

Supporting Statement A

North American Reporting Center for Amphibian Malformations (NARCAM)

OMB Control Number 1028-0056

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

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

The issue of malformed amphibians has captured both scientific and public attention. Understanding of the phenomenon, its causes, and extent, have been hampered by the lack of a centralized database for malformation occurrences in amphibians; NARCAM has attempted to mitigate this lack by providing a centralized repository of amphibian malformation occurrence data that is available to researchers, managers, and the public. The Fish and Wildlife Act of 1956 [16 U.S.C. 742 et seq.] authorizes “protection of fisheries and wildlife through research....to prepare plans to protect wildlife resources.”

While federal and state researchers conduct surveys and monitoring to assess the health and status of amphibian populations, the data collected often is held in disparate locations and databases. This presents impediments both to the sharing of information, and the awareness of potential hotspots. Additionally, researchers are often unaware of wildlife phenomena occurring on non-governmental lands; it is often a discovery by a private citizen that calls attention to a previously unknown problem.

Voluntary collection of malformations observation data through NARCAM provides the research community with a national dataset on malformation occurrences, preventing potential duplication of research effort, as well as offering an “early warning system” to potential hotspots.

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.

Information is used by scientists and federal, state, and local agencies to identify areas where amphibian malformations occur; to identify the types of malformations observed and the species in which they

occur; to determine the rates of occurrence; and to identify potential causes. Correlation of that data with other information about hypothesized causes of malformation may lead to better analyses of those features.

The online form is available to any public citizen interested in providing information about malformation observations. The form is available online at <http://www.nbii.gov/portal/server.pt?open=512&objID=386&&PageID=5146&mode=2&in_hi_userid=2&cached=true>.

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 collection of information is managed through the NARCAM Web site. Reports to NARCAM are submitted by volunteers through Web-based forms, and data and information that have undergone quality assurance reviews by experienced herpetologists are accessible from the NARCAM Web site. Use of online forms as the data submission mechanism directly supports the intent of sections 1703 and 1705 of the Government Paperwork Elimination Act [P.L. 105-277]. Collecting this information electronically reduces costs both for customers and for the NARCAM database managers, as the data is submitted directly to the NARCAM database for quality control/quality analysis. Reports can be submitted quickly, and review and publication of validated records occur more rapidly than with paper-based reporting.

Direct, voluntary end-user submission of malformation reports also reduces the potential for data entry errors posed by paper-based data forms that would have to be hand-entered into the database by data transcribers.

Since its inception, NARCAM has collected occurrence reports through an online form on the NARCAM Web site. 100% of the universe is expected to respond electronically.

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.

No other agency is aggregating and making publicly available amphibian malformations data on a comprehensive, national basis. U.S. Fish and Wildlife Service malformations data is limited to specific sites in the National Wildlife Refuge System. Some states and provinces do collect similar malformations information, and the responsible agencies have been contacted, and steps taken to ensure that NARCAM's efforts complement ongoing activities. NARCAM provides all of these agencies an online mechanism for making their amphibian malformations data publicly available from a single point of access. In some cases, NARCAM has been used as an agency's official repository for all observation data collected. For purposes of identifying regional and national trends in malformations occurrences, researchers and managers require broader data beyond local and even state monitoring efforts.

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

This information collection does not affect small businesses or other 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.

Failure to collect malformation occurrences data will render the federal government unable to respond to basic questions about malformed amphibians, including the location, frequency, and potential causes of the malformations. The lack of consolidated data will make it difficult for scientists to identify “hot spots” for malformations phenomena, and to explore possible causes.

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 secret, 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 the information to be collected 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

Federal Register notice requesting public comment was published on December 22, 2010 (75 FR 89525). No comments were received.

The USGS Biological Informatics Program worked with professional herpetologists to review the existing NARCAM data submission form, the reporting format, and the data query and display tools. Changes were made to the NARCAM database, the customer reporting forms, and the data display tools, based upon feedback. As a result, the data now reported by customers is more accurately geo-referenced, more precise, and more readily accessible.

The external consultant for the review of NARCAM data accessibility, frequency of data collection, and clarity and content of the data submission forms was:

Dr. Whitfield Gibbons, Professor of Herpetology and Senior Research Scientist
University of Georgia, Savannah River Ecology Laboratory
Address: Mail Drawer E, Aiken, SC 29803
Phone Number: 803.725.2472

Only the quality control personnel have access to this personal information, and no identifying information associated with an individual person is accessible from the Web site. The NARCAM site also provides contact information if submitters encounter problems with the online submission form, or have questions about a particular field.

Through the online form, NARCAM data submitters can provide any comments or concerns regarding data collection forms and processes. These comments are carefully reviewed for identification of needed improvements. Because users of the current NARCAM reporting system have the option of providing their name and email address when submitting reports, the USGS may use this information to follow-up with users to ensure that NARCAM process is straightforward and easy to accomplish.

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

No payments or gifts are made 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; however, the names and addresses of all respondents will be maintained only for the purpose of follow-up contact to clarify responses. Our primary purpose for collecting contact information is to follow-up with the respondents to verify the submission as a valid and reliable entry. Respondent names or e-mail addresses will not appear in any of our reports.

The records for this collection will be maintained in accordance to Privacy Act System of Records identified as Computer Registration System. (INTERIOR/USGS-20) published at 74 FR 23430 (May 19, 2009).

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.

The collection does not include 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.”**

Based on previous years, we estimate that 150 individuals and 150 state/local government agencies will submit information via the NARCAM website in a given year. Frequency of response is variable. Many respondents submit a single report; however, multiple occurrence reports may be submitted by an individual or an agency. A response takes an average of 30 minutes to complete. This figure is based upon the average completion times of 4 test subjects within the USGS Biological Informatics Program who were unfamiliar with both NARCAM’s data collection forms and with current research and data on amphibian malformations. Each was presented with a fictitious reporting scenario, and was asked to complete a malformations report to the NARCAM database. Based upon the 30 minute average response time calculated, and a historical average of 300 reports annually, the total estimated burden time is approximately 150 hours per year.

As a result of the consultation cited in item 8 above, there was no need to adjust the hour burden in this renewal.

Table 1. Estimate of annual respondent burden

Respondent	Responses	Completion Time	Burden Hours
Private	150	30 min	75
State/Local Government Agencies	150	30 min	75
TOTAL	300		150

We estimate the total annual dollar value of this collection to be \$4,457 (Table 2). The estimated dollar value of the burden hours for this collection takes into account the nature of our respondents: private individuals, state and local government agencies. We arrived at this figure by multiplying the estimated burden hours by \$26.25 (for individuals or households) and \$33.17 for State and Local government. This

wage figure included the multiplier for benefits and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics (BLS) Occupation and Wages, (BLS news release USDL-10-1687 for Employer Costs for Employee Compensation—September 2010 at - <http://www.bls.gov/news.release/pdf/ecec.pdf>), dated December 8, 2010).

Table 2: Estimated Dollar Value of Respondent Annual Burden Hours

Activity	Sector	Annual Number of Responses	Total Annual Burden Hours	Dollar Value of Burden Hours (Including Benefits)	Total Dollar Value of Annual Burden Hours
Completing and submitting the database form	Private	150	75	\$26.25	\$1,969
Completing and submitting the database form	State and Local Government Agencies	150	75	\$33.17	\$2,488
TOTAL		300	150		\$4,457

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 shown in Items 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]. 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, recordkeeping nor any fees associated with collection of this information.

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 annual cost to the Federal Government is \$98,143. This includes the operational expenses (\$50,000) and cost to the Federal Government for salaries and benefits for administering this information collection (\$48,143). The total estimated cost to the Federal Government includes employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2011-DCB (http://www.opm.gov/flsa/oca/11tables/html/dcb_h.asp) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the BLS news release USDL-10-1687). Operational expenses are listed in Table 3.

Table 3. Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time (hours)	Annual Cost
Technical Information Spec	13/6	\$49.77	\$74.65	520	\$38,818
Information Technology Spec	14/8	\$62.17	\$93.25	100	\$9,325
Total					\$48,143

Table 4. Operational Expenses

Operational Expenses	Estimated Cost
Website and database development and maintenance	\$5,500
Compliance monitoring for all federal IT security policies	\$2,000
Quality control/quality assurance reviews of submitted reports	\$17,000
Collaboration with and access to relevant external data holdings	\$11,000
Development of query and visualization tools for data reported	\$14,000
Costs to produce and distribute fact sheets	\$500
Total	\$50,000

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

No changes or adjustments are requested.

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.

County-level summary reports will be made available on the NARCAM Web site. Updates to the Web site are made at least twice monthly during peak periods of reporting activity in summer and fall. The USGS Biological Informatics Program does not perform any analysis on the data. The purpose of the data collection effort is to allow end users of NARCAM to review existing data by means of download and visualization tools, and to perform their own interpretation, analysis or modeling.

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 the single form in this collection.

18. Explain each exception to the certification statement, "Certification for Paperwork Reduction Act Submissions".

There are no exceptions to the certification statement.