

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

**Research Permit and Reporting System Applications and Reports
(36 CFR 2.1 and 2.5)**

OMB Control Number 1024-0236

Terms of Clearance. None.

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

The National Park Service Organic Act of 1916 (54 U.S.C. §100101) provides that park resources are to be conserved for the enjoyment of present and future generations of people. The National Parks Omnibus Management Act of 1998 (NPOMA, 54 U.S.C. 100705 and 100706) encourages use of parks for study to benefit park management and broader science. National Park Service Management Policies 2006 4.2 encourages publication of information derived from studies conducted in the National Park System. Section 205 of the NPOMA (54 U.S.C. 100705) constrains the use of parks for scientific study to those studies that are consistent with the laws and management policies of the parks and that can be conducted in a manner that poses no threat to park resources or public enjoyment. The National Park Service (we, NPS) has existing regulations that prohibit the disturbing, removing, or possessing of natural, cultural, and archeological resources (36 CFR 2.1) and that govern the collection of specimens in parks (36 CFR 2.5) for the purpose of research, baseline inventories, monitoring, impact analysis, group study, or museum display. We use a permit system to manage the conduct of scientific research and collecting in parks and our Museum Management Program manages collected specimens or portions or derivatives of those specimens that are to be retained permanently.

Scientific studies and science education activities in parks that might disturb resources or visitors, require authorization of an otherwise prohibited activity, or involve the collecting of specimens generally are conducted under permit. NPS policy regarding studies and collections, including surveys, inventories, monitoring, research, and data and specimen collection, conducted by other than NPS employees on official duty, requires an NPS scientific research and collecting permit. This policy also requires that all studies conform to NPS policies and guidelines regarding collection, reporting, and publication of accomplishments and data;

conduct of studies; wilderness restrictions; and requirements identified in the terms and conditions of a permit. In addition, this policy requires that projects be administered and conducted by fully qualified personnel and conform to current standards of scholarship. Finally, this policy provides that researchers who apply for and receive scientific research and collecting permits may be asked, based on NPS analysis of the individual study proposal and as an agreed condition to the associated permit, to provide a variety of products to the park issuing the permit. In keeping with the public nature of parks, permanently retained natural resource collections remain Federal property and are managed as NPS museum collections together with permittee-provided copies of associated field records. In addition, we expect that results of all scientific activities conducted in parks will be made available to the public through technical and, as appropriate, popular publication outlets. During the past 19 years, we have found that the existing scientific research and collecting permit system is being used also by applicants seeking permission to conduct science education activities in parks.

We have a long tradition of soliciting and disseminating annual progress reports from scientists holding NPS permits to conduct scientific research and collecting in parks. Section 201 (5) of NPOMA (not repealed but omitted from the text of title 54 U.S.C.) encourages the publication and dissemination of information from studies conducted in parks. One mechanism for fulfilling this encouragement is the Investigator's Annual Report, which provides annual collection and publication by the NPS of information briefs from permittees about the interim results and findings of their permitted research being conducted in the parks. A second mechanism for fulfilling this encouragement is to involve scientists who want to conduct science education activities in parks.

Legal Authorities:

- 54 U.S. Code §100101 National Park Service Organic Act of 1916
- 54 U.S. Code § 100705. AVAILABILITY OF SYSTEM UNITS FOR SCIENTIFIC STUDY
- 54 U.S. Code § 100706. INTEGRATION OF STUDY RESULTS INTO MANAGEMENT DECISIONS
- 36 CFR § 2.1 - PRESERVATION OF NATURAL, CULTURAL AND ARCHEOLOGICAL RESOURCES
- 36 CFR § 2.5 - RESEARCH SPECIMENS

2. Indicate how, by whom, how frequently, 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.

National Park Service Forms 10-741a (Application for a Scientific Research and Collecting Permit) and 10-741b (Application for a Science Education Permit) collect information from persons seeking a permit to conduct natural or social science research and collection activities in individual units of the National Park System. The information we collect includes, but is not limited to:

- Names and business contact information.
- Project title, purpose of study, summary of proposed field methods and activities, and study and field schedules.
- Location where scientific activities are proposed to take place, including method of access.
- Whether or not the study proposes that specimens will be collected or handled, and if yes, scientific descriptions and proposed disposition of specimens.
- If specimens are to be permanently retained, the proposed repositories for those specimens.

