

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Marine Recreational Information Program, Access-Point Angler Intercept Survey
OMB Control No. 0648-0659

Abstract

This is a request for extension of an approved information collection. Data collected from the APAIS are used to estimate the finfish catch per angler of recreational saltwater fishers. These APAIS estimates are combined with estimates derived from independent but complementary surveys of fishing effort, the Fishing Effort Survey (OMB Control No. 0648-0652) and the For-Hire Survey (OMB Control No. 0648-0709), to estimate total, state-level fishing catch by species. These estimates are used in the development, implementation, and monitoring of fishery management programs by the NMFS, regional fishery management councils, interstate marine fisheries commissions, and state fishery agencies. These data are required to carry out provisions of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 et seq.), as amended, regarding conservation and management of fishery resources.

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.

Collection of recreational fisheries catch and effort data is necessary to fulfill statutory requirements of Section 303 of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1852 et. seq.) and to comply with [Executive Order 12962](#) on Recreational Fisheries. Section 303 (a) of the Magnuson-Stevens Act specifies data and analyses to be included in Fishery Management Plans (FMPs), as well as pertinent data that shall be submitted to the Secretary of Commerce under the plan.

Historically, recreational fishing catch data (numbers and species of fish) were collected through the Marine Recreational Fishery Statistics Survey (MRFSS) Access-Point Angler Intercept Survey (APAIS), an in-person site-day sampling survey of recreational anglers who have completed fishing for the day. The MRFSS survey's precision and accuracy of catch statistics were questioned due to changes in fisheries management and the need for more accurate statistics at greater levels of resolution. To address concerns about the MRFSS, the National Marine Fisheries Service (NMFS) commissioned a review of its marine recreational fishing surveys by the National Research Council (NRC) of the National Academies of Science. The NRC review concluded that existing recreational fishing surveys are inadequate for sampling the universe of anglers and for determining their catch and effort (NRC, 2006).

NMFS addressed those concerns by implementing the Marine Recreational Information Program (MRIP). The MRIP program used a combination of expert consultants, partner statisticians and survey managers, and staff to design and test new survey methodologies for catch and effort data collections and estimation. The MRIP APAIS was the result of external review and re-design of the MRFSS' APAIS by expert survey statisticians and addressed the issues of field sampler influence, potential bias in sampling low-use sites, unknown sampling probabilities due to haphazard site selection and re-scheduling of site-days, and design and estimation inconsistencies.

The current MRIP APAIS was implemented in 2013. The stricter control of sampler behavior ensures that a probability sample is consistently obtained and potential biases are eliminated or minimized, and catch and effort estimation and statistics are consistent with the data collection design. The MRIP program was again reviewed by the National Academies of Sciences, Engineering, and Medicine (NAS) in 2017, including the current APAIS survey (NAS 2017). The report recognized ‘the impressive progress that NMFS has made, including major improvements in the statistical soundness of its survey design’ and principally focused on the Fishing Effort Survey (FES) and the APAIS that form the backbone of the MRIP.

This request is to extend the MRIP Access-Point Angler Intercept Survey (OMB Control No. 0648-0659) that has recently been conducted from 2019-2022. The APAIS will continue to be conducted in Maine through Florida on the Atlantic Coast, and in Florida through Mississippi on the Gulf of Mexico Coast (Louisiana not included), Hawaii, and Puerto Rico. On the Atlantic Coast, Maine and New Hampshire will be surveyed in three waves per year (May-Jun, Jul-Aug, Sep-Oct), Massachusetts-Virginia, South Carolina, and Georgia will be surveyed in 5 waves per year (Mar-Apr – Nov-Dec), and North Carolina, the Gulf States, Hawaii, and Puerto Rico will be surveyed in all 6 waves per year (Jan-Feb – Nov-Dec). These specific sampling periods by state or region encompass the majority of the recreational fishery seasons. Prior surveys indicated recreational fishing outside these periods was rare, contributed a very small percentage of annual landings of managed fishes, and would be disproportionately expensive to estimate precisely. The period of this request is for 2022 – 2024. The APAIS for this period will not be substantially changed from that of the previous 3-year data collection program (OMB Control No. 0648-0659).

