

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Approval Procedures for Incidental Harassment
Authorizations of Marine Mammals, 50 CFR 18.27
OMB Control Number 1018-0194**

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.

Section 101(a)(5)(D) of the Marine Mammal Protection Act of 1972 (MMPA; 16 U.S.C. 1361 *et seq.*) authorizes the Secretary of the Interior (Secretary) to allow, upon request, the incidental, but not intentional, taking by harassment of small numbers of marine mammals of a species or population stock by U.S. citizens who engage in a specified activity (other than commercial fishing) within a specific geographic region for periods of not more than 1 year. The U.S. Fish and Wildlife Service (we, Service) will authorize incidental take by harassment if statutory and regulatory procedures are followed and the Service finds:

- (i) take is of a small number of marine mammals of a species or stock,
- (ii) take will have a negligible impact on the species or stock, and
- (iii) take will not have an unmitigable adverse impact on the availability of the species or stock for taking for subsistence uses by Alaska Natives.

The term “take” means to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill, any marine mammal. Harassment for non-military readiness activities or scientific research activities conducted by or on behalf of the Federal Government means any act of pursuit, torment, or annoyance which:

- (i) has the potential to injure a marine mammal or marine mammal stock in the wild (the MMPA defines this as “Level A harassment”), or
- (ii) has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering (the MMPA defines this as “Level B harassment”).

Harassment for military readiness activities or scientific research activities conducted by or on behalf of the Federal Government means:

- (i) any act that injures or has the significant potential to injure a marine mammal or marine mammal stock in the wild; or
- (ii) any act that disturbs or is likely to disturb a marine mammal or marine mammal stock in the wild by causing disruption of natural behavioral patterns, including, but not limited to, migration, surfacing, nursing, breeding, feeding, or sheltering, to a point where such behavioral patterns are abandoned or significantly altered.

The terms “negligible impact,” “small numbers,” and “unmitigable adverse impact” are defined

in 50 CFR 18.27 (i.e., the Service's regulations governing small takes of marine mammals incidental to specified activities). "Negligible impact" is an impact resulting from the specified activity that cannot be reasonably expected to, and is not reasonably likely to, adversely affect the species or stock through effects on annual rates of recruitment or survival. "Unmitigable adverse impact" means an impact resulting from the specified activity:

- (1) that is likely to reduce the availability of the species to a level insufficient for a harvest to meet subsistence needs by:
 - (i) causing the marine mammals to abandon or avoid hunting areas,
 - (ii) directly displacing subsistence users, or
 - (iii) placing physical barriers between the marine mammals and the subsistence hunters;
and
- (2) that cannot be sufficiently mitigated by other measures to increase the availability of marine mammals to allow subsistence needs to be met.

The term "small numbers" is also defined in 50 CFR 18.27. However, we do not rely on that definition here as it conflates "small numbers" with "negligible impacts." We recognize "small numbers" and "negligible impact" as separate and distinct considerations when reviewing requests for incidental harassment authorizations (IHA) under the MMPA (see *Natural Res. Def. Council, Inc. v. Evans*, 232 F. Supp. 2d 1003, 1025 (N.D. Cal. 2003)). Instead, for our small numbers determination, we estimate the likely number of takes of marine mammals and evaluate if that take is small relative to the size of the species or stock.

The term "least practicable adverse impact" is not defined in the MMPA or its enacting regulations. The Service ensures the least practicable adverse impact through mitigation measures that are effective in reducing the impact of project activities but are not so restrictive as to make project activities unduly burdensome or impossible to undertake and complete.

If the requisite findings are made, the Service issues an IHA, which may set forth the following:

- (i) Permissible methods of taking;
- (ii) other means of effecting the least practicable impact on the species or stock and its habitat, paying particular attention to rookeries, mating grounds, and areas of similar significance, and on the availability of the species or stock for taking for subsistence uses by coastal dwelling Alaska Natives (if applicable); and
- (iii) requirements for monitoring and reporting such take by harassment.

OMB previously approved information collection requirements associated with incidental take regulations (ITRs) and letters of authorization (LOAs) contained in 50 CFR 18, subparts J (Beaufort Sea) and L (Gulf of Alaska) under OMB Control Number 1018-0070. Because the ITRs and associated LOAs authorize specific entities to incidentally take marine mammals while engaged in specified activities within a specific geographic region for periods of not more than 5 years, the Service is requesting a separate OMB control number for information collection requirements associated with IHAs.

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.