Permittee Field Check-In Report and 10-741D Permittee Field Check-Out Report:

The application and permitting process must start well before planned field work. The field start and end dates, locations, and methods of transport proposed in the application are generally estimations which are subject to change. However, Permittee response to the Field Check-In/Check-Out Reports in relation to time actually spent in the park will provide park resource management personnel, law enforcement and safety personnel real time awareness of what, when, and where activities are taking place within the park. Real time knowledge of permitted activities is crucial to law enforcement personnel who will use this information to account for activities that would otherwise be illegal; safety personnel to track, find or contact researchers if necessary; and park resource management personnel to monitor the impact of permitted activities. We anticipate that the majority of the smaller parks will not choose to use this report, so respondent permittees will constitute about a third of permits issued. The Permittee Field Check-In/Check-Out Reports are accessed through the Internet-based, automated Research Permit and Reporting System (RPRS). Pre-filled information derived from the permit record that remains accurate requires respondent review but no new input of information.

We encourage all respondents to use RPRS to complete and submit applications and reports. For those who do, much of the information needed for the Field Check-in/Check-out Reports and the Investigator's Annual Report is pre-filled automatically from the permit record.

Respondents are asked to provide the following information on the Field Check-in/Check-out forms:

Table 2.1 Check-In Report

| Requested Information | Reason for Question |
|--|--|
| Field Start and End dates | <ul style="list-style-type: none"> • Pre-filled from permit but can be edited to update. • This information will alert management staff that permitted research studies are active or ended. |
| Field Contact Phone Type(s) | <ul style="list-style-type: none"> • Informs the park whether the phone number will work when the field contact is in the field. |
| Residence during fieldwork trip | <ul style="list-style-type: none"> • Enhances the park's ability to communicate with the field contact, and to verify whether fieldwork is taking place. |
| Vehicle Make, Model, and License Plate Number | <ul style="list-style-type: none"> • Allows park to account for vehicles parked in areas outside of normal visitor parking options and to locate field personnel in remote areas. |
| <p>Checkboxes to acknowledge:</p> <ul style="list-style-type: none"> • advanced permission to conduct field work during night-time hours • backcountry camping permit for this trip • special permission to work in public view in the field • receipt of special permission to work in public view in the field approved over flight (aerial survey, telemetry flights, remote sensing, etc.) . • permission to survey park visitors • permission to conduct scientific studies in the wilderness or closed areas | <ul style="list-style-type: none"> • Parks need to know when and where these activities, which without permit would be illegal, occur. Through this information parks may account for, track, manage, and mitigate. |

Table 2.2 Check-Out Report

| Requested Information | Reason for Question |
|--|--|
| Names of field work site(s) | <ul style="list-style-type: none"> • To confirm all field work site locations to account for equipment or site disturbances, verify site conditions were managed to permit requirements, and to protect visitor safety. |
| GIS or specific coordinate location of each field site | <ul style="list-style-type: none"> • Exact location of field work sites allows parks to track equipment left in the field, protect park resources, verify that site conditions were managed to park requirements and conduct mitigation if they were not. |
| Number of days at each site | <ul style="list-style-type: none"> • Allows parks to calculate the potential impact of the permitted activities at each specific site, especially sites where resources are fragile and can sustain limited impact. |
| Number of researchers at each site | <ul style="list-style-type: none"> • Helpful information for the calculation of the impact of permitted activities. This information is especially |

| Requested Information | Reason for Question |
|--|---|
| | important if site resources are fragile and can sustain only limited visitation. |
| Equipment left at each site | <ul style="list-style-type: none"> • Parks use this information to track exact location of equipment left in field. This information informs visitor experience and safety efforts, resource protection efforts, and is used to track compliance when equipment removal is a permit requirement. |
| Types and quantities of specimens from each site visited | <ul style="list-style-type: none"> • Provided at the end of the field activity to verify the scope of the collection. This information is required for parks to meet their responsibility to preserve park resources and to track all collections, which remain Federal Property. |
| Other Comments | <ul style="list-style-type: none"> • Optional field which gives the permit holder the opportunity to give NPS feedback on their scientific study experience, and the opportunity to make clarifications or comments to supplement information they have provided on the form. |

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

The Research Permit and Reporting System allows electronic submissions via the internet and automated processing that make the application and reporting process as efficient as possible. Applicants can upload preexisting proposals and peer reviews to reduce the burden of creating duplicative documents they previously have obtained. Respondents use (or create) a protected account to access all forms in this collection using the RPRS website at <https://irma.nps.gov/rprs>. Applicants use RPRS to draft, print drafted, and submit final versions of applications, Investigator’s Annual Reports, and check-in/check-out forms from their accounts. Additionally, the System automatically sends confirmations of receipt of documents to the respondent’s email address provided in their account. Respondents may also contact the park research coordinator (by email or phone) to request a copy of a submitted form. Those few respondents who are unable to access the Internet (likely much less than 1% of all respondents) may submit paper applications and forms directly to the park of interest by mail.

