

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**THE INTERAGENCY ACCESS AND SENIOR PASS APPLICATION PROCESSES
OMB Control Number 1024-0252**

Terms of Clearance: None.

1. Explain the circumstances that make the collection of information necessary. Identify and legal or administrative requirements that necessitate the collection.

The America the Beautiful – the National Parks and Federal Recreational Lands Access Pass (Interagency Access Pass) is a free, lifetime Pass issued by the Bureau of Land Management, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, the U.S. Forest Service, and the National Park Service to citizens or persons who are domiciled in the United States, regardless of age, and who have a medical determination and documentation of permanent disability.

The America the Beautiful – the National Parks and Federal Recreational Lands Senior Pass (Interagency Senior Pass) is likewise a lifetime Pass issued by the Bureau of Land Management, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, the U.S. Forest Service, and the National Park Service to citizens or persons who are domiciled in the United States, and are 62 years of age or older. There is a \$10 fee for the Interagency Senior Pass.

The Interagency Access Pass and Interagency Senior Pass were created to meet the requirements of Title VIII, Division J of The Federal Lands Recreation Enhancement Act (FLREA), (Public Law 108-447), codified in Title 16, United States Code, sections 6801-6814 (16 U.S.C. 6801-6814). The FLREA (the Act) requires the Secretary of Agriculture and the Secretary of the Interior to make a free America the Beautiful – National Parks and Federal Recreational Lands Access Pass available to any United States citizen or person domiciled (i.e., permanent residents) 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 Act requires applicants to provide adequate proof of citizenship or residency and permanent disability, and that the Interagency Access Pass be valid for the lifetime of the Pass owner. The Interagency Access Pass entitles the Pass owner (only) to a 50 percent discount on some expanded amenity fees.

The proposed revision to current policy creates processes for applicants to obtain an America the Beautiful – The National Parks and Federal Recreational Lands Access or Senior Pass through the mail. Standard Operating Procedures have been updated to reflect this change. Information collection is being revised to allow applicants to submit by mail applications and photo copies of identification verifying U.S. residency or citizenship and documentation of disability as outlined below for the Access Pass or U.S. residency or citizenship and age for the Senior Pass. The process for obtaining an Interagency Access or Senior Pass in person is not changing. The new process is required only for mail-in applications.

Under OMB control number 0596-0173 (which was used until 2007) and under the authority of the Land and Water Conservation Fund Act, the requested information detailed above and the statement of disability have been collected and used since the creation of the Golden Access Passport in 1980 to verify individuals have been medically determined to have a permanent disability.

2. Indicate how, by whom, how frequently, 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 Interagency Access Pass replaced the Golden Access Passport 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 owner.

Since the early 1980s, agencies have required documentation or a signature on the statement of disability in order to obtain a Golden Access Passport (now Interagency Access Pass), and have required identification verifying age in order to obtain a Golden Age Pass (now Interagency Senior Pass).

In accordance with FLREA requirements and in order to clarify, simplify, and to provide uniform guidance for the public, the Secretaries of Agriculture and Interior established eligibility and documentation guidelines for issuing the Interagency Access Pass. These guidelines were published in the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass Standard Operating Procedures (SOP). Currently, anyone wanting to obtain an Interagency Access Pass is required to appear in person, present documentation, and sign the Interagency Access Pass in the presence of the issuing agency officer.

Types of documentation accepted to establish permanent residency include, but are not limited to, a driver's license, a U.S. Passport, a state issued identification card, or a Permanent Resident Card (Green Card).

The processes for obtaining the Interagency Access or Senior Pass in person will remain the same. An individual may apply for an Interagency Access or Senior Pass at any of the Federal agencies' entrance stations, or sites where a fee is charged for admission. The Interagency Access and Senior Passes can also be obtained at many of the agencies' staffed offices. Interagency Access and Senior 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 of:

1. the individual identifying him/herself as an applicant for the Interagency Access or Senior Pass to the agency issuing official who is collecting admission fees and/or issuing Interagency Access and/or Senior Passes
2. presenting documentation specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

For the Interagency Access Pass, acceptable documentation to verify an individual has been medically determined to have a permanent disability 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 a vocational rehabilitation agency, which attests that the applicant has been medically determined to be eligible to receive vocational rehabilitation, benefits, or services as a result of medically determined blindness or permanent disability. Showing a state-issued 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 Interagency Access Pass applicants of documentation requirements; however, there are instances where applicants learn about the Interagency Access Pass when arriving at a recreation site and do not have the required documentation available. For those instances, a fourth option is available at recreation sites. If a person claims eligibility for the Interagency Access Pass but cannot produce any documentation outlined above, that person must read, sign, and date a Statement of Disability Form in the presence of the agency officer issuing the Interagency Access Pass. If the applicant cannot read and/or sign the Form, someone else may read, date, and sign the statement on his/her behalf in the applicant's presence and in the presence of the agency officer issuing the Interagency Access

Pass.

Upon verification of documentation or signature on the Statement of Disability, the applicant is issued the Interagency Access Pass. If the applicant provides actual documentation, that documentation is returned immediately to the applicant and is not retained by the agency.

If an applicant wants to obtain an Interagency Access Pass through the mail, he/she must provide:

1. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass;
2. a photocopy of identification verifying permanent U.S. residency or citizenship; and
3. documentation of permanent disability as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

The application packet is then mailed to the interagency processing center along with any required payment. The agency will review the application and documentation to verify the applicant is eligible for an Interagency Access Pass. Upon verification of the documentation, an Interagency Access Pass will be mailed to the applicant, pre-printed with the applicant's name. The application and all documentation will also be returned to the applicant.

The applicant's document or signed statement is used only to verify the individual is qualified to receive the Interagency Access Pass. The issuing agency official may assess only whether adequate documentation has been submitted by the applicant or observe that the applicant has read and signed the statement of disability. 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.

As noted above, the process for obtaining the Interagency Senior Pass in person will also remain the same, except that instead of proof of permanent residency and permanent disability, applicants must present proof of permanent residency and proof of age. There is no application to obtain an Interagency Senior Pass in person. Upon verification of the documentation, the applicant is issued the Interagency Senior Pass. Documentation is returned immediately to the applicant and is not retained by the agency.

If an applicant wishes to obtain an Interagency Senior Pass through the mail they must provide:

1. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Senior Pass;
2. a photocopy of identification verifying permanent U.S. residency or citizenship and proof of age, as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

The application packet is then mailed to the interagency processing center along with any required payment. The bureau will review the application and documentation to verify the applicant is eligible for an Interagency Senior Pass. Upon verification of the documentation, an Interagency Senior Pass will be mailed pre- printed with the applicant's name. All materials, including the application and any and all documentation, will be returned to the applicant or destroyed.

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 FLREA requirements, Interagency Access and Senior Passes are issued only to persons who have been medically determined to be permanently disabled or age 62 or over, respectively. Documentation requirements in FLREA can be satisfied either in person or, now, through the mail.

Agencies anticipate the majority of Interagency Access and Senior Passes will continue to be issued in person. For

most applicants, acquiring an Interagency Access or Senior Pass at the first location they visit will be the most convenient and cost efficient. Providing an Interagency Access or Senior Pass through the mail will be an additional convenience for visitors who wish to obtain either ahead of time. Mail-in applications increase the cost burden for applicants and agencies because of additional information requirements and processing steps (application, mailing, and verification of documents).

Electronic submission of applications was considered; however, it was rejected at the present time due to logistical and technology concerns. Electronic submission would require infrastructure that agencies do not currently possess, including a system of records to maintain personal information and to process electronic payments. In the future, agencies will reassess ways to submit applications, required documentation, and electronic payment. The applications will be available on-line as a form that can be filled out and printed.

There are no plans to publish the results of this information 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.

Issuing agencies do not have access to the types of documentation required to obtain Interagency Access or Senior Passes.

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

This information collection does not apply to small businesses.

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.

Agencies must verify applicant eligibility in order to issue Interagency Access and Senior Passes in accordance with the FLREA requirements. The collection of additional information for the mail-in option is being sought in addition to the in-person issuance process as a convenience for visitors. Although the burden is slightly higher for the mail-in option, it is being provided to address a specific need the public has identified.

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;**

Individuals who lose their Interagency Access or Senior Pass must reapply for a new Pass. They would again be required to show one of the three forms of documentation or sign the statement of disability for the Interagency Access Pass, or proof of age and residency or citizenship for the Interagency Senior Pass.

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

Except for signatures of applicants on statements of disability (if applicants choose to read and sign the statements in lieu of showing documentation) and on Interagency Access or Senior Passes themselves, no written response to the documentation from the applicant is required if applying for an Interagency Access or Senior Pass in person.

For mail-in application, there is no due date. Applicants may obtain an application whenever they choose and submit it whenever they choose.

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

Applicants are required to show only one copy of any required document.

- * **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;**

Agencies record only the total number of Interagency Access and Senior Passes issued.

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

Agencies will not conduct statistical data classifications.

- * **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;**

There is no pledge of confidentiality in the Interagency Access and Senior Pass application processes.

- * **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 this request.

- 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.**

Federal Register: June 9, 2010 (Volume 75, Number 110) Pages 32810-32811

The agency received no comments.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least every three 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.

Numerous individuals and organizations of individuals with disabilities were contacted by agency accessibility program managers prior to final publication of the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures. Most people contacted concurred that the application

processes for the Interagency Access and Senior Passes were reasonable because:

1. Passes can be obtained and used at the same time and location,
2. applicants can show documentation of a medically determined permanent disability, or
3. alternatively, applicants can sign a statement of disability.

All also appreciated that the documentation was only to be shown to the issuing agency official and would not be retained.

Agency personnel interact with the public thousands of times a day when issuing Interagency Access and Senior Passes. Agencies have received no feedback from the public that, after arriving at a site, the process to obtain an Interagency Access or Senior Pass is burdensome. Agencies have received feedback that procuring a Pass in person is difficult in some areas of the U.S. because the nearest location to obtain a Pass can be many miles away. Although in most circumstances there is no need to obtain an Interagency Access or Senior Pass prior to a visit to one of the locations managed by the agencies that participate in the FLREA, the agencies have developed a process to obtain either Pass through the mail.

The new application processes to issue Interagency Access and Senior Passes through the mail were shown to individuals outside the agency (Deidra Coyne, U.S. Citizen, 6031 Queenstown St. Springfield VA, 22152 and Margaret Clay U.S. Citizen, 4100 Brickell St #301, Fairfax VA 22152, Blaine Flint, U.S. Citizen, 1592 Phillips, Kaysville, UT 84037). All respondents felt the information requested seemed reasonable because it is an elective process, it asked only for limited information and gave clear instructional guidance on how to fill out the forms.

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 nor any other remuneration made to contractors or grantees.

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

When applying in person, all documentation is returned to applicants upon issuance or denial of either the Interagency Access or Senior Pass. For mail-in applications, all documentation is either returned to applicants or destroyed when either Pass is issued or denied. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552).

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.

The only potentially sensitive information collected is confirmation of a medical determination and documentation of permanent disability. This is required to comply with specific language in the underlying statute referenced in Item 1 above. No specific information concerning the applicant's disability is recorded or retained.

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.

- * **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 under “Annual Cost to Federal Government.”**

In fiscal year 2009, approximately 73,400 individuals applied for an Interagency Access Pass from issuing Federal agencies. Agencies anticipate the number of Interagency Access Passes issued to remain the same in future years. In fiscal year 2009, approximately 550,000 individuals applied for an Interagency Senior Pass from issuing Federal agencies. Agencies anticipate 5% of applicants for each type of Pass will apply through the mail. The frequency of response is once per respondent per lifetime.

Estimated average number of respondents: 100,900

Estimated average annual number of responses: 100,900

69,730 in-person Interagency Access Pass applicants (95% of total applicants)

3,670 mail applicants (5% of total applicants)

27,500 Interagency Senior Pass mail applicants (5% of total applicants) (Reminder note: there is no application required for in-person Interagency Senior Pass applicants.)

Estimated average time burden per response: 5 minutes in person, 10 minutes by mail.

The estimated burden for obtaining an Interagency Access Pass in person is 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.

The estimated burden for obtaining an Interagency Access Pass by mail is 10 minutes, which is the estimated time it takes to fill out the basic information, sign the application, and gather one’s documentation.

The estimated burden for obtaining an Interagency Senior Pass by mail is 10 minutes, which is the estimated time it takes to complete and sign the application, and to gather one’s documentation.

The estimated total annual reporting burden is 11,006 hours. This is an increase from the previous burden of 6,117 hours. The increase is due to two factors:

1. increased time (5 minutes) for Interagency Access Pass mail-in applicants to complete the process
2. the addition of the mail-in process for Interagency Senior Pass applicants

We used Bureau of Labor Statistics news release USDL 10-1241, September 8, 2010, Employer Costs for Employee Compensation—June 2010 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), to estimate average hourly wages and to calculate benefits. Table 1 estimates the hourly wage for all workers to be \$20.55. We multiplied this rate by 1.4 to calculate benefits, resulting in an hourly rate of \$28.77.

Table 1 – Annual Burden Estimates

Activity	Annual Number of Responses	Average Burden Hours per Action	Total Annual Burden Hours	\$ Value of Annual Burden Hours*
Statement of Disability for Access Pass in-person applicants	69,730	5 minutes	5,811	\$167,182
Access Pass mail-in applicants	3,670	10 minutes	612	\$17,607
Senior Pass mail-in applicants	27,500	10 minutes	4,583	\$131,853
Total	100,900		11,006	\$316,642

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * 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 for form processing). 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 capital costs or start up costs for most respondents for this information collection. Mail-in respondents would need to make up to two photo copies and pay postage to mail their applications. The total maximum estimated burden would be \$0.64 per respondent for a total of \$19,949 for all Interagency Access and Senior Pass mail-in applicants.

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.

We estimate the total cost to the Federal government for reviewing and processing applications to be approximately \$388,576. Agency employees assigned to handle the distribution of the in-person Interagency Access and Senior Passes at each agency distribution point are responsible for looking at the documentation of medically determined permanent disability shown by the applicant for the Interagency Access Pass to ensure the documentation is 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 mail-in processing of Interagency Access and Senior Passes are located in Lakewood, CO., and vary in grade level but average at the GS-5 level. For purposes of this calculation, a grade level of GS-5 step 1 for the “Denver - Lakewood” pay category (http://www.opm.gov/oca/10tables/html/den_h.asp)

was selected with an hourly rate of 16.10. This was multiplied by 1.5 to account for benefits, yielding an hourly labor cost of \$24.15. The total of 7,792.5 hours, based on an average 15 minute processing time, multiplied by \$24.15 results in a total cost, among the five Federal agencies, of \$188,189 annually for this mail in portion of the information collection.

Agency employees who handle the in-person distribution of the Interagency Access Passes vary in grade level. For the purposes of this calculation, a grade level of GS 5 step 1 for the "Rest of the U.S." pay category (http://www.opm.gov/oca/10tables/html/den_h.asp) was selected with an hourly rate of \$15.00. This was multiplied by 1.5 to account for government benefits. The total of 8,061 hours, based on an average 5 minute processing time, during which agency employees are completing the in-person application function multiplied by \$22.50 results in a total cost, among the five Federal agencies, of \$181,373 annually for this information collection.

Agency costs to mail Passes and documentation back to applicants are calculated to be \$0.61 per respondent for a total of \$19,014 (31,170 mail-in applicants times \$0.61).

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

For in-person applicants, there is no change in the program or in the burden to obtain Interagency Access or Senior Passes. There program change is to add the option of mail-in applications which increases the burden for applicants by a total of 4,889 hours.

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.

There are no plans to 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.

None

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

None