Applicants seeking to conduct activities may request an IHA for the specified activity. If the IHA is issued, the applicants must submit on-site monitoring reports and a final report of the activity

to the Secretary.

This is a non-form collection. Applicants must comply with the regulations at 50 CFR 18.27, which outline the procedures and requirements for submitting a request. These regulations provide the applicant with a detailed description of information the Service needs in order to evaluate the proposed activity and make the required determinations. Specifically, applicants must submit the following information to the Service as part of the IHA application process:

- A description of the specific activity or class of activities that can be expected to result in incidental taking of marine mammals, and
- The dates and duration of such activity and the specific geographical region where it will occur.
- Based on the best available scientific information, each applicant must also:
 - Estimate the species and numbers of marine mammals likely to be taken by age, sex, and reproductive conditions, and the type of taking (e.g., disturbance by sound, injury or death resulting from collision, etc.) and the number of times such taking is likely to occur;
 - Describe the status, distribution, and seasonal distribution (when applicable) of the affected species or stocks likely to be affected by such activities;
 - Describe the anticipated impacts of an activity upon the species or stocks;
 - Discuss the anticipated impact of the activity on the availability of the species or stocks for subsistence uses;
- Discuss the anticipated impact of the activity upon the habitat of the marine mammal populations and the likelihood of restoration of the affected habitat;
- Describe the anticipated impact of the loss or modification of the habitat on the marine mammal population involved;
- Describe availability and feasibility (economic and technological) of equipment, methods, and manner of conducting such activity or other means of effecting the least practicable adverse impact upon the affected species or stocks, their habitat, and, where relevant, on their availability for subsistence uses, paying particular attention to rookeries, mating grounds, and areas of similar significance;
- Discuss the suggested means of accomplishing the necessary monitoring and reporting which will result in increased knowledge of the species through an analysis of the level of taking or impacts, and suggested means of minimizing burdens by coordinating such reporting requirements with other schemes already applicable to persons conducting such activity; and
- Suggest means of learning of, encouraging, and coordinating research opportunities, plans, and activities relating to reducing such incidental taking from such specified activities, and evaluating their effects.

The Service uses the information to draft the proposed IHA, including proposed determinations and mitigation measures to ensure the least practicable adverse impacts on the species or stock and its habitat. Upon IHA issuance, applicants must submit monitoring and final reports indicating the nature and extent of all takes of marine mammals that occurred incidentally to the specified activity. The purpose of monitoring requirements is to assess the effects of project activities on the species or stock, ensure that take is consistent with that anticipated in the negligible impact and subsistence use analyses, and detect any unanticipated effects on the species or stock. Because the length of project activities varies by project (a few weeks to months), some projects require weekly reports during project activities.

Information requested by the Service is available to the public on the Service's website: <https://www.fws.gov/service/incidental-take-authorizations-marine-mammals>.

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.

We estimate that 100% of respondents will utilize electronic submission for the information collections. The majority of applicants and respondents indicate a preference for electronic submission of information, and we have worked to accommodate that preference. Applicants may submit information via email or in an electronic format, thus, reducing the burden on the applicant of having to provide hard copies of reports or other documents. Though not required, applicants may also submit information via hard-copy documents, if they so choose. A minority of applicants and respondents continue to submit at least some information via hard-copy documents as their preference.

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.

Under the MMPA, we share responsibilities with the National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce (NOAA-Fisheries), with each agency being responsible for different species. While both agencies may have similar regulations, they apply to different species of marine mammals. Therefore, there is no duplication of information collected.

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

The collection of information will 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.

The MMPA requires that we determine what impacts proposed activities would have on marine mammals. The MMPA requires we make a determination of negligible impact to the species or stock prior to issuance of authorizations. In addition, we must determine the activity will not have an unmitigable adverse impact on the availability of these species for subsistence uses by Alaska Natives.

If we did not collect the information described in this supporting statement, we would not have critical information needed to make the required determinations. As a result, we could not authorize incidental taking under provisions of the MMPA. Conducting information collection less frequently than as described in this supporting statement would limit the Service's ability to monitor potential adverse impacts to federal trust species.

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.

