

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Application Forms for Membership on a National Marine Sanctuary Advisory Council
OMB Control No. 0648-0397

SUPPORTING STATEMENT PART A

Abstract

This request is for revision and extension of this information collection.

Section 315 of the [National Marine Sanctuaries Act](#) (NMSA) (16 U.S.C. § 1445a) allows the Secretary of Commerce to establish one or more advisory councils (councils) to advise and make recommendations to the Secretary regarding the designation and management of national marine sanctuaries. Executive Order 13178 similarly established a Coral Reef Ecosystem Reserve Council pursuant to the NMSA for the Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve. Councils are individually chartered for each site, or for the sanctuary system, to meet its specific needs. Once a council has been chartered, a sanctuary superintendent starts a process to recruit members for that council by providing notice to the public and requesting interested parties to apply for the available seat(s) (e.g., Research, Education) and position(s) (i.e., member or alternate). The information obtained through this application process will be used to determine the qualifications of the applicant for membership on the council.

An additional two questions are being added to solicit information on eligibility for a program to decrease financial barriers to joining a council. An additional section for demographic questions is also being added to include the newly updated *Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15) and *Recommendations on the Best Practices for the Collection of Sexual Orientation and Gender Identity Data on Federal Statistical Surveys*, and to learn more about our applicants.

Justification

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

Section 315 of the [National Marine Sanctuaries Act](#) (NMSA) (16 U.S.C. § 1445a) allows the Secretary of Commerce to establish one or more advisory councils to advise and make recommendations to the Secretary regarding the designation and management of national marine sanctuaries. Executive Order 13178 (December 4, 2000) similarly established a Coral Reef Ecosystem Reserve Council pursuant to the NMSA for the Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve. Councils are individually chartered for each site, or for the sanctuary system, to meet its specific needs. Once an advisory council has been chartered, a sanctuary superintendent starts a process to recruit members for that council by providing notice to the public and requesting interested parties to apply for the available seat(s) (e.g., Research, Education) and position(s) (i.e., council member or alternate). The information

obtained through this application process will be used to determine the qualifications of the applicant for membership on the advisory council.

Two application forms are currently associated with this information collection: (a) National Marine Sanctuary Advisory Council Application form; and (b) National Marine Sanctuary Advisory Council Youth Seat Application form. Application form instructions will specify requirements imposed upon the agency when reviewing applicants as potential council members or alternates. Questions posed to applicants have been reviewed and an additional two questions are being added to solicit information on eligibility for a potential stipend program to decrease financial barriers to joining advisory councils. An additional section for demographic questions is also being added to include the newly updated *Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15)* and *Recommendations on the Best Practices for the Collection of Sexual Orientation and Gender Identity Data on Federal Statistical Surveys*, and to learn more about our applicants. Existing questions may be reordered, reworded, and at times, condensed to improve the organization of applicant responses and, thereby, simplify the applicant review process. We do not believe that such revisions to the application would appreciably change the average annual number of respondents or the reporting burden for the information requirements supporting solicitation of new advisory council members.

As mentioned above, an application form for advisory council membership was developed to help ease the application process for the public and facilitate the review process for NOAA's Office of National Marine Sanctuaries (ONMS) director. ONMS is proposing minor revisions to the 0648-0397 form to better understand applicant motivations and how applicants will promote diverse perspectives, to ensure consistency in applications by providing recommended lengths for responses, and to update application language to be more inclusive. This information collection will remain unchanged, with the exception of the revisions noted below. Due to the additional 2 questions, we have added 0.25 hours to the annual burden hours from the last version of the application. 25% of the respondents may fax and mail their materials which makes the total annual cost to the public to \$450.

Revisions: Apart from minor, non-substantive textual changes to update the application (e.g., changing order of sentences and reordering of questions) the following changes have been made.

- Updated instructions for completing both applications (youth and general) to include a recommended length for each question response to reduce the time burden associated with completing the application and to ensure consistency in answers.
- Addition of questions on demographic information to learn more about our applicants.
- Addition of questions to solicit information on eligibility for a potential stipend program to decrease financial barriers to joining advisory councils.
- Moved previous question one, "How did you hear about the opportunity to apply for this sanctuary advisory council seat?" to the end of the question section.
- Moved previous question four (question two in youth application), "Will you commit to participate in sanctuary advisory council activities (e.g., meetings, constituent outreach, retreats, chairing or participating on a subcommittee or working group, and reviewing written materials)?" to the second to last question.

