

1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Migratory Bird Surveys, 50 CFR 20.20 OMB Control Number 1018-0023

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.

Migratory Bird Harvest Information Program: Under 50 CFR 20.20, migratory bird hunters must register for the Migratory Bird Harvest Information Program (HIP) in each state in which he or she hunts each year. State natural resource agencies are required to send names and addresses of all migratory bird hunters to the USFWS. The U.S. Fish and Wildlife Service (Service, we) sends surveys to selected hunters to estimate the magnitude and composition of migratory bird species harvest.

Migratory Bird Hunter Survey and Parts Collection Surveys: Under the Migratory Bird Treaty Act (16 U.S.C. 703-712), the Department of the Interior is designated as a key agency responsible for the wise management of migratory bird populations frequenting the U.S. and for the setting of hunting regulations that allow appropriate harvests of magnitudes that will allow for the populations' well-being. These responsibilities dictate the gathering of accurate data on various characteristics of migratory bird harvests of a temporal and geographic nature. The Fish and Wildlife Act of 1956 (16 U.S.C. 742a-742j) authorizes collection of such information as is necessary to determine the status of wildlife resources, which is necessary to develop appropriate hunting regulations. Information required for effectively governing harvests of migratory birds includes not only knowledge of the harvest's magnitude but also information of the species, age, and sex composition within that harvest, including the geographic and chronologic distribution of these components as they relate to various hunting regulations.

Sandhill Crane Harvest Survey: The cooperative management guidelines for mid-continent sandhill cranes (included are three currently recognized subspecies: lesser, *Grus canadensis canadensis*; Canadian, *G. c. rowani*; and greater, *G. c. tabida*) are aimed at providing optimum diverse recreational opportunity consistent with the welfare of the species and within the provisions of international treaties and socio-economic constraints. Beginning in 1960 and continuing to date, hunting seasons have been allowed for sandhill cranes in Alaska and all or part of eight Midwestern states (Colorado, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming) during specified time periods. In addition, Kansas allows a sandhill crane hunting season since 1993 and in northwest Minnesota since 2010. Prior to the initiation of the sandhill crane harvest questionnaire in 1975, little information was available on the number of individuals who annually hunt sandhill cranes or the number of harvested cranes. This lack of information was a major void in management of the species. Annual crane hunter activity and harvest information were readily available for Canada through uniform nationwide surveys conducted by the Canadian Federal Government. Lack of comparable information from the United States precluded ascertaining the total annual hunter harvest from this migratory bird resource shared by the two countries.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information

received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

We collect data via various survey forms that are specific to the type of information being collected (e.g., mail survey form for Migratory Bird Hunter Survey, envelope for Parts Collection Survey). Data are collected by state natural resource agencies (Migratory Bird Harvest Information Program) and the Service (Migratory Bird Hunter Survey, Parts Collection Survey, and Sandhill Crane Harvest Survey). We collect all data each year because there is a reasonable expectation of significant changes in key statistics between collections. This is because: (1) hunters change addresses over time; and (2) hunter success is dependent upon bird populations and migration chronology that can vary from year to year depending on weather and habitat conditions. Both Federal and state authorities use the collected information to monitor the effects of various hunting regulations on the harvest of individual migratory bird species. The information has been particularly useful in evaluating the effects of changes in daily bag limits, hunting season length, and hunting season dates on harvest. Information obtained also gives the Service a great deal of insight into the status of the many species involved.

We post annual reports on the [Division of Migratory Bird Management's](#) (DMBM) website. Promulgation of annual hunting regulations by the Service relies on a well-defined process of monitoring data collection and scientific assessment. At key points during that process, Flyway technical committees, Flyway Councils (state agencies), consultants, and the public (and in some instances international regulatory agencies) review and provide valuable input on data collection and technical assessments. We deemed all assessments pertaining to the setting of annual harvest regulations "highly influential;" however, they are exempted from strict application of IQA peer-review guidelines due to the compressed time schedule associated with the regulatory process. Therefore, we do not post peer-review plans for technical assessments that influence annual hunting regulations decisions on the DMBM webpage. The DMBM has a long history of subjecting applicable portions of such technical assessments to formal peer-review through submission to scientific journals, or other means, in addition to the review received as part of the annual regulatory process. Information from each survey contributes towards a national program to monitor the harvest of all migratory game bird species in the U.S.

The **Migratory Bird Harvest Information Program (MBHIP)**, developed by state natural resource agencies and the Service, allows each state to provide lists of all migratory bird hunters licensed by the state on an annual basis. Each migratory bird hunter is required to register in each state in which he/she hunts by providing his/her name, address, and date of birth, and other ancillary information (described below). Some states also collect the email address of each hunter. We request the date of birth in order to identify duplicate records and assess the quality of the data provided. The state includes the date the hunter registered with the record. We also accept email addresses in the HIP registration from states that already collect them, to assist us in implementing electronic surveys in the future.

