

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Management and Oversight of the National Estuarine Research Reserve System
OMB Control No. 0648-0121

SUPPORTING STATEMENT PART A

Abstract

This is a request for extension of an existing information collection.

The National Estuarine Research Reserve System (NERRS) is a partnership between the National Oceanic and Atmospheric Administration (NOAA) and 22 states and Puerto Rico that protects more than 1.3 million coastal and estuarine acres in 28 reserves for long-term research, monitoring, education, and stewardship, established under Section 315 of the Coastal Zone Management Act (CZMA) of 1972 (16 U.S.C. 1451), 16 U.S.C. 1461. The NERRS consists of carefully selected estuarine areas of the United States that are designated, preserved, and managed for research and educational purposes. The reserves are chosen to reflect regional differences and to include a variety of ecosystem types according to the classification scheme of the national program as presented in 15 CFR Part 921.

As part of a national system, the reserves collectively provide a unique opportunity to address research questions and estuarine management issues of national significance. The reserves also serve to enhance public awareness and understanding of estuarine areas and provide suitable opportunities for public education and interpretation. Regulations provide guidance for delineating reserve boundaries and additional guidance for arriving at the most effective and least costly approach to establishing adequate state control of key land and water areas.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Section 315 of the Coastal Zone Management Act (CZMA) of 1972 (16 U.S.C. 1451), 16 U.S.C. 1461, establishes the National Estuarine Research Reserve System (NERRS). The NERRS consists of carefully selected estuarine areas of the United States that are designated, preserved, and managed for research and educational purposes. The reserves are chosen to reflect regional differences and to include a variety of ecosystem types according to the classification scheme of the national program as presented in 15 CFR Part 921, the National Estuarine Research Reserve System Regulations. As part of a national system, the reserves collectively provide a unique opportunity to address research questions and estuarine management issues of national significance. The reserves also serve to enhance public awareness and understanding of estuarine areas and provide suitable opportunities for public education and interpretation. The Reserve System Regulations in 15 CFR Part 921 establish requirements for designating reserves, delineating reserve boundaries, developing and updating reserve management plans, and creating site profiles, as well as additional guidance for arriving at the most effective and least

costly approach to establishing adequate state control of key land and water areas.

Subsection 315(e)(1)(B) of the CZM Act authorizes NOAA's Office for Coastal Management (OCM) to make grants or cooperative agreements to any coastal state or public or private institution or person for purposes of supporting research within the NERRS. This program is listed in the Catalog of Federal Domestic Assistance under "Coastal Zone Management Estuarine Research Reserve, Number 11.420". Applications for such grants follow the provisions of 2 CFR Part 200, The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Financial Assistance Awards. Applications for research grants are required so that OCM can determine which projects best support the NERRS program and merit funding.

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.

There are several types of reporting requirements relating to this program. Those documents submitted include: 1) site designation (nomination) materials including associated National Environmental Policy Act (NEPA) requirements, 2) management plans, 3) site profiles which are ecological characterizations of the reserve, and 4) supporting materials for funding applications. All required documents are submitted electronically by state and university partners.

1) Site Designation: Requests by states to approve proposed sites for inclusion within the National Estuarine Research Reserve System must contain the information detailed at 15 CFR 921.11. In February 2020, NOAA published an updated *NERRS Designation Guidance*, which provides an overview of the designation process, list of best practices, and technical assistance for developing the site designation materials. This site designation information is necessary to ensure that the site meets national standards and requirements for a reserve, to obtain a complete description of the area being proposed, to ensure that the best available site was chosen, and to ensure proper participation by the public and state's Governor. Without the state's site designation submission, OCM could not review proposals and approve new sites as National Estuarine Research Reserves. Site designation occurs only once. Once a site is designated, the state will not need to submit site designation information again.

A coastal state may apply for financial assistance for the purpose of site selection, preparation of a management plan and environmental impact statement, and for conducting limited characterization studies. The requirements are described at 15 CFR 921.13. The management plan is a detailed document outlining goals, objectives and strategies for the reserve and serves as a framework for establishing and managing a reserve. The plan must contain sub-plans for administration, research, education, public access, construction, land acquisition and resource protection to ensure the appropriate use and protection of reserve resources. This information is needed to ensure that the reserve will meet the objectives the law established for reserves.

