

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

**Research Permit and Reporting System Applications and Reports
(36 CFR 2.1 and 2.5)**

OMB Control Number 1024-0236

Terms of Clearance. None.

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

The National Park Service (NPS) is required by the NPS Organic Act of 1916 to protect park resources for the benefit of current and future generations. The National Parks Omnibus Management Act of 1998 (NPOMA) directs NPS to support scientific study in parks when it improves park management and contributes to broader scientific understanding. NPOMA also requires that any scientific activities in parks comply with applicable laws and policies and do not harm park resources or visitor experience.

To meet these statutory responsibilities, NPS manages research and collecting activities through an established permit system. Regulations at 36 CFR 2.1 and 2.5 prohibit disturbing or collecting natural, cultural, or archeological resources unless authorized. The permit process ensures that proposed studies or science education activities - especially those involving resource disturbance or specimen collection—are reviewed for compliance with policy, scientific standards, safety, and potential impacts. It also ensures that only qualified personnel conduct such activities.

The permit system supports NPS resource protection responsibilities by requiring:

- conformance with NPS scientific, reporting, and publication policies;
- adherence to wilderness and resource-protection requirements; and
- acceptance of permit terms addressing data, specimens, and other deliverables.

Specimens retained permanently from permitted research remain federal property and are managed as part of NPS museum collections. Researchers are also expected to share study results through technical or public publications, consistent with NPOMA's direction to disseminate information gained from studies conducted in parks.

NPS has long used annual progress reporting to track the activities and results of permitted research. The Investigator's Annual Report provides an efficient mechanism for collecting

interim findings, fulfilling NPOMA's encouragement to publish and share scientific information. In recent years, the permit system has also become the mechanism by which applicants seek approval for science education activities, which similarly require oversight to ensure protection of park resources and compliance with policy.

Legal Authorities:

- 54 U.S. Code §100101 National Park Service Organic Act of 1916
- 54 U.S. Code § 100705. Availability of System Units for Scientific Study
- 54 U.S. Code § 100706. Integration of Study Results into Management Decisions
- 36 CFR § 2.1 - Preservation of Natural, Cultural and Archeological Resources
- 36 CFR § 2.5 - Research Specimens

2. Indicate how, by whom, how frequently, 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.

Forms 10-741a (Scientific Research and Collecting Permit Application) and 10-741b (Science Education Permit Application) collect the information NPS needs to review and approve requests to conduct research, collection, or science education activities in national parks. We use this information to understand **who** is conducting the work, **what** they plan to do, **where** they plan to do it, and **whether** the work could affect park resources, visitors, or operations.

The applications collect information such as:

- Names and business contact information.
- The project title, purpose, planned methods, and work schedule.
- The specific locations in the park where activities will occur and how the permittee will access those locations.
- Whether specimens will be collected or handled, descriptions of those specimens, and what will happen to them after the study.
- For any specimens that will be kept permanently, the proposed long-term repository.

This information allows parks to evaluate the proposal, ensure compliance, assess potential impacts, and confirm that qualified personnel will carry out the work.

Permittee Field Check-In and Check-Out Reports (Form 10-741D)

Because applicants must apply well before fieldwork begins, the dates and locations in the application are only estimates. Field Check-In and Check-Out Reports provide parks with real-time information about when permitted researchers are actually in the park, where they are

working, and how they are accessing those areas.

Parks use this information to:

- Give law enforcement awareness of approved activities that might otherwise appear illegal.
- Support safety personnel who may need to locate or contact researchers.
- Help resource managers monitor any effects of the permitted activities.
- Most small parks are not expected to use these reports, so only about one-third of permittees will complete them.

The forms are submitted through the online Research Permit and Reporting System (RPRS), which prefills information already included in the permit record. Respondents only need to confirm or update what has changed. Using RPRS also simplifies completion of Field Check-In/Check-Out Reports and the Investigator's Annual Report, since much of the information auto-populates from the approved permit.

