

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## Online Eastern Population Sandhill Crane Survey Data Entry Portal OMB Control Number 1018-0185

**Terms of Clearance:** None.

### **Justification**

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

The Migratory Bird Treaty Act (16 U.S.C. 703–712) designates the Department of the Interior as the primary agency responsible for managing migratory bird populations frequenting the United States and setting hunting regulations that allow for the well-being of migratory bird populations. These responsibilities dictate that we gather accurate data on various characteristics of migratory bird populations.

The Service's fall survey for eastern population sandhill crane was established in 1979. It is implemented by state and Federal agencies and public volunteers from eight states in the Atlantic and Mississippi Flyways, as well as Ontario, Canada. Sandhill cranes are widely dispersed during the breeding and wintering seasons and are difficult to count. The optimal time to survey cranes is during the last week of October when the majority of eastern population cranes breeding in Canada migrate to traditional staging grounds in the Great Lake States (e.g. Jasper-Pulaski Fish and Wildlife Area, Medaryville, Indiana). Since the initial survey in 1979, crane numbers have increased to over 90,000 birds.

**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.**

We collect the following information in conjunction with the account setup process and survey data submission via the Service's [Eastern Population Sandhill Crane Data Entry Portal](#):

- Account setup process:
  - Email address,
  - Username,
  - Photo (optional),
  - Option for other users to contact the registrant,
  - Time zone,
  - First and last name,
  - Phone number, and
  - Start date.
- Survey data submission:
  - Data submission location via online map,
  - Date and time of observation,
  - Number of cranes,
  - Method (ground count or point count),
  - Habitat (agricultural field, sandbar, wetland, or mixed-wetland agricultural field), and

- Any additional notes the user would like to submit.

We ask users to submit all observations, even if none were observed in a specific location, as this information allows scientists to determine the annual distribution of sandhill cranes (presence/absence) and provides insight about the level of effort of each annual Fall Survey.

We provide portal protocol guidance online via the portal to the users . We recommend the user write-down all requested information on the data form during their survey and then transfer the information to the online portal. The portal also includes links for a user to view their reported observations, as well as a link to obtain observational data reported for the years 2010 through the most current year (currently 2023). Finally, we also provide links to the most current survey reports, as well as links to the general information about the sandhill cranes and the Cornell Lab's website containing information about the sandhill cranes.

The information collected through this survey is vital in assessing the relative changes in the geographic distribution of the species. We use the information primarily to inform managers of changes in sandhill crane distribution and population trends. This survey has no statistical design. Notifications for the survey are sent to volunteers and data results are entered into the data portal in order to calculate an abundance of sandhill cranes. We do not solicit respondents. They are volunteer based and primarily consist of individuals. However, State and Federal agencies may participate as well.

**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.**

This survey is conducted via the secure online survey platform, [Eastern Population Sandhill Crane Data Entry Portal](#), to reduce cost, improve data quality, and decrease respondent burden.

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

There is no duplication. Due to the unique nature of this program, no other division of the Service or any other Federal agency collects this information from the public.

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

This collection does not impact small businesses or other small entities.

**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.**

If we did not collect the information, the Service might promulgate hunting regulations that:

- Are not sufficiently restrictive, which could cause harm to the sandhill crane population, or

- Are too restrictive, which would unduly restrict recreational opportunities afforded by sandhill crane hunting.

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

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

There are no special circumstances requiring collection of the information in a manner inconsistent with OMB guidelines.

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

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

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

On July 5, 2024, we published in the *Federal Register* ([89 FR 55649](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on September 3, 2024. 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-MB-2024-0092](#)) to provide the public with an additional method to submit comments (in addition to the typical U.S. mail submission method). We received the following comments in response to that notice:

**Comment 1:** Electronic comment received via Regulations.gov (FWS-HQ-MB-2024-0092-0004) from Jean Public on 07/13/2024, as well as an email comment from Ms. Public dated 07/05/2025. The commenter does not feel the survey is necessary and the cranes should be left alone to live in peace and tranquility.

**Agency Response to Comment 1:** The commenter did not address the information collection requirements; therefore; no response is required.

**Comment 2:** Anonymous electronic comment received via Regulations.gov (FWS-HQ-MB-2024-0092-0005) on 08/19/2024. The commenter requested the birds be protected and that they should be left alone.