- Added the Privacy Act Statement.
- Modified the following questions and descriptions in the youth and general application:
 - Will you commit to participate in sanctuary advisory council activities (e.g., meetings, constituent outreach, retreats, charring or participating on a subcommittee or working group, and reviewing written materials)?
 - Rationale: An advisory council member suggested we make the wording stronger to confirm the commitment to the advisory council. Changed “are you willing” to “will you.”
 - One of the key roles of a sanctuary advisory council member is to serve as a liaison between the sanctuary and its community. Explain how you will coordinate with, consult with, and inform the members of the constituency you will represent (ex: a Research seat), if appointed to that seat (ex: for a Research seat, members of the sanctuary’s research constituency). If you are applying for more than one seat, please provide responses for each constituency and be clear on which constituency you are referring to.
 - Rationale: Added “be clear on which constituency you are referring to” as advisory council members have commented that it is sometimes hard to follow answers to this question.

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.

1. What type of information will be collected?
 - General information about the applicant and their experiences will be collected to determine qualifications of the applicant for membership on the advisory council.
2. From whom will the information be collected?
 - The information will be collected from potential applicants of the general public who are interested in serving on an advisory council.
3. How will the information be collected?
 - Available seats and positions are announced by the appropriate site and ONMS headquarters through various public outreach channels, including a site’s website and local media (e.g., newspapers) and through an annual federal register notice summarizing the recruitment process and providing contact information for potential applicants to contact at each site regarding current vacancies, how to apply, and additional information. Interested persons can request an application kit (containing the application form, a copy of the council’s charter, the council handbook and information about the site itself) by phone or email. The applicant then completes and returns the form to the site office, by traditional mail or electronically.
4. What will this information be used for?

- In the past and in the future, the information obtained through this application process has been and will be used to determine the qualifications of the applicant for membership on the advisory council.

The specific information requested by the applications will be used in the following ways:

- Seat applying for (applicants are asked to check a box for the seat(s) for which they are applying): This information is used to determine the seat(s) on the council in which the applicant is interested.
 - Name, addresses and phone numbers: This is basic contact information that is necessary in order to conduct a LEXIS/NEXIS check and a departmental bureau check for potential conflict of interest and other issues in their background; and to notify the applicant about whether he or she will serve on the council. If the applicant becomes a member of the council, this information is used to keep them informed of meeting dates, upcoming events, etc.
 - Questions 1-5 and 9 (Questions 1-5 youth application): This information is used to determine the qualifications of the applicant for the seat(s) for which (s)he is applying, relative to those of other applicants for the same seat.
 - Question 6 (Question 5 youth application): This information is used to help ONMS understand how the applicant will help increase engagement with historically marginalized and underrepresented communities.
 - Questions 7-8 (Questions 6-7 youth application): This information is used to determine the qualifications of the applicant for the seat(s) for which (s)he is applying, relative to those of other applicants for the same seat.
 - Question 10: How applicants heard about the opportunity: This information is used to help ONMS improve recruitment efforts to ensure we are reaching a broad audience.
 - Demographic information: This information is used to learn more about our applicants. It will not be used in deciding who will join the advisory council.
 - Stipends: This information is used to understand who would like to opt-in to receiving a stipend per meeting attended to offset the expenses incurred by members to attend meetings and provide their expertise.
5. Does the respondent have multiple options for providing the information? If so, what are they?
- The applicant completes and returns the form to the site office, by traditional mail, fax or electronically. ONMS is currently developing a web-based version of the advisory council application form which would also allow applicants to submit their applications directly via a NOAA website.

6. How frequently will the information be collected?
 - Several sites per year will have to fill vacancies on existing councils; new councils may be created if new sites are proposed for designation. A site might open up recruitment once during a whole year or a couple of times throughout the year.
7. Will the information be shared with any other organizations inside or outside the Department of Commerce or the government?
 - Only the name and preferred contact information for each successful applicant would be published. Such information would likely appear on the individual sanctuary's web page and in newsletters and other usual information outlets for that sanctuary.
8. If this is an ongoing collection, how have the collection requirements changed over time?
 - The collection requirements have not changed over time. NOAA plans to use the information in the same manner as in the past.

