1SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION

Programmatic Clearance for
U.S. Fish and Wildlife Service Social Science Research
OMB Control Number 1018-New

Terms of Clearance – None.

Introduction

The Human Dimensions Branch (HD Branch) of the Natural Resource Program Center, on behalf of the U.S. Fish and Wildlife Service (Service, we), requests a programmatic clearance to enable the Service to more efficiently and effectively conduct research through standard social science methods (public surveys, focus groups, and interviews, and other information collections). Data from collections undertaken through this proposed programmatic clearance would provide information for agency management, planning, and monitoring and evaluating the National Wildlife Refuge System (Refuge System) and other Service program efforts generally, and the Urban Wildlife Conservation Program and the National Wildlife Refuge Visitor Survey, specifically.

As part of the Service's Refuge System, the HD Branch examines the complex relationships between people and the wildlife and habitats the Refuge System protects. In the Service, both biological and social sciences inform landscape-scale management of wildlife and their habitats. We offer decision-makers scientifically based information on social systems for conservation planning, design, implementation, and monitoring and evaluation. Building a connected conservation community ensures continued protection of wildlife resources for the American people.

Monitoring and evaluating activities of the Refuge System and other programs of the Service are essential components of an adaptive management cycle where social science contributions are important to identify gaps in knowledge, generate information and tools to answer questions, and inform and refine decision-making. This approach includes systematically gauging the perspectives and opinions of visitors, community residents, partners, and other stakeholders through surveys, interviews, and focus groups. A programmatic clearance presents a more streamlined approach to complying with the Paperwork Reduction Act of 1995 (PRA, 44 U.S.C. 3501, *et seq.*).

Examples of collections that would not generally fall under this programmatic clearance are collections that:

- will be used for making significant policy decisions;
- impose significant burden on respondents or significant costs to the government;
- involve potentially controversial topics or that raise issues of significant concern to other agencies; and
- are intended for the purpose of basic research and that do not directly benefit the agency's mission.

1. Explain the circumstances that make the collection of information necessary. Identify

any legal or administrative requirements that necessitate the collection.

We are pursuing a programmatic clearance under the PRA in order to facilitate the collection of social science information for the Service. In this section we present the legal and policy justifications for the data collection. We show that a programmatic clearance would provide an expeditious process for filling some of the existing information gaps, thereby increasing public input and improving the responsiveness of the Service.

Legal Justification

Below is a brief review of the laws, policies, and regulations that form the basis for the Service's need to conduct social science-based information collections.

The National Wildlife Refuge Improvement Act of 1997 (P.L. 105-57) amended the National Wildlife Refuge Administration Act (Refuge Act, 16 U.S.C. 668dd-668ee) and established the mission and objectives that guide planning and management of the National Wildlife Refuge system. The mission is "*to administer a national network of lands and waters for the conservation, management and where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.*" In addition, Section 5 provides for:

- a requirement to maintain the biological integrity, diversity, and environmental health of the Refuge System;
- a new process for determining compatible uses on refuges;
- a recognition that wildlife-dependent recreational uses (hunting, fishing, wildlife observation, photography, environmental education, and interpretation) when determined to be compatible, are legitimate and appropriate public uses of the Refuge System; and
- a requirement for preparing a comprehensive conservation plan for each refuge.

The Government Performance and Results Act of 1993 (GPRA, 31 U.S.C. 1101) requires Federal agencies to develop goals to improve program effectiveness and public accountability, and to measure performance related to these goals. The Service's GPRA Strategic Plan and Annual Performance Plans, outline the following goals:

- improve the Quality and Diversity of Recreation Experiences and Visitor Enjoyment on DOI Lands;
- expand Seamless Recreation Opportunities with Partners; and
- provide educational opportunities to students.

The Urban Wildlife Conservation Program (Urban Program) Policy (110 FW 1) was established as a means to encourage engagement with urban communities in fish and wildlife conservation. It enumerates designation criteria for Urban Wildlife Refuges (Urban Refuges), Partnerships and Bird Treaty cities, and describes how the Standards of Excellence apply to Urban Refuges and other urban activities. The Service is required to 'evaluate and adapt' the practices of the Urban Program through internal review of the urban entities by the Chief, Division of Visitor Services & Communications every 5 years, including an expanded visitor services review for the Urban Refuges; they, "…must analyze the people they are reaching and conduct approved visitor use surveys to monitor the changes and track audience engagement." In addition, the Service's Directorate Oversight Team may establish additional metrics for

evaluating progress and measuring success.

Among the standards of excellence most notable to the Service's pursuit of a programmatic clearance for conducting social science research are:

- know and relate to the community;
- connect urban people with nature through the steppingstones of engagement;
- build partnerships;
- be a community asset;
- provide equitable access; and
- ensure visitors feel safe and welcome.

Office of Management and Budget (OMB) Circular A-11, Section 280: Managing Customer Experience and Improving Service Delivery
This circular focuses on improving bureaus' ability to address customer service delivery and response and is part of President Trump's Management Agenda. The Service has been designated a High Impact Service Provider and as such must provide data regularly to OMB on customer feedback.

Department of the Interior Secretarial Orders 3356 (Hunting and Fishing Opportunities), 3362 (Big Game Corridors) and 3366 (Outdoor Recreation Access)
These Secretarial orders focus on expanding access to hunting, fishing, and other outdoor recreation opportunities, including recruiting and retaining new sportsmen and women conservationists; working more collaboratively with states, private landowners, and other stakeholders to improve management and conservation of habitat for fish and wildlife populations, including big game; and measuring economic benefits to local communities from recreation on national wildlife refuges, wetland management districts, and fish hatcheries.