Table 2.1 Check-In Report

Requested Information	Reason for Question
Field Start and End dates	• Pre-filled from permit but can be edited to update. • This information will alert management staff that permitted research studies are active or ended.
Field Contact Phone Type(s)	• Informs the park whether the phone number will work when the field contact is in the field.
Residence during fieldwork trip	• Enhances the park's ability to communicate with the field contact, and to verify whether fieldwork is taking place.
Vehicle Make, Model, and License Plate Number	• Allows parks to account for vehicles parked in areas outside of normal visitor parking options and to locate field personnel in remote areas.
Checkboxes to acknowledge: Permission to conduct fieldwork activities that require special authorization, including nighttime work, backcountry camping, working in public view, aerial or remote-sensing operations, visitor surveys, and scientific studies in wilderness or closed areas.	• Parks need to know when and where these activities, which without a permit would be illegal, occur. Through this information, parks may account for, track, manage, and mitigate.

Table 2.2 Check-Out Report

Requested Information	Reason for Question
Names of fieldwork site(s)	To confirm all fieldwork site locations, account for equipment or site disturbances, verify that site conditions were managed according to permit requirements, and protect visitor safety.
GIS or specific coordinate location of each field site	Provides the exact location of fieldwork sites, allowing parks to: (1) track equipment left in the field, (2) protect park resources, (3) verify that site conditions were managed according to park requirements, and (4) conduct mitigation for any damages.
Number of days at each site	Allows parks to calculate the potential impact of the permitted activities at each specific site, especially sites where resources are fragile and can sustain limited impact.
Number of researchers at each site	Helpful information for the calculation of the impact of permitted activities. This information is especially important if site resources are fragile and can sustain only limited visitation.
Equipment left at each site	Parks use this information to track the exact location of equipment left in the field. This information supports visitor experience, safety, and resource protection efforts, and it helps monitor compliance when equipment removal is a permit requirement.
Types and quantities of specimens from each site visited	Provided at the end of the field activity to verify the scope of the collection. This information is required for parks to meet their responsibility to preserve park resources and to track all collections which remain Federal Property.
Other Comments	Optional field which gives the permit holder the opportunity to give NPS feedback on their scientific study experience, and the opportunity to make clarifications or comments to supplement information they have provided on the form.

Form 10-226 [Investigator's Annual Report (IAR)] is used to report annually on the activities conducted under the permit. The form collects the following information:

- Reporting year, park, and type of permit.
- Names and business contact information and names of additional investigators.
- Project title, park-assigned study or activity number, park-assigned permit number, permit start and expiration dates, and scientific study start and end dates.
- Activity type, subject discipline, purpose of study/activity during the reporting year, and finding and status of study or accomplishments of education activity during the reporting year.

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.

All required forms are electronically submitted using the Research Permit and Reporting System (RPRS). The system automates much of the process to make applying and reporting as simple and efficient as possible. Applicants can upload existing proposals and peer reviews, so they do not have to create new documents they already have. In some cases, very small number of applicants (less than 1%) may have limited internet access. Those individuals may mail paper applications or forms directly to the park.

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 known duplication of effort. The information collected through these forms is specific to each individual research or science education project conducted with areas managed by NPS. No other system or program collects the same project-specific details needed to review and approve activities in a national park.

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

Some small organizations—such as small, independently owned research groups or small providers of field-based science education—may apply for these permits. However, the application and reporting steps are the same for everyone, regardless of size. Small entities do not face any additional requirements or higher burden than larger organizations. Because the process is the same for all applicants, this information collection does **not** create a significant impact on 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 NPS does not collect the information required in these applications and reports, we would not be able to review proposals, or issue permits for any scientific research in national parks. This information is needed to confirm that activities are safe, legal, and do not harm park resources or visitors' experiences. Without this collection, no scientific studies could be permitted,

preventing NPS from meeting the requirements of the National Parks Omnibus Management Act of 1998 and NPS Management Policies 2006, which mandate support and oversight of research.

