

The Supporting Statement for OMB 0596-NEW

Grey Towers Visitor Comment Card 2010

Terms of Clearance

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.**

Laws, Statutes, and Regulations: Executive Order 12862: Setting Customer Service Standards, which seeks to “ensure that the Federal Government provides the highest quality service possible to the American people.” _

The Forest Service (U.S. Department of Agriculture) is proposing a new information collection for a visitor comment card to be used at Grey Towers. Located in Milford, Pennsylvania, Grey Towers was originally the summer estate of the James Pinchot family and later the primary home of Gifford Pinchot, America's first forester and founder of the USDA Forest Service. In 1963, Gifford Bryce Pinchot, son of Gifford and Cornelia, donated Grey Towers and 102 acres to the US Forest Service, the Federal Agency founded by his father, and which now administers the site.

The information will be collected by administering an optional 8.5” x 11” comment card to guests at the conclusion of tours, programs, and events. Both members of the public and Federal employees will have the opportunity to complete the card. Grey Towers will also post comment cards on its website to allow visitors the option to electronically complete and submit. The collection is necessary to enhance and improve quality-based programs and events offered onsite. If not collected, programs and events would continue to have negative aspects of which the staff would be unaware, such as insufficient or unbeneficial delivery or content.

Cards will be collected by Grey Towers Programs and Administrative Staff and used to evaluate programs and in reports to staff and stakeholders. The evaluation will further improve upon or otherwise change programs and events, measure site usage, and generate data on participant's feedback on various programs and events. The collected information will be used for internal use only and completion of cards by guest will be 100% optional.

- 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.**

The information is collected on an 8.5-inch x 11-inch card provided to program and event participants at the conclusion of the activity. Forest Service employees overseeing Grey Towers Programs and Administration collect the information and use it to improve and enhance the programs and events. Information collected includes attendance, usage, and feedback from program attendees.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

The proposed comment card provides an optional venue for those participating in meetings and educational activities at Grey Towers to provide feedback. Participants provide input concerning the program and event which they attend. The completion and subsequent evaluation of filled-out comment cards from participants ensures that Grey Towers can continue to provide excellent service to all attendees. This information is vital to achieving Grey Towers' goal of providing quality-based programs and events.

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

This information will be collected from event participants at the conclusion of a program or event. Both members of the public and Federal employees have the option to fill out the comment cards. The Grey Towers Programs and Administrative Staff will analyze the collected information.

c. What will this information be used for - provide ALL uses?

The comment cards will be reviewed and evaluated by the Grey Towers staff for the purpose of improving programs and events held at Grey Towers. The collection and subsequent evaluation of the comment cards ensures that Grey Towers can continue to serve their stakeholders and public as well as possible.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

Comment cards will be administered to participants at the end of the activity. The cards are optional and will be collected by Grey Towers staff when the participant is finished providing feedback. The respondent may take home this form, complete it, and mail it back to Grey Towers. Grey Towers will also post comment cards on its website to allow visitors the option to electronically complete and submit.

e. How frequently will the information be collected?

Participants have the option to fill out a comment card at the end of Grey Tower tours, public programs, and public events.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

The information will not be shared with any other organizations inside or outside the USDA or government.

g. If this is an ongoing collection, how have the collection requirements changed over time?

This would be the first time this data will be collected.

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.

While on site, 8.5" x 11" comment cards will be distributed to participants for the option to provide feedback. Additionally, participants may take the cards home and mail back their responses. Grey Towers will also post comment cards on its website to allow visitors the option to electronically complete and submit, thus reducing paper usage and postage costs.

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.

Grey Tower's tours, public programs, and private events are unique to the location. Thus, similar feedback information is not available. For programs and activities that are brought in from the outside and may have received sufficient prior comments, the Forest Service will take these situations on a case-by-case basis, with the option to not offer comment cards.

5. If the collection of information impacts small businesses or other small entities¹, describe any methods used to minimize burden.

This information collection has no impact on 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.

Without this information collection, the Forest Service would not have the necessary information to enhance and improve offered programs. Programs or events would continue to have negative aspects of which the staff would be unaware, such as insufficient or unbeneficial delivery or content.

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 secret, 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The Federal Register 60-day notice was published on November 30, 2009 Vol. 74, No. 228, page 62554. The Forest Service received no comments in response to this notice.

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.

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.

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

Payments or gifts will not be made to respondents of this information collection. Information provided by applicants is on a voluntary basis.

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

No information covered by a Privacy Act System of Records, Personally Identifiable Information, or other confidential information covered by a statute, regulation, or agency policy will be collected.

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.

This collection does not collect information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- Description of the collection activity**
- Corresponding form number (if applicable)**
- Number of respondents**
- Number of responses annually per respondent**
- Total annual responses (columns c x d)**
- Estimated hours per response**
- Total annual burden hours (columns e x f)**

Note: 8,000 people will fill a comment card per year.

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Grey Towers Visitor Comment Card	NA-1600-15	3,000 Private Sector	1	3,000	0.17	510
Grey Towers Visitor Comment Card	NA-1600-15	5,000 Public Individuals	1	5,000	0.17	850
Totals	---	8,000	---	8,000	---	1,360

- Recordkeeping burden should be addressed separately and should include columns for:

a) Description of recordkeeping activity: none

b) Number of recordkeepers: none

c) Annual hours per recordkeeper: none

d) Total annual recordkeeping hours (columns b x c): 0

Participants and guests are not required to keep records.

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

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Grey Towers Visitor Comment Card	1,360	\$26	\$35,360
Totals	1,360	---	\$35,360

* Estimated hourly wage is from Bureau of Labor Statistics, National Compensation Survey, March 2009, <http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.htm>.

- 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.

There are no capital operation and maintenance 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.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

Employee labor and materials for developing, printing, storing forms

Employee labor and materials for developing computer systems, screens, or reports to support the collection

Employee travel costs

Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information

Employee labor and materials for collecting the information

Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

Developing, printing, storing forms:

Develop form: 15 hours of Administrative Support Clerk x 14.00 = \$210

Print: 8000 x \$1.00 per page = \$8,000

TOTAL: \$8,210

Analyzing, evaluating, summarizing, and/or reporting:

Evaluating and Reporting: 4,072 hours of x \$20.00 Programs staff (GS-05) = \$81,440

Total of all costs to Government: \$89,650

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

This is a new information collection.

- 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans to publish the results of this 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.

This display would be inappropriate because it is not anticipated that the information collected and questions asked will change, because the general content and message of Grey Tower's tours, programs, and events will stay consistent and not change in the future.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

The agency is able to certify compliance with all provisions under Item 19 of OMB form 83-I.