Monitoring and evaluating activities of the Refuge System and other programs of the Service are also essential components of the Service's Strategic Habitat Conservation adaptive management cycle. The implementation of this model represents a shift to more strategic, accountable, and adaptive actions that require sound social science as part of the array of inputs considered by decision-makers. Systematically gauging the perspectives and opinions of visitors, community residents, and other stakeholders through surveys, interviews, and focus groups are key to the success of this conservation model.

The Need for a Programmatic Clearance

A programmatic clearance will enable the Service to be more nimble in monitoring, evaluating, and prioritizing efforts on refuges and for other Service programs, including those undertaken to support socioeconomic inventory and monitoring and evaluation of the Urban Program. A programmatic clearance would increase the efficiency of Service personnel in collecting necessary information from the public pursuant to the established Office of Management and Budget (OMB) approval process. It would also improve coordination of social science research across Service programs and lessen potential redundancy in studies.

Historically, neither the Refuge System nor other programs within the Service have monitored or evaluated the perspectives and preferences of visitors, community residents, and other stakeholders in a systematic way or to the extent needed. An increased recognition for the need for social science data and the establishment of the Urban Program in 2011 has elevated the demand for systematic social science data to inform Service activities and decisions. The

National Wildlife Refuge Visitor Survey (Visitor Survey), Service landscape-scale conservation planning and design, and timely evaluation of Urban Program activities are priorities for this proposed programmatic clearance.

The Visitor Survey, in particular, has been an important tool in refuge planning for the 78 refuges that participated in the initial studies in 2010/2011 and 2012. Many other refuges and approximately a dozen priority urban refuges are still in need of this baseline visitor data. Additionally, for effective socioeconomic monitoring of refuges, this study must be repeated over time (i.e., every 5 years) at more than 175 refuges that experience moderate to high levels of public use. Tracking visitor experiences over time will allow for customer service and planning that is more responsive to public expectations and needs. In addition, data on visitor perceptions and evaluations provide a valuable baseline from which to track changes that could be attributed to refuge activities or community involvement efforts. By gathering this information we can ensure we are meeting the objectives of our programs and inform resource management priorities throughout the Service, thus assuring the most efficient use of human and financial resources.

Monitoring and evaluating outcomes of the Urban Program and its Standards of Excellence will be critical to the success of the program. A multi-year national evaluation plan for the 105 urban refuges under the Urban Program is currently being developed and will include performance measures that will require timely, replicable implementation and consistent feedback from program participants and partners. A programmatic clearance would allow more efficient execution of this evaluation plan at the local scale in a timely and adaptive manner as urban refuges develop, grow -- and sometimes discard -- their programs.

The Service principal investigators and others who collect information under this clearance would benefit through:

- efficient, effective, and timely review process;
- focus on peer review that improves the quality of information collections;
- increased attention to methodological improvements and use of best practices;
- better administration and wider sharing of information obtained from surveys of the public; and
- a renewed confidence and willingness to complete the review process.

Assessment of Current Information Collections

While other programmatic clearances accessible by the Service exist, a new one is needed for several reasons. The Department of the Interior (DOI) customer service clearance (OMB Control No.1040-0001) provides a useful mechanism for collecting information on current customer satisfaction. There is a need, however, for the Service to collect information beyond the scope of customer satisfaction that includes desires for future conditions and offerings. Similarly, the DOI qualitative feedback Fast Track Clearance (OMB Control No. 1090-0011) is a useful tool to meet needs where appropriate, but the limitations in terms of releasing information outside of the agency and restricting the use of "statistically reliable results" does not make it practical for many uses within the Service's social science goals.

Finally, the Federal Land Management Agency (FLMA) Collaborative Visitor Transportation Survey (CVTS; OMB Control No. 0596-0236), co-managed by the Department of Transportation and the USDA-Forest Service (housed within the Forest Service), provides a mechanism for the

Service and other FLMAs to ask questions of visitors and community members about their perceptions and attitudes regarding transportation conditions, services, and recreation opportunities. The CVTS clearance is a useful tool for gauging attitudes about transportation or trail related efforts, or if there is a need to collect information across multiple land management agencies on these topics. It will not, however, cover all the needs of the Service with respect to non-transportation related matters such as overall visitor satisfaction or program evaluation.

Development of the Programmatic Clearance

The proposed programmatic clearance for the Service is patterned after the National Park Service's (NPS) Programmatic Review and Clearance Process. The HD Branch has consulted with the NPS Social Science Program Chief and NPS Information Collection Clearance Officer, to better understand the details of their programmatic clearance and how it is administered. We also consulted with the Volpe social scientist and the former Information Collection Officer with the Forest Service; as well as with the former DOI Information Collection Clearance Officer, to learn about their experiences with the CVTS and other clearances.

To gauge the breadth of need for a programmatic clearance for the Refuge System and other programs throughout the Service, we spoke by phone with over 20 Service employees in 10 programs during June 2015 using a semi-structured interview process. There was overwhelming positive receptivity to a social science programmatic clearance for the Service across programs.

Benefits of a streamlined process expressed by those interviewed include: 1) reduced time to obtain OMB approval, thereby increasing the Service's responsiveness and ability to manage more adaptively; 2) time and cost savings; 3) greater likelihood that staff will gather needed information from audiences, such as visitors, community members, and customers; and 4) better understanding of the steps in the process via a coordinated Service effort. They also provided valuable feedback on the need for information collections under this programmatic clearance, the audiences they are interested in surveying, the methods they would employ, and the topic areas to consider under the Service programmatic clearance.

In addition to multiple mandates to collect information and minimize the burden to the public we expect the volume of surveys will also necessitate the efficiencies afforded by a programmatic clearance. We anticipate that approximately 35 Information Collection Requests (ICRs) would be submitted under the clearance each year. A programmatic clearance would increase the agility of Service programs and reduce the workload inherent in standard OMB approvals.

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.

