

1 Supporting Statement A

Bird Banding and Recovery Reports

OMB Control Number 1028-0082

Terms of Clearance: None

Justification

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

In accordance with the Migratory Bird Treaty Act, 16 U.S.C. 703-712, the capture, banding, and marking of wild migratory birds by persons holding federal permits must be monitored. The United States Bird Banding Program is the responsibility of the U.S. Geological Survey (USGS) Bird Banding Laboratory (BBL). The primary role of the BBL is to support the use of banding and banding data by researchers and managers engaged in science, conservation, and management of birds.

The BBL attempts to achieve the following three objectives related to this information collection:

1. Ensure through the federal permitting process that bird banders know how to safely capture and band birds, collect data accurately, and maintain birds in humane and healthful conditions.
2. Ensure that banders describe a clear justification and goals for the banding projects they've planned
3. Maintain an automated, electronic system to efficiently verify, accept, store and manage data associated with individually banded, marked or rebound birds.

The BBL collects information using three forms: 1) *Application for Federal Bird Banding or Marking Permit*, 2) *Federal Bird Banding or Marking Permit Renewal Form*, 3) *The Bird Banding Recovery Report*. This information also assists the U.S. Fish and Wildlife Service to fulfill its responsibilities designated by international migratory bird treaties with Canada, Mexico, Japan, and Russia and provides a vital dataset assisting state and federal waterfowl biologists to set yearly hunting regulations

- 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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The BBL has a critical role in permitting banding and marking wild migratory birds in the United States, storing and maintaining data on banded and marked birds, particularly to facilitate coordination between banders and people who later encounter the banded or marked birds, and to ensure the data are available

for later analyses. The BBL works toward increasing the types and amounts of data that are being collected and stored while increasing the efficiency of data collection and storage to reduce overall costs.

The three forms described in this package are used for separate purposes. The *Application for Federal Bird Banding or Marking Permit* (See A below) is used to identify individuals and evaluate their purpose, need, and qualifications to hold a Bird Banding Permit. If a permit is granted, then the identifying information about the individual is entered into the BBL database, a permit is issued, and the application is stored and maintained as a permanent record. The permit program is designed and carried out to protect birds covered by Federal statutes and to enhance research and management efforts. BBL has a regulatory responsibility (50 CFR 21) to ensure that birds are captured and marked in an ethical and safe manner. The permit system is consistent with legal regulations.

The *Federal Bird Banding or Marking Permit Renewal Form* (See B below) is used by permitted banders to renew their Federal banding permits. It collects the same contact information as the original application and this information is also stored and maintained as a permanent record. This form is a part of the BBL permit program with the same regulatory responsibility as described in the preceding paragraph.

The *Recovery Report Form* is (See C below) used by individuals that encounter a banded or marked bird to report the information to the BBL. All of the information on the bird and the person reporting the bird are stored in the BBL database. The information about these individuals is used to generate a personalized Certificate of Appreciation and may be used to contact them if any discrepancies are encountered with the reported information.

A. Application for Federal Bird Banding or Marking Permit

This application is submitted by those parties who wish to become bird banders. These “parties” include governmental agencies, businesses, universities, nongovernmental organizations and individuals. The data collected is used by the BBL to determine the applicant’s qualifications for a Federal Bird Banding or Marking Permit. It is essential that the applicant be well qualified and has a valid research or management need for the permit.

The current version of this application is a modifiable pdf form. The applicant must print the form and return it by mail or fill out the modifiable form and send it email to the BBL permit office in Laurel MD.

New permittees must fill out all applicable sections of the application. The applicant will need supply ancillary documents including a resume and written description of the planned activities as outlined in the Permit Application Instruction found at https://www.usgs.gov/centers/pwrc/science/permit-application-instructions?qt-science_center_objects=0#qt-science_center_objects.

B. Federal Bird Banding or Marking Permit Renewal Form

This form is completed by permitted bird banders when their banding permits need to be renewed. As set by regulations, most BBL permits are renewed every 3 years. This form is only available electronically at: <https://www.pwrc.usgs.gov/BBL/homepage/renewalform.cfm>. The banders fill out the required fields and the submission process provides an electronic signature for the form. This process is used only for permit renewals and no changes to authorizations on the banding permit can be made through this form.

C. Recovery Report

This form is submitted by anyone who finds a banded or marked bird and wishes to report it to the BBL. The data collected are used by Federal, Provincial, and State personnel and scientific cooperators to aid in the study of population size, mortality and survival rates, longevity, and migration patterns of wild birds. Band recovery information is also one of the most important tools used in the preparation of annual hunting regulations by state and federal waterfowl management officials.

