

Supporting Statement for Paperwork Reduction Act Statement Submissions
“The Interagency Access Pass Application Process”
OMB Control Number 1024-0252

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 Federal Lands Recreation Enhancement Act (FLREA), Title VIII, Division J, of Public Law 108-447 (16 U.S.C. 6801-6814) requires the Secretary of Agriculture and the Secretary of the Interior to make The America the Beautiful - The National Parks and Federal Recreational Lands Pass available to any United States citizen or person domiciled in the United States who has been medically determined to be permanently disabled for purposes of section 7(20)(B)(i) of the Rehabilitation Act of 1973 (29 U.S.C. 705(20)(B)(i)). The FLREA requires that this pass be issued to persons who have been medically determined to be permanently disabled and a citizen or permanent resident of the United States. The Act further requires that the applicant provide adequate proof of the disability and such citizenship or residency. The Act further describes that the Pass shall be valid for the lifetime of the Pass holder.

The America the Beautiful – the National Parks and Federal Recreational Lands Access Pass (Interagency Access Pass) was created to meet the FLREA directive and will replace the Golden Access Passport. An Interagency Access Pass is a free, lifetime permit that is issued without charge by the Bureau of Land Management, Bureau of Reclamation, United States Fish and Wildlife Service, United States Forest Service, and National Park Service to citizens or persons who are domiciled (permanent residents) in the United States, regardless of age, and who have a medical determination and documentation of permanent disability. Furthermore, the Pass is nontransferable, issued without charge, and entitles the permittee and any person accompanying him in a single, private, noncommercial vehicle, or alternatively, the permittee and three adults to enter with him where entry to the area is by any means other than private, noncommercial vehicle. Interagency Access Passes may be obtained only in person and upon proof of medically determined permanent disability. The Pass must be signed by the holder. This Pass also entitles the holder to a 50 percent discount on some expanded amenity fees.

The Interagency Access Pass replaces the Golden Access Passport that was established in 1980 by an amendment to the Land and Water Conservation Fund

Act (LWCFA) of 1965. Previously issued Golden Access Passports will remain valid for the lifetime of the Pass holder.

In order to issue the Interagency Access Pass only to persons who have been medically determined to be permanently disabled, in accordance with the FLREA direction and in order to clarify, simplify, and to provide uniform guidance for the public on the process for obtaining the Interagency Access Pass, the Secretaries of Agriculture and Interior established eligibility and required documentation guidelines for issuing the Interagency Access Pass and published them within the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures. The procedures require the individual to appear in person and sign the Pass in the presence of the issuing agency officer. Acceptable documentation to verify that the individual had been medically determined to have a permanent disability has been identified and includes:

- A. A statement signed by a licensed physician attesting that the applicant has a permanent physical, mental, or sensory impairment that substantially limits one or more major life activities, and stating the nature of the impairment;

OR

- B. A document issued by a Federal agency, such as the Veteran's Administration, which attests that the applicant has been medically determined to be eligible to receive Federal benefits as a result of blindness or permanent disability. Other acceptable Federal agency documents include proof of receipt of Social Security Disability Income (SSDI) or Supplemental Security Income (SSI);

OR

- C. A document issued by a State agency such as the vocational rehabilitation agency, which attests that the applicant has been medically determined to be eligible to receive vocational rehabilitation agency benefits or services as a result of medically determined blindness or permanent disability. Showing a State motor vehicle department disability sticker, license plate or hang tag is not acceptable documentation;

Information available to the general public through agency websites and publications will inform potential pass applicants of the documentation requirements. However, there are instances where applicants learn about the Pass when arriving at a recreation site and do not have the required documentation available. For those instances, a fourth option is made available at recreation sites. If a person claims eligibility for the Access Pass but cannot produce any of the documentation outlined above, that person must read, sign, and date the

Statement of Permanent Disability Form in the presence of the officer issuing the Pass. If the applicant cannot read and/or sign, someone else may read, date, and sign the statement on his/her behalf in the applicant's presence and the presence of the officer issuing the Pass.

The requested information detailed above and statement of disability has been collected and used since the creation of the Golden Access Passport in 1980 to verify that the individual had been medically determined to have a permanent disability for the issuance of the Golden Access Passports under OMB control number 0596-0173 under the authority of the LWCFA. That collection number has been discontinued. This request would continue the discontinued request for the new Interagency Access Pass authorized by FLREA.

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.}

Since the early 1980s, the agencies have been requiring documentation or secondarily a signature on the statement of disability in order to obtain a free, Golden Access Passport, in accordance with the requirements that the permit only be issued to individuals who have been medically determined to be blind or have a permanent disability.

The process for obtaining the Interagency Access Pass will be the same as the Golden Access Passport. An individual may apply for a new Interagency Access Pass at any of the Federal agencies entrance stations, or sites where a fee is charged for admission. The Interagency Access Pass can also be obtained at many of the agencies staffed offices. These Passes are issued at the same locations where they can be used for free admission, and are immediately issued upon completion of the application process. The application process consists first of the individual identifying himself/herself to the agency official at that location who is collecting the admission fees and/or processing Passes, as an applicant for the Interagency Access Pass.

The individual is then asked to present documentation specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures. Upon verification of the documentation the applicant is issued the pass. If the applicant is unable to produce documentation, they will be offered the opportunity to read and sign the statement of disability provided by the agency. By signing the statement of disability, the applicant will be self-declaring that they have been medically determined to have a permanent disability. If the applicant is unable to either read or sign the statement, a representative selected by the applicant may do so for them in the presence of the applicant. Upon completion of the statement, the applicant is asked to sign the Pass and then issued the signed Pass.

The applicant's document or signed statement is used only to verify that the individual is qualified to receive the Interagency Access Pass. The agency official may assess only whether adequate documentation has been submitted by the applicant or to observe that the applicant has read and signed the statement of disability. If the applicant is able to show documentation, that documentation is returned immediately to the applicant and is not retained by the agency. No information concerning the applicant's disability is recorded or retained. The agency only notes that an Interagency Access Pass was issued. The information is used for no other purpose.

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.}

In accordance with the FLREA direction that procedures assure that these Interagency Access Passes are only issued to persons who have been medically determined to be permanently disabled and that the Passes are not transferable. The passes must be issued in person. Because these Passes are issued at the same locations where they can be used for free admission and are immediately useable upon application and issuance, there is no burden on the individual to have to apply in person. Information technology alone does not currently have the capability to allow for this face-to-face verification of documentation and observation of signature as well as the immediate transfer of the Interagency Access Pass to the applicant.

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 proof of medically determined permanent disability concerning each applicant, as required under the FLREA, available to the Federal agencies other than through the applicant's own furnishing of documentation or through the applicant's self declaration.

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.

This collection does not pose a burden to small entities.

6. Describe the consequences 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 the agencies did not have a process by which to determine that these Interagency Access Passes are only issued to persons who have been medically determined to be blind or permanently disabled, the agencies would not be able to issue these Passes in accordance with the FLREA requirements.

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;**

If an individual lost his/her Interagency Access Pass, that individual must reapply for a new Pass, and would, therefore, be required to once again either show one of the three forms of documentation or to sign the statement of disability.

*** requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

No written response to the documentation from the applicant is required. The only writing involved is the signature of the applicant on the statement of disability if the applicant reads and signs the statement in lieu of showing documentation, and the applicant's signature on the Interagency Access Pass itself.

*** requiring respondents to submit more than an original and two copies of any document;**

The applicant is only required to show their choice of one copy of one of the three documents or to read and sign the statement of disability.

*** requiring respondents to retain records, other than health, medical, Government contract, grant-in-aid, or tax records for more than three years;**

The applicant is not required to retain any documents.

*** 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;**

The agencies only record the total number of Interagency Access Passes issued.

- * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

The agencies will not conduct a statistical data classification.

- * **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**

There is no pledge of confidentiality in the Interagency Access Pass application process.

- * **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 such requirements in the Interagency Access Pass application process.

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 record keeping, 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 to solicit public comments on May 25, 2007 (Volume 72, Number 101, pages 29351-29352). No public comments were received.

The NPS has gotten feedback from persons in different agencies and parks on whether it was hard or easy to obtain an Interagency Access Pass. They are as follows:

Mr. Jim Cribbs
Interagency Volunteer Coordinator – BLM
Red Rocks NCA
4701 North Torrey Pines Drive
Las Vegas, Nevada 89130
702/515-5000

“They have received no comments or suggestions for improvements from visitors relating to obtaining the Interagency Access Pass. They have had no comments on whether it is easy or hard to obtain the Pass. It takes between 3-5 minutes to issue a Pass.”

David Sanders
Yosemite National Park
P.O. Box 577
Yosemite, California 95389
209/372-0200

“Generally the process can be completed in less than five minutes unless the person has a more severe disability. Many times visitors do not have the required documentation, so the statement of disability is a good option to have. Visitors generally seem to think the process is easy.”

Shannon Hopkins
United States Forest Service
P.O. Box 3623
Portland, Oregon 97208-3623
503/872-2150

“We have received no comments from the public on ways to improve how the Access Pass is issued. It takes less than 5 minutes to review the documentation or have the person sign the form. Visitors seem happy with the process to obtain the Pass.”

Chris Williamson
Deputy Fee Manager
Rocky Mountain National Park
1000 Highway 36
Estes Park, Colorado 80517
970/586-1439

“Some visitors feel the process of obtaining the Pass is too easy in some respects and that documentation should be required. Yes it takes less than 5 minutes. They have not received any suggestions for improving the process.”

**Tammy Wert
Yellowstone National Park
P.O. Box 168
Yellowstone, Wyoming 82190
307/344-2115**

“Visitors were surprised at how easy it is to obtain the Pass. They have not received any comments about how to improve the process. The process of obtaining the Pass takes 10 minutes or less.”

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

We do not provide payment or gifts to respondents.

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

There is no assurance of confidentiality provided to respondents.

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. 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 expected 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.

a) description of the collection activity,

An applicant for the free, lifetime Interagency Access Pass must either show one of the three types of required documents of medically determined permanent disability, or the applicant must read and sign a statement that they have been medically determined to have a permanent disability.

b) corresponding form number (if applicable),

The Interagency Access Pass replaced the Golden Access Passport under the provisions of the FLREA. This information has previously been collected to verify that the individual had been medically determined to have a permanent disability for the issuance of the Golden Access Passports under OMB control number 0596-0173, which has been discontinued.

c) number of respondents,

In fiscal year 2005, approximately 73,400 individuals applied for and obtained a Golden Access Passport. The expectation for the Interagency Access Pass is the same.

d) number of responses annually per respondent,

Once per the applicant's lifetime, as the Interagency Access Pass is a free, lifetime permit.

e) total annual responses (columns c x d)

73,400

f) estimated hours per response

5 minutes, which is the estimated time it takes to either show one's documentation or to read and sign the Statement of Permanent Disability.

g) total annual burden hours (columns e x f)

6,117 hours

Record keeping burden should be addressed separately:

No record keeping is required by the respondents.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The dollar equivalent cost to each respondent is about \$1.56 based on five minutes per response and an evaluation of this time using the average hourly earnings of all production and non-supervisory workers on private non-farm payrolls of \$18.77 per hour. This amount is based on volunteer hours within parks.

The total estimated dollar equivalent cost of the collection is \$114,816.

13. Provide estimates of 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 shown in items 12 and 14).

- **The cost estimates 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 the 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 the 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 burdens 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 the 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 practices.

There are no non-hour burden costs.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

- employee labor and materials for collecting the information

Agency employees assigned to handle the distribution of the America the Beautiful - the National Parks and Federal Recreational Lands Passes at each agency Pass distribution point are responsible for looking at the documentation of blindness or medically determined permanent disability shown by the applicant for the Interagency Access Pass to assure that the documentation is one of the three types of documentation acceptable under the guidelines. If the applicant reads and signs the statement of disability provided by the agency, in lieu of showing documentation, the agency employee must observe the applicant reading and signing the form.

Agency employees who handle the Interagency Access Passes vary in grade level. For purposes of this calculation, a grade level of GS – 5/Step 2 was selected with an hourly rate (including 20% benefits) of \$15.55. The total of 6,117 hours during which respondents are completing this application function multiplied by \$15.55 results in a total cost, among the five Federal agencies, of \$95,119 annually for this information collection.

- employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information:

The documentation shown by the respondents is not retained by the agencies therefore no analyzing, evaluating, summarizing, and/or reporting are conducted on the collected information.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

There are no program changes or adjustments.

16. For collections of information whose results are planned to 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 the report, publication dates, and other actions.

We will not publish the results of this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date.

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

There are no exceptions.