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 that require us to collect 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 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 April 29, 2026, we published in the Federal Register (91 FR 23111) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on June 29, 2026. We did not receive any comments.

In addition to the Federal Register Notice, we consulted with six (6) individuals familiar with this collection of information to validate our time burden estimates and asked for comments on the questions below the following table. Respondents included:

Title	Affiliation
Research Scientist	U.S. Geological Survey
Assistant Professor	University of Oregon
Research Scientist	State of Colorado
Professor	California Polytechnic Humboldt
Professor	Montana State University
Postdoctoral Research Fellow	U.S. Forest Service

Question 1: “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: Representatives were supportive of the need to collect applications and report information. Overall, they felt the information requested is practical, useful for tracking research activities and funding, and appropriate for park management needs. Respondents also noted that the collection is necessary and not burdensome, and that all requested information appears reasonable and relevant.

- “The information requested is highly practical and necessary for tacking research activities in the park and their funding sources.”
- “The collection of the information is necessary and not onerous.”
- “The information collected by RPRS seems practical and reasonable. Nothing seemed completely unnecessary”

NPS Response/Action Taken: No Response Required

Question 2: “The accuracy of our estimate of the burden for this collection of information:

Comments: The comments suggest that while the process is manageable, the actual time required is higher than projected. Respondents reported spending between 30 and 60 minutes on annual reports and renewals, depending on the complexity of their activities.

- “Yes, while it takes a little time, it is not over burdensome.”

- “It takes me about 30 minutes to renew my permit each year and about 45-60 minutes to prepare my total Annual Report.”
- “I usually spend at least 30-60 minutes on these reports, sometimes more, depending on the scope of activities and degree of detail I choose to report.”

NPS Response/Action Taken: No Response Required.

Question 3: “Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: No specific suggestions for enhancing the quality, utility, and clarity of the information to be collected were provided by respondents. Nor were any specific elements of the forms lacking quality, utility and clarity.

NPS Response/Action Taken: No Response Required

Question 4: “Ways to minimize the burden of the collection of information on respondents”

Comments: Two respondents provided feedback that the forms did not pose a burden and did not suggest changes to reduce burden. Both affirmed that the current process is already streamlined: one noted that the required check-in/check-out and reporting steps are simple and can be completed retroactively if needed, and the other stated that the current level of questioning is appropriate and sufficient

- “I think this burden has already been minimized. Once a permit is submitted, researchers just need to remember to check in and check out (and this can be done retroactively, if the researcher forgets), and to submit an annual report and renewal.”
- “I think the current amount of questioning is adequate.”

NPS Response/Action Taken: No Response Required. The estimate burden of 1.5 hours to complete the Application and 30 minutes to complete the Annual report remains the same.

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

We do not provide payments 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. All forms inform applicants that some or all of the information they submit may be made public. Investigator's Annual Reports are posted on the RPRS website, and other submitted information may be released as required by the Privacy Act and the Freedom of Information Act. We request only official names and business contact information, and RPRS records can be retrieved by applicant or permittee name. This information collection is covered by the Privacy Act System of Records Notice INTERIOR/NPS-25, Research Permit and Reporting System (RPRS) — 87 FR 33203 (June 1, 2022).

