. The information collection previously listed in ROCIS is being broken out in order to provide more transparency into the burden of the individual respondent types.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Application, Reference Forms, and Support Letter	0	80	0	80	0	80	This information collection is being broken out in this new action to more accurately reflect the burden imposed on the different respondents. These are not new collections. The previous IC line in ROCIS was broken out to more accurately reflect the number of respondents and the burden imposed on the different respondents. The number of respondents/applications has increased during the past 3 years.
Scholarship Application Form	25	0	25	0	25	0	
Character References	50	0	50	0	25	0	
Support Letter	25	0	25	0	12.5	0	
Total for Collection	100	80	100	80	62.5	80	
Difference	20		20		-17.5		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Application, Reference Forms, and Support Letter	0	Not previously calculated	0	20	This information collection is being broken out in this new action to more accurately reflect the burden imposed on the different respondents. These are not new collections. The previous IC line in ROCIS was broken out to more accurately reflect the number of respondents and the burden imposed on the different respondents. The number of respondents/applications has increased during the past 3 years.
Scholarship Application Form	\$ 250.00	0	0	0	
Character References	\$ 1,232.25	0	0	0	
Support Letter	\$ 616.13	0	0	0	
Total for Collection	\$ 2,098.38	0	0	20	
Difference	\$2,098.38		-\$20		

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.

No information collected will be published.

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

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

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

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