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 MRIP APAIS estimates catch per trip by species for all finfish encountered. This information is combined with effort data collected through offsite surveys of fishing effort to estimate total catch by species. These recreational fishing catch and effort estimates are used on an ongoing basis by NMFS, regional fishery management councils, interstate marine fisheries commissions and state natural resource agencies in developing, implementing and monitoring fishery management programs, per statutory requirements of the Magnuson-Stevens Fishery Conservation and Management Act. Catch and effort statistics are fundamental for assessing the influence of fishing on any fish stock. Accurate estimates of the quantities taken, fishing effort, and both the seasonal and geographic distributions of the catch and effort are required for the development of regional management policies and plans.

National Oceanic and Atmospheric Administration’s (NOAA) Fisheries 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. The information collection is designed to yield data that meet all applicable information quality guidelines. The data collected by the APAIS will be subject to the quality control measures and 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.

Information will be collected through onsite in-person interviews. Tablet-based interviewing occurs on the Atlantic and Gulf Coasts and paper forms are used in Hawaii. Data from paper forms are key-entered into a 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 Question 2

NMFS collaborates with state natural resource agencies and regional interstate fisheries commissions on the Atlantic and Gulf coasts to ensure that recreational fisheries data collections are not duplicative. Every five years, the Fish and Wildlife Service (FWS) of the U.S. Department of the Interior conducts the National Survey of Fishing, Hunting and Wildlife-Associated Recreation (OMB Control No. 1018-0088). This survey collects minimal information about annual recreational saltwater fishing activity within the context of additional recreational activities. That survey does not provide the spatial or temporal resolution needed by managers of fishery resources to monitor and manage recreational fisheries landings.

The MRIP APAIS Head Boat mode sampling and estimation overlap with the Southeast Head Boat Logbook Program (SEHB) conducted by the Beaufort Laboratory of the NMFS Southeast Fisheries Science Center (OMB No. 0648-0016). The SEHB includes only head boats that typically target reef-fish species, whereas the APAIS coverage includes all identified head boats in the region, regardless of target or landed species. The APAIS method of at-sea interviews of head boat anglers includes direct observations of the discarded catch, identification of discarded fish to species by trained interviewer/observers, evaluation of discard disposition, and length measurements of discarded fish. This information is not available in the SEHB logbooks.

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

The respondents are individual recreational fishers and, by definition, are not businesses. Therefore, no small businesses will be impacted by this survey design or conduct.

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 survey is not conducted, NMFS will not have recreational fisheries catch information from a majority of saltwater anglers to support fishery stock assessments and management. An ongoing survey of recreational anglers is required to monitor changing conditions in the fishery and support modifications in fishery regulations both within fishing seasons and among fishing years. In addition, a continuous time series of data is scientifically essential to assess the impact of recreational fishing on fish stocks.

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

There are no special circumstances that would cause the APAIS information collection to be conducted in a manner inconsistent 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 published on Monday, February 7, 2022 (87 FR 6849) solicited public comment on this continuing data collection program. One comment was received that was found to be non-substantive or outside the scope of the collection.

MRIP is a collaborative effort among government agencies, independent scientists, recreational fishing groups, and conservation organizations to ensure scientifically rigorous collection of appropriate information that meets manager and stakeholder needs. NMFS staff maintains regular communication with customers, through workshops, workgroup meetings and one-on-one consultations, to ensure that needs for recreational fishing statistics are being met. At various open meetings (Fishery Management Councils and Commissions) the details of the MRIP data collection surveys have been commented on and discussed, leading to improved outreach and education materials, updated websites, and revisions to sample allocation with the ultimate goals of improved interview response and respondent burden reduction. Changes to APAIS sampling were implemented in 2015 including multi-mode angler interviewing at sampling sites, rather than single mode assignments, and definition of a peak sample period of 11 am – 5 pm for sampling. And, in 2016 the APAIS survey conduct was transitioned from a private contracted company to a cooperative venture among the Atlantic Coast states similar to the Gulf Fishery Information Network (GulfFIN program of Gulf States Marine Fisheries Commission) model with the Atlantic Coast Cooperative Statistics Program (ACCSP) as the central administrator and data processor. This change put state resource agency staff in the field conducting APAIS interviews which was widely viewed by constituents in the recreational fishing community as an improvement in data collection quality and customer service. These changes have all been favorably accepted by the recreational fishing community and the end users of the MRIP survey products.

All survey questionnaires are presented to the cooperating state participants at both ACCSP Recreational Technical Committee meetings and Gulf FIN meetings to ensure the meaning, intent, and wording of questions to be put to respondents are clear and appropriate for the information being requested. The questionnaires are also reviewed, question by question, at annual training sessions conducted by the ACCSP and GulfFIN for the field interviewers to further ensure the question sequence and administration are understood for proper delivery. Advice on circumstances that may require follow-up response to respondent questions and appropriate probing replies to obtain appropriate responses are also included in these training sessions.