The state must also submit the data necessary for OCM to prepare an Environmental Impact Statement. Since the state has to gather much of this information or similar information for other purposes, it can obtain it efficiently. The state also receives federal funds to provide this information.

2) Management Plan: The National Estuarine Research Reserve System Regulations in 15 CFR, section

921.33(c) require that states update the site's management plans every five years. As stated above, management plans outline the major goals, objectives and strategies that the reserve will undertake in a five year period and contains plans for administration, research, education, public access, construction, land acquisition and resource protection. The management plan provides a vision and framework to guide reserve activities during the five year period, enables the reserves and NOAA to track progress and realize opportunities for growth, guides program evaluations under Section 312 of the Coastal Zone Management Act, and enables the reserves to acquire facilities construction and land acquisition funds.

3) Site Profile: According to the 15 CFR Subpart I, section 921.60 (1) and (2), monitoring funds are used to support major phases of a monitoring program: (1) studies necessary to collect data for a comprehensive site description/characterization; and (2) development of a site profile. The site profile is a synthesis of information gathered during Phase I, the Environmental Characterization Phase, which is conducted as a combination of literature and field (optional) research that provides an overall picture of the reserve in terms of its resources, issues, management constraints, and research needs. The site profile will help reserve management find important information gaps in the resources and identify the aspects of monitoring to be initiated during a later monitoring phase (resource monitoring). The site profile provides a summary of scientific information for academic and agency researchers, graduate students, advanced undergraduates, and coastal resource managers.

4) Funding Application: States apply for federal funds to assist the state in operation and management of the reserve including the management of research, monitoring, education and interpretive programs (15 CFR 921.32) Applications (SF 424s and supporting documentation required by 2 CFR 200 are required by OCM to determine if the proposal for funding meets the standards of the Act and implementing regulations, and applicable laws and regulations. Most state partners submit funding applications on an annual basis. However, over the past several years, OCM has been implementing a multi-year award pilot program with the goal of reducing the time burden on both funding applicants and OCM staff. Multi-year awards allows states to submit a funding application every other year – rather than every year. At present, eight reserves are piloting multi-year awards, but based on conversations with partners, OCM expects the number of multi-year award participants to increase during the next grant cycle when the updated CAMMP (grant application development) system is launched. CAMMP system updates are further described in the answer to question 8.

Applications for acquisition and development awards must include a categorical exclusion check list, Certification of Federal Consistency, and State Historical Preservation Office (SHPO) comments. Before the funds for construction are expended, the categorical exclusion checklist, which is a part of the grant application package for construction and development projects, is submitted to NOS for approval. The National Historic Preservation Act requires that OCM obtain the state comments to ensure the federal government is not funding a project that will harm a site of historical significance.

5.) Pursuant to 2 CFR Part 200 (UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS), states must submit performance reports to report progress on projected work schedules and stated objectives for each cooperative agreement. In addition, states submit data for the NERRS Performance Measurement System to report progress toward the goals of the Coastal Zone Management Act and the National

Estuarine Research Reserve System, per 16 U.S.C. § 1461 (f). The cooperative agreement performance reports are reviewed by agency personnel who determine whether the state is adhering to its approved coastal zone management program and whether it is making continued progress toward coastal management goals. If it is not, future grants could be reduced or a full scale program review could be triggered; the latter could result in a requirement for expenditure of federal funds to correct the program’s deficiency; or, in the state losing federal approval of its program. Regulations require performance reports to be submitted from recipients no less than annually and up to quarterly. OCM requires cooperative agreement performance reports to be submitted semi-annually. OCM also lets the final semi-annual report for an award constitute the final report, rather than requiring a comprehensive final report that the regulations allow. Performance measures are submitted semi-annually

OCM will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should OCM decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

Sample Table: Information Requirements and Needs and Uses of Information Collected

Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
1	Site Designation	316 U.S.C. § 1461 (b)	15 CFR 921.11	N/A	Used by OCM to evaluate and approve state’s nomination of sites for inclusion within the National Estuarine Research Reserve System.
2	Management Plans	16 U.S.C. § 1461	15 CFR, section 921.33(c)	N/A	Used by the public to understand the major goals, objectives and strategies that the reserve will undertake in a five year period. Used by OCM and the Reserve to establish and communicate priorities at each Reserve site; facilitate strategic partnerships; and to track progress and realize opportunities for growth.
3	Site Profile	16 U.S.C. § 1461	15 CFR section 921.60 (1) and (2)	N/A	Provides a summary of existing scientific information at the Reserve Site. Used by OCM, the Reserve, and the public (researchers and coastal managers) to plan future research and monitoring projects.
4	Funding Application (including NEPA compliance)	316 U.S.C. § 1461 (e)	15 CFR 921.32 (specific to Reserves); 2 CFR 200 – Uniform Administrative Requirements for Financial Assistance Awards (Government wide)	Various government-wide financial Assistance forms in the 424 Family. (not specific to NOAA). No	Used by OCM to determine if the proposal for funding meets the standards of the Act and implementing regulations, and applicable laws and regulations.

				NOAA-specific forms required.	
5	Grant Progress Reporting – Interim and Final	316 U.S.C. § 1461 (e) and (f)	15 CFR Part 14 § 14.51 to 14.53 – Department of Commerce reporting requirements for Financial Assistance Awards; 2 CFR 200 – Uniform Administrative Requirements for Financial Assistance Awards (Government wide)	N/A	Used by OCM to monitor and provide technical assistance for the Reserve’s progress towards accomplishing the goals and objectives outlined within the funding application (item 4).

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.

All information collection is conducted electronically.

OCM developed the Internet-based Coastal and Marine Management Program (CAMMP) Information System which is an electronic grant application management system. Reserves use CAMMP to develop their annual cooperative agreement applications. Completed CAMMP applications and other documents needed for federal financial assistance are submitted through the federal Grants.gov system. From there, the application is transferred to NOAA’s Grants Online system for review and processing. Reserves use the Grants Online system to submit performance reports and request other post-award action requests, as needed. NOAA is currently working to update the CAMMP system in response to state partner feedback.

OCM has also maintains reporting sites for reserves to submit their annual performance measurement data, which is included as part of the semi-annual progress reports.

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 Question 2

The CZMA creates the only state-federal partnership program that establishes a national system of coastal protected areas dedicated to long-term stewardship, research and monitoring, and education. There are no similar programs or duplication of information collected to support the National Estuarine Research Reserve system.

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

The information collection primarily involves state agencies, with a few (if any) small entities involved each year for research grants. This information collection is not requesting information from small

business, and we do not anticipate any impact on small businesses. OCM does provide technical assistance in preparing responses as requested, and this reduces the burden for state agencies and 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.

If this information were not collected, OCM would not be able to support the implementation of the National Estuarine Research Reserve System, approve designation of new National Estuarine Research Reserve sites, or provide financial support to existing sites.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

This collection of information will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice published on March 11, 2020 (85 FR 14,188) solicited public comment on this collection. No comments were received.

Following the 2020 grant cycle, NOAA solicited comments from a number of grant recipients. The questions asked included:

1. Do estimated annual reporting burdens accurately reflect the reporting efforts?
2. Are the methods of data collection appropriate? (i.e., paper vs. electronic)
3. Are there ways to enhance the quality, utility, and clarity of the information collected?
4. Are there ways to minimize the burden of the collection of information?

Responses were received from four recipients. The majority felt that the estimated burden efforts did not accurately reflect the actual effort expended in one or more categories. Two recipients indicated that the burden estimates were too low for award applications and progress reports, both semi-annual and final. One recipient indicated that burden estimates were too low for NEPA. While OCM is working to reduce the burden for award applications and progress reports through actions such as updating the CAMMP system that is used to develop award application, OCM agrees that an increase is justified for grant applications, NEPA documentation, and progress reports. The revised estimates are shown in the table in A.12, and will be closely monitored moving forward as OCM continue to think about other ways to streamline and potentially consolidate reporting requirements.

One respondent indicated that the burden estimates for management plan development was too high and another indicated that it might be too high, but wasn't sure. One recipient thought that the burden

estimate was realistic. OCM decided to utilize a management plan burden estimate that averaged the responses, resulting in a slight decrease in burden estimate. This reduction is also supported by the recent changes to the management plan guidelines, since as noted below, one of the main objectives for the updated 2020 Reserve System Management Plan Guidelines was to reduce the page length and staff time devoted to management plan updates.