Visual sightings and interactions with Service species (i.e., polar bears, walruses, and sea otters, and manatees) during activities authorized by an IHA are not always predictable. If the encounter is persistent or unusual, the respondent must contact us to report the encounter and to request our expertise in assistance addressing the situation. At times, we also request that the respondent verbally report an encounter with a marine mammal at the time of occurrence and follow up with a written report. We are not aware of any other circumstances that would cause us to collect information in a manner that is 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 December 15, 2025, we published in the *Federal Register* ([90 FR 58047](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on February 13, 2026. 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-ES-2025-0613](#)). We received one comment in response to that notice:

Comment 1: Anonymous electronic comment (FWS-HQ-ES-2025-0613-0002) received February 9, 2026. The commenter encouraged the Service to protect marine mammals from destruction.

Agency Response to Comment 1: 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 are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Organization	Title
SolsticeAlaska Consulting, Inc	President
SolsticeAlaska Consulting, Inc	Biologist
Environmental Research and Consulting, LLC	CEO
Eco49 Consulting LLC	CEO
Alaska Dept. of Trans. And Public Facilities	Environmental Impact Analysis Manager
Weston Solutions	Project Manager
Weston Solutions	Senior Project Scientist
WSP Global Inc.	Lead Consultant – Environ. Planning
Turnagain Marine Construction	President

“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: One response stated that overall, the information required for IHA applications and reporting is necessary and has clear practical utility for evaluating the potential for harassment, ensuring mitigation/monitoring are adequate, and documenting compliance and effects. It highlighted specific information the responder considered essential and appropriate, including aspects of the activity description, acoustic source and sound propagation details, marine mammal species occurrence, assumptions and methodology for take estimates, mitigation and monitoring measures, and information in required reports.

Multiple responders mentioned specific requested information they felt was unnecessary:

- This included information a commenter believed was repetitive: repeated submission of identical or near-identical acoustic modeling descriptions for repeat IHAs where equipment, location, and methods are unchanged, and re-entry of project metadata (coordinates, activity description, species lists) across applications and reports.
- One responder believed questions in the IHA application about species biology (beyond species presence in the action area) were unnecessary, and another felt extensive narrative justification for standard, routine mitigation measures was unnecessary.
- A commenter suggested that a more structured approach (e.g., standardized tables and checklists for IHA applications and/or reports) would preserve analytical rigor while reducing repetitive narrative burden.
- Additionally, one response expressed that some Service requests for project spatial information are unnecessarily precise, mentioning requests to adjust project

shapefiles by less than 10 meters and requests for exact pile coordinates versus using coordinates for project area boundaries.

Agency Response/Action Taken: We appreciate responders' feedback. Repeated submission of information is sometimes necessary, as each IHA application (even those for activities highly similar to activities covered by prior IHAs) is required to contain the information listed at 50 CFR 18.27. While we note the suggestion to remove questions in the IHA application on species biology beyond presence in the action area, "a description of the status, distribution, and seasonal distribution (when applicable) of the affected species or stocks likely to be affected by such activities", as well as information on anticipated impacts to the species and its availability for subsistence uses, is currently required in IHA applications per regulations at 50 CFR 18.27.

We will look into developing new structured materials, such as standardized tables or checklists, that we could provide to IHA applicants for optional use in IHA applications and reports. Currently we provide applicants mitigation measure checklists ("Least Practicable Adverse Impact Checklists") to assist with consideration of mitigation measure options. We have also worked to develop an online reporting platform for polar bear monitoring reports that should be available for use by IHA holders later this year. If resources allow, we will look into creating a similar platform or other aids for reporting for projects that involve additional species (northern sea otters and Pacific walruses).

Going forward, we will minimize our requests for changes to spatial files as our analysis allows and refrain from asking for <10-meter adjustments unless such adjustments have meaningful impacts on take estimates. We note that analysis often requires coordinates for pile locations to accurately assess the specific area and marine mammal habitat impacted by underwater sound, but we will consider when we can use project boundary coordinates instead.

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

Comments: Responders noted that the amount of time it takes to complete IHA applications, monitoring and observation reports, and final reports varies substantially based on the nature of the project in question, including its complexity, location, schedule, similarity to prior projects, and the number of species involved. One responder stated that our current burden hour estimates were reasonable, especially since there is overlap between time spent on FWS IHA applications and IHA applications for NMFS. Other responders indicated the burden estimates were too low, and they typically spent more time than what was listed on applications and/or reports. They provided the following estimates of burden hours across different project types: 50 to 250 hours for new IHA applications (versus our current estimate of 50 hours), 1.5 to 57 hours for observation and monitoring reports (versus our current estimate of 1.5 hours), and 35 to 115 hours for final reports (versus our current estimate of 5 hours). Higher estimates of burden hours for reports included substantial time for data quality assurance and quality control. One responder provided specific time estimates for different components of IHA applications and reports and noted that key burden drivers include whether or not acoustic modeling must be rerun, how much narrative reformatting is required to match current guidance, and iterative consistency checks across sections.