Recovery Reports are submitted electronically through a secure website accessed at the URL below

The BBL sends electronic Certificates of Appreciation to everyone reporting a banded bird. Additional information such as email address is collected in case the BBL has questions concerning the band encounter. This form is available on the BBL website in:

- English at: <http://www.reportband.gov>;
- Spanish at: https://www.pwrc.usgs.gov/BBL/bblretrv/index_v_sp.cfm; and
- French at: https://www.pwrc.usgs.gov/BBL/bblretrv/index_v_fr.cfm

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 Application for Federal Bird Banding or Marking Permit is currently available on the BBL web site (<https://www.usgs.gov/labs/bird-banding-laboratory>) as an electronic pdf file that can be submitted electronically by email to the BBL. To ease the burden on applicants needing to print and mail this form to the BBL, this electronically fillable form has been in place since the last ICR renewal and nearly are submitted by email. No questions have been changed or modified since the last ICR approval

The Federal Bird Banding or Marking Permit Renewal Form is an entirely electronic form submitted from the website directly to the BBL permit processing section. The information is being collected with less effort because the banders no longer have to deal with the preparation and submission of paper forms for this process.

The Recovery Report is an entirely electronic form submitted from the website (www.reportband.gov) directly to the BBL. This web reporting has been in place since the last ICR approval renewal and the information collected has not changed since that time

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.

There is no duplication of efforts because banding activity in the United States is regulated only by the BBL. The information collected by the BBL is not being collected by any other Federal agency. The

BBL is part of an international project, the North American Bird Banding Program, that is run in cooperation with the Bird Banding Office Canada Wildlife Service (BBO). The BBL is gathering and storing data for both countries through an international agreement that, in turn, saves the BBO many operating expenses.

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

We only collect the minimum information necessary to meet our legal responsibilities and scientific objectives.

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.

Without this information collection, the Department of the Interior could not meet its legal responsibilities under the Migratory Bird Treaty Act. The data collected are also essential to setting annual bird hunting/harvest regulations established by the U.S. Fish and Wildlife Service and as a basis for important research publications. The frequency of collection is necessary to achieve the legal requirements and research objectives.

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 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 once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On September 1, 2023, the Bird Banding Lab published a 60-day Federal Register notice (83 FR 62882) announcing that this ICR would be submitted to OMB for approval. In that notice public comments for 60 days, ending February 4, 2023. In this notice, we now note there was a minor typographical error in the estimated completion time for the *Permit Renewal Form*. The total time for completion should have been 3 minutes not 30 minutes. This minor difference resulted in little change in the total burden hours (180 hours).

We also received one comment in response to that notice noted below

Comment #1

The Ornithological Council appreciates the opportunity to offer comments on the bird banding permit application and renewal forms used by the U.S. Geological Survey's Bird Banding Laboratory (BBL). The Ornithological Council is a consortium of scientific societies of ornithologists. The research conducted by their members spans the globe and their cumulative expertise comprises the knowledge that is fundamental and essential to science-based bird conservation and management. The members of these scientific societies may be researchers working for academic institutions, museums, agencies or non-profit organizations. Their work runs the gamut from field research, to teaching, to curating museum collections. Collectively, the ornithological research they conduct and facilitate enables ornithological conservation around the globe. Federal permit applications, policies, and regulations are a priority of the Ornithological Council, as such permits are often a prerequisite for the scientific research undertaken by

ornithologists. Therefore, we appreciate the USGS's attention to improving efficiency and reducing regulatory burden through this Information Collection. We have organized our comments according to the questions posed by the U.S. Geological Survey in their Federal Register Notice. (1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility. As noted above, banding permits are essential for much of the work that ornithologists do. We support the BBL and the banding program, and we value the work that it does. We agree that the information collected by banding permit applications and renewal forms are necessary for the Lab's functions and we provide minor suggestions below to improve those forms, reduce the burden on applicants and banders, and improve clarity of the application requirements. (2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used. The agency estimates the time to complete a banding application at 30 minutes. That estimate is low if it is meant to include time to prepare the required additional documents that must be provided along with the application form (as discussed below). We suggest that 60-90 minutes is a more realistic estimate. (3) Ways to enhance the quality, utility, and clarity of the information to be collected. The application asks applicants to attach a one-page description of what they hope to achieve with their banding project. The checklist (a separate form also required for the application to be complete) requires applicants to attach a resumé/CV and a 'comprehensive research project description.' Any revisions should make clear whether the same document can be used for both purposes. As the Bird Banding Lab's website notes, the list of capture methods in Box 12 of the application is not complete, but the BBL requires listing all desired capture techniques on permit applications (banders are to attach a short narrative indicating all capture techniques that they intend to use for their banding activities). We encourage you to either list all possible capture methods in Box 12, or list none and request that applicants list their desired methods in that space. Providing check boxes for some, but not all, methods is confusing for applicants. Clarification about whether a simple list of proposed methods suffices, or whether the applicant's prior experience with each method should be indicated there (as opposed to in the resumé or CV), would be helpful, as well. Currently, the banding application asks applicants if they would like to be authorized to sample blood or feathers. The BBL website indicates that "permits can authorize the collection of blood samples, feather samples, and mouth swabs from birds that are also banded and/or marked." We encourage you to add authorization for mouth swabs to the application, so it is clear that swabs are authorized. In addition, over the years, there has been some confusion over whether banding permits can authorize cloacal samples or whether a separate scientific collecting permit is needed from the U.S. Fish and Wildlife Service. We encourage the BBL to also add a question regarding cloacal swabs to the application form. We note that mouth swabs and tracheal swabs are mentioned in the application checklist, but not on the application itself. (4) How the agency might minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response. We encourage USGS to develop a system to allow online submission of the banding application form and all supplementary materials. Such a system should also allow online tracking of application status and easy renewal of permits. Finally, the affirmation at the bottom of the application form requires applicants to comply with the Bird Banding Manual. We encourage you to provide a link to the most recent edition of the Manual on the form, or to the equivalent information on the Lab's website, if the Manual is no longer current. Thank you for considering the views of ornithologists. Sincerely, Laura M. Bies Executive Director

Response to Comment #1

The USGS Bird Banding Laboratory recognizes the valued partnership with the Ornithological Council

and appreciates the comments regarding *Bird Banding Permit Application form*. As the Council represents ornithologists that routinely require a federal banding permit for their research on wild birds, the comments are valuable user feedback to help the Bird Banding Lab collect the required information to properly review a permit application while limiting the burden and redundancy within the form. Based on these comments, we've adjusted the burden time for the Permit Application Form as suggested from 30 to 60 minutes. Although the form has not changed, previous calculations of the burden time appear to have not adjusted over time to include additional time required to prepare ancillary documents, a factor that could only be estimated using real applicants.

The council has also provided some very practical and actionable suggestions to improve the application form. We concur that this application form needs to be updated with some of these suggestions. However, these updates will require an **Information Collection Modification** and changes to the application form itself. Once the renewal is complete, we are planning to initiate an information collection modification to the form that will address the comments more completely as well as some necessary internal programmatic changes in FY 2025. This modification will bring the form up to current standards and practices while reducing the noted redundancy within the form.

With regard to consultation with user groups, each year the BBL receives numerous comments from bird banders on the entire permit application process and the lab uses this feedback to improve its permitting related activities. The initiation of the electronic permit renewal form has been very favorably received by bird banders who consider this electronic form to be a vast improvement over the previous process of submitting a paper renewal application. We've also received favorable feedback on the conversion to an electronic fillable pdf form for the Banding Permit Application Form. In an effort to assist applicants filling out the application, BBL has completely rewritten and improved the instructional pages for the application including the addition of an optional user friendly checklist for the applicant's review. These two enhancements help guide applicants to provide the precise information needed while not altering the original application form with new or burdensome questions.

The current Recovery Reporting website was released in September 2012 and the BBL has received numerous comments about its usability. The comments have been wide-ranging though overall favorable and the volume of users has steadily increased annually. Based on these comments we've made improvements to the site annually that speak to improving the user experience and lowering the burden on the user without changing the form questions from the original OMB approval.

In lieu of requesting outside comments on form functionality from a few individuals, beginning in the fall of 2017 the BBL began a collaborative effort with the University of Baltimore's graduate program in Interaction Design and Information Architecture. This collaboration provided the BBL with a design and usability review of the BBL website where the forms reside and more specifically the site pages where the *Recovery Report Form* is found (reportband.gov). This project resulted in a new layout and framework for the existing *Recovery Report Form*. This new design (completed in 2019) improved the usability of the site while not changing the amount or type of information collected. Unfortunately, due to a number of urgently required internal database structural changes, the implementation of an updated *Band Recovery Report* reporting website has been delayed. We hope to initiate this project in the next year or two.