The previous renewal noted that OCM had begun looking at options for streamlining the Reserve Management Plan update process, including reducing the types of information that will be required to be included. During the process of updating the guidance, OCM received written comments from four reserves, and verbal feedback from several others. In 2020, OCM published updated Reserve System Management Plan Guidance and Resources. The 2020 Guidance streamlined required language, provided additional guidance on optional vs required elements, and clarified the difference between 'routine' and 'major/comprehensive' updates. One of the overall goals of the revised guidance is to shorten the length of the management plans, as well as the staff burden on developing and reviewing management plans.

Respondents felt that the methods of data collection are appropriate, noting that the data collections were all electronic. Several recipients noted that it would be helpful to have more data pre-filled and to have the ability to easily 'cut-and paste' between different reports within reporting systems. OCM is working to incorporate pre-filled data as part of the CAMMP system update. One recipient had several suggestions specific to the CAMMP system, but also noted that the ongoing CAMMP system update would likely address some of these concerns.

In 2017, OCM asked state NERR and Coastal Zone Management Programs for suggestions on ways to improve application development through the Coastal and Marine Management Program (CAMMP). OCM received responses from 37 individuals. OCM estimates that at least 18 of the respondents were associated with a National Estuarine Research Reserve. Suggestions included improvements to user interface, the development of queries or summary reports, and the ability to 'copy and paste' tasks between different funding years. OCM is currently in the process of revising CAMMP to address many of the recommendations provided, and anticipates that the updated CAMMP system will be available for Reserve programs to use for developing their FY2021 funding applications. The updated CAMMP system will reduce burden time on respondents through increased system efficiencies. In addition, the updated CAMMP system will support the development of multi-year award applications; the current CAMMP system only supports single year award applications. When the updated CAMMP becomes available, OCM anticipates that many applicants will chose to develop (2 year) multi-year award applications. This will significantly reduce the paperwork burden on recipients since they will only have to develop funding applications every other year rather than every year.

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

No payments or gifts to respondents are made, other than remuneration of contractors or grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records

notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

No assurance of confidentiality is provided.

External grant applications/proposals are not typically collected by OCM (IT system NOAA6101). Per the NOAA Grants Management Office policy, proposals almost always run through the Grants.gov submission process and end up in the Grants Online system (IT system NOAA1101). In rare cases, applicants without access to the Internet [e.g., US Territories] are permitted to submit paper applications. When this happens, OCM scans the proposals and loads them into Grants Online. Any subsequent sharing of grant proposals via email for review must be done via a secure file transfer process (e.g., Grants Online, Accellion/Kiteworks if emailing internally or externally to NOAA, a secure Google Drive or a network location for internal NOAA reviewers, or a password protected website for internal and external NOAA reviewers). Once reviews are complete and awards are made, proposals are removed from the OCM system and the Grants Online system is the official repository. Both NOAA6101 and NOAA1101 have approved PIAs.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

It is anticipated that three new sites will be considered for designation within the next five years, eventually bringing the total respondent number to 32, however these site designations are still the preliminary stages, and it is unlikely that this sites will be approved during the next 3 year time frame and affect the management plan, reporting, or application estimates.

The Bureau of Labor Statistic’s May 2019 National Occupational Employment and Wage Estimates (United States) was the source of the hourly wage rate. The National Estuarine Research Reserves (respondents) employ a wide variety of scientific staff, at locations across the nation. Therefore, NOAA utilized the “Life, Physical, and Social Science Occupations” (Code 19-0000), nationwide median wage hour rates for these calculations.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Management Plans	Life, Physical, and Social Science Occupations (19-0000)	29	0.14 (Management Plan revision is a multiyear process)	4	1,600	6400	\$32.77	\$209,728
Site Profile	Life, Physical, and Social Science Occupations (19-0000)	1	.33 (This is a multiyear process)	0.33	1800	594	\$32.77	\$19,465
Site designation	Life, Physical, and Social Science Occupations (19-0000)	3	.02 (Reserve designation is a multiyear process)	0.6	2500	1500	\$32.77	\$49,155
Grant Progress Reporting - comprehensive	Life, Physical, and Social Science Occupations (19-0000)	29	2	58	10	580	\$32.77	\$19,006
Grant Progress Report – Final non-comprehensive	Life, Physical, and Social Science Occupations (19-0000)	29	1	29	4	116	\$32.77	\$3,801
Grant Application	Life, Physical, and Social Science Occupations (19-0000)	29	.83 (estimating 10 reserves submit only every other	24	24	384	\$32.77	\$18,875

			year due to multi-year applications)					
NEPA and SHPO	Life, Physical, and Social Science Occupations (19- 0000)	29	1	29	2	58	\$32.77	\$1,900
Totals				145		9,632		\$321,930

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

Electronic copies are encouraged for management plan and site profile submission. Printed hard copies are no longer required (although some respondents may choose to submit a hard copy). Total annual recordkeeping/reporting costs are \$0. Printing requirements have been eliminated. Completed documents are now made available in electronic format and a large number of printed documents are not necessary. The other items (grant applications, grant reports) can be submitted electronically and/or copies are made by the federal government. All grant/cooperative agreement related records are maintained within the federal grants management system. There is no additional record keeping burden associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	Band 4	\$220,792	5%		\$11,039
	Band 4	\$167,785	10%		\$16,778
Other Federal Positions	Band 3	\$128,927	40% (2 employees)		\$51,570
	Band 4	\$198,947	10% (1 employee)		\$19,894
Contractor Cost		\$127,603	100%	N/A	\$127,603
Travel					\$0
Other Costs:					\$0
TOTAL					\$226,884

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Site Designation	3	1	0.6	0.2	1500	500	This adjustment is due to an increase in the number of states (respondents) that are participating in the site designation process. Please note that joining the Reserve System is voluntary. During the previous renewal period, only 1 state (CT) was working towards designation of a new Reserve site. In the current renewal period, OCM anticipates that 3 states (CT, WI, and LA) will be working towards the designation of new Reserve sites in their states, thereby resulting in an increase in burden hours.
Management Plan	29	29	4	4	6,400	7,200	This adjustment is due to updated Guidance designed to reduce the length of management plans and simplify the required elements.
Grant Progress Reporting - comprehensive	29	29	58	58	580	290	This adjustment was due to changes in the burden estimation provided by state respondents.
Grant Progress Report - Final non-comprehensive	29	29	29	29	116	58	This adjustment was due to changes in the burden estimation provided by state respondents.
Grant Application	29	29	24	29	384	232	This adjustment was due to changes in the burden estimation as well as estimated changes to the average number of responses per year. Reserves indicated that the burden estimate for the grant application development was too low and OCM agrees with this assessment. At the same time, we are estimating that the level of effort will decrease for some respondents as more reserves begin to implement multiyear awards rather than single year awards. This means that respondents will only have to develop grant applications every other year rather than every year. We are estimating that at least 10 states will chose to develop multi-year awards during this renewal period. This reduces the average annual number of respondents to 24 (Some years all 29 Reserves will need to develop funding applications, but the next year, only 19 Reserves will need to develop applications).
NEPA and SHPO	29	29	29	29	58	29	This adjustment was due to changes in the burden estimation provided by state respondents.
Total for Collection	149 (32 unique respondents)	147 (30 unique respondents)	145	149	9,038	8,309	
Difference	+2		-4		+729		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Respondent labor costs	\$321,930	\$267,270	N/A	N/A	Increase in burden hours in addition to an increase in the labor rate used to calculate costs. Previous collection used a labor rate of \$30/hour. The current collection used a labor rate of \$32.77. The Bureau of Labor Statistic's May 2019 National Occupational Employment and Wage Estimates was the source of this rate estimate.

Total for Collection	\$321,930	\$267,270			
Difference	\$54,660				

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.

After the coastal state completes the designation of a new National Estuarine Research Reserve Site, the Draft and Final Environmental Impact Statement, the Environmental Assessment documents, and the reserve's initial Management Plan are published online according to the National Environmental Policy Act (NEPA) and the NOAA regulations for the Designation of a National Estuarine Research Reserve (15 CFR 921.30). As noted above, management plans must be updated every five years and these revised Reserve Management Plans (draft and Final) are also published online for public comment and public use, according to the NOAA regulations at 15.CFR 921.33

Site profiles are published online for use by researchers and other users both internal and external to the reserve system.

NOAA will also regularly synthesize information from the NERRS Financial Assistance Applications and award progress reports (including NERRS performance measurement data) to develop factsheets posted to the web to show national accomplishments of the National Estuarine Research Reserve System.

There are no complex analytical or statistical techniques used in these publications.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).