Agency Response/Action Taken: We increased the burden completion time estimates based on feedback from the majority of responders. We note that estimates reflect what

we believe are average completion times, and completion times will vary between projects due to many factors. We also note that internal preparation and review protocols that some IHA applicants choose to implement may increase the time they spend on IHA information collections.

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

Comments: Responses stated it would be helpful for the Service to offer a course for compiling IHA applications to communicate agency expectations. One responder suggested the Service provide a process chart demonstrating the steps involved in IHA issuance and regulatory compliance.

Regarding observation and monitoring reports, one comment stated it would be helpful for the Service to share guidance on how observations are evaluated and any inferences applied for assessment of harassment. Another comment said it could be helpful if the Service made monitoring information from projects more widely available, perhaps in an annual report of monitoring efforts and data, as this information could assist applicants in areas with similar projects or locations tailor their expected marine mammal presence estimates and associated take requests.

One responder suggested that the Service provide standardized application and reporting templates, including required acoustic analysis tables, standard monitoring effort and observation summaries, and a final report structure. They also suggested that the Service offer formatting and naming conventions for tables, figures, and GIS outputs; define key terms and required metrics consistently; and provide clear guidance on when analysis in prior applications may be referenced rather than reproduced.

Agency Response/Action Taken: We appreciate the suggestion to offer a course on IHA applications and to provide a current process chart showing steps in the IHA process, and we will work on developing these. We will also look into sharing information from IHA observation and monitoring reports more widely, as we agree that this information could be helpful for others applying for IHAs. Data sharing considerations will likely vary between project types and affected marine mammal species, and we will assess how we can practicably provide helpful observation information to interested parties.

We regularly communicate with IHA holders about the criteria we use to assess whether a marine mammal observation indicated an instance of harassment. However, we acknowledge these assessments can take many factors into account, including case-by-case details, and we will look into developing and sharing additional guidance on harassment criteria and any related inferences. We emphasize that all observation reports must be objective, and those making reports should not be biased by whether or not the Service will consider a specific observation an instance of harassment.

We will look into developing standardized application and reporting templates, as well as guidance that provides definitions, suggested formatting conventions, and clarifications on when new analysis is necessary. In general, analysis for an IHA covering identical activities as a prior IHA will need to be updated (versus copied from the prior application) only if new information is available that may impact take estimates. Developing comprehensive templates for IHA application or reports is not practicable due to the large range of activity types that IHAs may address. However, we likely can create templates for some components of applications and reports, such as acoustic analysis tables, and provide these to applicants along with the example materials we currently

share. As noted above, we are close to launching an online reporting platform for polar bear monitoring observations that would provide standard structure for many reports.

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

Comments: Responders stated that electronic tools and submission systems could be helpful. One response suggested that a GIS mapping tool that generates a project polygon (based on the National Marine Fishery Service’s (NMFS’s) Multi-Species Pile Driving Calculator) and an associated species list could streamline requirements. Another response recommended the development of an electronic submission platform capable of auto-populating information for repeated projects, upload validation for file requirements, and status tracking and messaging to reduce email exchanges. This response also recommended a mechanism for allowing project metadata to be entered a single time and flow into applications and reports, as well as structured data collection tools for monitoring (e.g., standardized spreadsheets or webforms).

Additional recommendations were for a pre-approved standard mitigation measure library or checklist that replaces narrative descriptions, defined final report requirements that are tiered to project scope (i.e., are more streamlined for smaller projects), and formal allowance of incorporation by reference of previously approved application sections.

Agency Response/Action Taken: We have some web-based tools in place already that may be useful for IHA applicants, and we do not have the capacity to develop an extensive new online platform for IHA processing with auto-population, tracking, and messaging. The Service’s Information for Planning and Consultation (IPaC) tool includes marine mammal species (both ESA-listed and non-listed) and can be used to see what marine mammals under the Service’s jurisdiction occur in a project area. We are not currently able to develop a GIS mapping tool that generates a project polygon based on NMFS acoustic calculations, and we also note that some aspects of FWS acoustic analysis differ from NMFS analysis.

