

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Annual Economic Survey of Federal Gulf and South Atlantic Shrimp Permit Holders**  
**OMB Control No. 0648-0591**

**Abstract**

We are requesting an extension of a currently approved data collection with no changes.

Economic data is collected from vessel owners who operate in federal waters of the Gulf of Mexico and South Atlantic and who have one or more federal permits for the commercial catch of shrimp.

The Annual Economic Survey of Federal Gulf and Atlantic Shrimp Permit Holders is conducted by the Social Science Research Group of the Southeast Region Fishery Science Center (SEFSC) of the National Fisheries Marine Service (NMFS). Now in its 15<sup>th</sup> year, the survey collects data about operating expenses and the costs of owning and maintaining shrimp vessels. Each spring, surveys are sent by mail to a random sample of about a third of all vessels with federal permits for the harvest of Gulf of Mexico penaeid shrimp or South Atlantic penaeid or rock shrimp. The survey has been very successful, with high response rates. For the 2018 data year---a typical year---the raw response rates was 82.7%; ranging from 74.2% to 90.2% by permit type; with open access permits at the lower end as would be expected (permit non-renewal is less of a motivation to complete the survey if you can always get a new one). The response rate for the 2019 survey---conduct primarily during the beginning of the COVID19 pandemic---was uncharacteristically low at only 73%.

A collection of economic information from fishermen affected by the management of federal commercial fisheries is needed to ensure that national goals, objectives, and requirements of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MFCMA) and other laws are met. This information is vital in assessing the economic and social effects of management decisions and regulations on individual fishing enterprises, fishing communities, and the nation as a whole.

**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.**

A collection of economic information from fishermen and fishing businesses affected by the management of federal commercial fisheries in the southeast region is needed to ensure that national goals, objectives, and requirements of the MFCMA, National Environmental Policy Act (NEPA), Regulatory Flexibility Act (RFA) and Executive Order 12866 (EO 12866) are met. This information is vital in assessing the economic and social effects of fishery management decisions and regulations on individual fishing enterprises, fishing communities, and the nation as a whole. Due to the persistent fluctuations in the price of fuel and the price of shrimp and other changes in the southeast shrimp fisheries, analyses and models require up-to-date data to remain valid.

The central goal of this project is to collect up-to-date cost data for the Gulf and South Atlantic commercial shrimp fisheries in federal waters. National Standard Guidelines for social and economic information needs are mandated in 50 CFR 600. In the past, legal decisions have gone against Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), and NMFS based on the lack of social and economic information or the inadequate analysis of existing data. Thus, it is imperative that these data be collected to accurately assess the economic and social impacts on individual shrimp fishing entities as imposed by shrimp fishery management plans and regulations.

The data collection effort is an ongoing annual survey effort. Regular surveying is necessary to capture critical cost data that fluctuate from year to year. Fluctuations are generally due to annual fluctuations in shrimp abundance caused by environmental factors, input and output price variability and adaptations to these, as well as hurricane or other impacts, e.g., BP oil spill.

Economic information on commercial fishing enterprises is also vital to the optimum yield (OY) management of marine fishery resources as mandated under the MFCMA (16 U.S.C. 1802 MS Act § 3). The term “optimum” is defined under section 104-297 (28) of the Act, as: (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems; (B) is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factors; and (C) in the case of an over-fished fishery, provides for the rebuilding to a level consistent with producing the maximum sustainable yield in such a fishery.

Due to these obvious needs for economic data for successful fishery management, and due to difficulty compelling the industry to provide these data voluntarily, the Gulf of Mexico Fishery Management Council---the decision making body per the primary US law for fisheries (the MFCMA)---decided to make the collection of economic data “mandatory.” With the implementation of Amendment 13 to the Gulf Shrimp Fishery Management Plan (FMP) by the Gulf of Mexico Fisheries Management Council, the completion and return of the economic survey became a requirement to be eligible for renewal of the federal Gulf shrimp moratorium permit (a tradable, limited access permit, issued to historical participants). For the South Atlantic shrimp fisheries, the South Atlantic Fisheries Management Council followed suit with Amendment 7 the South Atlantic FMP, requiring shrimp permit holders to provide economic information.

