# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**Generic Clearance for Marine Recreational Information Program: Design & Field Test Studies**

**OMB Control No. 0648-XXXX**

**Abstract**

This is a request for a new collection of a generic clearance for the Marine Recreational Information Program (MRIP) that will allow it to carefully develop, test and evaluate survey instruments and data collection methodologies. The primary objective of MRIP is to monitor marine recreational fishing activity and produce statistics required to manage marine resources. Current MRIP surveys include the Fishing Effort Survey (0648-0652), the Access-Point Angler Intercept Survey (0648-0659), the For-Hire Survey (0648-0709) and the Large Pelagics Survey (0648-0380). This request is part of an on-going initiative to improve MRIP surveys as mandated by the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1852) and the Modernizing Recreational Fisheries Management Act of 2018 (16 U.S.C. 1881) and recommended by the National Academies of Science, Engineering and Medicine.

The generic clearance will be an important planning tool for MRIP. Conducting these activities in a timely manner will allow MRIP to more effectively address emerging needs for data, including more timely estimates and/or estimates at finer levels of resolution; evaluate the effects of non-sampling errors on the accuracy of survey estimates; and incorporate new technologies into ongoing data collection designs. The procedures expected to be used include but are not limited to exploratory surveys and interviews, focus groups, cognitive laboratory activities, and pilot studies that explore sampling methods, questionnaire design, incentives, and data collection mode. Conducting these activities in a timely manner would allow MRIP to improve both the quality and turnaround time of its policy relevant evaluations.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Collection of recreational fisheries catch and effort data is necessary to fulfill statutory requirements of Sections 303 and 401 of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1852 et. seq.) and to comply with Executive Order 12962 on Recreational Fisheries. Section 303 (a) of the Magnuson-Stevens Act specifies data and analyses to be included in Fishery Management Plans (FMPs), as well as pertinent data that shall be submitted to the Secretary of Commerce under the plan. Section 401 requires the Secretary to improve the Marine Recreational Information Program to better meet the needs of science and management. The Modernizing Recreational Fisheries Management Act (2018) (Public Law No. 115-405) requires the Department of Commerce to establish partnerships with states to improve recreational fisheries data collections. Consequently, MRIP has established a partnership among government agencies, independent scientists, recreational fishing groups and conservation organizations to ensure scientifically rigorous collection of appropriate information that meets science, policy and stakeholder needs.

MRIP is requesting a generic clearance in order to respond quickly to emerging issues and data collection needs. The survey industry continues to evolve, and MRIP needs to continuously evaluate its surveys in light of these changes. Specifically, response rates decrease over time, technology continues to change (e.g., the Web quickly became a data collection option), and data needs continue to change. In addition, our understanding of how to improve surveys continues to evolve (e.g., the application of cognitive psychology to survey methodology has increased our understanding of surveys). The generic clearance structure will allow MRIP to meet these information needs in a timely manner using a means that minimizes respondent and administrative burden. Thus, MRIP requests an ongoing OMB clearance structure to continue to improve the overall quality of its statistical surveys, lessen the burden on survey respondents, shorten the time period between testing and implementing improved methods, and decrease the burden on both OMB and program office staff.

**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.**

Other federal agencies have found similar clearances (e.g., National Center for Education Statistics OMB #1850-0803, National Agricultural Statistics Service OMB #0535-0248, National Center for Education Evaluation OMB #1850-0952, and Health Resources and Services Administration #0915-0379) to be helpful vehicles for evaluating data collection plans and procedures, questionnaires, sampling and data collection designs, and assessments. Generic clearances have allowed these agencies to take advantage of a variety of methods to identify questionnaire, assessment, and procedural problems in advance, suggest solutions, and measure the relative effectiveness of alternatives. Through the use of these techniques, questionnaires have been simplified for respondents, respondent burden has been reduced, and the quality of the questionnaires and subsequent data and estimates has been improved.

MRIP envisions using a number of survey improvement techniques, as appropriate to the individual project under investigation. These include field tests and split-ballot experiments, focus groups, cognitive interviews, and respondent debriefings and follow-up interviews.

Field test. For the purposes of this clearance, we are defining field tests as data collection efforts conducted among either purposive or statistically representative samples, for which the main objective is gathering critical information needed to inform the design of an ongoing or proposed survey. This may include split-ballot experiments testing various survey design features. Field test or pilot collections are an essential component of this clearance package because they serve as the vehicle for ensuring that federal investments in fisheries statistics, including large-scale data collections, are feasible and appropriate and yield reliable and valid information. Under this clearance a variety of instruments may be used or tested as part of a pilot, and the exact nature of the surveys and the samples would vary depending on the specific goals of the study. The needs of the particular sample will vary based on the type of field test, including the respondent, content of the instruments, or data collection methods.

Follow-up interviews (or re-interviews). This involves re-interviewing or re-assessing a sub-sample of respondents after the completion of a survey or assessment. Responses given in the re-interview are compared with the respondents’ initial responses for consistency. Similarly, respondents may be re-interviewed to confirm responses and/or describe the rationale for a particular response. Utilizing repeated measures designs provides data for studies of test–re-test reliability and other measures of the quality of data collected. In turn, this information aids in the development of more reliable measures.

Cognitive interviews. This method involves intensive, one-on-one interviews in which the respondent is typically asked to "think aloud" as he or she answers survey questions. A number of different techniques may be involved, including asking respondents to paraphrase questions, probing questions asked to determine how respondents came up with their answers, and so on. The objective is to identify problems of ambiguity or misunderstanding, or other difficulties respondents have answering questions. This is frequently the first stage in revising a questionnaire.

Focus groups. This method involves group sessions guided by a moderator, who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups are useful for exploring issues that are nuanced and conditional on factors not easily anticipated.

This request for generic clearance provides a description of the scope of possible activities that might be covered and the procedures for keeping OMB informed about them. Following approval, and prior to implementation of any testing activity, MRIP will provide OMB with a copy of the questionnaire (if one is used), and all other survey materials, as well as a memo describing the project, including the research question or goal of each survey improvement project, the method proposed to answer the question or address the proposed goal, the recruitment of participants and/or selection of the sample, collection of information, and proposed analysis.

Information quality is an integral part of MRIP, and data collections adhere to survey and data quality standards (<https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>). The information obtained from these efforts will be used to develop new MRIP surveys and improve current ones. Specifically, the information will be used to reduce respondent burden, improve the quality and/or utility of survey data, increase data collection efficiency and reduce survey costs.

None of the data collected under this clearance will be published for its own sake. Study results will be included in agency research reports, and results may also be prepared for presentations related to evaluation or survey methodology at professional meetings or in professional journals.

**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.**

MRIP will employ information technology, including virtual interviews, to reduce the burden on respondents who agree to participate in its survey improvement projects. In addition, this clearance will provide MRIP with opportunities to design and test innovative technologies, such as web surveys, that would reduce burden and increase the timeliness and accuracy of survey data.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2**

Information collection and analysis under this clearance will not duplicate any other feasibility and design work being conducted by MRIP or other federal and non-federal agencies that may collaborate in this work. Additionally, to the extent possible, MRIP will make use of existing information, including reviewing results of previous evaluations of instruments, methods, and interventions to build upon past efforts.

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

Generally, research efforts will focus on household or individual respondents. However, some research may focus on for-hire fishing operations, which are generally small businesses. This research will be designed as relatively small-scale data collection efforts so as to minimize the amount of burden required to improve questionnaires and procedures, test new ideas, and refine or improve upon positive or unclear results from other tests. The results of the research conducted under this clearance are expected to improve the methods and instruments utilized in full scale studies and thereby improve information quality while minimizing burden to respondents.

**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 the exploratory and methodological tests proposed as part of this collection, the quality of ongoing surveys would suffer, as we would be unable to effectively evaluate potential sources of survey error and test alternative designs. Our ability to test and incorporate new data collection technologies would be limited, and we would be unable to execute studies in a timely manner to meet policy goals, evolving needs for survey data and Congressional mandates to improve MRIP. Including the necessary testing and evaluation in separate, individual information collection requests, or as revisions to existing information collections would delay implementation of survey enhancements and result in unreasonable burden for both OMB and program office staff.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

There are no special circumstances.

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

 **Describe the 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.**

A 60-day Federal Register notice for this request published on April 10, 2024 (89 FR 25250). There were no public comments received.

The Modernizing Recreational Fisheries Management Act (2018) (Public Law No. 115-405) requires the Department of Commerce to establish partnerships with states to improve recreational fisheries data collections. Consequently, MRIP has established a partnership among government agencies, independent scientists, recreational fishing groups and conservation organizations to ensure scientifically rigorous collection of appropriate information that meets science, policy and stakeholder needs. MRIP staff members maintain regular communication with customers, through workshops, workgroup meetings and one-on-one consultations.