To ensure continuous improvement, Service activities and projects require ongoing systematic assessment of their design, implementation, and outcomes. The scope of this programmatic clearance includes individual surveys, focus groups, or interviews of refuge visitors, potential visitors, and residents of communities near refuges and other Service lands, stakeholders, and partners. Principle investigators will be Service staff at the refuge, regional or national program leads, and third parties such as universities or other governmental agencies. The data collected will provide Service programs with reliable information to better inform strategic planning; allocations of physical, fiscal, or human resources; modification or refinement of various

program management plans, goals and objectives; and future planning efforts focused on developing more effective and efficient delivery of conservation activities, projects, and experiences.

Administration of Proposed Programmatic Clearance and Submission Process

The HD Branch of the Refuge System supports the mission of the Service by providing social science understanding and information to Service headquarters, regional and field offices. The role of the HD Branch is to 1) build human dimensions understanding and capacity within the Refuge System and 2) provide social science expertise. "Human dimensions" in this context is defined as how and why people value natural resources, how they want resources managed, and how they affect or are affected by natural resource management decisions.[1] The human dimensions of natural resource field covers a variety of disciplines and practices including cultural, social, and economic values; individual and social behavior; demographics; legal and institutional frameworks of management; communication and education; and, decision-making processes of management.

The HD Branch will serve as the Office of Control for the programmatic clearance.[2] Under the proposed programmatic clearance, we will be able to pursue an accurate understanding of the relationship between people and the constituent components of the Refuge System and other programs critical to achieving the mission of the Service *to work with others to conserve, protect and enhance fish, wildlife and plants and their habitats for the continuing benefit of the American people*. Such understanding requires a sound scientific basis. Hence, social science research is a necessary and important function of the agency. As a science-based organization we subscribe to the highest standards of scientific integrity and reflect this commitment in the design, implementation and evaluation of all our work.

The HD Branch is well-equipped to serve as the Office of Control for this clearance and provide necessary subject matter expert review to ensure submissions meet the spirit of the clearance, the topic areas covered, and that the questions and methodology follow sound social science practices. Within the HD Branch, an Information Collection Request Coordinator (ICR Coordinator) would be assigned to manage this clearance process.

The HD Branch Chief, Natalie Sexton, has over 20 years of social science research experience, including obtaining OMB PRA approval for information collections through both the regular PRA process and through a programmatic clearance. Additionally, social science staff in the HD Branch are trained in social science theory, research methodology, and statistical design and analysis including psychometrics, univariate and multivariate statistical analysis, and survey sampling. Collectively the staff members have over 60 years of social science research and technical assistance experience, including developing and conducting both qualitative (focus groups/interviews) and quantitative (survey) research. Additionally, the HD Branch has formalized a team of social science experts (Information Collection Review Team, ICRT) who have been identified within the Service, yet outside the HD Branch, who can serve as a resource for principle investigators developing ICRs and provide social science peer review of submissions under this programmatic clearance on an as-needed basis. The *Suite of Questions* will serve as the basis for all information collections under this programmatic

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[1] Adapted from: Decker, D. J., Brown, T. L., & Siemer, W. F. (2001). Evolution of people-wildlife relations. In D. J. Decker, T. L. Brown, & W. F. Siemer (Eds.), Human Dimensions of Wildlife Management in North America (pp. 3-22). Bethesda, MD: The Wildlife Society.

[2] Administration determined through consultation with DOI's Office of Policy, Management and Budget, and the Service's Division of Policy, Performance, and Management Programs.
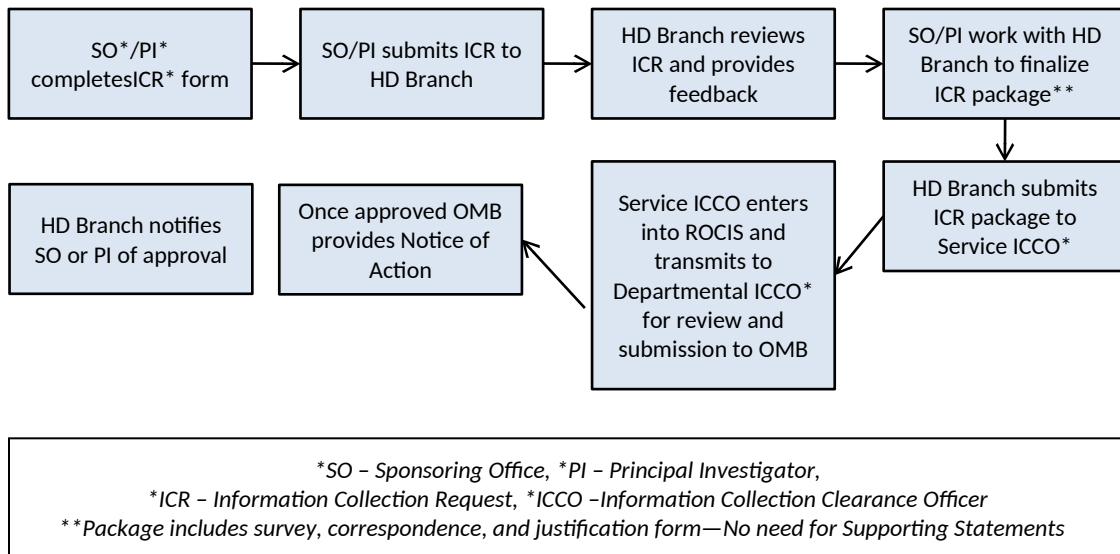
clearance.

As the Office of Control, the HD Branch ICR Coordinator will conduct the necessary quality control, including assuring that each survey instrument comports with the guidelines of the programmatic clearance. Each collection under this programmatic clearance must be well-defined in terms of its sample or respondent pool and research methodology, and each individual collection should clearly fit within the overall plan and scope of the currently approved ICR. Individual collections should not raise any controversial policy issues or go beyond the methods specified in this programmatic ICR. Any individual collection that requests non-agency goal-related data or information on controversial topics would be inappropriate for expedited review under this clearance and must go through the full PRA process. In instances where HD Branch staff are involved with the development or information collection, other uninvolved staff in the HD Branch or a member of the ICRT would review the ICR.

A series of questions for each of the topic areas listed below has been developed to streamline the ICR process. These questions have been peer-reviewed by a team of social scientists outside of the HD Branch and will provide a base from which principle investigators can develop survey instruments. An initial information collection request and submission form will be used by the HD Branch for submissions under this clearance (see Form 3-2140). In addition to the *Suite of Questions* incorporated in the programmatic clearance package, the submission form requires principle investigators to describe the methodology involved in surveys. This would include a description of any statistical methods employed. This will allow the ICR Coordinator to quickly determine whether the collection fits within the programmatic clearance and if additional review is needed.

As the Office of Control, the HD Branch will ensure the information collections are designed based upon standard statistical practices and sampling methodologies to ensure consistent, valid data that are representative of the target populations and account for non-response bias, according to OMB guidance such as Agency Survey and Statistical Information Collections (January 20, 2006) and Standards and Guidelines for Statistical Surveys (September 2006).

If, after consultation with the principle investigator, a proposed survey is recommended for approval by the ICR Coordinator, the package will be sent to Service Information Collection Clearance Officer (ICCO) for review and entry into ROCIS. The Departmental ICCO will also review the ICR and upon concurrence, transmit it to OMB. OMB has agreed to provide a response within ten working days of receiving the submission package. Once it has received approval from OMB, the ICR Coordinator will assign the OMB Control Number (1018-####) and expiration date to the survey and notify the principle investigator when the survey is approved. (Figure 1)

Critical to implementing this programmatic clearance efficiently, the ICR Coordinator and ICRT members would undergo training for the ICR review procedures. All administrative tracking, accountability and oversight processes, along with any guidance documents and standardized forms, would be finalized within the first three months of approval for this programmatic clearance.

| SO*/PI* completesICR* form | → | SO/PI submits ICR to HD Branch | → | HD Branch reviews ICR and provides feedback | → | SO/PI work with HD Branch to finalize ICR package** |

| HD Branch notifies SO or PI of approval | Once approved OMB provides Notice of Action | Service ICCO enters into ROCIS and transmits to Departmental ICCO* for review and submission to OMB | HD Branch submits ICR package to Service ICCO* |

*SO – Sponsoring Office, *PI – Principal Investigator,
*ICR – Information Collection Request, *ICCO –Information Collection Clearance Officer
**Package includes survey, correspondence, and justification form—No need for Supporting Statements

Figure 1. Workflow for U.S. Fish and Wildlife Service Programmatic Clearance

Typical Information Collection Methods

The list below includes typical collection methods that will be used under this programmatic clearance. Depending on the needs of each specific ICR and the population(s) being surveyed, a multi-method approach may be advantageous. Further details of potential respondent selections and sampling strategies are discussed in Supporting Statement B.

Interviews
In some cases, it may be necessary to collect data through interviews, particularly for hard-to-reach populations or in cases where in-depth, qualitative information is required. Interviews are a method of eliciting answers to predetermined, semi-structured questions from one individual at a time. If this research method is utilized, interview scripts would be designed to guide the discussion and data recorded by electronic means or written notes.

Focus groups
Some data and information are best collected through more conversational means. Focus groups are small, semi-structured group discussions designed to obtain in-depth qualitative information and are most useful in an exploratory stage or when researchers want to develop a deeper understanding of a program or service. Individuals will be specifically recruited to participate in the discussion, which may take place in person or through technologically enhanced means (e.g., video conferencing, on-line sessions). A trained moderator will lead the conversation using an approved moderator's guide, and encourage participants to talk with each other about their experiences, preferences, needs, observations, or perceptions. The focus group participants may be randomly chosen using standard telephone sampling protocols, recruited on-site or through a social media or web interface, as dictated by the needs of the study. They may also be assembled according to a key variable of interest to the study or a demographic characteristic – a research design element that would require thorough explanation in the ICR. When pre- and post-surveys are implemented at part of a focus group, the ICR should include an appropriate statistical analysis plan and discussion about the uses and limitations of the data.

On-site intercept surveys
Survey instruments will be provided to respondents while on site to complete and return before

they depart. This may include oral administration, paper forms, or the use of electronic technology (e.g., tablets or smartphones) or kiosks. The survey administrator will be prepared to answer any questions a respondent might have about how to fill out the instrument but does not interfere or influence how a respondent answers the questions. In some cases, this method may be combined with other methods. For example, respondents may be recruited in-person, given a survey instrument to complete at the end of their visit, or at the end of a program, and either drop it off at a specified location or return it via mail. Additionally, respondents may be intercepted on-site and then asked to complete a survey online by a later date. If the in-person intercept and mail back (or online) approach is used, a research design akin to Dillman's "Tailored Design Method" (TDM)[3], involving follow-up or reminder attempts, should be followed and discussed in the ICR. This and any other efforts designed to increase response rates should be discussed in the ICR.

Mail surveys
If address lists for targeted respondents are available or may be acquired, a multiple contact-approach based on Dillman's TDM may be employed. For example, the first contact might be a 'pre-notice' postcard or a cover letter explaining that a survey is coming to them, why the data are needed and their likely use, and why the chosen respondent's input is important. The next contact would be the survey instrument along with a postage-paid addressed envelope to return the survey. Several reminders could be sent over the data collection time period, the first of which would be a postcard mailed 10 days after the survey was sent. Finally, the respondents would receive a letter thanking them for their willingness to participate in the survey and reminding them to return it if they have not already done so. At each juncture, the respondents will be given multiple ways to contact someone with questions regarding the survey (including phone, web, or email). If the survey has been lost, the respondent can request that another be sent to them.