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

There is no monetary value associated with this collection. The BBL provides an electronic Certificate of Appreciation to people reporting bands to the BBL via the *Recovery Report* website.

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

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 request information 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.**

We estimate the total burden for this collection will be approximately 4,734 hours (See Table 1),

including time to read instructions, gather information, and complete the forms. The burden estimates in this supporting statement are based on our prior experience with the permit application forms and permit renewal website; the known average time for submissions the recovery reporting page; and the outreach described in item 8.

We expect to receive approximately 80 new permit applications annually requiring each respondent approximately 60 minutes to complete, totaling 80 burden hours. We expect to receive approximately 400 permit renewal forms annually requiring each bander 3 minutes to complete, totaling 20 burden hours. On average, we anticipate receiving approximately 92,670 recovery reports annually requiring approximately 3 minutes to complete, totaling 4,634 burden hours

We estimate the total dollar value of the annual burden hours to be \$201,988 (see Table 1). The hour cost is based on BLS news release USDL-23-0488 of March 17, 2023, for average full compensation per hour including benefits for private industry. The particular values utilized are:

- Private sector. Average hourly wage is \$42.48
- States/tribal/local governments. Average hourly wage is \$57.60

Table 1. Estimated Value of Annual Burden Hours

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Value of Burden Hour Including Benefits</i>	<i>Value of Annual Burden Hours</i>
Permit Application					
Private Sector	70	60 minutes	70	\$42.48	\$2,974
State/local/tribal govt	10	60 minutes	10	\$57.60	\$576
Subtotal	80		80		\$3,550
Renewal Form					
Private Sector	370	3 minutes	18.5	\$42.48	\$786
State/local/tribal govt.	30	3 minutes	1.5	\$57.60	\$86
Subtotal	400		20		\$872
Recovery Report					
Private Sector	91,670	3 minutes	4,583.5	\$42.48	\$194,686
State/Local/Tribal	1,000	3 minutes	50	\$57.60	\$2,880
Subtotal	92,670		4,634		\$197,566
TOTAL	93,150		4,734		\$201,988

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

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or

contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour cost burden to applicants under this collection. There is no fee for any permit application and there is no charge associated with submitting a *Recovery Report*

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

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$39,500 (Table 2). This total includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2018-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf) to determine the hourly rate. We multiplied the hourly rate by 1.6 to account for benefits.

Table 2. Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time per task	Annual Cost
Permit Application					
Application Examiner	GS-7/10	33.08	52.93	100 hrs	\$5,293
Chief, BBL	GS-13/5	60.83	97.33	50 hrs	\$4,866
3 Wildlife Biologists	GS-12/3	48.15	77.04	50 hrs (x3)	\$3,852
	GS-12/4	49.65	79.44		\$3,972
	GS-12/8	55.67	89.07		\$4,453
Subtotal					\$22,436
Permit Renewal Form					
Application Examiner	GS-7/10	33.08	52.93	100 hrs	5,293
Subtotal					\$5,293
Recovery Report					
Wildlife Biologist	GS 12/3	48.15	77.04	150 hrs.	\$11,556
Wildlife Biologist	GS-9/1	31.12	49.79	100 hrs.	\$4,979
Subtotal					\$16,535
Total					\$39,500

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

Since the last ICR in 2019, little has changed in the BBL program with regard to the Permit Application Form and Permit Renewal Forms. None of the original questions have changed. However, we've re-written a number of the instructional web pages that help guide respondents to provide more concise answers to the application questions.

There has been a measurable increase in the burden hours since the last ICR for the *Recovery Report* and we estimate that the *Recovery Report* will receive approximately 18,000 more respondents annually than the previous ICR. This is based on a running three average number of band recovery reports submitted by those accessing the form. This increase is direct result elimination of the BBL's call center contract in 2015 (noted in the previous ICR) and a continued increase in the number of band recovery reports filed annually on reportband.gov.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be

used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The band recovery data are published in two online repositories and available for public download below. The data are also available through a personalized data query if requested.

1. ScienceBase: <https://www.sciencebase.gov/catalog/item/632b2d7bd34e71c6d67bc161>
2. BBL Data Visualization and Download portal (<https://www.usgs.gov/tools/explore-and-request-data-bbl>)

Finally, the BBL also provides the gamebird banding recovery dataset to state and federal (US Fish and Wildlife Service) waterfowl biologists on an annual basis. These data are vital for managing waterfowl populations and setting annual waterfowl hunting regulations at the state and federal level.

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 OMB's expiration date on all information collection instruments associated with this request, including the websites

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.