

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

**Bird Banding and Recovery Reports
OMB Control Number 1028-0082**

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.

Under the authority of the Migratory Bird Treaty Act (16 U.S.C. § 703-712) (MBTA), the U.S. Department of the Interior (DOI) delegates oversight of the national bird banding program to the U.S. Geological Survey's (USGS) Bird Banding Laboratory (BBL), which authorizes permits for the capture, banding, and marking of wild migratory birds (50 CFR 21.70). The BBL oversees more than 9,000 federally permitted bird banders and manages the North American Bird Banding Program (NABBP), the national database of bird banding and encounter records. In collaboration with the Canadian Wildlife Service's Bird Banding Office (BBO), the BBL administers the NABBP across North America. This includes coordinating the reporting and tracking of marked birds encountered by the public, hunters, researchers, and other partners, ensuring that these valuable data remain available for long-term scientific research, management and conservation.

Bird banding is a vital scientific tool that enables researchers and wildlife managers to monitor bird populations, track long-term ecological trends, and develop science-based conservation and harvest management strategies. The BBL serves as the national repository for bird banding and encounter data collected throughout North America. Federal and State wildlife agencies, Flyway Councils, non-governmental organizations, academic institutions, and other partners rely on these data to support sustainable harvest management, identify species of conservation concern, assess population trends, and inform critical land management and conservation decisions.

To fulfill these responsibilities, the BBL collects information through the Federal Bird Banding and Marking permit application and other forms to:

1. Ensure that permit applicants describe clear scientific justification, objectives and methodologies for proposed bird banding and marking activities.
2. Ensure, through the federal permitting process, that permit applicants possess the necessary knowledge, training, and experience to safely capture, band and mark birds, accurately collect and report data, and maintain birds in safe and humane conditions.
3. Maintain an automated electronic system to efficiently verify, accept, process, store and manage data associated with individually banded or marked birds, including records of recoveries.

The BBL collects information through three forms: 1) the Federal Bird Banding and Marking Permit Application (permit application), used to evaluate new permit requests 2) the Federal Bird Banding and Marking Permit Renewal Form (renewal form), used to assess permit renewal requests and continued eligibility and 3) the Federal Bird Banding Recovery Report (recovery report), used to document encounters with banded birds and maintain accurate records within

the NABBP.

In accordance with the Paperwork Reduction Act of 1995 (PRA), the USGS is proposing revisions to information collection control #1028-0082, which expires on February 28, 2027, for the permit application. These proposed revisions aim to enhance clarity, eliminate unnecessary duplication, and improve efficiency, thereby reducing the administrative burden on both respondents and the USGS. Other forms in control #1028-0082, including the renewal form and the recovery report, remain unchanged. The existing information collection associated with Control Number #1028-0082 was last modified on September 1, 2023 (88 FR 60482).

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.

The USGS BBL permit program is designed to manage hands-on bird research thus supporting the protection of birds covered by Federal statutes and contributing to broader conservation efforts. The BBL has a regulatory responsibility under 50 CFR 21.70 to ensure that the capture, banding and marking of wild birds are conducted for justified scientific purposes by qualified and properly trained individuals. Information collected by OMB Control Number 1028-0082 complies with DOI requirements, including the USGS Information Quality Guidelines, which are designed to ensure and maximize the quality, objectivity, utility, and integrity of the information collected by the BBL. The BBL maintains quality assurance and control procedures to ensure accurate collection, curation, and management of bird banding and encounter data. Data released through public repositories, such as [ScienceBase](#), are accompanied by documentation describing data collection and processing methods, data structure and content, measures of accuracy and precision, and applicable metadata standards. Prior to release, all datasets pass through USGS review and approval processes to ensure compliance with established quality assurance requirements.

The USGS BBL issues Federal Bird Banding and Marking Permits based on the type of authorization requested through the permit application process. Permits are generally issued for a period not to exceed three years. Current permit holders submit a renewal form when their permits are due for renewal, typically every three years. The recovery report may be submitted at any time by individuals who encounter a banded or marked bird.

The likely respondents to this information collection are individual citizens, businesses, nonprofit organizations, educational institutions, and Federal, State, local, or Tribal governments.

These forms will ensure that:

- Applicants understand the information required for permit issuance and that the collection of such information is approved in accordance with the PRA of 1995.
- Applicants possess the qualifications, training, and experience necessary to receive a Federal Bird Banding and Marking Permit.
- Proposed banding and marking activities are scientifically justified and consistent with the purposes for which bird banding and marking permits are issued.
- Current permittees submit updated contact information for their bird banding and marking permit.
- Respondents can efficiently report encounters with banded or marked birds, and the BBL can verify, process, store, and manage data associated with banded, marked, recaptured,

resighted (recovered) birds.

The BBL collects information through both form and non-form formats, including electronic submissions, email correspondence, written communications, and, when necessary, telephone discussions.

The **permit application** is completed by individuals seeking authorization to capture, band, or mark migratory birds. If a permit is approved, identifying information about the permittee is entered into the BBL database, a permit is issued, and the application is retained as a permanent administrative record. The application is available as a fillable PDF form at the USGS website <https://www.usgs.gov/media/files/bbl-permit-application>. Applicants must complete all applicable sections of the form and provide supporting documentation, including a banding résumé and a comprehensive project description detailing proposed banding or marking activities, capture methods, and biological sampling procedures, as outlined in the [Permit Application Instructions | U.S. Geological Survey](#).

The **renewal form** is completed by permitted holders when their permits are due for renewal. The form collects current or updated contact information and is retained as a permanent record. As set by regulations, most permits are renewed every 3 years. This form is only available electronically at: [Permit Renewal | U.S. Geological Survey](#). The banders submit their current contact information through the Bander Portal and the submission process provides an electronic signature for the form. The renewal form is limited to maintaining permit eligibility and contact information and may not be used to request changes to permit authorizations.

The **recovery report** is completed by individuals who encounter a banded or marked bird and wish to report that encounter to the BBL. Information provided by respondents is entered into the BBL database and used to document bird encounters and support scientific analyses. The information submitted by individuals is used to generate a personalized Certificate of Appreciation and may be used to contact a respondent if any discrepancies are found with an encounter report. Recovery reports are submitted electronically through a secure website accessed at the URLs below:

- English at: www.reportband.gov
- Spanish at: https://www.pwrc.usgs.gov/BBL/Bander_portal/login/reportband.php?lng=sp
- French at: https://www.pwrc.usgs.gov/BBL/Bander_portal/login/reportband.php?lng=fr

The BBL plays a critical role in permitting banding and marking migratory birds in the United States, maintaining records of banded and marked birds, facilitating coordination between banders and individuals who later encounter banded or marked birds, and ensuring the resulting data remain available for future scientific analyses. The BBL continually works to improve quality, quantity, accessibility, and efficiency of data collection and management while reducing administrative burden and operational costs.

Data collected through this information collection is used by Federal, Provincial, State, Tribal and local agencies, as well as academic researchers and other scientific cooperators, to study population size, mortality and survival rates, longevity, and migration patterns of wild birds. Further, the waterfowl band recovery information is prepared by the BBL and is one of the most important tools used in the preparation of annual hunting regulations by state and federal management officials. On an annual basis, the USGS provides banding and recovery data on harvested waterfowl and upland gamebirds to the U.S. Fish and Wildlife Service to help fulfill its

responsibilities designated by international migratory bird treaties with Canada, Mexico, Japan, and Russia. This dataset assists state and federal biologists in setting harvest regulations and evaluating management strategies and better understanding the environmental drivers of migratory bird population dynamics. The USDA APHIS Wildlife Services uses bird banding data to better understand bird movements near airports, inform habitat modifications, and reduce the risk of bird strikes through targeted deterrents. The USGS also makes these data publicly available through annual releases on ScienceBase, the agency's trusted digital repository. The dataset currently contains more than 85 million bird banding, encounter, and recapture records representing over 1,000 migratory bird species covered under the Migratory Bird Treaty Act. Researchers, wildlife managers, and conservation practitioners use these data to study avian distribution, migration, disease, ecology, longevity, demography, and population dynamics, to support science-based conservation and management decisions across North America.

With the proposed revisions to information collection control #1028-0082, the BBL aims to provide essential clarity, enhance efficiency, and eliminate duplication, thereby further reducing the administrative burden for both the public and the USGS. Other forms in control #1028-0082, including the permit renewal form and the bird banding recovery report, remain unchanged.

Current information collection control #1028-0082: In addition to the standardized information required by 50 CFR 13.12, the current permit application requirements include submission of the following information:

- 1) Height, Weight, Hair Color, Eye Color, Gender (Male/Female).
- 2) Type of Permit.
- 3) Current and previous federal migratory permits possessed, previously possessed, or pending.
- 4) If blood sampling is being requested, the master permit holder and permit number of the person requiring permission, species, site of the blood draw or technique, the volume of blood, why blood sampling is needed, how it will be used, and the applicant's qualifications for such blood sampling.
- 5) If feather sampling is being requested, the master permit holder and permit number of the person requiring permission, species, what feathers and how many are needed, why is feather sampling needed, how it will be used, and the applicant's qualifications for feather sampling.
- 6) Species proposed to band or mark based on groups.
- 7) Trapping techniques proposed: mist nets, rocket nets, and cannon nets, or list of other intended techniques.
- 8) Auxiliary marking being requested and the master permit holder and permit number of the person requiring permission, species, techniques used, type of marker used, why are aux markers needed, how will they be used, and the applicant's qualifications for feather sampling.
- 9) Description of what an applicant hopes to accomplish by banding birds.
- 10) References – names, email, addresses in which whom the BBL may consult with regarding an applicant's qualifications.

Proposed revisions to information collection control #1028-0082: In the proposed revisions to information collection control #1028-0082, we removed outdated or irrelevant questions,

consolidated several inquiries to strengthen the scientific justification for banding and marking, and eliminated the application checklist to reduce redundant information requests. Specifically, the following revisions are proposed:

- 1) Type of Permit. We removed “Renewal Permit” as this is outdated information. Renewals are submitted by permitted banders through the Bander Portal and do not require this form. We added the options, of “Master Station,” “Master Personal,” and “Change in Responsible Individual” to this section. These options were consolidated from other sections to provide clarity to the BBL on the type of permit being requested.
- 2) (NEW) Applicant Type. A section on Applicant Type, was added to provide clarity to the BBL and ensure consistency with the program’s database. Applicant Types include Federal, State, Tribal, Local Government, Non-governmental Organization, University, Avocational Biologist, Business, and Other.
- 3) Personal information such as Height, Weight, Hair Color, Eye Color were removed from the application. This information is irrelevant to BBL permitting.
- 4) Gender was modified to Sex and an option for “undisclosed” was added.
- 5) Contact Information. We consolidated home and business addresses into one address section. The applicant is now only required to provide one address to the BBL for correspondence and has the option to include an organization, if applicable.
- 6) Species. We eliminated the pre-selected species groups and instead allow the applicant to list their proposed species groups or individual species for banding.
- 7) Capture techniques. We eliminated the pre-selected techniques and instead allow the applicant to list their proposed capture techniques.
- 8) Auxiliary marking. We removed requests for information in this section that were redundant. Species, techniques, and purposes for auxiliary marking are already required as part of the applicant’s Comprehensive Project Description as part of the scientific justification for banding and marking. An applicant’s skills and qualifications for auxiliary marking are already required as part of their banding resume.
- 9) Blood and Feather Sampling. We removed requests for information in this section that were redundant. Species, techniques, and purposes for blood and feather sampling are already required as part of the applicant’s Comprehensive Project Description as part of the scientific justification for banding and marking. An applicant’s skills and qualifications for blood and feather sampling are already required as part of their banding resume.
- 10) (NEW) Biological Sampling. We added a new section that allows an applicant to request other types of biological sampling (e.g., mouth or tracheal swabbing) that would be completed as part of banding or marking birds. Species, techniques, and purposes for additional biological sampling are now required as part of the applicant’s Comprehensive Project Description as part of the scientific justification for banding and marking. An applicant’s skills and qualifications for additional biological sampling are now required as part of their banding resume.
- 11) Removed section. Description of what an applicant hopes to accomplish by banding birds. We replaced this section with a yes/no option if the applicant has included a Comprehensive Project Description as part of their application package. The Comprehensive Project Description should include all the necessary details for the BBL to properly evaluate a proposal as a scientifically justifiable banding or marking project.
- 11) (NEW) Banding Resume. We added a yes/no option if the applicant has included a banding resume as part of their application package and that it should include previous

bird banding and marking experiences for the BBL to properly evaluate an applicant's skills and formal training for capturing and banding or marking of birds.

- 12) References. We modified the References section to simply state that three letters of recommendation must be received by the BBL before any application is considered and that a minimum of two references should be from a bird bander that has worked directly with the applicant and can confirm their experience and abilities. Applicants no longer need to provide names, emails, addresses as that information is redundant to the information provided by their references who submit letters of recommendation.
- 13) (NEW) Freedom of Information Act (FOIA). This section was added to the permit application to protect applicants that are not covered by the Privacy Act and allow for the identification of any information that should be considered privileged and confidential business information to the USGS to meet its responsibility under FOIA. This section is informational and does not require any additional input or effort from the applicant.

Forms in control #1028-0082, including the following:

For the Bird Banding and Marking Permit Application	So that we can...
Full name of applicant, organization name (if applicable), address, phone number, and email address	Contact the applicant during the application process or after issuing a permit
Applicant type (e.g., federal, state, NGO etc.), and permit type (station, personal, or change in responsible individual)	Determine the level of information required to process the application
Applicant birth date and sex	To ensure the applicant is 18 years or older. Sex is collected for any law enforcement inquiries made in the field.
Current or past federal migratory bird permit held (if applicable)	Determine if the applicant has previously held a BBL permit and may be already in our database
Description of the activity (location, species, capture techniques, auxiliary marking, biological sampling)	Determine whether or not an activity is scientifically justified, the methods and species proposed are one that an applicant is qualified for, and if auxiliary markers and/or biological sampling are needed
Attached project description	Determine that all the necessary details are included for the BBL to properly evaluate a proposal is a scientifically justifiable banding or marking project
Attached banding resume	Determine that the applicant's previous bird banding and marking experiences are included for the BBL to properly evaluate the skills and formal training with capturing and banding and marking of birds
Signature of applicant and date of application	Determine who provided the information and the date the application was signed
For the Bird Banding and Marking Permit Renewal	So that we can...

Current contact information (address, email, phone) of the permit holder	Update the contact information in our database for future communication
For the Bird Banding Recovery Report	So that we can...
Type of reporter (finder, bander, or government)	Understand who is recovering and reporting banded or marked birds
Federal Band Number or Color Band	Match the encounter report with a banding record
Species, How Obtained (e.g. hunted, saw live bird, etc.), Condition of the band (on the bird or removed, Condition of the bird (alive or dead, in captivity or released), date of recovery, optional comments	Collect information about this recovery to ensure it matches with the banding record, determine age and current condition of the bird
Color marking info (if applicable)	To verify the color band matches with what the bird was banded with
Location (country, state, then either wildlife management area, town/place, coordinates, or pin on a map). Additional comments on location (if applicable)	To verify the new location of the bird and if it also makes sense biologically for species, time of year, etc.
Contact Info (Name, Email, Phone, Address, and whether they would like to receive a certificate)	Contact the reporter for additional information/questions on a recovery report as needed, email their certificate of appreciation once processing is complete
Verification/Submission	Receive submission of the record(s) at the BBL

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.

The permit application is currently available on the BBL's web site at: <https://www.usgs.gov/labs/bird-banding-laboratory> as an electronic fillable pdf file that can be submitted electronically by email to the BBL. To ease the burden on applicants needing to print and mail this form to the BBL, this electronically fillable form has been in place since the 2019 ICR renewal and nearly all applications are submitted by email. The BBL proposed revisions to the permit application aim to enhance clarity, remove unnecessary duplication, and improve efficiency with the goal of reducing administrative burden on both the agency and the public. Other forms in control #1028-0082, including the renewal form and the recovery report, remain unchanged.

The renewal form is an entirely electronic form submitted through the Bander Portal to the BBL permit processing section. The information collected has been collected electronically since 2023.

The recovery report is an entirely electronic form submitted from the website (www.reportband.gov) directly to the BBL. This web reporting has been in place since the 2019 ICR renewal and the information collected has not changed.

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 associated with this information collection. The authority to issue Federal Bird Banding and Marking Permits and regulate bird banding and marking activities in the United States is vested exclusively to the USGS BBL under 50 CFR 21.70. The information collected is specific to the proposed banding and marking activities, locations, methods, and qualifications of applicants and is not collected by any other Federal agency.

The BBL also serves as the U.S. administrator of the NABBP, which is jointly administered with the Canadian BBO. Through a longstanding international agreement, the BBL maintains the shared database of bird banding and encounter records for both countries. As a result, information collected through this program is entered, maintained, and managed through a single integrated system, eliminating duplication of effort and reducing administrative and operational costs for both organizations.

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

We only collect the minimum information necessary to meet our regulatory and programmatic responsibilities and scientific objectives.

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 do not collect the information or collect the information less frequently, the DOI cannot meet its legal responsibilities under the MBTA. We could not issue applicants a permit since the information collected is required on the permit. If we cannot satisfy the information requirements necessary to issue a permit, the public will not be able to conduct banding and marking activities nor will researchers and land manager be able to obtain the most up to date information collected and curated as part of our recovery reports. For example, the waterfowl data collected are also essential to setting annual hunting/harvest regulations established by the U.S. Fish and Wildlife Service and as a basis for important research publications. The frequency of collection is necessary to achieve the legal requirements and research objectives.

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 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 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 April 8, 2026, we published a 60-day *Federal Register* notice (91 FR 17811). We received three comment letters in response to the notice including from a Federal Bird Banding and Marking Permit holder, the Ornithological Council (OC) and the Arizona Game and Fish Department (AZGFD). All comment letters support the proposed revisions to the permit application and that changes are common sense, reduce burden on both the agency and the applicants, and have improved clarity. The OC agreed that the information collected by the permit application is necessary for the USGS BBL's functions and supports the change that allows applicants to list the capture methods rather than select from a short list.

Comment #1 Biological Sampling: Received from an anonymous permit holder on April 16, 2026, and the Ornithological Council on May 26, 2026, via <https://www.regulations.gov>. Comments were received on the proposed change that allows applicants to include other biological sampling (other than blood or feather sampling). One comment expressed the open-endedness of the biological sampling question may be problematic and that the USGS should be clear in what they may authorize (e.g., fecal samples, biopsies, etc.) as this could potentially cause confusion with applicants that may also need a U.S. Fish and Wildlife Service scientific collection permit. A similar comment requested the addition of cloacal swabbing as an example of biological sampling.

Agency response to Comment #1: The USGS previously proposed the addition of

biological sampling examples (e.g., mouth and tracheal swabbing) on the permit application for enhanced clarity in the 60-day notice for public comment (91 FR 17811). No authorization is required from the BBL for cloacal sampling/fecal samples as that is passively collected outside of a bird. The USGS intends to keep this question open to allow for flexibility if new sampling or sampling technologies are developed in the future.

Comment #2 Time of Burden: The OC suggested expanding the estimated time of burden to include more than the completion of the permit application. The USGS has not changed the estimated burden for the permit application. While there are additional materials required as part of the application process, *i.e.*, a project description and a banding resume, the preparation of those documents is too variable among applicants, and no standard format is required to develop a baseline of estimated time of burden.

Comment #3 Comprehensive Online System for Permit Application Submission: The OC suggested the development of an online submission system for permit application materials and other permit related processes. The USGS agrees with the electronic submission of all permit application materials and tracking of application status and will explore these suggestions using our existing Bander Portal system when funding and capacity allow for such improvements.

Other comments: Received from AZGFD on June 8, 2026, via <https://www.regulations.gov>. The AZGFD also provided additional comments that were unrelated to the proposed modifications to the permit application or information collection, rather program-level recommendations for other aspects of the USGS BBL permitting.

In addition to the *Federal Register* notice, we consulted with the four (4) individuals identified in Table 8.1 who are familiar with this collection of information to validate our time burden estimates and asked for comments on the questions below:

Table 8.1

Organization	Title
Braddock Bay Bird Observatory	Executive Director
Missouri Department of Conservation	Migratory Game Coordinator
The Ornithological Council	Executive Director
USGS Breeding Bird Survey	Biologist

“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:

Commenters included that banding permits are essential for the work of ornithologists and that they value and support our agency and our banding program. They agree that information collected is necessary for the agency’s function.

Commenters noted that the proposed changes to the permit application were straightforward and self-explanatory. Others included that the changes were agreeable, simpler and should make the process easier for the applicant. Commenters appreciated the removal of eye color, hair color, and weight as questions that were unnecessary to the permit application.

One commenter expressed frustration with some of the questions and the redundancy of the current permit application form; and noted that the proposed permit application form was a major improvement.

One commenter found the proposed permit application form slightly less user-friendly than the current form but was agreeable with the condensing of information requested in the proposed permit application form.

Agency Response/Action Taken: No agency response required or action taken.