Web-based surveys
The internet offers another means of surveying and can be more convenient for respondents because they can complete the survey electronically when they choose. (Or they can print the survey to complete and return by mail.) Surveys may be posted on websites, including social media pages, or may be sent to respondents via email. If respondents' emails are available, Dillman's TDM will be used, including multiple contacts via email to increase response rates. Although this is a convenient and cost-effective survey mode, especially with large groups of people, principle investigators need to address sampling, response rate, and potential non-response bias issues. Telephone calls to non-respondents can be used to increase response rates. For activities and projects or environmental education curricula that are provided through electronic means, a web or email survey may be most appropriate. During the course of their web interaction, users can volunteer to take a survey at the beginning or end of their web experience, or add their names to a list for future surveys. From this list, a respondent pool will be selected in accordance with the sampling procedures outlined in the ICR. Discussion of additional non-response bias surveys may also be necessary.

Telephone surveys
If telephone numbers are available or can be acquired for respondents, telephone surveys may be used either alone or in combination with some other method. In particular, this method is likely to be used if a national sample is required, or to reach respondents located in physically inaccessible or broadly dispersed locations. As described in Dillman's TDM, multiple attempts will be made to reach each respondent in an effort to boost response rates. Trained

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[3] Dillman, D., Smyth, J. & Christian, L.M. (2014). *Internet, mail, and mixed-mode surveys: The tailored design method.* (4th ed.). Hoboken, N.J.: Wiley & Sons.

interviewers will be utilized to collect the survey responses. Given the increasing number of households in the United States that no longer have a landline telephone in their homes, any ICR that includes a national survey conducted by telephone will also need to discuss current best practices for incorporating cell phone samples to avoid coverage bias.[4]

Question Topic Areas

To qualify for the programmatic clearance, all questions in an information collection need to fit within one or more of the approved topic areas in the *Suite of Questions* accompanying this programmatic clearance. Some of the questions in the *Suite of Questions* have been taken from Service information collections previously approved by OMB; all questions have been peer-reviewed by a team of experts representing a cross-section of Service programs. Principal investigators conducting the information collection would have flexibility, within accepted standards of appropriate survey, interview, or focus group design and OMB regulations, to develop need-specific questions within the topic areas. Altered and new questions would be subject to peer-review. Topic areas included in the Service programmatic clearance include the following:

Topic Area 1: Respondent Characteristics[5]
The questions in this section characterize respondents. Questions include individual or group socio-demographic information that will help management understand various populations of interest, including visitors and non-visitors, partners and stakeholders. Analysis of questions will be used to check the representativeness of respondents to the population of interest, to better serve audiences, and provide baseline information for programs intended to increase variability in visitation. In addition to relevant demographic information, including user group characteristics, questions regarding visitation history, recreational history, conservation behaviors, and basic transportation behaviors are also included.

Topic Area 2: Communication
The questions in this section will be used to characterize preference for accessing or receiving information and communications about the U.S. Fish & Wildlife Service or a specific site. As the U.S. Fish & Wildlife Service increases its presence in the virtual world (e.g., websites, Facebook, Instagram, Twitter), understanding the communication habits and preference of our "virtual visitors" is paramount. Information from questions in this section will help site managers determine how to prioritize resources for providing information about the site before or during visits. It also identifies the need to develop interpretive programs and printed materials/signage in other languages.

Topic Area 3: Trip Planning and Logistics
This section includes information that might affect decisions made by individuals prior to, during, or following their visits to U.S. Fish & Wildlife Service lands or sponsored activities in nearby communities. Trip characteristics will be relevant to the mission, management, and/or operations of the Refuge System and improve Service understanding of visitor planning and the role of local communities in related decisions.

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[4] According to the Center for Disease Control's National Center for Health Statistics (January – June 2013), 39.4 % of American homes have only wireless telephones. Hispanics, younger adults and the poor are more likely to use only a cell-phone. See: http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201312.pdf
[5] Information that might be considered sensitive, such as income or education level, is reported in aggregate so that no one individual may be identified or associated with his or her stated views.

Topic Area 4: Recreation Activities, Experiences, and Preferences
The questions in this topic area will be used to identify activities, behaviors, or uses of natural and cultural resources which are relevant to the mission, management, and/or operations of U.S. Fish & Wildlife sites. Understanding the public's opinions of facilities, services, and recreational opportunities offered by the U.S. Fish & Wildlife Service will help managers understand values held by the public in relation to services offered and identify areas for improvements.

Topic Area 5: Knowledge, Attitudes, and Beliefs
Questions in this topic area will be used to elicit public knowledge, attitudes, beliefs, and values related to natural resources conservation and management. Understanding how people comprehend the natural world and issues that affect it will aid in resource allocation, outreach and other management decisions. Questions will be limited to circumstances that can be directly influenced by the U.S. Fish & Wildlife Service.

Topic Area 6: Resource Management Perceptions and Preferences
Questions in this topic area focus on gauging public knowledge of the U.S Fish & Wildlife Service, its mission and functions, as well as understanding of current conservation management practices on Service lands. By understanding public perceptions of the U.S. Fish & Wildlife Service as an agency and its management practices, managers can more effectively communicate the reason for actions or changes made to programs, lands, and/or uses. Please note that questions pertaining to resource protection are also located in other sections of this document.

Topic Area 7: Visitor Expenditures and Economic Inputs
Information about income and visitor expenditures is used to estimate economic impact on local economies. Questions are intended for visitors to Service lands and landowners who conduct business or hold agreements with the Service. Questions will be used to develop spending estimates in the case of visitors.