This ancillary information allows the Service to stratify the sample, investigate sources of bias, calculate bias correction factors, and identify duplicate records. Each state collects the information in a way that is most appropriate for that state, but all states ask some variation of the following questions that are appropriate in that state:

- 1) Will you hunt migratory birds this year?
- 2) How many ducks did you bag last year?
- 3) How many geese did you bag last year?

- 4) How many doves did you bag last year?
- 5) How many woodcock did you bag last year?
- 6) Did you hunt coots or snipe last year?
- 7) Did you hunt rails or gallinules last year?
- 8) Will you hunt sandhill cranes this year?
- 9) Will you hunt band-tailed pigeons this year?
- 10) Will you hunt brant this year?
- 11) Did you hunt sea ducks last year?

Because the distributions of these birds vary across the country and hunters vary in terms of what species they choose to hunt, the answers to these questions allow us to increase the efficiency of sampling by allowing us to concentrate sampling effort on the most appropriate hunters in each state.

We use the **Parts Collection Surveys (PCS)** to estimate the species, sex, and age composition of the harvest, and the geographic and temporal distribution of the harvest. Randomly selected successful hunters who responded to the Migratory Bird Hunter Survey the previous year are asked to complete and return a letter (Form 3-165B [waterfowl], Form 3-165C [woodcock, band-tailed pigeon, rail, gallinule], or Form 3-165D [mourning dove]) if they are willing to participate in the Parts Collection Surveys. We also ask those who answer “Yes” to report approximately how many birds they harvest in an average season. We need this information to determine how many of Forms 3-165, 3-165A, or 3-165E to send each participant at the beginning of the hunting season.

Respondents to Forms 3-165B, 3-165C, and 3-165D are provided postage-paid envelopes before the hunting season and asked to send in a wing or the tail feathers from each duck or goose (Form 3-165) they harvest, a wing from each woodcock, band-tailed pigeon, rail, or gallinule (Form 3-165A) they harvest, or a wing from each dove (Form 3-165E) they harvest. Dove managers are interested in estimates of local recruitment, so dove wings are requested from only the first 2 hunts during the first week of the dove season, to limit the sample to local birds. We use the wings and tail feathers to identify the species, age, and sex of the harvested sample.

We also ask respondents to report on the envelope:

- Hunter name, to allow identification of the hunter if the barcode sticker is damaged or destroyed;
- Location (state, county and nearest town) the bird was harvested, because this enables us to estimate the geographic distribution of the harvest of each species (nearest town enables us to identify county if county was unknown);
- Month and day the bird was harvested, because this provides information on the temporal distribution of the harvest of each species that enables us to evaluate the effects of hunting season dates on species-specific harvest;
- The band number of any leg-banded bird, because this enables us to estimate band reporting rates (Form 3-165 only, because we only band waterfowl in significant numbers).

We based the **Migratory Bird Hunter Survey (MBHS)** on the sample frame provided by the Migratory Bird Harvest Information Program. Randomly selected migratory bird hunters are sent one of the following forms and asked to report their harvest of those species: a waterfowl questionnaire (Form 3-2056J), a dove and band-tailed pigeon questionnaire (Form 3-2056K), a

woodcock questionnaire (Form 3-2056L), or a snipe, rail, gallinule, and coot questionnaire (Form 3-2056M). We combine the resulting estimates of harvest per hunter with the complete list of migratory bird hunters, which serves as the expansion factor to provide estimates of the total harvest of those species or species groups.

On survey Form 3-2056J-M, we ask hunters to identify the following information:

- Whether or not they hunted (waterfowl [Form 3-2056J]; doves and/or band-tailed pigeons [Form 3-2056K]; woodcock [Form 3-2056L]; or snipe, rails, gallinules and/or coots [Form 3-2056M]) this season. We need this information to estimate the number of active hunters of that species or species group. If they did hunt those species, we ask for:
 - o Month and day of hunt, because this provides information on the temporal distribution of the harvest that enables us to evaluate the effects of hunting season dates on harvest;
 - o County and state of hunt, because this enables us to estimate the geographic distribution of the harvest;
 - o Number of birds bagged, because this provides us with information on daily hunting success that enables us to evaluate the impacts of daily bag limits on harvest; and
 - o Season totals (days hunted, birds bagged, and birds knocked down but not retrieved), because this allows people who do not record their daily hunts to still provide us with data that enable us to estimate total days of hunting, total harvest, and mortality due to crippling loss.

