[1]Supporting Statement Part A for Paperwork Reduction Act Submission for National Park Service Visitor Survey Card

Reinstatement of OMB Control Number 1024-0216

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 Act of 1916, 38 Stat 535, 16 USC 1, et seq., requires that the NPS preserve national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments as are necessary for public use, health, and safety. Other federal rules (National Environmental Policy Act, 1969 and 2006 NPS Management Policies) require visitor use data in the impact assessment of development on users and resources as part of each park's general management plan. The Government Performance and Results Act of 1993 (P.L. 103-62) requires that the NPS develop goals to improve program effectiveness and public accountability, and to measure performance related to these goals. The Visitor Survey Card Project measures performance toward those goals through a short scannable visitor survey card. The project is an element of both the NPS Strategic Plan and the Department of the Interior (DOI) Strategic Plan.

   The VSC is a component of the Visitors Services Project, which is funded by the NPS through a cooperative agreement with the Park Studies Unit at the University of Idaho. In 1998, the NPS received clearance for the Visitor Survey Card (OMB# 1024 0216). When that 3-year clearance expired on May 31, 2001, a new clearance was acquired under the Programmatic Approval for NPS-Sponsored Public Surveys (1024-0224, NPS #01-003). Clearance was again acquired in 2005 under Programmatic Approval for NPS-Sponsored Public Surveys (1024-0224, NPS #05-004). This request is another extension of the on-going study.

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.]

   <u>Use of Information</u>
   Data from the proposed survey is needed to assess performance regarding NPS GPRA goals IIa1 and IIb1. These goals state:

   II. *Provide for the public enjoyment and visitor experience of parks*;
   IIa1. *95% of park visitors are satisfied with appropriate park facilities, services, and recreational opportunities*;
   IIb1. *86% of park visitors understand and appreciate the significance of the park they are visiting*.

In addition, the survey collects data to support the DOI Strategic Plan goal IIa12 on visitor satisfaction with the value for entrance fees paid to access public lands managed by the DOI:

IIa12. *92% of customers are satisfied with the value for entrance fee paid.*

The VSC has been in existence since 1998, and in that time has provided the necessary information on park, regional, and national levels to assess performance on relevant GPRA measures and the DOI Strategic Plan. This information continues to be needed in order to satisfy these legal requirements, as well as provide useful management to park managers.

NPS performance on all goals measured in this study contributes to DOI Department-wide performance reports. Results of the VSC are also used by park managers to improve visitor services at the approximately 330 units of the National Park System where the survey is administered.

<u>Question Justification</u>
The VSC contains 15 questions. Twelve of these are grouped into three categories: park facilities, visitor services, and recreational opportunities. In addition, two open-ended questions are included, as well as an "overall satisfaction" question.

The five "park facilities" items ask visitors to rate common park facilities on a five-point scale ranging from "very good" to "very poor," with an "average" mid-point. A "not used or not available" option is also included because not all parks have all facilities. The facilities are:

- Visitor center
- Exhibits (indoor and outdoor)
- Restrooms
- Walkways, trails, and roads
- Campgrounds and/or picnic areas.

Parks use these ratings to indicate potential areas of concern with facilities. A consistent rating of "poor" or "very poor" from visitors points to the need for additional investigation into the likely causes of such ratings.

The five "visitor services" questions ask respondents to rate park services on the same five-point scale used for facilities. A "not used or not available" option is included because not all parks offer all services. The rated services are essential to visitor orientation, education, and enjoyment. They include:

- Assistance from park employees
- Park map or brochure
- Ranger programs
- Commercial services in the park (food, lodging, gifts, rentals, etc.)
- Value for entrance fee paid.

These ratings are used by parks to improve the quality of services to visitors. A consistently low rating for any single service indicates the need for further investigation into potential problems with the provision of that service. In addition, “value for entrance fee paid” is used to report on the DOI Strategic Plan goal IIa12 at the System level.

Two “recreational opportunities” questions are asked that encompass the range of cultural and natural resource-based recreation experiences provided in parks. These items use the same five-point response scale and also include “not used or not available” as a response option. The opportunities are:

- Learning about nature, history, or culture
- Outdoor recreation (sightseeing, camping, bicycling, boating, hiking, etc.)

Parks use these ratings to determine if visitors are satisfied with the kinds of recreational experiences available to them in a park. Tracking these ratings over time indicates if visitors think the quality of these experiences is increasing or diminishing.

An additional question measures performance on GPRA goal IIa1. Using the same “very good” to “very poor” response scale, visitors rate the “overall quality of facilities, services, and recreational opportunities.” This result is reported for each park and for the National Park System as a whole.

An open-ended question measures performance on GPRA goal IIb1. The question is, “This park was established because of its significance to the nation. In your opinion, what is the national significance of this park?” Answers to this question are organized using a typology based on parks' self reported significance worksheets. The understanding score is based on the number of visitors correctly noting one of the five significance items reported by the park as a reason for the designation of the park divided by the total number of visitors answering the question. This average is then reported by the parks in fulfillment of their GPRA requirement to educate visitors on this matter.

A final open-ended question asks visitors if there is anything else they would like to tell the park about its facilities, services, or recreational opportunities. This question gives respondents a chance to comment on other aspects of their experience not covered in previous questions.

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.].

This information will be collected via mail-back or drop-box surveys. No automated data collection will take place.

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.

This is the only information collection the NPS has that satisfies the requirements of GPRA and the DOI Strategic Plan. In addition, there is no other information collection that is conducted at nearly all of the NPS units on an annual basis. For these reasons, the information that the VSC provides is unique.

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.

The data collection will not impact small businesses or other small 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.