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

Comments:

Commenters noted that the time burden of "up to 30 minutes" is an accurate estimate of the time to complete the proposed permit application form and varies from 5 to 20 minutes. One commenter conducted a comparison of the current permit application form versus the proposed application form and found that the current permit application took three times as long. Commenters noted although the estimate time burden for the completion of the proposed permit application form is 30 minutes or less, the time required for a full permit application package would likely take an applicant 60-90 minutes if the time burden included time to draft the supporting documents, a project description and banding resume.

Agency Response/Action Taken: The USGS has not adjusted the estimated burden for the permit application form. While there are supporting documents required as part of the application process, *i.e.*, project description and banding resume, the preparation of those documents is too variable among applicants, and no standard format is required to develop a baseline of estimated time of burden.

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

Comments:

Comments were received regarding the species and capture techniques and the removal of the options to select from on the proposed permit application form. One commenter asked if we remove pre-selected options on the form that we continue to provide lists of species groups and capture techniques on the BBL's website or in the application instructions as a helpful guide.

Other commenters found the options to select species and capture techniques extremely helpful, but agreed for auxiliary marking, it is beneficial to applicants to transcribe their request and the specifics directly into the permit application.

A comment was received on the removal of the reference to blood draw site and volume and noted that information is also not referenced in the project description section of the proposed permit application form.

Comments were received on the project description and banding resume sections of the proposed permit application form. The commenter noted improvement in how these sections are now structured, and it is clearer to have an applicant's qualifications in a single place, rather than spread out across the application for each technique requested. The commenter also recognized how this proposed permit application form emphasizes the importance of a project

description.

Agency Response/Action Taken: The USGS will continue to provide links to species groups and capture techniques on the BBL's general permitting webpage and will also add those same links on the application instructions. The BBL will move forward with the removal of options to select from for species groups and capture techniques on the permit application form. The BBL receives many applications where an applicant chooses too many options and does not have either a scientific justified project for those species or capture techniques, and/or they are also not trained for such requests. Regarding the comment of the removal of blood draw site and volume from the form, the USGS still retains that information on the BBL's blood sampling authorization webpage, which is also linked on the permit instructions webpage. This requested information is also included on the optional project description template.

And

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

Comments:

A commentor suggested the development of an online submission system for permit application materials and other permit-related processes. They also suggested that the system allows the user capabilities to track application status and renewals of permits.

Another commenter appreciated the redundancy that was removed from the current permit application form when they tested the proposed permit application form.

Agency Response/Action Taken: The USGS agrees with the electronic submission of all permit application materials and tracking of application status and will explore these suggestions using our existing Bander Portal system when funding and capacity allows for such improvements.

Additional comments received during the outreach:

Comments:

Two testers noted some issues with the fillable pdf while practicing submissions on a Mac computer, particularly in Boxes 1a, 1b, and 2. The tester was unable to see where to 'click' the circle next to the section options.

Agency Response/Action Taken: The USGS will ensure that the proposed pdf fillable permit application form works properly for all computer types before being available for use.

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

There is no monetary value associated with this collection. The BBL provides an electronic Certificate of Appreciation to people reporting bands to the BBL via the *Recovery Report* website.

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 is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (DOI LEARN (Department-wide Learning Management System) - Interior, DOI-16, 70 FR 58230).

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.**

We estimate that there will be approximately 101,692 respondents annually in this collection, totaling 5,121 annual burden hours. The completion time for each information collection varies as shown in Table 12.1 below. The burden estimates in this supporting statement are based on our prior experience with the permit application forms and permit renewal website; the known average time for submissions of the recovery reporting page; and the outreach described in item 8.

We estimate the total dollar value of the annual burden hours to be \$253,765,796.65 (see Table 12.1). This is an increase from the ICR in 2023 due to the increase in recoveries reported to the BBL. Our permit applications and renewals remained consistent. The hour cost is based on [BLS news release USDL-26-04827 of March 17, 2026](#), for average full compensation per hour including benefits. The values utilized are:

- Civilian. Average hourly wage is \$49.32, including benefits
- Private sector. Average hourly wage is \$46.60.48, including benefits
- Government. Average hourly wage is \$66.41, including benefits

Because the BBL database does not discriminate between individuals vs. private industry for recovery reports, we erred on the side of caution and used the higher hourly rate designated for civilians and grouped responses outside of government into civilian/private sector in Table 12.1. Most recoveries are reported by individuals and not private industry.

Table 12.1. Estimated Value of Annual Burden Hours from 2023-2025.

<i>Activity</i>	<i>Annual Average Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Value of Burden Hour Including Benefits</i>	<i>Value of Annual Burden Hours</i>
Permit Application					
Civilian/Private	70	30 minutes	35	\$49.32	\$ 1,726.20
Government	10	30 minutes	5	\$66.41	\$ 332.05
Subtotal	80		40		\$ 2,058.25
Renewal Form					
Civilian/Private	359	3 minutes	18	\$49.32	\$ 887.76
Government	104	3 minutes	5	\$66.41	\$ 330.50
Subtotal	463		23		\$ 1,218.26
Recovery Report					
Civilian/Private	99,916	3 minutes	4,996	\$49.32	\$246,402.72
Government	1,233	3 minutes	62	\$66.41	\$4,117.42
Subtotal	101,149		5,058		\$ \$250,520.14
TOTAL	101,692		5,121		\$ 253,796.65

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, 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 to applicants under this collection. There is no fee for a permit application and there is no charge associated with submitting a recovery report. There are no charges associated with renewal reports for existing permit holders.

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 for processing and initial reviewing of information received as a result of this collection is \$ 64,059.22 (Table 14.1). This total includes Federal employee salaries and benefits. We used the Office of Personnel Management Salary Table [2026-DCB](#) (Washington-Baltimore-Arlington, DC-MD-VA-WV-PA) to determine average hourly Federal wages. In accordance with BLS News Release [USDL-26-0827](#), March 2026, Employer Costs for Employee Compensation—March 2026, we multiplied individual hourly wages for the Federal employees by 1.57 to calculate the fully burdened hourly rate shown below in Table 14.1.

Table 14.1 – USGS Bird Banding Lab Salary/Benefits for Information Collection

Action	Position and Grade	Hourly Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Total Annual Hours	Total Annual Cost
Permit Application	Application Examiner GS 7/10	\$ 36.08	\$ 56.65	100	\$5,625.00
	Lab Manager, BBL GS 13/06	68.31	107.25	50	5,362.50
	4 Wildlife Biologists				
	GS 12/8	60.73	95.35	52	4,958.20
	GS 12/5	55.80	87.61	52	4,555.72
	GS 12/4	54.16	85.03	52	4,421.56
	GS 11/6	46.00	72.22	52	3,755.44

Subtotal					\$28,678.42
Permit Renewal Form	Application Examiner GS 7/10	\$ 36.08	\$ 56.65	104	\$ 5,891.60
Subtotal					\$ 5,891.60
Recovery Report	3 Wildlife Biologists				
	GS 12/8	60.73	95.35	52	\$ 4,958.20
	GS 12/4	54.16	85.03	156	13,264.68
	GS 11/6	46.00	72.22	156	11,266.32
Subtotal					\$29,489.20
Total					\$64,059.22

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

We are reporting an increase of 63 responses and an additional 3.15 burden hours for permit renewal forms. We are also reporting an increase of 8,479 responses and an addition of 423.3 burden hours for recovery reports. The increased burden and changes to this collection are the result of:

- An increased number of permits that were up for renewal before expiration.
- An increased number of submissions of recovery reports submitted to the BBL.

As a result, we are reporting a total annual increase in the cost to the Federal Government of \$24,560 (rounded). The increased costs to the government for this information collection are mainly the result of additional burden hours required for USGS staff to review and process the increased number of recovery responses, as well as an additional biologist to take part in the permit application and recovery report review processes. Additional review and coordination are required for quality assurance and control of the data collected by the BBL. Minor increases in costs were due to increases in staff yearly salaries.

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 band recovery data are published in two online repositories and available for public download below. The data is also available through a personalized data query if requested.

1. ScienceBase: [North American Bird Banding Program Dataset 1960-2025 retrieved 2025-07-11 - ScienceBase-Catalog](#)
2. BBL Data Visualization and Download portal: [Explore and Request Data from the BBL | U.S. Geological Survey](#)

Finally, the BBL also provides the waterfowl banding recovery dataset to state and federal waterfowl biologists (e.g., U.S. Fish and Wildlife Service) on an annual basis. These data are vital for managing waterfowl populations and setting annual waterfowl harvest regulations at the state and federal level.

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 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.