**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.**

Combined with data from existing collections, the information is used by NMFS economists and social scientists to create, develop, and update economic and social models and descriptive reports of these important fisheries. The results support the management of the shrimp fisheries by the South Atlantic and Gulf Fisheries Management Councils and NMFS Southeast Regional Office. Foremost, the data are used to evaluate the economics of the sector and the potential economic impact of proposed regulations. The frequency of the data use depends on the number and timing of Amendments to the Shrimp Fishery Management Plans.

Currently, results based on these data are being incorporated into draft Amendment 10 to the Coral FMP (rock shrimp results) and into a draft Framework Action to the FMP for the Shrimp Fishery in the Gulf

of Mexico. As an example of typical, standardized results regularly generated by this data collection, the latter product---for the active SPGM-permitted Gulf of Mexico shrimp fleet for 2014-2019---is provided as a supplemental document. Previously, the results have been used in Amendments 15, 16, 17A, 17B, and 18 to the Gulf of Mexico Shrimp FMP. They have also been used in the South Atlantic shrimp FMP Amendments, and Amendment to the coral FMP and reef fish FMP (which interact with shrimp). The results are also used for rule making related to protected resources, specifically for those managing sea turtle interactions with shrimping gear. Since the survey is repeated annually, the data are also used to assess trends in the financial and economic state of the fisheries. Results or non-confidential data extracts are also provided and used by the academic community studying SE shrimp fisheries.

Statistical models that predict or forecast various characteristics, such as fleet size, fishing activity or effort, cost versus benefits of fishing, market activity, and efficiencies of proposed fishing regulations are further uses of these data. Gross revenues and costs can vary across time and geographic areas as a result of changes in a number of different factors, including fishery management regulations (e.g., gear modifications, time/area closures, etc.), fluctuations in abundance (due to changes in various environmental factors), market conditions (such as fuel or seafood prices), and behavioral responses by fishermen.

In general, the survey instrument asks questions pertaining to the annual total of variable costs, fixed costs, and other financial and production factors. These data are necessary to generate cost, profit, input demand, and production functions. Such functions and the results generated from their estimation are typically used in financial analyses (used to determine a business' cost efficiency and profitability), economic impact analyses (used to determine the economic value of a particular activity to a particular locale, community, or region), bio-economic models (used to predict how the biological and economic components of a fishery will respond to exogenous shocks, such as policy changes), cost-benefit analyses (used, in part, to determine the net economic benefits of a particular action), and behavioral models (such as those that explain or predict exit or entry decisions and decisions regarding spatial or temporal allocation of effort). These data can also be used to determine the relative efficiency of the various participating vessels in a fishery and thus whether the aggregate harvesting costs are in fact being minimized. Such models and analyses are critical to guiding fisheries management decisions whose general purpose is to maximize net national benefits and optimally distribute those benefits.

The two-page mail survey collects data about operating expenses and the costs of owning and maintaining shrimp vessels from commercial fishing permit holders (permits are issued for specific vessels so there is a unique mapping). Each February/March, surveys are sent by mail to a random sample of about a third of all vessels with federal permits for the harvest of Gulf of Mexico penaeid shrimp or South Atlantic penaeid or rock shrimp.

The following is a more detailed description and justifications for each element of the data collection.

The survey is divided into three parts. It starts on page 1 with a pre-filled header section that serves to identify the respondent. The second section, also on page 1, collects information on annual financial expenditures ("cash costs"). These should correspond to receipts and invoices and the associated payments and should be readily available from regular business accounting. They are arranged into three blocks corresponding to variable costs (Questions 1 to 6), fixed costs (Questions 7 to 10), and a check for completeness (Question 11). Page 1 is set up to add up to the total financial expenditures of one calendar year. This should reduce the cognitive load and enhance internal consistency. These questions can generally be used to construct input demand function, cost functions, and production functions, all

of which are needed to conduct the types of analyses mentioned previously. Distinguishing between variable and fixed costs is necessary for conducting analyses with different time horizons.