Topic Area 8: Public, Stakeholder, and Partner Engagement
In order engage partners and the general public in fish and wildlife conservation it is important to understand the dynamics of various aspects of participation and collaboration. Questions in this topic area assess to what degree the public is willing to participate in conservation advocacy for Service sites and programs, including basic participation measures and Friends-specific questions. For our partnerships with local municipalities, the private sector, non-governmental organizations, and other State, tribal and Federal agencies, monitoring and evaluating factors that influence the quality and effectiveness of our partnerships (e.g., agency responsiveness, shared goals, effectiveness of communications, satisfaction with decision making, volunteer activities) will be key in creating and sustaining effective collaborations.

Topic Area 9: Program Evaluation
Program evaluation is the systematic collection of information about the activities, outputs, characteristics, and outcomes of a program or project in order to make judgments about, improve the effectiveness of, and inform decisions about future program or project development. Questions related to program evaluation are asked to assess the effectiveness of Service activities and programs geared toward engaging communities and visitors in the outdoors, building connected conservation constituencies and ensuring these efforts are meeting targeted objectives. They will also be helpful to managers updating management plans and improving educational and outreach efforts.

The items in the *Suite of Questions* were developed primarily from the following sources:

- National Park Service's Pool of Known Questions (OMB #1024-0224);
- The Federal Land Management Agencies Collaborative Visitor Transportation Survey Compendium of Questions (OMB #0596-0236);
- Expired OMB-approved National Wildlife Refuge Visitor Survey;
- Surveys found in peer-reviewed literature conducted for federal land management agencies; and
- Previous nonfederally funded studies.

Potential Respondents

The programmatic clearance will include information collections of the following audiences: visitors, potential visitors, local community members, educators, Government officials, landowners, partners and other stakeholders, volunteers, and tribal interests.

Visitors
Visitors include any person visiting a unit or website managed by the Service. Visitors may be pursuing recreational activities at the site, attending an educational event, or traveling through or stopping incidentally while traveling or on business-related purposes. They may be visiting a website for trip planning and research or viewing a virtual presentation. Visitors, both physical and virtual, include, but are not limited to, members of the general public, students, youth groups, teachers, partner employees, and legal resources users, such as hunters and anglers, including subsistence users.

Potential visitors
Potential visitors are any persons who *are contacted off Service lands and* might visit a unit owned by the Service to attend an educational event, visit for recreational purposes, incidentally as part of other travel, or for non-recreational uses.

Local community members
Local community members are individuals who live in communities directly adjacent to or in close proximity to Service-owned units.

Educators
Educators include any persons who participate in or lead an educational event for the Service or in partnership with the Service. These individuals might be teachers, administrators, program leaders, or volunteers working specifically on environmental education efforts. Educators may participate in events in Service or non-Service venues.

Government officials representing the local area (non-federal)
Government officials include those not directly employed by the Service. They may be State, county, or city officials, or members of other governing boards such as conservancy districts. Officials may or may not have visited the Service unit, but have a vested interest in outcomes related to Service management.

Landowners
Landowners include people who currently, or may potentially, work with Service personnel to complete management goals on their private land holdings. They may or may not live adjacent

to Service-owned units. Individuals may work directly with Service personnel on a specific project or may have agreements with the Service for a conservation easement, restoration activity, or other activities related to their private land holdings.

Partners and other stakeholders
Partners and other stakeholders include individuals who work with the Service in some capacity other than direct employment. They may be volunteers or those who have a vested interest in outcomes related to Service management, such as guides and outfitters or local Chambers of Commerce. Individuals may be employed by Federal, State, county, city, or nongovernmental entities that work directly with the Service or those who work for non-profit and for profit entities. They may also be members of the general public who have an interest or stake in specific Service management or decisions.

Volunteers
Volunteers are individuals who work with the Service in a nonpaid capacity. They may work directly on a Service-owned unit or conduct work on behalf of the Service on lands or projects not directly located on Service property.

Tribal interests
Tribal interests include citizens of Native American tribal nations, tribal leaders, and Alaskan Native Tribes. They may be visitors to a Service-owned unit or members of the local community. They may take part in non-recreational or recreational pursuits on Service-owned lands including subsistence harvest. They may also be members who have an interest or stake in Service management or decisions.

Information Collections Covered

We anticipate reviewing between 100-125 Information Collections Requests (ICRs) over the three-year duration of this clearance. The Service's programmatic clearance would be limited to non-controversial information collections that do not attract attention to significant, sensitive, or political issues. All information collection survey instruments will be designed and implemented based upon acceptable survey research practices, sampling methodologies and statistical analysis. This requirement will ensure consistent, valid data that are representative of the target populations and account for non-response bias, according to the most recent OMB guidance on agency survey and statistical information collections.

Data Uses

Principle investigators will use these data to identify:

- visitor and program participant needs;
- levels of understanding and knowledge;
- ideas or suggestions for improvement to activities, programs, and/or management;
- barriers and constraints to achieving customer service standards;
- perceptions and values;
- baseline measurements to observe changes over time; and
- spending behaviors.

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.

As noted in the Information Collection section above, if appropriate and feasible, the Service will collect information electronically to reduce burden and cost. When ICRs have not addressed this issue, the ICR Coordinator may recommend such adaptations to collection methods.

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.

This programmatic clearance seeks to reduce duplication through increased collaboration and coordination across the Service. As the Control Office for this clearance, we can recommend standardized survey instruments and protocols to speed IC processes. The ICR Coordinator would be sensitive to any duplication of efforts conducted by other entities. We will examine any possible duplication during the technical and administrative review of individual submissions.

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

A significant advantage of a programmatic clearance is to gather information without putting additional burden on small businesses or entities. Small businesses or other small entities may be included in sampling frames for some surveys. When designing the surveys, researchers will be sensitive to respondent burden and will seek to collect the required information using the fewest possible questions. As appropriate, we will utilize electronic collection methods to reduce respondent burden.

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.