The APAIS survey is conducted in-person and therefore the respondent burden (time to respond to interview questions) is known by the NMFS, the respondent does not need to read or interpret instructions, participation is voluntary, and there is no cost, other than time, to respond to the interview questions, so the requirement for directed consultation with respondent groups concerning burden is not necessary. Respondents are informed of approximate time of response when the interview is requested.

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

of contractors or grantees.

Neither payments nor gifts will be provided 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.

As stated on the instruments, responses are kept confidential as required by section 402(b) of the Magnuson-Stevens and NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form without identification as to its source. Section 402(b) stipulates that data required to be submitted under an FMP shall be confidential and shall not be released except to Federal employees and Council staff responsible for FMP monitoring and development or when required under court order. Any public release of survey data will be without identification as to its source or in aggregate statistical form. All survey data will be stored on secured, password protected servers, and all transfer of survey data will utilize secure file transfer protocols.

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 of a sensitive nature are requested in this collection of information.

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

As discussed in Part B, Question 1, approximately 100,000 annual responses are expected, averaging 5 minutes per response. Annual labor costs to respondents were estimated based on an hourly average wage rate of \$27.07 for All Occupations (Occupational Code 00-0000 in May 2020 (https://www.bls.gov/oes/current/oes_nat.htm#00-0000)). There are no other costs to respondents. There are also no recordkeeping requirements associated with the APAIS. The Access-Point Angler Intercept Survey will be completed by approximately 100,000 respondents resulting in a total estimated burden of 8,333 hours (100,000 responses *5 minutes / 60 minutes = 8,333 hours). The expected number of respondents is based on the results of previous APAIS angler interviews in the regions the MRIP APAIS is to be conducted (Maine – Mississippi, Puerto Rico, Hawaii). A total of 8,333 burden hours are anticipated, resulting in a labor cost to respondents of approximately \$225,574.

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)
MRIP APAIS	All Occupations	100,000	1	100,000	0.083	8,333	27.07	225,574
Totals				100,000		8,333		225,574

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 costs or operating and maintenance costs associated with this information collection.

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.

Annual cost to the Federal government is approximately \$11,300,000: \$11,000,000 in contractor data collection costs and \$300,000 in federal professional staff and computing costs. Federal Oversight involves multiple MRIP staff, each conducting specific tasks for survey frame maintenance, monitoring contractor survey conduct/performance, reviewing deliverables, and statistical analyses/estimation. It is estimated that the combined employee labor effort is equal to the labor of two full-time employees. Contractor/Grantee cost is for interviewer training, survey conducting, data processing, QA/QC tasks, and meeting participation.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-03/04	\$ 300,000			\$ 300,000
Other Federal Positions					
Contractor Cost		\$ 11,000,000			\$ 11,000,000
Travel					0
Other Costs:					0
TOTAL					\$ 11,300,000

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.

Each year, NMFS administers recreational fishing surveys for six discrete, two-month reference waves, beginning with wave 1 (January/February) and continuing through wave 6 (November/December). The MRIP APAIS will be administered for six successive waves per year, for 3 years, beginning with wave 1 (January/February), 2022 and continuing through wave 6, 2024.

All data collected and analyzed will be included in table format available on the Web page of the Fisheries Statistics Division, Office of Science and Technology, National Marine Fisheries Service. The Web site address is <https://www.fisheries.noaa.gov/recreational-fishing-data/saltwater-recreational-data-and-statistics-queries>. Data from this survey may support research and analyses to be presented at appropriate professional meetings (e.g. American Fisheries Society, Joint Statistical Meetings) and may be submitted for publication in appropriate statistical or fisheries peer-reviewed journals. Summary marine recreational fishery catch statistics produced using data from this survey are included in the annual publication by NMFS, Fisheries of the United States (e.g. FUS 2019, available online: <https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2019>)

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\(b\)\(3\)](#).

References

Fisheries of the United States, 2017 (2018) U.S. Department of Commerce, NOAA, National Marine Fisheries Service, Office of Science and Technology, USGPO, October 2015, <https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2017-report>

National Research Council (2006). Review of Recreational Fisheries Survey Methods. Washington, D.C.: National Academies Press.