User accounts are protected by username and password, and account holders may save all

documents as drafts with the ability to return to RPRS (at their convenience) to complete the process. RPRS provides account holders with a secure method to communicate with parks, assign permissions to other agents to use the account, and transfer information between accounts.

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.

The information collected using the forms and reports in this request is unique and project specific, therefore no other source is available. Since circumstances for conducting scientific studies and activities in parks vary by project, there is no available information that can be used in lieu of that supplied by each applicant. With this, no duplication of effort has been identified.

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

The small entities that could be affected by the requirements of this information collection include small, independently owned scientific research organizations and small-entity providers of field science education. The steps involved in the application and reporting process are the same as for as any other entity. The burden is the same for small businesses as for other entities applying to conduct scientific studies in parks. As a result, there is no significant economic impact on small entities within the meaning of the Regulatory Flexibility Act (5 U.S.C. 601, *et seq.*). Thus, no special provision has been made for small businesses.

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.

Failure to collect necessary information from applicants requesting permission to conduct studies or activities in parks would result in no permitted scientific studies being allowed in parks. Failure to have permitted scientists conducting scientific activities in parks would prevent compliance with the National Parks Omnibus Management Act of 1998 and NPS Management Policies 2006. Such failure also would reduce the availability of park-based scientific study results for use in park management and public information programs.

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

- * requiring respondents to report information to the agency more often than quarterly;**
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * requiring respondents to submit more than an original and two copies of any document;**
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least every three years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On July 7, 2022, we published in the Federal Register (87 FR 40547) a notice of our intent

to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on September 6, 2022. We did not receive any comments.

In addition to the Federal Register Notice, we consulted with six (6) individuals familiar with this collection of information in order to validate our time burden estimates and asked for comments on the questions below the following table. Respondents included:

| Title | Affiliation |
|------------------------------|---------------------------------|
| Research Scientist | U.S. Geological Survey |
| Assistant Professor | University of Oregon |
| Research Scientist | State of Colorado |
| Professor | California Polytechnic Humboldt |
| Professor | Montana State University |
| Postdoctoral Research Fellow | U.S. Forest Service |

Question 1: “Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”

Comments: Representatives were supportive of the need to collect application and reporting information. Some respondent comments are copied below:

- “Most, if not all of the information that is requested makes sense and should help park managers with assessing and managing the research.”
- “I didn't find any of the questions to be too onerous and could see why the Park would want to know the information they asked for. No need for multiple phone number fields, or fax.”
- “I thought that the form was fair and collected reasonable information. It seemed that the information collected would have been useful for NPS staff.”

NPS Response/Action Taken: No Response Required

Question 2: “The accuracy of our estimate of the burden for this collection of information:

Comments: Representatives agreed with our burden estimates for Check-in and Check-out Reports but felt our burden estimates for the Application and the Investigator's Annual Report were too low. Some respondent comments are copied below:

- “Check-In and Check-Out Reports - 5 min each.”
- “The IAR typically takes between 30 and 60 minutes.”
- “The estimated burden is grossly underestimated for forms 10-226 and 10-741A. I would double both of those estimates.”
- “Application and Annual Report - 2 hours each.”
- “Annual Report 1 hour. The estimated time on the form is 15 minutes, which seems low unless the report is duplicates information already prepared for other

reports. Application 1 hour. I copied and pasted relevant information from related applications and proposals.”

NPS Response/Action Taken: We have increased our estimated burden to match the average of representative’s estimates. The new numbers are reflected below in Table 12.1.

Question 3: “Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: No specific suggestions for enhancing the quality, utility and clarity of the information to be collected were provided by respondents. Nor were any specific elements of the forms lacking quality, utility and clarity.

NPS Response/Action Taken: No Response Required

Question 4: “Ways to minimize the burden of the collection of information on respondents”

Comments: Most respondents said they were not burdened by the forms and offered no specific suggestions to minimize burden. Two specific comments were offered related to geographic coordinates:

- “When submitting sampling coordinates (e.g., for sampling permits and for researcher check-ins/checkouts) it would be nice if the system also accepted coordinates in decimal degrees (datum WGS84), rather than just UTM. The conversion to UTM is always a bit tedious and could easily be automated on the NPS’s side.”
- “Putting where the GIS locations are always takes forever. Being able to view previous locations and just tick/highlight them would be much easier. This takes me way longer than any other part.”