The U.S. population continues to grow, as does the public's use demands on its public lands. Understanding public conservation beliefs, expectations, and use patterns aids managers and staff at the local, regional, and national level. For the Service, these inputs are integral to effective conservation and addressing our trust responsibilities. This programmatic clearance would simplify and streamline the information collection requests to OMB in a manner that will allow the Refuge System and other Service programs to submit more requests per year than would occur through the regular submission route. Surveys are reviewed and approved expeditiously, allowing data collections to occur more frequently and in a timely manner – more specifically during the visitation season of interest. Without these expedited information collections the public will be denied the opportunity for timely input into management plans, and the Service will not be able to respond nimbly to needs of the American public.

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.**

This request contains no special circumstances with respect to 5 CFR 1320.5 (2) (i) and (iii-viii) with the exception of (ii). We may be asking respondents to send back their responses in fewer than 30 days after receipt of the survey, which is common practice to ensure a reasonable and representative response rate. There are no other circumstances that require the collection of 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 October 2, 2023, we published in the *Federal Register* ([88 FR 67792](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 1, 2023. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-NWRS-2023-0126](#)) to provide the public with an additional method to submit comments (in addition to the typical U.S. mail submission method). We received five comments (described below) in response to that notice:

Comments 1 and 2: Two comments objected to collecting information from specific populations and the effectiveness of surveys information collection tools.

Agency Response to Comments 1 and 2: Input from a variety of populations and recreation groups is critical to a robust understanding of potential impacts from management, planning, and policy decisions. Information collection and understanding social landscapes help the Service better meet its mission of working with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American People. The agency took no action to unilaterally exclude public input from certain recreation groups or prevent stakeholder input as a tool to inform decisions.

Comment 3: One comment was about the appropriate use of animals for hunting, fishing, and trapping.

Agency Response to Comment 3: The agency took no action from this comment, as it is unrelated to the information collection.

Comments 4 and 5: Two comments were supportive the use of information collection to better understand customers. One of these comments also discussed methods to improve inclusivity and reduce agency burden with the use of technology.

Agency Response to Comments 4 and 5: The agency appreciates support of its efforts and suggestions to improve information collection. When appropriate, individual information collections may include methods such as online data collection or QR code recruitment. As noted in comment 5, it may be more difficult to reach certain populations, and reaching these populations may necessitate the use of sampling methods such as in-person recruitment. The agency took no action, as each information collection submitted through this clearance will be evaluated if sampling methods appropriately reach the population of interest.

On April 17, 2020, we published in the *Federal Register* ([85 FR 21450](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on June 16, 2020. We did not receive any comments in response to that notice.

On October 12, 2016, we published in the *Federal Register* ([81 FR 70437](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 12, 2016. We received three nonsubstantive comments in response to that notice which did not address the information collection comments. No responses were required to those comments.

Outside Agency Peer Review Comments and Actions Taken to Address Comments.

In addition to the Federal Register Notice, peer review sessions by the four (4) individuals identified below who are familiar with this collection of information were conducted in order to validate our time burden estimate and asked for comments on the questions below:

Position	Organization
Assistant Professor	Virginia Tech
Assistant Professor	Ohio State University

| Assistant Professor | Pennsylvania State University |
| Senior Director | Resource Systems Group, Inc. |

"***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: All reviewers believe this collection of information is necessary and will have practical utility. Reviewers commented that the justification is well detailed and empirical support is also provided from conversations with Service staff who will potentially use this programmatic clearance. The collection of information is critical to inform management, planning, and policy. This information will provide the agency with a basis to document and assess trends concerning refuge visitation, the effects of visitors and visitor use on National Wildlife Refuge wildlife, habitat, and other resources; the impacts of refuge management on visitors' experiences; and the effectiveness of Service educational efforts and public programs (e.g., Urban Wildlife Conservation Program).

Service Response/Action Taken: No further action was taken based on these comments.

"*The accuracy of our estimate of the burden for this collection of information*"

Comments: Reviewers believe the estimate of burden for this collection is reasonable and appropriate. One reviewer commented that the estimate of an average completion time of 60 minutes per focus group is consistent with social science research conventions, though could be increased to 90 or even 120 minutes per completion to provide a more conservative estimate of burden.

In addition, one reviewer commented that overall burden will be reduced due to the streamlined nature of the clearance.

Service Response/Action Taken: Since the estimate for focus groups is consistent with past experience and recommendations we did not take any further action to change the burden. However, we will monitor completion times to see if adjustments need to be made in the future.

"*Ways to enhance the quality, utility, and clarity of the information to be collected*"

Comments: Reviewers commented that the specifications in this Information Collection Request align with best practices for conduct of mail, internet, and telephone surveys (e.g., Dillman et al., 2014).

Service Response/Action Taken: No further action was taken based on these comments.

"*Ways to minimize the burden of the collection of information on respondents*"

Comments: One reviewer commented on the use of pre-testing as a way to test for question clarity and respondent comprehension and to test assumptions about the completion time as a way to minimize burden.

Service Response/Action Taken: We agree with this comment and encourage investigators to pre-test their collection instrument(s). There is also a question regarding pre-testing and

peer review on the submission form. No further action was needed based on this comment.

Comments on the Service Programmatic Clearance Guidelines

Comments: Reviewers felt the Guidelines were clear and thorough, and would be extremely helpful for applicants. Several of the reviewers offered suggestions to improve the guidance.

Service Response/Action Taken: We incorporated reviewer comments into the revised Guidelines.

Comments on the Service's Programmatic Clearance Submission Form

Comments: Reviewers offered minor suggestions to improve the submission form but overall, thought the form was well organized and clear and the instructions were helpful.

Service Response/Action Taken: We made several edits to the form based on the comments.