The consequence to the NPS of not having this information is that it will not be able to determine whether or not it is meeting the requirements of GPRA for two specific NPS goals and the DOI Strategic Plan for the goal on visitor satisfaction with the value for entrance fees paid.

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.

These circumstances are not applicable to our collection of data. Ours consists of an annual survey, in which frequency of reporting, preparation or submission of documents, retaining of records, and revealing of trade secrets do not apply. It is a statistical survey designed to produce valid and reliable results, using only data classifications to be reviewed and approved by OMB. No pledge of confidentiality is offered, although, as discussed in section A(10), below, the survey is completely anonymous.

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 notice to solicit public comments on this ICR in the Federal Register on May 13, 2008 (Vol. 73, No. 93, Page 27553-27554). The comment period closed on July 14, 2008. **Attachment A** contains a copy of the 60-day Federal Register notice. After notification to stakeholders requesting comments, the NPS received one comment as a result of the publication of this 60-day Federal Register notice.

The commenter suggested that the program should be shut-down to avoid wasteful spending. The NPS replied to the comment, indicating that the VSC Project is how the NPS complies with the Government Performance and Results Act of 1993. In compliance with this law, the NPS implemented the project in 1998. The project continues to be the only source of visitor satisfaction information across the entire system on an annual basis. Parks collect valuable information about visitor satisfaction with facilities, services, and recreational opportunities available at all the NPS sites across the country, Guam, Puerto Rico, and the Virgin Islands.

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

No payments or gifts will be provided to respondents.

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

No assurance of confidentiality will be provided to respondents, since the Department of the Interior does not have the statutory authority to protect confidentiality or to exempt the survey from a request under the Freedom of Information Act. Instead, those who inquire about this issue will be told that reports prepared from this study will summarize findings across the sample so that responses will not be associated with any specific, identifiable individuals. Names and addresses will not be collected in association with this research. Thus, anonymity will be ensured, but confidentiality will not be pledged.

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.

No questions of a sensitive nature will be asked. In addition, respondents are advised that their answers are voluntary.

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.

On an annual basis, Visitor Survey Cards will be distributed to 132,000 visitors systemwide (400 cards at 330 NPS units). Based on previous years, a response rate of 29% is expected. Thus, of the 132,000 visitors initially intercepted, 94,000 are expected to receive the one-minute contact and not respond and 38,000 are expected to receive the one-minute contact and complete and return the card. The card takes approximately two minutes to complete. The burden for respondents (n=38,000) is three minutes (one minute initial contact and two minute completion time). The burden for non-respondents (n=94,000) is one-minute for the initial contact. This results in a total annual burden of 3,467 hours. Using the Bureau of Labor Statistics national wage information, the most recent published report (March 2008) lists an average hourly wage of $19.83, adding the total benefits of $8.63 per hour leads to a total compensation of $28.46 per hour (http://www.bls.gov/news.release/pdf/ecec.pdf). Thus, the estimated annualized cost to respondents for the hour burden is $98,670.82.

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.

The cost burden on respondents and record-keepers, other than hour burden, is zero.

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.

The annualized cost to the Federal government for this information collection is $211,550.

ANNUALIZED COST

Salaries	
Research Support Scientist	$40,000
Technical Records Specialist	$5,361
Part--time Temporary Help	$3,640
Employee Benefits	
Research Support Scientist (35%)	$14,000
Technical Records Specialist (40%)	$2,144
Temporary Help (9%)	$328
Travel	$6,000
Operating Expenses including printing	$34,339
Equipment	$5,000
Miscellaneous (VISA subcontract)	$70,000
SUBTOTAL	$180,812
Indirect Costs (17%)	$30,738
Total	**$211,550**

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

More NPS units will be using the Visitor Survey Card in fulfillment of the GPRA requirements. This increased use will lead to an increase in the overall, annual burden.

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.

A Systemwide score is calculated for GPRA goal IIa1, based on the percentage of respondents who indicate that the overall quality of facilities, services, and recreational opportunities is “very good” or “good.” Each region and park also receives a score on this measure. All scores are computed by the University of Idaho and sent to the appropriate national, regional, and park contacts.

Goal IIb1 is calculated by the parks based on open-ended responses to the question, “This park was established because of its significance to the nation. In your opinion, what is the national significance of this park?” Parks receive instructions from the University of Idaho on how to construct this score. Specifically, after the university has finished computing GPRA Goal IIa1 for each unit, it returns the completed surveys to the parks. Using score sheets provided for this purpose, park coordinators determine if key words or phrases in each open-ended response accurately reflect the meaning of one or more items on the park's "Significance List." For example, a response such as "large number of petroglyphs" is a match with a significance-list item such as "the largest concentration of petroglyphs in North America."

In addition to GPRA reporting, since 2005 the VSC has collected information to support the DOI Strategic Plan goal on visitor satisfaction with the value for entrance fees paid on public lands managed by the DOI. This is measured by calculating the percentage of respondents who answer that the "value for entrance fee paid" is "very good" or "good." Data are reported only for those parks charging an entrance fee.

The results of this information collection activity will be presented in individual park reports distributed to NPS managers for each participating park, as well as at the park cluster, regional, and national levels. The reports are distributed to interested stakeholders within the agency who use the results for internal reporting purposes. A copy of all reports will be archived with the National Park Service Social Science Program for inclusion in the Social Science Studies Collection, and available on the University of Idaho Park Studies Unit website. The sampling period each year begins in February and ends in August. Park level reports are typically available by October 15 of each year. National level reports are available by mid-October of each year as well.

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 are not seeking such approval.

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 to the certification statement.