Expenditures do not fully reflect the economic concepts of costs (and hence profit); therefore, in order to facilitate economic analysis, further information is necessary, and this is collected on page 2. For example, loan principal payments are real financial transfers but do not constitute a cost in the economic sense. Depreciation charges are an example of the reverse, where real economic costs produce no corresponding financial transaction. Please see the attached survey instrument and its instructions for an in-depth explanation of the intent of each question.

Questions 12 to 15 deal with the economics of the vessel---the fixed factor of production. Questions 13 to 15 try to discern the total amount of financial capital invested in the vessel, the current value of that capital, the owner's net equity in the vessel, and the annual amount the capital is depreciating by. This information is required to estimate economic profit and then to calculate various rates of return on the owner's investment. The expected rate of return is a critical factor in the owner's decision to invest further in the vessel, and whether to remain in the fishing industry. Changes in the levels of net equity should be indicative of the industry's economic health. Question 12 collects information on the type of vessel insurance and the total amount for which the vessel is insured (coverage level). The lack of hull and other related vessel insurance is indicative of the industry's economic health. Further, the level of insurance coverage is a measure of how exposed this industry is toward risk, such as losses due to hurricanes. There is much policy interest in insurance-related questions.

Questions 16 to 18 provide information on activities and revenue by the vessel that are supplemental to the revenue from shrimping. Other data collection efforts allow us to calculate the total revenue each vessel generates from shrimp. In the case where a vessel also engages in other commercial fisheries, portions of the reported costs will apply to these activities rather than to the catching of shrimp. Hence these additional revenue data are needed to ensure that the total vessel costs collected on page 1 can be matched to total revenue---for a correct accounting of net revenues. The information also help sort vessel into categories, such as active Gulf shrimp vessel or non-commercial fishing vessel and how specialized the shrimp industry is.

At the bottom of the last page of the survey (page 2) an optional question asks the respondent for any comments and if they would like to receive annual results.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this supporting statement for more information on confidentiality and privacy. This information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

**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 data collection is conducted as a self-administered mail survey. Given the southeast region's past

experiences with surveys of this population, a very low impact (burden) approach is necessary to obtain fishermen's cooperation. A mail survey is less intrusive, more convenient, and less time-intensive than one based on in-person interviews.

All vessel owners are contacted by mail. They are asked to return the completed survey instrument to us in an enclosed, pre-paid envelope. If no response is received, up to two further letters are sent (including additional survey instruments). Non-responders are also contacted by phone and urged to return the survey. Information is not collected during the phone call (a further survey instrument is sent – by mail, fax, or email – if requested).

There will be no other means, electronic or otherwise, to submit data or information for the purposes of this study. When asked in 2008, there was little interest by the industry for an online submission option for this survey. Based on multiple phone conversations over the years, respondents still indicate that the hard copy survey is preferred as it helps them assemble the different data points from accounting records; which are not necessarily done at one time. An online data entry system for confidential data would require login and password protection if incremental data entry was allowed. Getting and maintaining such an account for transmission of one survey every three years quickly exceeds the additional burden imposed by the mailing of the hard copy in the provided, self-addressed envelope.

The survey responses will be entered into an electronic Oracle database by NMFS or a contractor. The analytical results of studies based on this data will be disseminated in internal, management related, and peer-reviewed publications. Some of these will be available over the Internet.

#### **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**

This is the only systematic, region-wide, and continuous economic data collection in the Gulf and South Atlantic shrimp fisheries. Hence, there is no duplication of economic information. Experts on these fisheries in academia and state agencies have been consulted.

The data collection is set up in a way to avoid duplicating the time burden for vessels that hold a Gulf shrimp moratorium permit and one or more South Atlantic shrimp permits. There are many vessels that hold the South Atlantic penaeid shrimp permit and the Gulf shrimp moratorium permits at the same time. Southeast commercial shrimp vessels will be treated as a single fleet for sampling purposes (thereby ensuring every vessel can only be selected once).