NPS Response/Action Taken: We will include these points as a recommendation in the next round of technical updates to the application. We cannot ensure that the recommendations will be incorporated, based on budgetary constraints.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Each collection of information form tells the respondent: “All or some of the information you provide may become available to the public.”

Permit General Condition No. 7 tells the permittee: "The permittee is responsible for the content of reports and data provided to the National Park Service." The information provided by permittees in their Investigator's Annual Reports is posted for public access on the RPRS site (see Section 6.1 in the document available at: <https://irma.nps.gov/DataStore/DownloadFile/494280>). Other information provided by respondents as part of this collection may become available to the public. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. We ask for official name and contact information, not personally identifying information. The information in RPRS can be retrieved by applicant and permittee name and contact information. NPS has an approved System of Records Notice (SORN) (see https://doi.gov/privacy/nps_notices).

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

We do not ask questions of a sensitive nature.

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

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."**

We estimate that we will receive **8,590** responses totaling **6,884** burden hours. We estimate that the dollar value of the annual burden hours is **\$327,851** (rounded).

We used the Bureau of Labor Statistics (BLS) News Release [USDLE23-0488](https://www.bls.gov/news.release/USDLE23-0488), March 17,

2023, Employer Costs for Employee Compensation— - December 2022, to calculate the total annual burden. We used Table 1 to calculate the total compensation rate (average per hour) including benefits for all workers in the following categories:

- Individuals (Civilian workers): \$42.48
- Private Sector: \$40.23
- State and Local Government: \$57.60

TABLE 12.1. Total Estimated Annualized Burden

| Activity | Number of Annual Responses | Completion Time per Response | Total Annual Burden Hours | Hourly Rate Including Benefits | \$ Value of Annual Burden Hours |
|--|----------------------------|------------------------------|---------------------------|--------------------------------|---------------------------------|
| Form 10-741a, "Application for a Scientific Research and Collecting Permit" | | | | | |
| Individuals | 260 | 1.5 hours | 390 | \$42.48 | \$16,567 |
| Private Sector | 1,600 | 1.5 hours | 2,400 | 40.23 | 96,552 |
| Government | 1,330 | 1.5 hours | 1,995 | 57.60 | 114,912 |
| Subtotal | 3,190 | | 0 | | 0 |
| Form 10-226, "Investigator's Annual Report" | | | | | |
| Individuals | 270 | 30 minutes | 135 | \$42.48 | \$5,735 |
| Private Sector | 1,640 | 30 minutes | 820 | 40.23 | 32,989 |
| Government | 1,360 | 30 minutes | 680 | 57.60 | 39,168 |
| Subtotal | 0 | | 0 | | \$77,892 |
| Form 10-741B, "Application for a Science Education Permit" | | | | | |
| Individuals | 30 | 1 hour | 30 | \$42.48 | \$1,274 |
| Private Sector | 50 | 1 hour | 50 | 40.23 | 2,012 |
| Government | 50 | 1 hour | 50 | 57.60 | 2,880 |
| Subtotal | 130 | | 130 | | 06,166 |
| Form 10-741C, Field Work Check-in Report | | | | | |
| Individuals | 80 | 10 minutes | 13 | \$42.48 | \$552 |
| Private Sector | 520 | 10 minutes | 87 | 40.23 | 3,500 |
| Government | 400 | 10 minutes | 67 | 57.60 | 3,859 |
| Subtotal | 1,000 | | 167 | | 0 |
| Form 10-741D, Field Work Check-out Report | | | | | |
| Individuals | 80 | 10 minutes | 13 | \$42.48 | \$552 |
| Private Sector | 520 | 10 minutes | 87 | 40.23 | 3,500 |
| Government | 400 | 10 minutes | 67 | 57.60 | 3,859 |
| Subtotal | 1,000 | | 167 | | 0 |
| TOTALS | 8,590 | | 6,884 | | \$327,851 |

*Figures rounded to match ROCIS.

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no non-hour burden cost to respondents.