The MRIP Executive Steering Committee (ESC), which includes senior managers from NOAA Fisheries, the Executive Directors of the Interstate Marine Fisheries Commissions, and a representative from the Marine Fisheries Advisory Committee, provides general oversight of MRIP and ensures that the program satisfies Federal, state and stakeholder needs for recreational fishing statistics. The ESC meets annually to review program activities, strategically allocate funds to address data needs and approve research priorities. MRIP Regional Implementation Teams (RITs), representing NOAA Fisheries regional offices and science centers, state natural resource agencies and interstate marine fisheries commissions, develop Regional Implementation Plans and convene annually to identify specific needs for recreational fisheries statistics, including needs for survey coverage, resolution, precision and timeliness of survey estimates. Regional priorities, as determined by the RITs are documented on the MRIP website. This generic clearance will facilitate testing of research needs and priorities identified by partner organizations.

These consultations will include discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden. Additional efforts to consult with potential respondents to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken as part of the testing that is conducted under this clearance.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Respondents for activities such as cognitive interviews and focus groups under this clearance may receive compensation for participation. This practice has proven necessary and effective in recruiting subjects to participate in such research and is also employed by the other federal cognitive laboratories. Research on incentives that may be conducted under this clearance may also involve nonmonetary incentives. The Office of Management and Budget (OMB) has noted that effectiveness of such incentives is a worthwhile research topic. If incentives need to be proposed for any research activity under this clearance, justification will be provided. MRIP will typically propose incentives at the level approved by OMB for cognitive laboratories and focus groups. If a higher incentive amount is proposed for approval, a meaningful justification will be provided.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

All respondents who participate in research under this clearance will be informed that their participation is voluntary and that all of the information they provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law. All participants in cognitive research will be required to sign written notification concerning the voluntary and confidential nature of their participation. No participant direct identifiers will be maintained as part of research under this generic clearance.

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

No sensitive questions will be asked.

**12. Provide an estimate in hours of the burden of the collection of information.**

The estimated annual response burden per survey activity and the total estimated annual response burden are shown in Table 1. We estimate that the number of individual respondents involved in research activities will be at most 46,000 per year. This estimate is based upon previous pilot studies that have been completed within the past several years. The estimated annualized burden is 4,375 hours. The hourly rate of $31.29 is based upon the average for all civilian workers from the December 2023 National Compensation Survey (<https://www.bls.gov/news.release/ecec.t02.htm>). There are no other costs to respondents, and there are no recordkeeping requirements. The estimated annual cost to respondents is $136,894.

Table 1. Estimated annual response burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **# of Respondents/year(a)** | **Annual # of Responses / Respondent(b)** |  **Total # of Annual Responses(c) = (a) x (b)** | **Burden Hrs / Response(d)** | **Total Annual Burden Hrs(e)  = (c) x (d)** | **Hourly Wage Rate  (for Type of Respondent)(f)** | **Total Annual Wage Burden Costs(g) = (e) x (f)** |
| Mail, web, telephone, face-to-face surveys | 45,000  | 1  | 45,000  | 5 mins  | 3750  | $31.29  | $117,337.50  |
| Cognitive Interviews | 250  | 1  | 250  | 1 hr  | 250  | $31.29  | $7,822.50  |
| Focus Groups | 250  | 1  | 250  | 1 hr  | 250  | $31.29  | $7,822.50  |
| Re-interviews/Panel designs | 500  | 1  | 500  | 15 mins  | 125  | $31.29  | $3,911.25  |
| **Totals** | **46,000** |  | **46,000** |  | **4,375** |  | **$136,894** |

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

There is typically no cost to respondents for participating in the research being conducted under this clearance, except for their time to complete the requested activity.

1. **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.**

There is no way to anticipate the actual number of participants, duration, and/or mode of data collection to be conducted under this clearance. Thus, it is impossible to estimate in advance the cost to the Federal Government. Costs will be covered by divisions conducting the research from their data collection budgets. We will include information about costs in the individual submissions. The annual costs to the Federal Government associated with each specific test will be determined as the individual tests are planned.

**15. Explain the reasons for any program changes or adjustments reported in ROCIS**

This is a new collection.

**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.**

Data from these studies may support research and analyses to be presented at appropriate professional meetings (e.g., American Fisheries Society, Joint Statistical Meetings) and may be submitted for publication in appropriate statistical or fisheries peer-reviewed journals. Agency reports will be made available on the program website.

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**18. Explain each exception to the certification statement.**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf)