

**Supporting Statement for Paperwork Reduction Act Statement Submissions
"Urban Park and Recreation Recovery Program Project Agreement and
Amendment"
OMB Control Number 1024-0089**

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 Urban Park and Recreation Recovery Act was passed as title X of the National Parks and Recreation Act of 1978. It was signed into law as Public Law 95-625. The Act authorized the Secretary of the Interior to establish a program to provide Federal grants to economically distressed communities within urban areas and facilities, and for the development of improved recreation programs. The program is administered by the National Park Service (NPS). Grant duration is generally one year for Recovery Action Program (planning) and non-construction Innovation grants and up to three years for Rehabilitation and construction Innovation Grants.

In order to receive financial assistance, grant recipients must complete and sign the UPARR Project Agreement form (#FNP 10-912). To alter this agreement, they must complete and sign the UPARR Project Amendment form (#FNP 10-915). The forms set forth the obligations assumed by the grantee through its acceptance of Federal assistance including the rules and regulations applicable to the conduct of a project under the UPARR Act and any special terms and conditions to the project established by NPS and agreed to by the respondent. It also obligates the United States government to provide grants up to the designated amount for eligible costs incurred on the project on the basis of information and estimates contained in the proposal.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

The forms are used by NPS and the applicable respondent to describe the obligations of each party with respect to the grant award/amendment. Use of such forms is necessary to set forth the legal obligations of the grantor agency (NPS) and the applicable grant recipient.

- 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 Agreement and Amendment forms. The forms must be signed by the parties to the agreement. Both forms require a brief amount of information and the current information burden cannot be reduced.

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.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication of the information because it is project specific to this unique grant program.

- 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 urban governments which are traditionally cities with populations greater than 50,000. No businesses or small entities are eligible.

- 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.**

The data collection occurs strictly on a project-by-project basis at the initiative of the recipient/respondent as it either obligates funds or amends existing projects. There cannot be less frequent data collection in these instances.

- 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.

The Project Agreement and Amendment forms are completed on an "as needed" basis in order to obtain a benefit (grant assistance). Therefore, their use may occur more frequently than quarterly. None of the other listed circumstances apply.

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 comments on March 14, 2007(Vol. 72, Num. 49, pages 11899-11900). No comments were received.

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

Mr. Robert Newton

Mississippi Department of Wildlife,
Fisheries, and Parks
P.O. Box 451
Jackson, Mississippi 39205
501/432-2224

Mr. Todd Stump
South Carolina Department of Parks,
Recreation, and Tourism
1205 Pendleton Street
Suite 246
Columbia, South Carolina 29201
803/734-0617

They concur with our cost and burden hour estimates placed on the public in completing the information collection process.

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. Information pertaining to UPARR grants is subject to public scrutiny. No confidential information is involved.

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 (recipients on average for both agreements and amendments) is estimated at 10 per form. The rate of response varies from recipient but averages approximately 1 per year for a total of 20 responses per year. Its estimated yearly burden is therefore 20 hours.

20 total responses x 1.0 hours = 20 hours x \$24.00 per hour (est. salary of city/county personnel) = \$480.00

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 NPS an estimated \$727.60 annually based on an estimated 20 total responses at an average Federal handling time of one hour per response (20 total hours), and an average salary of \$36.38/hour (GS-12/5 at 2007 rates).

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

There are no program 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. There are no plans for tabulation or publication of the specific data requested.

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.