We use the **Sandhill Crane Harvest Survey** to estimate annually the magnitude, geographical distribution, and temporal distribution of the sandhill crane harvest in Alaska, Colorado, Kansas, Minnesota, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming. Although we do not currently survey crane hunters in Kentucky and Tennessee, the recent additions of crane seasons in these states will require us to sample from these registered hunters in our survey in the future. It has also been possible for us to estimate the portion of the sandhill crane's total population taken during harvest. This information has been particularly useful in determining the effects on harvests of daily bag limits and changes in hunting dates and the areas (counties) of states open to hunting. Based on information from the U.S. and Canadian surveys, we can adjust hunting regulations as needed to optimize harvest at levels that provide a maximum of hunting recreation while keeping populations at desired levels.

On survey Form 3-2056N, we ask hunters to identify the following information:

- Whether or not they hunted sandhill cranes this season. We need this information to estimate the number of active crane hunters.
- If they did hunt cranes, we ask for:
 - o Month and day of hunt, because this provides information on the temporal distribution of the harvest that enables us to evaluate the effects of hunting season dates on harvest;
 - o County and state of hunt, because this enables us to estimate the geographic distribution of the harvest;
 - o Number of birds bagged, because this provides us with information on daily hunting success that enables us to evaluate the impacts of daily bag limits on harvest; and
 - o Season totals (days hunted, birds bagged, and birds knocked down but not retrieved), because this allows people who do not record their daily hunts to still

provide us with data that enable us to estimate total days of hunting, total harvest, and mortality due to crippling loss.

REVISION TO THIS COLLECTION:

In fall of 2019, we will be implementing a new, online platform for the Migratory Bird Hunter Survey. The online platform was approved by OMB for usability testing under the Department of the Interior's "Fast Track" clearance process (1090-0011). We are now ready to seek full OMB approval for the platform. It will be optimized for uses on multiple device types (computer, tablet, or phone; Android or Apple OS). Unlike the paper survey form, the online survey platform walks a participant through the process of entering their harvest for a single day, asking for one piece of information at a time. This reduces confusion and the likelihood that the hunter will provide incorrect information. Also, data quality is improved at each step with a new system of checks and pre-populated menus which limit the type of responses (e.g., reporting harvest of the wrong species, or in the wrong state). We will continue to conduct the paper survey for 3 years, in order to ensure that data collected through the new method is sound, and to provide a side-by-side comparison of harvest estimates that can be used to calibrate the old survey to the new one. This is particularly important for maintaining a continuous time series of harvest estimates, despite changing methodology.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

We have developed an online survey response platform to allow hunters to respond to our season-long survey over the internet, as an alternative to a paper form. This change to our survey platform will be operational in a limited deployment during the 2019-2020 harvest season. Limited testing with the new online survey indicates that total response time will decrease with implementation of this online form because of the following changes: (1) hunters will not need to return the survey in the mail; (2) the step-by-step question and response format of the online survey reduces confusion and provides drop-down prepopulated menus for county names, bird species, and number harvested; and (3) the system is optimized for mobile application, allowing hunters to respond at their convenience, even while they are hunting, which reduces the additional need to keep notes on harvest). In addition, we will be inviting the majority of hunters to participate in the survey via email, rather than through mailed letters, and will also be sending reminders via email.

We also receive hunter information from states that are collected electronically. On average, we receive the name and addresses of about 3,800,000 migratory bird hunters. Almost all of these are now collected electronically by the states, either online (through electronic licensing systems) or by telephone. We no longer receive hunter records via paper forms.

Finally, we have implemented 2 electronic methods for hunters to communicate with us: an email address (MigratoryBirdHarvestSurveys@fws.gov) and a website that allows hunters to request more survey forms or request more survey forms or wing envelopes (<https://migbirdapps.fws.gov/hipweb/>).

The envelopes (Forms 3-165, 3-165A, 3-165E) for the migratory bird wing/feather parts are

large and most standard printers are incapable of printing them. Furthermore, we could not guarantee envelopes printed on personal printers would comply with U.S. Postal Service regulations, thus we do not anticipate putting those envelopes online. We believe the burden currently placed on cooperators and the cost to the Federal government to be at a minimum level consistent with the information required.

We do not print out paper copies of our reports for distribution. We post annual reports on the [Division of Migratory Bird Management's](#) (DMBM) website.

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.

Many state wildlife agencies collect some information on migratory bird harvest within their state, and we examine a number of state hunter surveys. States generally collect information secondarily in harvest surveys of game other than migratory birds and is not adequate for Federal regulatory responsibilities primarily because: (1) not every state conducts surveys to estimate harvest of migratory birds and hunter activity, and (2) survey methodologies vary among those states who do conduct harvest surveys. Information from state surveys is often insufficiently detailed or imprecise, or has weaknesses in sampling design that can result in bias (e.g., failing to contact non-respondents; having no verification of species identification). Furthermore, many state survey results are not available in time to be useful for promulgating regulations. Some states eliminated migratory birds from their harvest surveys when we began conducting the Migratory Bird Hunter Survey; thus, reducing duplication of effort between state and Federal surveys since implementation of the Migratory Bird Harvest Information Program.