As mentioned above, we are close to releasing a polar bear reporting web platform and will look into developing additional web-based tools for components of the IHA process. We will also look into providing additional guidance that includes reporting requirements, and we note that we currently share mitigation measure checklists with applicants (“Least Practicable Adverse Impact Checklists”) that can be incorporated into IHA applications. In general, sections of previously approved applications can be copied over to new applications so long as activities remain the same and no new information related to take estimation has become available.

Additional comments received during the outreach:

Comments: Responses noted that standardizing information requests and reviewer expectations across Service biologists would be helpful, as would be increased standardization in the form of authoritative templates and definitions.

Multiple comments stated that the Service’s IHA internal review process is long and lacks transparency. As a result of lengthy internal review, IHA applicants may not receive IHAs by the time their project starts even if applications were submitted 9 or more months in advance, putting projects at higher risks of shutting down. Comments recommended additional staffing capacity for IHA processing in Alaska to improve timelines, as well as greater transparency on application status and causes of delay after applications leave the

Alaska Region for higher levels of internal review.

One response expressed gratitude to Service staff for their work on IHAs, including for their effective close coordination with NMFS staff on consistent analysis and review.

Agency Response/Action Taken: We will work on standardizing information requests and reviewer expectations across Service biologists that work with IHA applicants. Internal guidance on this topic is currently in progress. We will also look into developing certain templates and standard guidance to IHA applicants, as discussed above.

We acknowledge comments that IHA timelines are lengthy and delays related to review protocols and staffing limitations may be burdensome. We will assess protocols for opportunities to streamline the clearance process through the Service, Office of the Assistant Secretary for Fish and Wildlife and Parks, and the Department of the Interior.

Despite multiple attempts to solicit feedback, we did not receive a response from 1 of the 9 individuals contacted. Additionally, several responders that work together submitted a single joint response.

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 to respondents. Information may be disclosed to the extent permissible under the Freedom of Information Act (FOIA), the Privacy Act of 1974 and the routine uses listed in INTERIOR/ FWS-21, Permits System, [89 FR 2230](#) (January 12, 2024).

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 **56 responses** totaling **1,680 annual burden** hours for this information collection. The total dollar value of the annual burden hours is approximately **\$99,897** (rounded).

We used table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-25-1358, September 12, 2025, Employer Costs for Employee Compensation—June 2025, to calculate the total annual burden.

- Private Sector – the hourly rate for all workers is \$45.65, including benefits.
- Government – the hourly rate for all workers is \$63.94, 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
<i>Incidental Harassment Authorization – Application</i>							
Private Sector	3	1	3	120	360	\$ 45.65	\$16,434.00
Government	5	1	5	120	600	63.94	38,364.00
<i>Incidental Harassment Authorization – Monitoring and Observation Reports</i>							
Private Sector	3	5	15	10	150	\$ 45.65	\$6,847.50
Government	5	5	25	10	250	63.94	15,985.00
<i>Incidental Harassment Authorization – Final Report</i>							
Private Sector	3	1	3	40	120	\$ 45.65	\$5,478.00
Government	5	1	5	40	200	63.94	12,788.00
Totals:	15		56		1,680		\$ 99,896.50

*Rounded to match ROCIS

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 annual non-hour cost burden associated with 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 estimated annual cost to the Federal Government associated with this collection of information is **\$312,512** (rounded).

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2026-AK](#) to determine the annual salary costs for staff involved in reviewing and processing the information collected as shown below. In accordance with BLS [News Release](#) USDL-25-1358, we multiplied the annual salaries by 1.62 to account for benefits.

Position/Grade	Annual Salary	Annual Salary (Inc. Benefits)*	Time Spent on Collection	Total Annual Salary Costs
Clerical, GS-07/05	\$ 64,663	\$ 104,754	15%	\$15,713.11
Biologist, GS-12/05	114,702	185,817.24	50%	92,908.62
Biologist, GS-12/05	114,702	185,817.24	30%	55,745.17
Biologist, GS-12/05	114,702	185,817.24	30%	55,745.17
Biologist, GS-13/05	136,396	220,961.52	30%	66,288.46
Management, GS-14/05	161,180	261,111.60	10%	26,111.16
Total:				\$ 312,511.69

*All figures rounded

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

Due to a change in the number of IHA applications received, we are reporting a change in estimate of -14 annual responses and change of 1,315 annual burden hours.

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 do not publish the information in the form in which it is received. We do analyze the information annually to determine impacts resulting from incidental harassment authorizations.

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.

These are regulatory requirements; however, we will display the OMB control number and

expiration date on appropriate materials.

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.