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

We estimate that the total cost to the Federal Government to administer this information collection is **\$36,957,600** (rounded). This includes federal salary costs and benefits and the cost associated with reviewing and processing applications and reports based upon hourly rates (see tables below)

To determine average hourly rates, we used Office of Personnel Management Salary Table [2023-RUS](#) as an average nationwide rate. In accordance with (BLS) News Release [USDL-23-0488](#), March 17, 2022, Employer Costs for Employee Compensation - we multiplied the hourly rates by 1.59 to account for benefits.

Table 14.1 Annualized cost to the Federal government – weighted hourly rate

| Position | Grade/Step | Hourly Pay Rate | Hourly Rate Including Benefits (1.6 x hourly rate) |
|---------------------------------|------------|-----------------|--|
| Administrative | GS-07/05 | \$ 25.36 | \$ 40.58 |
| Technician | GS-09/05 | 31.02 | 49.63 |
| Scientist | GS-13/05 | 53.49 | 85.58 |
| Curator | GS-11/05 | 37.53 | 60.05 |
| Weighted Average (\$/hr) | | | \$58.96 |

Table 14.2 Total Annualized Cost to the Federal Government

| Activity | Total hours | Weighted Average Cost (\$/hr) | Total cost (\$) |
|---|-------------|-------------------------------|-------------------|
| Process Application | 40 | \$ 59 | \$ 2,360 |
| Process specimen application (curator) | 10 | \$ 59 | 590 |
| Monitor permit | 24 | \$ 59 | 3,186 |
| Receive reports | 4 | \$ 59 | 236 |
| Manage specimens | 8 | \$ 59 | 472 |
| Total Weighted Cost per Permit | | | 0 |
| <i>Total [\$6,844 (Weighted Cost) x 5,400 (avg. number of active permits to administer annually calculated over a three-year span)]</i> | | | 36,957,600 |

15. Explain the reasons for any program changes or adjustments.

The net increase of 1,200 hours is due to the adjustment in the time to complete Forms 10-741 and 10-266. This change was made based on the comments received in response to the estimate of burden (see Question 8 above).

Table 15.1 Program Changes

| Form | Previously Approved | | Current Request | | Net change | |
|----------------|----------------------------|---------------------------|----------------------------|---------------------------|----------------------------|---------------------------|
| | Number of Annual Responses | Total Annual Burden Hours | Number of Annual Responses | Total Annual Burden Hours | Number of Annual Responses | Total Annual Burden Hours |
| 10-741A | | | | | | |
| Individuals | 260 | 359 | 260 | 390 | 0 | 31 |
| Private Sector | 1,600 | 2,208 | 1,600 | 2,400 | 0 | 192 |
| Government | 1,330 | 1835 | 1,330 | 1,995 | 0 | 160 |
| 10-226 | | | | | | |
| Individuals | 270 | 68 | 270 | 135 | 0 | 67 |
| Private Sector | 1,640 | 410 | 1,640 | 820 | 0 | 410 |
| Government | 1,360 | 340 | 1,360 | 680 | 0 | 340 |
| 10-741B | | | | | | |
| Individuals | 30 | 30 | 30 | 30 | 0 | 0 |
| Private Sector | 50 | 50 | 50 | 30 | 0 | 0 |
| Government | 50 | 50 | 50 | 30 | 0 | 0 |
| 10-741C | | | | | | |
| Individuals | 80 | 13 | 80 | 13 | 0 | 0 |
| Private Sector | 520 | 87 | 520 | 87 | 0 | 0 |
| Government | 400 | 67 | 400 | 67 | 0 | 0 |
| 10-741D | | | | | | |

| Form | Previously Approved | | Current Request | | Net change | |
|----------------|----------------------------|---------------------------|----------------------------|---------------------------|----------------------------|---------------------------|
| | Number of Annual Responses | Total Annual Burden Hours | Number of Annual Responses | Total Annual Burden Hours | Number of Annual Responses | Total Annual Burden Hours |
| Individuals | 80 | 13 | 80 | 13 | 0 | 0 |
| Private Sector | 520 | 87 | 520 | 87 | 0 | 0 |
| Government | 400 | 67 | 400 | 67 | 0 | 0 |
| TOTAL | 8,590 | 5,684 | 8,590 | 6,884 | 0 | 1,200 |

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.

This collection of information package is not intended to produce any specific publication. Although they are part of the public record, the applications and permits are not published. The Investigator's Annual Reports, prepared and entered into RPRS by the permittees, are released to public availability on the Internet site once park staff have reviewed them and found them appropriate for posting in the System. NPS has no plans for any tabulation, analytical analysis, or publication of tabulations or syntheses.

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

We will display the OMB control number and expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.