**Agency Response to Comment 2:** The commenter did not address the information collection requirements; therefore; no response is required.

**Comment 3:** Electronic comment received via Regulations.gov (FWS-HQ-MB-2024-0092-0005) from WhoPoo App on 09/03/2024. The commenter cited whistleblower activity related to offshore wind construction and operations which posed a danger to the North Atlantic right whale and linked it to the frequency of harm to birds.

**Agency Response to Comment 3:** The commenter did not address the information collection requirements; therefore; no response is required.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

<b>Organization</b>	<b>Title</b>
Private Citizen 1	Surveyor
Private Citizen 2	Surveyor
Private Citizen 3	Surveyor 3
Private Citizen 4	Surveyor
Private Citizen 5	Surveyor
Private Citizen 6	Surveyor
Private Citizen 7	Surveyor International Crane
Foundation	Wildlife Biologist Surveyor
WI DNR	Wildlife Biologist Surveyor

***“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: No feedback received on this question.

Agency Response/Action Taken: No action required.

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

Comments: One individual commented that they thought our estimate of the burden for this collection was accurate (i.e., that the average completion time for logging in and entering data for an individual was approximately 5 minutes).

Agency Response/Action Taken: No action necessary.

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

Comments: No feedback received on this question.

Agency Response/Action Taken: No action required.

And

***“Ways to minimize the burden of the collection of information on respondents”***

Comments: No feedback received on this question.

Agency Response/Action Taken: No action required.

Despite multiple attempts to solicit feedback via email and phone calls, we did not receive responses from 8 of the 9 individuals contacted.

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

We will not provide any payment or gifts to respondents.

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

We do not provide any assurance of confidentiality. Information may be shared in accordance with the Privacy Act of 1974 or the routine uses listed in the System of Records Notice, FWS-26, Migratory Bird Population and Harvest Surveys ([80 FR 27183](#), May 12, 2015, and modified at [88 FR 16277](#), March 16, 2023), or as described in Migratory Bird Data Entry Portals Privacy Impact Assessment (PIA) provided to OMB as supplemental documents in the ICR in ROCIS.

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

We will not ask any questions of a sensitive nature.

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

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of

potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that we will receive **112 annual respondents, 157 annual responses, and 11 annual burden hours** (rounded). The total dollar value of the annual burden hours is approximately **\$580** (rounded).

We used Table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-24-2561, December 17, 2024, Employer Costs for Employee Compensation—September 2024, to calculate the cost of the total annual burden hours:

- Individuals – the hourly rate for all workers is listed as \$46.84, including benefits.
- Government – the hourly rate for all workers is listed as \$62.92, including benefits.

**Table 12.1**

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours*
<b>Account Registration</b>							
Individuals	33	1	33	5 mins	3	\$ 46.84	\$ 140.52
State Agencies	18	1	18	5 mins	2	62.92	125.84
<b>Survey Data Submission</b>							
Individuals	38	2	76	3 mins	4	\$ 46.84	\$ 187.36
State Agencies	23	1.3	30	3 mins	2	62.92	125.84
<b>TOTALS:</b>	<b>112</b>		<b>157</b>		<b>11</b>		<b>\$ 579.56</b>

\*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 associated with this information 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 cost to the Federal Government to administer this information collection is **\$8,918** (rounded).

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2025-DET](#) to determine the annual salary costs for staff involved in reviewing and processing the information collected as shown below. The benefits rate was calculated from BLS [News Release](#) USDL-24-2561, we multiplied the annual salary by 1.61 to account for benefits. Due to staffing shortages, the program currently has one employee identified below in Table 1.

**Table 1 – Salaries and Benefits**

Position/Grade	Annual Salary	Annual Salary (Inc. Benefits)*	Time Spent on Collection	Total Annual Salary Costs*
Biologist, GS-12/05 (2025-DET)	\$ 110,788	\$ 178,369	5%	\$ 8,918
<b>TOTAL:</b>				<b>\$ 8,918</b>

\*Rounded

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

We are not reporting any program changes or adjustments.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The information we will collect will not be published.

**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.**

Not applicable.

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

There are no exceptions to the certification statement.