Within the USFWS, we do not select a hunter for more than one survey each year. We have implemented computer algorithms to identify exact duplicate Migratory Bird Harvest Information Program registrations across all data files. We eliminate these duplicate records prior to drawing our sample, thus improving the efficiency of our survey while avoiding asking a single hunter to fill out more than one survey. We are also investigating the cost-effectiveness of implementing address hygiene software to identify probable duplicates across all data files to further decrease the probability that a hunter will be selected for more than one survey each year.

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

This collection does not significantly impact small entities. We only collect this information from individual migratory bird hunters and state agencies.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If we did not collect this information, it would greatly weaken the Service's ability to promulgate regulations allowing controlled hunting of migratory birds. Agencies participating in determining appropriate hunting regulations, and making use of survey results, include the Department of the Interior, the Canadian Wildlife Service, state conservation agencies, and various private conservation organizations. Additionally, researchers often use these data to investigate biological phenomena such as range expansion, migration chronology, and species

presence/absence.

The Service would not be able to estimate annual hunter take of migratory birds, or assess our ability to manage populations through harvest regulation. The continued health of migratory bird populations demands that harvests be commensurate with population size and status. If we did not conduct these surveys, the lack of accurate assessment of migratory bird harvests would dictate restrictive hunting regulations, which could result in lost hunting recreation. Loss of hunting opportunity due to lack of monitoring would not be acceptable to the hunting public, state natural resource agencies (many of whom rely on revenue from hunting licenses for funding and USFWS harvest surveys to set state-level hunting regulations), and some Non-Governmental Organizations (NGOs; e.g., Ducks Unlimited). Allowing hunting opportunity without monitoring would not be acceptable to conservationists, much of the hunting public, non-hunting public, and some NGOs (e.g., Humane Society).

The Service needs to conduct surveys annually because the number of birds harvested can change substantially between years. Harvests fluctuate with the size of the hunted and hunter population, as well as climatic conditions such as drought, flood, extreme warm or cold temperatures, and annual fluctuations in species distribution. Annual harvest estimates are required to allow us to adequately measure these changes in harvest. Furthermore, states and some NGOs are interested in creating increased hunting opportunity for hunters and are experimenting with hunting regulations (e.g., different license types, special seasons, season length, bag limit, opening and closing dates, zoning). The utility of these approaches needs to be monitored annually to determine efficacy.

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 we 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 February 28, 2019, we published in the Federal Register ([84 FR 6814](#)) a notice soliciting public comment on this information collection for sixty (60) days, ending April 29, 2019. We received no comments in response to that notice.

In addition to the Federal Register Notice, we consulted with the five (5) individuals identified in Table 8.1 who familiar with this collection of information (through usability testing approved under Interior’s “Fast Track” clearance process (OMB Control No. 1090-0011), particularly the online survey (all of these hunters were testers of the online survey in 2018-19) in order to validate our time burden estimate and asked for comments on the questions below:

Table 8.1

Organization	Title
Private Citizen – Watertown, SD	Migratory Bird Hunter, online survey tester
Private Citizen – Summerton, SC	Migratory Bird Hunter, online survey tester
Private Citizen – Fresno, CA	Migratory Bird Hunter, online survey tester
Private Citizen – Erskine, MN	Migratory Bird Hunter, online survey tester
Private Citizen – Bolivar, MO	Migratory Bird Hunter, online survey tester

“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: All hunters felt the collection of information was necessary for sound migratory game bird management.

Agency Response/Action Taken: No response required.

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

Comments: Three out of five hunters said the estimate was accurate; the remaining two hunters said it probably doesn’t take that long.

Agency Response/Action Taken: The amount of time it takes a hunter to fill out a form is highly variable, depending upon how often the hunter hunts and how many birds he harvests. Based on our experience administering this collection, we feel our burden estimates represent the average completion time of most respondents.

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

Comments: No suggestions were made.

Agency Response/Action Taken: No response required.

And

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

Comments: Four out of five hunters said there was no burden on them. One hunter suggested the elimination of the email verification.

Agency Response/Action Taken: We have taken action to revise the login/authentication procedure for the online survey, and we have removed the requirement for email verification.

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

We provide no payments or gifts to respondents. As incentive, we provide participants in the Parts Collection Survey with a report at the end of the hunting season. This report lists the species, age, and sex of each wing that hunter submitted during the past hunting season.

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

Each hunter contacted receives an assurance that the survey is conducted in accordance with the Privacy Act of 1974 (5 USC 552a). Hunters are not asked to write their names on the questionnaires, and are assured that their names or identifications will not be associated with their questionnaires. A System of Records Notice (SORN), “Migratory Bird Population and Harvest Surveys – Interior, FWS-26” ([64 FR 29055](#)) has been published for this survey. This SORN is being updated in collaboration with the Service’s Associate Privacy Act Officer (APAO). We submitted a breakdown of our survey data and are working with the APAO to determine appropriate retention schedules for each data type. We expect this update to be completed in 2020. We will provide OMB with the updated SORN as a non-substantive change request upon publication.

We contract out the printing of some of the survey materials. All contracts, completed through the Government Printing Office (GPO), and all contractors must meet Privacy Act guidelines.

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.

There are no questions of a sensitive nature.

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

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that we will receive **218,033 responses** from **109,953 respondents** totaling **143,444 annual burden hours** for this information collection with an estimated total dollar value of the annual burden hours of approximately **\$7,067,859** (rounded). We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release [USDL-19-1002](#), June 18, 2019, Employer Costs for Employee Compensation—March 2019, to calculate the total annual burden.

- Individuals – the hourly rate for all workers is listed as \$36.77, including benefits.
- Government – the hourly rate for all workers is listed as \$50.89, including benefits.

Table 12.1

Collection Type/ Form Number	Number of Respondents	Average Number of Responses Each	Number of Annual Responses*	Average Time per Response	Total Annual Burden Hours*	Cost per Hour (Incl. Benefits)	Total Annual Dollar Value of Burden Hours
Migratory Bird Harvest Information Program (State Governments)							
	49	16.5	809	157 hours	127,013	\$ 50.89	\$ 6,463,691.57
Migratory Bird Hunter Survey (Individuals)							
Form 3-2056J	31,900	1	31,900	5 minutes	2,658	\$ 36.77	\$ 97,734.66
Form 3-2056K	16,900	1	16,900	4 minutes	1,127	36.77	41,439.79
Form 3-2056L	8,500	1	8,500	4 minutes	567	36.77	20,848.59
Form 3-2056M	10,200	1	10,200	3 minutes	510	36.77	18,752.70
Subtotals:	67,500		67,500		4,862		\$ 178,775.74
Parts Collection Survey (Individuals)							
Form 3-165	4,870	22	107,140	5 minutes	8,928	\$ 36.77	\$ 328,282.36
Form 3-165A	1,000	5.5	5,500	5 minutes	458	36.77	16,840.66
Form 3-165B	3,600	1	3,600	1 minute	60	36.77	2,206.20
Form 3-165C	900	1	900	1 minute	15	36.77	551.55
Form 3-165D	1,134	1	1,134	1 minute	19	36.77	698.63
Form 3-165E	1,100	1.5	1,650	5 minutes	138	36.77	5,074.26
Subtotals:	12,604		119,924		9,619		\$ 353,653.66

Sandhill Crane Harvest Survey (Individuals)							
Form 3-2056N	4,300	1	4,300	3.5 minutes	251	\$ 36.77	\$ 9,229.27
Online Migratory Bird Harvest Survey (Individuals) <i>NEW</i>							
	25,500	1	25,500	4 minutes	1,700	\$ 36.77	\$ 62,509.00
TOTALS:	109,953		218,033		143,444		\$ 7,067,859.10

*Numbers rounded to match ROCIS

Migratory Bird Harvest Information Program: Although state licensing authorities are collecting the name and address information needed to provide a sample frame of all licensed migratory bird hunters, Federal regulation requires collection of the information. Therefore, we provide the reporting burden associated with that information collection here. The Service estimates that the 49 states will collect the required information from approximately 3,800,000 individuals annually. States are using a variety of methods to collect the required information, and the amount of time required for an individual respondent to provide the information varies from less than 1 minute to up to 4 minutes, depending upon the method employed by the state. We estimate that the overall average time per response is 2 minutes.

The states then compile a list of migratory bird hunters in their state and send it to the Service. States send their first list of hunter names to the service in August and continue to send updated entries at 2-week intervals until the end of the migratory bird hunting seasons in their state. The number of hunters on each list varies, depending on the time of year and the number of migratory bird hunters in the state. On average, the lists contain 4,710 records and we receive an average of 16.5 lists per state per year. The total annual burden estimate for the Migratory Bird Harvest Information Program is 127,013 hours. This estimate is slightly higher than in 2017 due to a slight increase in the number of responses per state (up from 16 per year in 2014-16).

Migratory Bird Hunter Survey: The frequency of response for each form involved is once annually. Although many respondents report that they did not hunt for the species for which we survey them, they still need about 2 minutes to read the instructions prior to responding. Therefore, each of the following form-specific burden estimates includes 2 minutes per respondent for reviewing instructions on the form.

About 31,900 hunters respond to Form 3-2056J (waterfowl harvest survey) each year; the number of hunting trips reported ranges from zero to as many as 100, with an average of 3 trips reported per respondent. Recording and summarizing the trips requires an average of 1 minute per trip (2,658 total burden hours). This is reduced from 37,000 hunters in 2014-16 because of a decline in the number of hunters invited to participate in the survey.

About 16,900 hunters respond to Form 3-2056K (dove-pigeon harvest survey), with the number of trips reported ranging from zero to about 30. The number of trips reported averages 2, and the time required to report and summarize the trips averages 1 minute per trip (1,127 total burden hours). This is reduced from 23,100 hunters in 2014-2016 due to a decline in the number of hunters invited to participate.

About 8,500 hunters respond to Form 3-2056L (woodcock harvest survey) each year, with response burden averaging 1 minute per trip and respondents averaging 2 trips (567 total burden hours). This is a reduction from 8,900 hunters in 2014-16 due to a decline in the number of hunters invited to participate.

About 10,200 respondents are also expected for Form 3-2056M (snipe, coot, rail, and gallinule harvest survey) each year, with response burden again averaging 1 minute per trip and

respondents expected to average 1 trip (510 total burden hours). This is a reduction from 12,000 in 2014-16 due to a decline in the number of hunters invited to participate.

The total annual burden estimate for all 4 paper forms used for the Migratory Bird Hunter Survey is 4,862 hours, which is a decline from the 2014-16 average of 5,817 hours.

Parts Collection Survey: About 4,870 respondents provide waterfowl parts in Form 3-165 (waterfowl wing envelope). Response frequency for Form 3-165 varies from once to up to 200 times annually dependent on the amount and success of hunting by individuals, averaging about 22 times per individual. The estimated time required to complete form 3-165 is 5 minutes, and we receive about 106,135 completed forms annually (8,983 total burden hours). This is an increase from the 2014-16 average of 7,700 burden hours, due to an increase in sampling rate, in order to maintain our current level of participation in the waterfowl parts collection survey.

About 1,000 respondents will provide wings using Form 3-165A (woodcock, rail, gallinule, and band-tailed pigeon wing envelope), averaging 5.5 responses per individual annually. The estimated time to complete Form 3-165A is 5 minutes, and we receive about 5,500 forms annually (458 total burden hours).

Approximately 3,600 hunters will respond to Form 3-165B (request to provide waterfowl parts). Response frequency is once annually, and completion of the form requires about 1 minute (60 total burden hours).

About 900 hunters will respond to Form 3-165C (request to provide wings from woodcock, rails, gallinules, and band-tailed pigeons). Response frequency is once annually, and completion of the form requires about 1 minute (15 total burden hours). This is an increase from 7 burden hours in 2014-16, in order to improve our estimates of harvest for these species.

Approximately 1,134 respondents will respond to Form 3-165D (request to provide wings from mourning doves). The response frequency is once annually, and completion of the form requires about 1 minute (18 burden hours).

Approximately 1,100 hunters will provide mourning dove wings using Form 3-165E (mourning dove wing envelope), averaging 1.5 responses per individual annually. The estimated time to complete Form 3-165E is 5 minutes, and we receive about 1,700 forms annually (138 total burden hours). This is an increase from 113 burden hours in 2014-16, in order to improve precision in our dove harvest estimates.

Thus, the total annual burden estimate for the Parts Collection Survey is 9,619 hours.

Sandhill Crane Harvest Survey: About 4,300 hunters respond to form 3-2056N; the number of hunting trips reported ranges from zero to as many as 20, with an average of 1.5 trips reported per respondent. Recording and summarizing the trips requires an average of 1 minute per trip totaling 251 burden hours. This is an increase in the number of responses from 4,000 in 2014-16, due to an increase in the number of sandhill crane harvest permits.

Online Migratory Bird Harvest Survey: During the 2019-20 hunting season, assuming an average 30% response rate, we will be inviting a total of 85,000 hunters to complete the online survey, resulting in approximately 25,500 hunters responding. We will invite 350 hunters to complete each of the survey types (waterfowl, dove, woodcock, snipe/coot/rail/gallinule, and crane), in order to test the functioning of the online survey, estimate burden times, and calculate

response rates. We will also invite an additional 83,250 hunters to complete the waterfowl survey online, in order to compare the estimates of days hunted and waterfowl harvested between the two survey types (paper vs. online). To evaluate the effectiveness of email vs. paper invitations, we will invite hunters to participate in the online survey using both of these invitation methods, and compare response rates in each group. Assuming an average response time of 4 minutes per online survey, the online survey will total an estimated 1,700 burden hours. During the 2020-2021 hunting season, we will increase the number of invitations sent to result in a total of 50,000 responses among the 5 online survey types, for a total estimated 3,333 burden hours. After 3 years, we will end the paper survey and replace it with the online survey (while allowing hunters to request a paper survey if desired), and the number of burden hours will drop back down to previous levels.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- * **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- * **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour dollar cost burden to respondents. We provide a postage paid return envelope with the survey. There is no fee for completing the survey or any other costs associated with responding to this survey.

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 annual cost to the Federal Government is **\$1,753,670** (rounded) (\$864,320

(rounded) for salaries and \$889,350 for operating costs). We used Office of Personnel Management Salary Table [2019-DCB](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with BLS News Release [USDL-19-1002](#), June 18, 2019, Employer Costs for Employee Compensation—March 2019. The Patuxent Wildlife Research Center in Laurel, MD conducts most work so we used the DC area salary table to calculate salaries and benefits.

Table 1 – Salaries and Benefits: \$864,320 (average grades/steps with 100% of time dedicated to program).

Position	Grade/Step	2019-DCB Annual Salary	Total Salary*, Inc. Benefits (Salary X 1.59)	Number of Positions	Total Salary Costs
Branch Chief	GS-14/05	\$ 132,818	\$ 211,181	1	\$ 211,181
Biologist	GS-13/05	112,393	178,705	1	178,705
Biologist	GS-11/05	78,861	125,389	1	125,389
Lead Survey Clerk	GS-06/05	47,952	76,244	1	76,244
Survey Clerk	GS-05/05	43,014	68,392	2	136,784
Administrative Assistant	GS-07/05	53,285	84,723	1	84,723
Speciator/Survey Contractor	GS-05/05	43,014	68,392	0.25	17,098
Half-time Speciator	GS-05/05	43,014	68,392	0.5	34,196
Subtotal - Table 1:					\$ 864,320

*Rounded

Table 2 - Operating Costs: \$889,350 (printing and mailing survey forms, packing and mailing wing envelopes, processing incoming data, producing reports, coordinating with state agency partners, and implementing modernizations).

Activity/Survey	Travel	Postage	Printing	Contracts, Supplies, & Equipment	Total Operating Costs
Parts Collection Survey	37,500	306,800	78,800	37,000	460,100
Harvest Surveys (Diary)		256,300	54,200	6,800	317,300
Online Harvest Surveys		38,250	10,200	20,000	68,450
Harvest Surveys Support and Operations	5,000	10,000		28,500	43,500
Subtotal – Table 2:	42,500	611,350	143,200	92,300	889,350

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

We are reporting a total increase of **27,899 annual responses** and **5,951 burden hours**. Of this, we are reporting a net increase of 2,399 annual responses and 4,251 hours associated with the previously approved information collections (Table 3; see parts 12, 13, 14 for reasons for adjustments in hours or cost burden). We are also reporting an increase (due to agency discretion) of 25,500 responses and 1,700 burden hours associated with the new information collection for the Online Migratory Bird Harvest Survey.

Table 3 – Change in discretion burden costs from 2017 to 2019.

2,017	2,019	Change
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IC Title	Responses	Responses	Responses
Migratory Bird Harvest Information Program - State Governments	784	809	(25)
Migratory Bird Hunter Survey (Form 3-2056L) - Individuals	8,900	8,500	400
Migratory Bird Hunter Survey (Form 3-2056K) - Individuals	23,100	16,900	6,200
Parts Collection Survey (Form 3-165B) - Individuals	3,600	3,600	0
Migratory Bird Hunter Survey (Form 3-2056J) - Individuals	37,000	31,900	5,100
Parts Collection Survey (Form 3-165) - Individuals	92,400	107,140	(14,740)
Sandhill Crane Harvest Survey (Form 3-2056N) - Individuals	4,000	4,300	(300)
Parts Collection Survey (Form 3-165E) - Individuals	1,350	1,650	(300)
Migratory Bird Hunter Survey (Form 3-2056M) - Individuals	12,000	10,200	1,800
Parts Collection Survey (Form 3-165A) - Individuals	5,500	5,500	0
Parts Collection Survey (Form 3-165C) - Individuals	400	900	(500)
Parts Collection Survey (Form 3-165D) - Individuals	1,100	1,134	(34)
Online Migratory Bird Harvest Survey (Individuals) NEW		25,500	(25,500)
TOTALS:	190,134	218,033	(27,899)

IC Title	2,017 Hours	2,019 Hours	Change Hours
Migratory Bird Harvest Information Program - State Governments	123,088	127,013	(3,925)
Migratory Bird Hunter Survey (Form 3-2056L) - Individuals	593	567	26
Migratory Bird Hunter Survey (Form 3-2056K) - Individuals	1,540	1,127	413
Parts Collection Survey (Form 3-165B) - Individuals	60	60	0
Migratory Bird Hunter Survey (Form 3-2056J) - Individuals	3,083	2,658	425
Parts Collection Survey (Form 3-165) - Individuals	7,700	8,928	(1,228)
Sandhill Crane Harvest Survey (Form 3-2056N) - Individuals	233	251	(18)
Parts Collection Survey (Form 3-165E) - Individuals	113	138	(25)
Migratory Bird Hunter Survey (Form 3-2056M) - Individuals	600	510	90
Parts Collection Survey (Form 3-165A) - Individuals	458	458	0
Parts Collection Survey (Form 3-165C) - Individuals	7	15	(8)
Parts Collection Survey (Form 3-165D) - Individuals	18	19	(1)
Online Migratory Bird Harvest Survey (Individuals) NEW		1,700	(1,700)
TOTALS:	137,493	143,444	(5,951)

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

We plan to continue the Migratory Bird Harvest Surveys annually as long as the U.S. offers migratory bird hunting seasons.

Schedule for Migratory Bird Harvest Information Program: The schedule for the Migratory Bird Harvest Information Program varies among states and is dependent upon the license structure used in that state. States have differing hunting license structures, including license that are valid from 1 January-31 December, 1 September-31 August, 1 April – 31 March, and 365-days from date of purchase. States generally send these data from August-February, but some states send data year-round. We receive migratory bird hunter names and addresses from the states, either in the form of electronic databases or on paper forms from which the data are compiled in a database.

Schedule for the Migratory Bird Hunter Survey

- Sep-Feb We send questionnaires to the sampled migratory bird hunters asking them to keep track of their hunting trips throughout the hunting season and return the form when they have completed their hunting season.
- Dec-Apr Following a staggered schedule based on the closing date of the hunting season in each state, we send sent reminder letters and replacement questionnaire forms to sampled hunters who have not returned questionnaires. We accept responses until the end of April.
- Apr-May Editing, compilation in a database, and analysis of response data.
- Jun-Jul The report on non-waterfowl species must be prepared and distributed by early June, in time for the public meeting on hunting regulations for those species and publication in the Federal Register and various status reports. The report on waterfowl must be prepared and distributed by early July, in time for the public meeting on waterfowl hunting regulations and publication in the Federal Register. The complete harvest report is distributed both internally and externally and made available on our website:
<http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm>

Schedule for the Parts Collection Survey

- JunWe mail postcards soliciting participation in the survey to the public from the Service in Laurel, Maryland. Respondents return the postcard to the Service in Laurel, Maryland. We compile names and addresses of respondents in a database.
- Jul-Aug Employees prepare the parts envelopes for mailing.
- Aug-Oct Because they must be in the possession of survey participants at the start of the hunting season, we send parts envelopes to participants about 2 weeks before the hunting season begins in each state. Hunting seasons open as early as September 1 in many states, and as late as early November.
- Sep-Mar Hunters mail parts to collection points in each Flyway throughout the hunting season, which continues to mid-March in some states.
- Nov-May Federal and state biologists assemble at one of six collection points to identify the species, age, and sex of each part between late November and mid-March. They forward late arriving parts to Laurel in early April and identified there. We accept parts until May.
- Feb-May Shipment of completed data slips (form #s) to Laurel, where we compile the data in a database. We analyze data in combination with information derived from the Migratory Bird Hunter Survey to generate species-specific estimates of harvest.
- Aug-Sep We publish status reports containing estimates of annual dove, woodcock, band-tailed pigeon, and sandhill crane by August 20. The Service's Division of Migratory Bird Management must receive harvest estimates used in harvest

strategies driven by population models internally for model input by early-August. The complete harvest report is available by the end of September and is distributed both internally and externally and accessible on our website.
<http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm>

Schedule for Sandhill Crane Harvest Survey: In all states but Alaska, participating states issue permits to sandhill crane hunters in mid-July. States send electronic copies of issued permits (showing names and addresses of permittees) to the Division of Migratory Bird Management, Laurel, Maryland, following the end of the crane-hunting season in each state. Upon receipt of name and address cards, we produce computer records of each name/address, select hunters, and mail surveys. We mail these questionnaires to permittees approximately two weeks after the close of the respective hunting seasons. We mail a follow-up questionnaire to non-respondents approximately one month later. In recent years, the latest crane season has closed in early February. Thus, we complete distribution of follow-up forms in early April and the analysis of data commences in May. The sample frame for the estimating sandhill crane harvest from Alaska is provided from the Migratory Bird Harvest Information Program. Survey procedures are the same as for the other states, except that the survey can be sent out before the close of the sandhill crane hunting season because of earlier receipt of sample frame information. An annual report is available by August on our website:
<http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm>

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 approval expiration date on the survey forms.

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.