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

To trawl for shrimp in federal waters of the Gulf of Mexico requires the use a large, specialized fishing vessel with 3-5 person crews. As such, owners must invest substantial sums to participate in this fishery (new vessels might cost anywhere from \$100,000 to \$1,000,000) and employ other individuals (mates; usually paid as contractors (1099-MISC) rather than hired as employees). About half the owners captain their own vessels (owner-operators; usual legal form: sole proprietors or S-corporations), while the other half hire captains. Some own multiple vessels. As such, they all run small businesses.

Only the minimum data to meet the current and future needs of NMFS management and permitting programs are collected. The information requested should be available to the respondent in the course of normal business operations. Keeping additional records is not needed and hence the burden is low. To simplify the process further, the survey collects aggregate annual data and will be timed to coincide with

tax season. The results of this study are expected to improve the economic conditions of small fishing entities by affording fishery management agencies the information needed to consider economic factors in management plans and regulations.

**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.**

Previous attempts to collect costs data have been plagued by their small geographic scope, their limited duration, refusal by the industry to be surveyed, and delineation issues between inshore and offshore fleets. Current and statistically valid economic data is needed for the southeast shrimp fisheries in order to accurately assess the positive and negative impacts of federal rules and regulations. Such assessments are mandated under EO 12866, the RFA, MFCMA (and the National Standards attached thereto), and the Endangered Species Act, among others. Additionally, legal decisions against the federal government have been handed down based on the absence of social and economic data (i.e., summer flounder litigation: North Carolina Fisheries Association, et al. versus Daley - Civil Nos. 2: 97cv339; 2: 98cv606).

If current and accurate economic data are not available, then the social and economic assessments of management alternatives will be impossible or inaccurate, thereby potentially leading the Council and NMFS to make poor management decisions. Thus, continuous economic data collection is needed to satisfy these various mandates and help ensure that good management decisions are made.

The purpose of collecting this data annually is to identify and track changes and trends through time. This fishery has been experiencing substantial upheaval (dumping of product on the U.S. market by foreign competition and large fuel price fluctuations; hurricane and oil spill impacts). Further reasons to collect this data annually include the paucity of existing economic data in the shrimp fishery (especially about costs); the fact that there can be wide fluctuations in all costs, not just variable, from year to year; and that future, proposed management strategies are substantially different from the current management structure. In the absence of annual data, the Council and NMFS cannot satisfy the various mandates described above and in the response to Question 1; cannot fully assess the social and economic impacts of potential management changes; and generally cannot ensure that good management decisions are made.

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

The collection will be conducted in a manner consistent with 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 was published on December 17, 2021 (86 FR 71622) for the extension of this data collection. Public comments were solicited on the proposed data collection reporting program. No comment was received.

NMFS reached out to five external stakeholders for their views on the availability of the requested data, frequency of collection, the clarity of the instrument and instructions, disclosure, making it a requirement, survey methodology, and on the data elements to be recorded, disclosed, or reported. No comments were received. However, throughout our annual survey effort (including during calendar year 2021), the principal investigator and a contractor speak with many survey respondents concerning help/questions about the questionnaire, the inability to participate or requesting extensions, reminder calls, and, especially, NMFS initiated call-backs to clarify entries or fill in blanks [to be useful, economic surveys require a high level of completion, e.g., to calculate net revenue, we need values for all revenue and cost components]. While there is huge variation among respondents, for respondent with financial records (most respondents), the entire processing of the survey is likely to be less than 30 minutes.<sup>1</sup> Many individuals have told us the survey “takes 5 minutes” to complete. For individuals without accounting records, especially if they try to add up receipts, the process could be substantially longer [but, as detailed more in depth in questions 12 and 13 below, “adding up receipts” and basic accounting is customary and usual business practices of any for-profit business and should not be considered a burden specific to this data collection, i.e., those tasks are needed for state and federal taxes and general business operations]. When we speak to this latter group we always instruct them to provide us with their best estimate and that the survey should take no longer than 45 minutes to complete. We also always provide extensions, especially for delayed tax filers, who have not yet assembled their records.