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.

ONMS provides a broad opportunity for the public to apply for membership on councils. The revised application kit will be available in the updated Council Handbook once the updated Handbook is completed and posted on the sanctuary advisory council website. Applications can be submitted through the mail, by fax or email. It is estimated that 25% of applicants will mail or fax in their applications and the other 75% will email their applications.

In addition, ONMS is currently developing a web-based version of the advisory council application form which would allow applicants to submit their applications directly via a NOAA website. The estimated implementation date for this online advisory council application form is still to be determined.

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

Advisory councils are bodies unique to ONMS; no other collection of information meets the needs of ONMS for the purpose of selecting members of councils.

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

Advisory councils are bodies unique to ONMS and do not impact small businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing

burden.

Advisory councils serve an important function in the management of national marine sanctuaries, by providing advice to ONMS (from a variety of different perspectives and interests) and helping link the sanctuary to the community. In recognition of this importance, the National Marine Sanctuaries Act provided ONMS with its own authority to have councils, making the councils exempt from the [Federal Advisory Committee Act](#). Being able to collect this information allows ONMS to choose the best applicants to serve as council members. Without this information collection, council work would not be done effectively.

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

The collection is consistent with OMB guidelines.

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

A *Federal Register* Notice published on July 31, 2024 (89 FR 61401) solicited public comment. No comments were received.

In addition to soliciting public comments in the *Federal Register*, we selected three national marine sanctuaries: Flower Garden Banks, Stellwagen and Channel Islands and asked members of their Sanctuary Advisory Councils the following questions:

1. Is the current Sanctuary Advisory Council application form easy to understand, to complete, and to submit?
2. Are the instructions and information provided in the Sanctuary Advisory Council application enough and clear?
3. Do you think enough information is requested from the applicants? Are there other questions you think should be included in the application?

We received 3 responses, and overall, comments stated that the form is clear and easy to understand, to complete, and submit. Also, the respondents think the instructions of the form are clear. One respondent recommended decreasing the approximate lengths for question responses to two paragraphs to reduce the burden on applicant reviewers and to ensure consistency across all applications. In general, all respondents think the amount of information asked is enough and no additional information should be required. One respondent suggested that perhaps too much information is required but understands that it may be helpful in selecting the advisory council members. One respondent suggested rearranging sentences on the explanation paragraph of how to answer the questions and suggested clarifying which constituency the applicant is applying for question 5. Another respondent suggested we change the wording of question 4 to be more upfront on expectations for participating on an advisory council. Two respondents suggested rearranging the order of questions to better suit those applying.

As a result of this survey, two changes were made to the form:

- Updated instructions for completing both applications (youth and general) to include a recommended length (no more than 2 paragraphs) for each question response.
- Modified question 5 on general application to include the following statement, “If you are applying for more than one seat, please provide responses for each constituency and be clear on which constituency you are referring to.”
- Modified question 9 (question 8 on youth application) to include “will you” instead of “are you willing” for the exact question to be, “Will you commit to participate in sanctuary advisory council activities (e.g., meetings, constituent outreach, retreats, chairing or participating on a subcommittee or working group, and reviewing written materials)?”
- Moved previous question 1 and 2 to the end as two respondents mentioned that they belonged towards the end of the questions.

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

Respondents to the application are not given payments or gifts. When selected to serve on a council, members are eligible for travel expenses (including per diem in lieu of subsistence) for travel to and from official meetings (per 5 U.S.C. §§ 5702-5703). In addition to reimbursement of travel expenses, when selected to serve on a council, members can opt-in to the stipend program. NOAA has an interest in ensuring that the councils reflect a diversity of viewpoints, and offering stipends to members with financial need, who would otherwise be unable to serve on the council due to prohibitive cost, would help to achieve this goal.

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.