Comments on the Service's Programmatic Clearance Suite of Questions

Comments: Overall, reviewers thought the range of topics included in the Suite of Questions is very comprehensive, which will ensure that information collections will have practical utility in addressing questions of importance to the Service. All reviewers supplied specific suggestions for additions to the Suite of Questions (e.g., birdwatching, Leave No Trace).

Service Response/Action Taken: We added several questions based on reviewer comments.

Additional comments received during the outreach

Comments: One reviewer commented that the Information Collection Request reflects a high-level of experience and expertise in the design and conduct of social science research for Human Dimensions of Natural Resource Management in federal land management agencies, generally, and the Service specifically. Moreover, the request reflects a substantial effort to incorporate best practices, lessons learned, and successfully established conventions from other Programmatic Clearances (e.g., NPS Programmatic Review and Clearance Process).

Service Response/Action Taken: No further action was taken based on these comments.

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

In some cases, the provision of gifts and incentives to respondents may appear to be a conflict of interest. Incentives, remuneration, and gifts beyond a _de minimus_ token would generally be deemed inappropriate within the scope of this programmatic clearance. Service outreach activities commonly include items such as a magnet, notepad, or other items displaying U.S. Fish and Wildlife Service or National Wildlife Refuge System visual identifiers. Providing this type of incentive will not increase the burden on refuge personnel or the Government and may increase response rates (Dillman et al, 2014). However, there may be extraordinary

circumstances under which more substantial remuneration may be appropriate within the scope of this program.

In the event that there are collections that seek to use incentives, the principle investigator will be required to justify the purpose and description of the proposed incentive; the proposed purpose will be reviewed and considered.

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

We will not provide any assurance of confidentiality. Information will be protected in accordance with the Freedom of Information Act and the Privacy Act of 1974 and as described in the attached Privacy Impact Assessment (PIA). Privacy notices will be made available to respondents. Those who inquire about this issue will be told that their answers are used only for statistical purposes. Visitors, programs participants and partners will also be told that reports prepared from studies covered under this clearance will summarize findings so that responses will not be associated with any specific individual. Data will only be reported in aggregate and no individually identifiable responses will be reported.

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.

Questions about matters that are commonly considered private are beyond the purview of this programmatic clearance.

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.**

ICRs submitted through this programmatic clearance will use a variety of instruments and platforms to collect information from respondents. We anticipate that over a three-year period, there will be approximately 105 collections representing no more than 66,027 respondents. Given these estimates, the total burden hours over the three-year period will not exceed 21,747

burden hours (see table below).

We estimate the total dollar value of the annual burden hours for this collection to be **$318,449 (rounded)** (total annual burden hours x average hourly rate for individuals). We used Table 1 from the Bureau of Labor Statistics (BLS) News Release USDL-23-2567, December 15, 2023, Employer Costs for Employee Compensation—September 2023, to obtain the average hourly wage of $43.93 for individuals (including benefits).

Table 12.1 - Estimated Annual Respondent Burden and Cost for 3-Year Programmatic Clearance

Mode	Annual Estimates			
	Number of Respondents	Completion Time per Response (Avg. Minutes)	Burden Hours**	Cost of Burden Hours**
On-site, mail, internet surveys*	20,333	20	6,778	
Telephone surveys	833	25	347	
All nonresponse surveys	784	5	65	
Focus groups/in person interviews	59	60	59	
Annual Total	22,009	--	7,249	
3-Year Total	66,027	--	21,747	

*Includes 2-minute contact time for some surveys, interviews and focus groups and approximately 2,500 electronic surveys.
**All figures are rounded.

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, record keeping, or any fees associated this 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.

The total estimated annualized cost for this generic clearance is **$1,770,398**, which includes $30,398 in fixed salary costs to administer the programmatic clearance (Table 2) and $1,750,000 in other costs associated with the collection of information (Table 3).

We estimate that there will be an average of 35 submissions per year. Using the NPS Programmatic Clearance (OMB Control Number 1024-0224) as a model, we provide a reasoned estimate based upon their experience with the resources necessary for the development, review and submission of each ICR. Although the time to review each submission will vary depending on the complexity and completeness of each ICR, we have assumed a ratio of 10 hours of time per Federal worker associated with the development of a programmatic submission. We used the Office of Personnel Management Salary Table 2024-DEN to determine the hourly rate. We multiplied the hourly rate by 1.61 to account for benefits in accordance with BLS News Release USDL-23-2567.

Table 14.1 - Fixed costs for U.S. Fish and Wildlife Service administration of the programmatic clearance.

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.61 x Hourly Rate)	Estimated time (hours) per Submission	Cost per Submission	Annual Cost (x 35)
Administrative	GS-09/05	$ 36.20	$ 58.28	10	$ 582.80	$ 30,398.00

Table 14.2 - Other costs associated with this programmatic clearance

Description	Annual Cost
Researcher/Principal Investigator Salaries	$700,000
Operational Expenses (Survey Design and Development, Survey Administration, Data Collection, Data Entry, Data Analysis and Reporting)	$1,050,000
Total	$1,750,000

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

This is a request for a new programmatic clearance for the Service.

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.

We expect that information from data collections approved by the programmatic clearance will be a mixture of internally and externally distributed findings. If the results of a particular collection are to be published or otherwise made public, that fact will be disclosed in the completed ICR for that survey, along with an information dissemination plan. Each information collection will provide an explanation of the specific tabulation methods to be used to synthesize, analyze, and aggregate the data collected. Analyses may typically include response frequencies, means, standard deviations, and confidence intervals, and cross tabulations with appropriate statistical measures of fit and significance. Additional analysis for determining economic impact might include the development of scalar multipliers (as in the IMPLAN methodology). Collections that will use statistical models (regression, time series, social network analysis, etc.) should include an explanation of how the findings are related to Service goals.

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 OMB's expiration date will be displayed on the information collection instruments.

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

We are requesting no exceptions to the certification statement.