One comment submitted along with the survey commented on a lack of comprehension (feeling a CPA was needed to understand the survey). Received on March 23, 2021:

*The questions on this form require assistance of a certified CPA. I am not a certified CPA nor can I afford one, I believe this paperwork violates the paper reduction act, I have answered to best of my knowledge.*

Two other comments believed the data collection would be useless or meaningless due to what (erroneously) perceived as a faulty statistical design. The first believed we are always asking same vessels year in year out, while the second believed that our survey does not capture non-federally permitted shrimp vessels fishing in federal waters (we do not, but such fishing would be illegal; it is not clear how this respondent would know the permit status of other vessels). We have checked and rechecked our codes and files to ensure that surveying of the same vessel each year never takes place. Their misunderstanding can be explained by the number of forms and paperwork that a typical shrimping enterprise needs to complete these days. To address each comment specifically: 1. we repeatedly hear from individuals that the survey is easy and simple to complete, especially if they have a summary of their financial records handy (as accountants will usually provide their customers with their tax returns); 2. we have extensively evaluated and rejected the approach of requesting tax forms instead

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<sup>1</sup> In fact, it is often the “simple” fuel gallons or price questions that office-based respondents have a hard time filling out. While they have access to all financial records (and can answer all the rest of the questions), accounting records do not usually drill down to fuel price or gallons. [We ask them to estimate or get an estimate of fuel price and then calculate gallons based on that.]

of the survey (tax entities, forms, and completing norms vary greatly and make extracting standardized data across our industry impossible---more on that below), and 3. in our knowledge-based economy, fishing enterprises, as all businesses, are faced with completing a large number of forms and complying with regulations---this seems to be the nature of highly advanced economies as the information is needed to identify and achieve efficiencies (which underpin our wealth). Especially in public, renewable resources, such as fisheries, substantial information is necessary to achieve "optimal use" across individual commercial fishermen, other commercial fisheries, for-hire fisheries, and recreational fisheries.

The principal investigator has also explored the feasibility of an entirely different approach for collecting annual financial information. As part of the Capital Construction Fund program, NMFS receives a substantial number of tax returns each year. It was thought that these tax returns might 1) provide enough information to track the SE shrimp industry without the survey, or, at least, 2) allow us to rephrase questions on the survey to request specific tax information (e.g., "provide line 23 on your 1040"). Regrettably, for a variety of reasons, extracting useful economic data from the CCF archive is not possible. Major problems included the CCF's lack of representativeness of the SE shrimp fishery and the wide variety of tax-entities (sole-proprietor, corporations, LLCs, multi-vessel operations, etc.) and resulting tax forms and information, which made extracting standardized economic data near impossible.

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

No monetary payments or other remuneration will be made to respondents.

**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.**

The cover letter sent with the survey states that all data that are submitted are treated as confidential, in accordance with NOAA Administrative Order 216-100 and the Magnuson-Stevens Act, Section 402(b), Confidentiality of Information. No Personal Identifiable Information is collected. Only one SSRG FTE staff and one on-site contractor implement and process this data collection annually. All these staff have signed a NMFS/SEFSC non-disclosure agreement (NDA) and are familiar with the requirement to maintain the data secure and confidential. The finalized data are located in the Center's Oracle database. Individual records are never released to the public.

This information is covered by the Privacy Act System of Records Notice [NOAA-6](#), Fishermen's Statistical Information. A current privacy impact assessment is on file for the collection of this information ([NOAA4400](#)).

**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.**

No questions will be asked of survey participants about sexual behavior and attitudes, religious beliefs,



or similar sensitive activities. Questions pertaining to a respondent’s business costs and expenses will be used, together with revenue data collected elsewhere, to establish their profitability. Business income (not directly collected) is sometimes considered private. This information is necessary for the development of economic assessment models and analyses described extensively in Questions 1 and 2. The data are used and reported only at the aggregate or representative (average) levels. The respondents are informed of this in the cover letter.

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

The number of limited access Gulf of Mexico moratorium permits continues to decline slightly. To allow for possible fluctuations in the survey population over the next three years (the South Atlantic penaeid and rock shrimp permits are open access), we are asking for burden hours equivalent to completing a total of 650 surveys annually. This covers roughly one third the population each year. The annual economic survey consists of one response per year per selected respondent. The public reporting burden for this collection of information is estimated to average 45 minutes per response including the time for reading the instructions, gathering the data from business records, and completing and mailing the survey instrument. As a result, we require 488 hours annually for the survey.

Over the years (now in 15th year), typical responses on how long the survey took to complete range from 5 minutes to one hour. The typical accounting/financial statements provided by accountants or accounting software usually contain all the data needed to complete the survey quickly. We mail the survey in February, with a (flexible) deadline of April 30, to insure respondent have our survey during the usual tax season.

The annualized cost to respondents of the overall burden hours is estimated as \$12,776, using a wage rate of \$26.18 per hour. The wage rate we use is from BLS’s Occupational Employment and Wages, May 2021, for First-Line Supervisors of Farming, Fishing, and Forestry Workers (45-1011); defined as “Directly supervise and coordinate the activities of agricultural, forestry, aquacultural, and related workers.” The respondents are federal commercial fishing permit holders, usually owners of fishing businesses. More than half captain their own fishing vessels (owner-operators).

Info Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents per year (a)	Annual # of Responses per Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs per 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)
Economic shrimp survey	First-Line Supervisor of Fishing	650	1	650	0.75	488	26.18	12,776
<b>Totals</b>				<b>650</b>		<b>488</b>		<b>12,776</b>

**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 capital/start-up or ongoing operation/maintenance costs associated with this information collection. The economic information requested is part of customary and usual business practices of any business, and it is also needed to comply with other federal and state government requirements (e.g., filing taxes). We do know that a few respondents ask their accountants to fill out the survey. In these cases, the respondent would presumably incur additional costs. As this is not required by the government, we deem these costs to be ‘at the convenience’ of the respondent and do not count them here. The information is returned in a postage-paid envelope provided by NMFS.

**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.**

This annual survey is conducted by the Social Science Research Group of the SEFSC of NMFS. This includes annual development of the sampling frame and sampling, conducting the survey, administration and supervision of a student intern or contractor, continued database development, and preparation of results and reports.

The total *average annual cost* of continuing this data collection (including staff time) is estimated at about \$75,000 per year. The estimate of annual costs for NMFS staff involvement is \$40,000 (staff time and benefits); though the time commitment fluctuates significantly from year to year. Additionally, annually \$32,000 was spent to hire a contractor to help with the implementation of the survey, including mail handling, telephone follow-up, and data entry and verification. Additional cash expenses are approximately \$3,000 for supplies (paper, printing, envelopes) and postage.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight and Implementation	GS-14/10	200,000	20%		40,000
Contractor Cost (mail processing, data entry, etc.)		112,000	25%	-	28,000
Travel					0
Other Costs (supplies and postage)					3,000
<b>TOTAL</b>					<b>75,000</b>

**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.

**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.**

Annual summary statistics of these data are produced, according to a standardized methodology, in standardized results tables and provided to the management process whenever needed. See the supplemental document for the recent example.

Occasionally, these results are also published in annual NMFS economic reports; one for the Gulf and one for the South Atlantic shrimp fisheries. These reports provide documentation about the survey methodologies, survey instrument, statistical and random sampling design, an assessment of the validity of the collected data, and basic descriptive statistics. The analytical results of studies based on this data will be disseminated in internal, management related, and peer-reviewed publications. Some of these will be available over the internet.

**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.”**

On behalf of NOAA Fisheries, I certify that the collection of information encompassed by this request complies with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).