If chosen to serve on a council, members are informed that their names and business contact information (or other contact information as the member prefers) are made available so that constituents from the segment of the community the member represents can contact him or her. The application form states that ONMS intends to disclose applications only to Department of Commerce/NOAA staff, including employees, grantees, and contractors, with a need to know the information in the applications to complete the application review process, and to current sanctuary advisory council members who serve on the applicant review panel. Applicants are also informed on the application that some information contained in the application may be subject to release under a request from the [Freedom of Information Act](#), through a court order or in response to a Congressional inquiry. However, if disclosure is requested under FOIA, ONMS will endeavor to protect the privacy of applicants by withholding personal information, such as home addresses and telephone numbers of applicants, as well as names or other identifying information of applicants who are not chosen as members of the council. The application also now includes our Privacy Act statement.

Protection of applications (for both selected and non-selected applicants) is as follows:

- Council Applications for Selected Applicants: These are retained and filed in a secure location inaccessible to non-staff. When no longer needed, they are shredded. For record-keeping purposes, applications are retained for five years beyond the expiration of their seat term.

- Council Applications for Non-Selected Applicants: These applications are retained and filed in a secure location as described above. Applications are filed according to the seat applied for. It is useful to have this information to solicit qualified, non-selected applicants to apply again when council seats are vacated. When no longer needed, they are shredded. For record-keeping purposes, these applications are retained for five years beyond their application date.

The information collected is authorized under system of record notice [COMMERCE/NOAA-11](#), Contact Information for Members of the Public Requesting or Providing Information Related to NOAA's Mission, and [COMMERCE/DEPT-11](#), Candidates for Membership, Members, and Former Members of Department of Commerce Advisory Committees. This information is stored in NOAA system [6602](#), Office of National Marine Sanctuaries, and a current Privacy Impact Assessment is on file.

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

The application includes questions on demographics and follows the OMB *Standards for the Classification of Federal Data on Race and Ethnicity*. After applying, this information will be used to help understand how well NOAA's ONMS is inclusive of and serves all of our communities.

ONMS wants to remove, or reduce, a barrier to participation in an advisory council for individuals who would otherwise experience financial hardship, due to costs such as time off work, arranging for childcare, or making accommodations due to a disability or impairment. The application includes questions on if a member wants to opt-in to a program where they could offset their costs. A stipend per meeting attended can help offset the expenses incurred by members to attend meetings and provide their expertise. The stipend is not intended as compensation or payment for services.

Both sets of questions are not mandatory and are optional. The answers to these questions will not affect in any way the consideration of their application and will not result in any disadvantage or impact to their candidacy, and the application form states this clearly. ONMS will retain and file the selected applications in a secure location that is only accessible to staff and is approved for storage of personally identifiable information (e.g., in a locked filing cabinet or in a secure computer folder). According to the NOAA Records Schedule 100-16, these applications will be destroyed when no longer needed for current agency business.

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

Approximately 1200 applications will be sent out by request or downloaded from the Internet. Of these, approximately 75%, or 900, are expected to be completed and returned (850 adult and 50 youth), with an estimated time per applicant of one hour and 15 minutes for obtaining, completing and returning the application, for a total annual response time of 1,125 hours. The total annualized cost to respondents for the one hour and 15 minutes time burden of completing the application at a professional wage rate of \$31.48 per hour is \$34,431.25.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents / year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
General Sanctuary Advisory Council Application	Individual (All Occupations)	850	1	850	1.25	1062.5	\$31.48	\$33,447.50
Youth Sanctuary Advisory Council Application	Individual (All Occupations)	50	1	50	1.25	62.5	\$15.74	\$983.75
Totals				900		1,125		\$34,431.25

* The Mean Hourly Wage Rate for All Occupations from the [U.S. Bureau of labor Statistics May 2023 National Occupational Employment and Wage Estimates \(https://www.bls.gov/oes/current/oes_nat.htm\)](https://www.bls.gov/oes/current/oes_nat.htm) was used since respondents will likely span all occupational categories. For the Mean Hourly Wage Rate for the Youth applications, the All Occupations rate was divided in half since most individuals under age 18 will be making minimum wage or slightly above, if they are working.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital or start-up costs. No special equipment will need to be obtained for this information collection. ONMS expects applications to cost about \$2 per person for the cost of mailing the completed application, for a total annual cost to the public of \$450.00 (25% of 900 applications x \$2/person).

Information Collection	# of Respondents Submitting by Mail (a)	Annual # of Responses / Respondent (b)	Total # of Annual Mailed Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
General Sanctuary Advisory Council Application	200	1	200	\$2.00	\$ 400.00
Youth Sanctuary Advisory Council Application	25	1	25	\$2.00	\$ 50.00
TOTALS			225		\$ 450.00

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.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZA-4 (5)	\$249,121.50 x 15	1		\$37,368.23
Advisory Council Coordinator	ZA-3 (4)	\$172,114.50 x 6	10		\$103,268.70
Contractor Cost		\$122,313.75 x 11	10		\$134,545.13
Copying					\$540.00
Printing					\$1350.00
TOTAL					\$277,072.06

Sanctuary Superintendent oversees the advisory council application process, which is approximately a ZA-4 Band 5 position. Using the US Locality CAPS Standard Pay Table (https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf) (Rest of U.S.), the position is estimated to have a \$166,081 salary rate. The loaded annual salary is estimated to be 1.5 times the base salary, or \$249,121.50. Across the system, superintendents devote about 1% effort to reviewing applications. \$249,121.50 loaded salary multiplied by 1% equals \$2,491.22 cost per superintendent. There are fifteen superintendents that may be involved in reviewing applications. Therefore, the annual total cost associated with their involvement is \$2,491.22 multiplied by fifteen, or

\$37,368.23.

Site advisory council coordinators process and evaluate the applications, conduct any necessary interviews, and draft the final decision documents. Federal advisory coordinators are approximately a ZA-3 step 04 position. Using the US Locality CAPS Standard Pay Table (Rest of U.S.), the position is estimated to have a \$114,743 salary rate. The loaded annual salary is estimated to be 1.5 times the base salary, or \$172,114.50. Across the system, advisory council coordinators devote about 10% effort to processing advisory council applications. \$172,114.50 loaded salary multiplied by 10% equals \$103,268.70 cost per advisory council coordinator. There are six federal advisory council coordinators involved in processing applications. Therefore, the annual total cost associated with their involvement is \$17,211.45 multiplied by six, or \$103,268.70.

There is also contractor support with processing and evaluating applications, conducting any necessary interviews, and drafting the final decision documents. Affiliated advisory coordinators are approximately a ZA-3 step 01 position. Using the US Locality CAPS Standard Pay Table (Rest of U.S.), the position is estimated to have a \$81,542.50 salary rate. The loaded annual salary is estimated to be 1.5 times the base salary, or \$122,313.75. Across the system, advisory council coordinators devote about 10% effort to processing advisory council applications. \$122,313.75 loaded salary multiplied by 10% equals \$12,231.38 cost per affiliated advisory council coordinator. There are eleven affiliated advisory council coordinators involved in processing applications. Therefore, the annual total cost associated with their involvement is \$12,231.38 multiplied by eleven, or \$134,545.13. In summary, the total cost to the government is approximately \$277,072.06.

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

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
General Sanctuary Advisory Council Application	850	750	850	750	1.25	1	The increased number of respondents is based on the addition of new advisory councils during the 3-year period. Burden Hours increased for new questions added to application.
Youth Sanctuary Advisory Council Application	50	30	50	30	1.25	1	The increased number of respondents is based on the addition of new advisory councils during the 3-year period. Burden Hours increased for new questions added to application.
Total for Collection	900	750	900	750	1.25	1	
Difference	150		150		0.25		

Information Collection	Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	
General Sanctuary Advisory Council Application	\$ 400.00	\$ 180.00	Miscellaneous costs have increased due to increase of respondents and cost of mailing and copying increases.
Youth Sanctuary Advisory Council Application	\$ 50.00	\$ 8.00	Miscellaneous costs have increased due to increase of respondents and cost of

			mailing and copying increases.
Total for Collection	\$ 450.00	\$ 188.00	
Difference	\$ 262.00		

The costs to the federal government increased for several reasons. First, due to the increased number of advisory councils, there is a direct increase in the cost of copying and postage. Second, a more accurate reflection of the government labor rate was used, rather than using a flat rate of \$20/hour.

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.

Only the name and preferred contact information for each successful applicant would be published. Such information would likely appear on the individual sanctuary’s web page and in newsletters and other usual information outlets for that sanctuary. New council members are usually announced about 30-60 days after the deadline for accepting applications has passed.

NOAA’s ONMS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA’s ONMS decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

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.

No exemptions are being sought. The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).