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 do not ask 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. Instead, this cost should be included under "Annual Cost to Federal Government."**

We estimate that we will receive **8,590** responses totaling **6,884** burden hours. We estimate that the dollar value of the annual burden hours is **\$374,911** (rounded). We used the Bureau of

Labor Statistics (BLS) News Release¹ (USD-26-0505, March 20, 2026, Employer Costs for Employee Compensation - December 2025), to calculate the total annual burden. We used Table 1 to calculate the total compensation rate (average per hour) including benefits for all workers in the following categories:

- Individuals (Civilian workers): \$48.78
- Private Sector: \$46.15
- State and Local Government: \$65.68

TABLE 12.1. Total Estimated Annualized Burden

Activity	Number of Annual Responses	Completion Time per Response	Total Annual Burden Hours	Hourly Rate Including Benefits	\$ Value of Annual Burden Hours
Form 10-741a, "Application for a Scientific Research and Collecting Permit"					
Individuals	260	1.5 hours	390	\$48.78	\$19,024
Private Sector	1,600	1.5 hours	2,400	\$46.15	\$110,760
Government	1,330	1.5 hours	1,995	\$65.68	\$131,032
Subtotal	3,190		4785		260816
Form 10-226, "Investigator's Annual Report"					
Individuals	270	30 minutes	135	\$48.78	\$6,585
Private Sector	1,640	30 minutes	820	\$46.15	\$37,843
Government	1,360	30 minutes	680	\$65.68	\$44,662
Subtotal	3270		1635		89090
Form 10-741B, "Application for a Science Education Permit"					
Individuals	30	1 hour	30	\$48.78	\$1,463
Private Sector	50	1 hour	50	\$46.15	\$2,308
Government	50	1 hour	50	\$65.68	\$3,134
Subtotal	130		130		6905
Form 10-741C, Field Work Check-in Report					
Individuals	80	10 minutes	13	\$48.78	\$634
Private Sector	520	10 minutes	87	\$46.15	\$4,015
Government	400	10 minutes	67	\$65.68	\$4,401
Subtotal	1,000		167		9050
Form 10-741D, Field Work Check-out Report					
Individuals	80	10 minutes	13	\$48.78	\$634
Private Sector	520	10 minutes	87	\$46.15	\$4,015
Government	400	10 minutes	67	\$65.68	\$4,401
Subtotal	1,000		167		4401
TOTALS	8,590		6,884		\$374,911

*Figures rounded to match ROCIS.

¹ <https://www.bls.gov/news.release/pdf/ecec.pdf>

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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 burden cost to respondents.

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.

We estimate that the total cost to the Federal Government to administer this information collection is **\$29,721,600** (rounded). This estimate includes federal salary costs and benefits, as well as the costs associated with reviewing and processing applications and reports, based on hourly rates (see Tables 14.1 and 14.2 below). To determine average hourly rates, we used the Office of Personnel Management 2026 Salary Table² as an average nationwide rate. In accordance with (BLS) News Release (mentioned above). We multiplied the hourly rates by 1.6 to account for benefits.

² https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/RUS_h.pdf

Table 14.1 Annualized cost to the Federal government – weighted hourly rate

Position	Grade/Step	Hourly Pay Rate	Hourly Rate Including Benefits (1.6 x hourly rate)
Administrative	GS-07/05	\$ 27.40	\$ 43.84
Technician	GS-09/05	33.52	53.63
Scientist	GS-13/05	57.80	92.48
Curator	GS-11/05	40.55	64.88
Weighted Average (\$/hr)			0

Table 14.2 Total Annualized Cost to the Federal Government

Activity	Total hours	Weighted Average Cost (\$/hr)	Total cost (\$)
Process Application	40	\$64	\$ 2,560
Process specimen application (curator)	10	\$64	640
Monitor permit	24	\$64	1,536
Receive reports	4	\$64	256
Manage specimens	8	\$64	512
Total Weighted Cost per Permit			86
Total [\$5,504 (Weighted Cost) x 5,400 (avg. number of active permits to administer annually calculated over a three-year span)]			\$29,721,600

15. Explain the reasons for any program changes or adjustments.

There are no program changes.

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.

This information collection is not intended to produce publications. Although applications and permits are part of the public record, they are not published. Investigator's Annual Reports entered into RPRS are posted online only after park staff review and approve them. NPS does not plan to tabulate, analyze, or publish any aggregated results.

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.

We will display the OMB control number and expiration date.

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.