

**Supporting Statement for Paperwork Reduction Act Submissions
"Land and Water Conservation Fund On-Site Inspection Report"
OMB Control Number 1024-0034**

Terms of Clearance: None

A. 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.**

The National Park Service (NPS) administers the Land and Water Conservation Fund (L&WCF) State assistance program. Matching grants are provided to States, and through States to local communities, for the acquisition and development of outdoor recreation areas and facilities. The L&WCF State assistance program has been designed to give maximum flexibility and responsibility to States in the administration of their programs, and all reporting requirements were developed for this purpose.

As part of the administrative responsibilities of the L&WCF program as mandated by the L&WCF Act of 1965, on-site inspections of funded sites are required. On-site inspections are used in the determination of the eligibility of a project to receive L&WCF assistance, in monitoring the performance of grantees, and ensuring that all requirements and regulations have been compiled with. The following on-site inspection reports are to be submitted to NPS: pre-award reports, progress reports, final inspection reports and post-completion reports (required every five years). A copy of that portion of the L&WCF Manual pertinent to on-site inspection reports is attached. No special form is required.

- 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.)**

This data will be used by NPS in the monitoring of grant recipients.

- 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.).**

There is no substitute for the physical on-site inspection of sites improved by projects funded under the L&WCF program. Inspections are mandatory in order to assure the protection of the Federal investment.

The Government Paperwork Elimination Act (GPEA), (P.L. 105-277, Title XVII, Sections 1703 and 1705 of 1998 requires Federal agencies to be able to allow individuals or entities the option to submit or transmit information electronically when practical. Ultimately, the State and Local Assistance Program Division of the NPS will be integrated into the grants.gov program. There are no forms involved in this collection.

- 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 similar information is collected and there is no duplication.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Not applicable. All recipients are State governments.

- 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 inspections were conducted less frequently, there would be an increased likelihood of violation of program requirements regarding the public availability of assisted sites in accord with Section 6(f)(3) of the L&WCF Act.

- 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.

None of the listed circumstances applies.

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.

The NPS published a 60-Day Federal Register Notice seeking public comment on this collection on March 14, 2007(Vol. 72, Num. 49, pages 11899-11900.) No comments were received.

Over the course of the past 3 years, several consultations with persons outside of the agency have taken place. They are:

Mr. Robert Newton
Mississippi Department of Wildlife,
Fisheries, and Parks
P.O. Box 451
Jackson, Mississippi 39205
601/432-2224

Mr. Todd Stump
South Carolina Department of Parks,
Recreation, and Tourism
1205 Pendleton Street
Suite 246
Columbia, South Carolina 39205
803/734-0617

They concur with our cost and burden hour estimates to complete the information collection process.

The State Liaison Officers, who are appointed by the Governors to administer the L&WCF program for each State, have been consulted concerning the reporting requirements and format. Through the National Association of State Outdoor Recreation Liaison Officers, an on-going mechanism exists for direct input into program administration. No major problems with regard to this requirement have been identified.

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

Not applicable.

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

Not applicable. No confidential information is solicited.

- 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.**

Not applicable. No sensitive questions are asked.

- 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 in Item 13 of OMB Form 83-I.**
 - *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 in Item 14.**

The number of respondents is set at 56, which include the number of States and territories eligible for L&WCF funding. The average number of reports submitted per State annually based on reports received in recent years is 132, or 7,400 total reports nationally. The estimated burden per response averages to about 30 minutes, which total 3,700 hours.

7,400 total responses x 0.5 hours = 3,700 hours x \$24/hr (est. salary of State Personnel) = \$88,800

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 and 14).

*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 are no non-hour costs.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Collection of this data will cost the Federal Government an estimated \$134,606 annually for the processing (review, filing

and entry of data into L&WCF database) of an estimated 7,400 reports per year (based on the approximate average number of responses filed in recent years), or an average of 132 responses per State at an average NPS handling time of 30 minutes per response (3,700 total hours annually) by personnel averaging \$36.38/hour in salary (GS-12 step 5 at 2007 rates.)

The above estimates are based on surveys of NPS Regional and Washington Office staff with several years experience processing inspection reports.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

No changes.

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

Not applicable.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable.