

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

**NATIONAL PARK SERVICE CONCESSIONS
36 CFR PART 51**

OMB CONTROL NO. 1024-0029

Terms of Clearance: None.

Note: The information collection requirements associated with National Park Service concessions are currently approved under four OMB control numbers: 1024-0029, 1024-0125, 1024-0126, and 1024-0231. During our review for this renewal, we discovered some additional requirements that need OMB approval. In this revision of 1024-0029, we are including all of the information collection requirements associated with applying for and operating NPS concessions. If OMB approves this revision, we will discontinue OMB Control Numbers 1024-0125, 1024-0126, and 1024-0231.

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

Private businesses under contract to the National Park Service (we, NPS) manage food, lodging, tours, whitewater rafting, boating, and many other recreational activities and amenities in more than 100 national parks. These services gross more than \$1 billion every year and provide jobs for more than 25,000 people during peak season.

The regulations at 36 CFR Part 51 primarily implement Title IV of the National Parks Omnibus Management Act of 1998 (Pub. L. 105–391), which provides legislative authority, policies, and requirements for the solicitation, award, and administration of NPS concession contracts.

Section 403 of Pub. L. 105-391 provides that “all proposed concession contracts shall be awarded by the Secretary to the person, corporation or other entity submitting the best proposal, as determined by the Secretary through a competitive selection process. Such competitive process shall include simplified procedures for small, individually-owned, concessions contracts.”

- 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.**

We collect the following information associated with the administration of concessions:

PROPOSALS FOR CONCESSION OPPORTUNITIES (partially approved under OMB Control Number 1024-0125).

The public solicitation process begins with the issuance of a prospectus to invite the general public to submit proposals for the contract. The prospectus describes the terms and conditions of the concession contract to be awarded, the procedures to be followed in the selection of the best proposal, and the information that must be provided. Information that we collect includes, but is not limited to:

- Description of how respondent will conduct operations to minimize disturbance to wildlife; protect park resources; and provide visitors with a high quality, safe, and enjoyable visitor experience.
- Organizational structure and history and experience with similar operations.
- Details on violations or infractions and how they were handled.
- Financial information and demonstration that respondent has credible, proven track record of meeting obligations.

We collect this information in narrative and form format. While the information we collect is currently approved under OMB Control No. 1024-0125, OMB has not approved the following forms:

- Business Organization and Credit Information (Form 1 or 2).
- Business History Information Form.
- Initial Investments and Start-up Expenses Form.
- Initial Investments and Start-up Expenses Assumptions.
- Income Statement Form.
- Income Statement Assumptions.
- Operating Assumptions.
- Cash Flow Statement Form.
- Cash Flow Statement Assumptions.
- Recapture of Investment Form.
- Recapture of Investment Assumptions.
- Estimate of Investment Required to Begin Operations in the Draft Contract
- Prospective Income Statement.

The amount of information or degree of detail requested varies widely, depending upon the size and scope of the business opportunity. For example, a much greater amount of detailed information would be required for a multi-unit lodging and food service operation (such as that at Yellowstone), than would be required for a small firewood sales operation.

We use the information provided to objectively evaluate offers received for a particular business opportunity, assure that the park resources will be adequately protected, and determine which offeror will provide the best service to visitors.

AMENDMENTS

In accordance with 36 CFR 51.15, an offeror may not amend or supplement a proposal after the submission date unless requested by the Director to do so and the Director provides all offerors that submitted proposals a similar opportunity to amend or supplement their proposals. Permitted amendments must be limited to modifying particular aspects of proposals resulting from a general failure of offerors to understand particular requirements of a prospectus or a general failure of offerors to submit particular information required by a prospectus.

In accordance with 36 CFR 51.32, if the Director determines that a proposal other than the responsive proposal submitted by a preferred offeror is the best proposal submitted for a qualified concession contract, then the Director must advise the preferred offeror of the better terms and conditions of the best proposal and permit the preferred offeror to amend its proposal to match them. An amended proposal must match the better terms and conditions of the best proposal. If the preferred offeror amends the proposal within the time period allowed, and the Director determines that the amended proposal matches the better terms and conditions of the best proposal, then the Director must select the preferred offeror for award of the contract.

APPEALS (currently approved under OMB Control Number 1024–0231).

Regulations at 36 CFR 51.47 state that any person may appeal to the Director, a determination that a concessioner is not a preferred offeror for the purposes of a right of preference in renewal and that the appeal must specify the grounds for the appeal. If the appellant does not identify the specific grounds on which it objects to the Director's initial preferred offeror determination, the Director could make a final determination without fully understanding the appellant's concerns or without taking into consideration important information the appellant may wish to submit in support of its position.

REQUEST TO CONSTRUCT A CAPITAL IMPROVEMENT (currently approved under OMB Control Number 1024–0231).

In accordance with 36 CFR 51.54, a request for approval to construct a capital improvement must include appropriate plans and specifications for the capital improvement. The request must also include an estimate of the total construction cost of the capital improvement. The estimate of the total construction cost must specify all elements of the cost in such detail as is necessary to permit the Director, NPS to determine that they are elements of construction cost. The approval requirements of this and other sections of 36 CFR part 51 also apply to any change orders to a capital improvement project and to any additions to a structure or replacement of fixtures.

CONSTRUCTION REPORT (currently approved under OMB Control Number 1024–0231).

In accordance with 36 CFR 51.55, a concessioner obtaining a leasehold surrender interest must submit a construction report to the NPS. The construction report must be supported by actual invoices of the capital improvement's construction cost together with, if requested by the NPS, a written certification from a certified public accountant (CPA). The construction report must document, and any requested certification by the certified public accountant must certify, that all components of the construction cost were incurred and capitalized by the concessioner in accordance with Generally Accepted Accounting Principles (GAAP), and that all components

are eligible direct or indirect construction costs. Invoices for additional construction costs of elements of the project that were not completed as of the date of substantial completion may subsequently be submitted to the Director for inclusion in the project's construction cost.

APPLICATION TO SELL OR TRANSFER CONCESSION OPERATION (currently approved under OMB Control Number 1024-0126).

36 CFR part 51, Subpart J, provides that a concessioner must obtain NPS approval to assign, sell, convey, grant, contract for, or otherwise transfer: any concession contract; any rights to operate under or manage the performance of a concession contract as a subcontractor or otherwise; any controlling interest in a concessioner or concession contract; or any leasehold surrender interest or possessory interest obtained under a concession contract. The amount

and type of information to be submitted varies with the type and complexity of the proposed transaction. Information includes, but is not limited to:

- Instruments proposed to implement the transaction.
- Narrative description of the proposed transaction.
- Opinion of counsel that the proposed transaction is lawful under all applicable Federal and State laws.
- Statement as to the existence and nature of any litigation relating to the proposed transaction.
- Description of the management qualifications, financial background, and financing and operational plans of any proposed transferee.
- Description of all financial aspects of the proposed transaction.
- Prospective financial statements (proformas).
- Schedule that allocates in detail the purchase price (or, in the case of a transaction other than an asset purchase, the valuation) of all assets assigned or encumbered. In addition, the applicant must provide a description of the basis for all allocations and ownership of all assets.

ANNUAL FINANCIAL REPORT (Forms 10-356 and 10-356A (currently approved under OMB Control No. 1024-0029)

The Concessioner Annual Financial Report) provides concessioner financial information as required by each concession contract. This information is necessary to comply with the requirements placed on the Secretary of the Interior by Congress. Title IV, Section 407 of the National Parks Omnibus Management Act of 1998 (P.L. 105-391) requires that “a concessions contract shall provide for payment to the Government of a franchise fee or other such monetary consideration as determined by the Secretary, upon consideration of the probable value to the concessioner of the privileges granted by the particular contract involved. Such probable value shall be based upon a reasonable opportunity for net profit in relation to capital invested and the obligations of the contract.” 36 CFR Part 51, Subpart I requires that concession contracts “provide for payment to the Government of a franchise fee or other monetary consideration as determined by the Director upon consideration of the probable value to the concessioner of the privileges granted by the contract involved.” In order to verify the accuracy of the report and payments of franchise fees, concessioners with gross receipts of over \$1 million are required to have financial statements audited by an independent certified public accountant and have them express an opinion on the financial statements. Concessioners with gross receipts between \$500,000 and \$1 million must have a review opinion by an independent accountant, a lesser requirement and burden.

Form 10-356 is an accumulation of various financial statements commonly used by industry for reporting in conformance with generally accepted accounting principles. The information provides a comprehensive view of the concessioner’s financial situation at the end of its fiscal year and the concessioner’s activity over the preceding year. Careful analysis provides an effective tool in the decisionmaking process and for the tracking of concessioner and Government contractual obligations for payments and maintenance and construction requirements. The financial information being collected is necessary to provide insight into and knowledge of the concessioner’s operation so that this authority can be exercised and franchise fees can be determined in a timely manner and without an undue burden on the concessioner. We collect the following information:

- Cover sheet provides identifying information and the concessioner's certification as to the accuracy of the accompanying report.
- Schedule A is an income statement summarizing the financial activity (gross receipts, expenses, and net income) of the period being reported on.
- Schedule A-1 is a worksheet for calculating the comprehensive income.
- Schedule B is a worksheet for calculating the franchise fee.
- Schedule C is a balance sheet comparing the sources (liabilities and equity) with the uses (assets) of the capital of the company at the end of the fiscal year.
- Schedule D is a detail of the fixed assets reported on the balance sheet with a special listing of possessory interest or leasehold improvement assets (potential obligations of the Government).
- Schedule E is a statement of cash flows.
- Schedule F is space reserved for explanatory notes to the report.
- Schedule G is a breakdown of gross receipts by major departments.
- Schedule H is a detail of departmental income and expenses.
- Schedule I is a detail of general and administrative expenses.
- Schedule J lists ownership and compensation to officers and owners.
- Schedule K details the additions and disposals of fixed assets during the year.
- Schedule L is a supporting schedule for any amounts that need further explanation or detail.
- Schedule M contains various operational statistics commonplace for the major services provided in parks.
- Schedule N provides an accounting for those concessioners who have Special Accounts.
- Schedule O lists expenditures from those accounts.
- Schedule P provides an accounting for those concessioners who have a contractual repair and maintenance reserve requirement.
- Schedule Q lists the projects from that reserve.

Form 10-356A - In an attempt to reduce administrative burden, concessioners with gross receipts under \$500,000 submit only a shorter report (Form 10-356A). This "short form" is a simplified income statement, balance sheet, and operation statistics. Concessioners with gross receipts under \$250,000 do not have to submit the balance sheet.

RECORDKEEPING

In accordance with 36 CFR 51.98, a concessioner (and any subconcessioner) must keep and make available to NPS, records for the term of the concession contract and for 5 years after the termination or expiration of the concession contract.

- 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.**

Notice of the availability of the prospectus is advertised via the internet at fedbizopps.gov, and we publish each prospectus on our concessions web page. The forms associated with the prospectus are provided in an Excel format.

The burden associated with the completion of the Concessioner Annual Financial Report (AFR) is essentially one of transcribing figures from the concessioner's financial records to our forms. In 2008, we began the use of the electronic AFR submission process. The electronic process utilizes an Excel file which tracks the paper forms and contains pop-up instructions for essentially every line. Once all data is entered into each worksheet of the AFR form, the report is submitted to the NPS and processed electronically. A concessioner with a MAC computer (not compatible with AFR forms) who does not have access to a PC will need to request permission from the park superintendent to submit a hard copy of the AFR.

At this time, the collection of information for the remaining information collection requirements is not available electronically, primarily due to the wide variety of information requested (for example, plans and specifications, invoices, etc.), and the concessioner's ability to provide responses electronically. If the information is available electronically, we will accept electronic submissions.

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.

The requested information is unique to the applicant and each business opportunity. No similar information pertaining to business opportunities on park lands is collected by other NPS offices or other Federal agencies.

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

We collect only the minimum information necessary to allow us to evaluate all offers received and determine which offer is the best. As indicated in 36 CFR 51.12, solicitations for large, complex operations may be issued in two phases (qualifications and proposal); while solicitations for concession contracts that are likely to be awarded to a sole proprietorship or are likely to have annual gross receipts of less than \$100,000 will incorporate simplified administrative requirements. For annual financial reports, the information collected is the minimal information necessary to determine appropriate fees. We developed the AFR short form (Form 10-365A) for use by 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.

16 U.S.C. § 5952 requires us to use a competitive selection process for concession contracts and to solicit proposals. That law also requires us to collect the categories of information described in item 2 above. For proposals, we collect information in response to a specific advertisement of a concession opportunity. If we did not collect the information, we would be unable to: (1) objectively evaluate offers received for a particular business opportunity, (2) assure that the park resources will be adequately protected, and (3) determine which offeror will provide the best service to visitors at reasonable rates and with the greatest overall return to the Government. Once we issue a concessions contract, we require minimal information to ensure that businesses operate in accordance with NPS policy.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The only special circumstance that is inconsistent with OMB guidelines is the number of copies that we request. When the contract has a preferred offeror, we usually request two or three copies. For projects where we expect several offers, we request more copies to ensure sufficient copies for the reviewing panel. In a limited number of cases involving large construction projects, additional copies of some items for other submissions may be required.

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.

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

On March 7, 2013, we published in the Federal Register (78 FR 14822) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 6, 2013. We did not receive any comments.

After soliciting comments from the public through a Federal Register notice, we contacted the following concessioners and requested comments on the accuracy of burden estimates, availability of the data needed, 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. Responses were valuable in identifying several process improvements although none addressed any specific need to change the forms used for information collection.

In regard to the cost and hour burden of submitting annual financial reports, a comment we received stated there is a slight increase in the reporting burden any time we modify the AFR. We believe, however, that the average completion time has not changed. Additionally, although we received comments that on an overall basis the electronic submission of the AFR is a benefit, one concessioner reported a few complications with the electronic submission process itself. This process is a recent upgrade from a previously manual submission process, and we have continued to work with concessioners to improve the efficiency of the process, address these minor issues, and improve consistency year-to-year.

We received a suggestion to improve specificity and eliminate redundancy in the information collection requirements associated with submitting prospectus proposals, which would reduce the reporting burden on concessioners. Specifically, the concessioner suggested some basic financial information that we require for prospectus proposals is already available via concessioner Annual Financial Reports. We believe that while that may be the case in some situations, there are several reasons why we collect standard financial information in the prospectus submission. The most important is that we may not have the latest financial information about a company on file, so providing it in the proposals allows a company to give us the most current data. Also, while some prospectus proposals are received from companies that already have a concessioner relationship with us, many do not and thus must provide essential financial information. The prospectus proposal process is designed to require the same amount of information from all prospective bidders. It would be unfair to fulfill aspects of information reporting from some offerors and not others.

These were general comments and did not address the forms used in particular. We are currently conducting a study on simplifying procedures for concessions contract management and prospectus submissions and seeking to reduce information collection burdens as appropriate.

<p>Karen Hager Guest Services Inc. 3055 Prosperity Avenue Fairfax, VA 33031 703-849-9378</p>	<p>Donna Wright Forever Living Products International, LLC 7501 E. McCormick Parkway Scottsdale, AZ 85258 480-607-8339</p>	<p>Carol Metzler TRF Concession Specialist of Florida, Inc. 302 York Street Gettysburg, PA 17325 717-337-1698</p>
<p>Terry Macrae Hornblower, Inc. tmacrae@hornblower.com</p>	<p>Barry Trice Guest Services Inc. triceb@guestservices.com</p>	<p>Terry Sides Forever Resorts tsides@foreverresorts.com</p>
<p>Tasha Wade Stokely Hospitality Enterprises twade@stokelyhospitality.com</p>		

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

No payments or gifts are provided to respondents.

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

Information is collected and protected in accordance with the Freedom of Information Act (5 U.S.C. 552) (FOIA). In accordance with the Freedom of Information Act, if respondents believe their proposal contains trade secrets or confidential commercial or financial information exempt from disclosure under the Freedom of Information Act, the cover page, as well as each page containing such information is to be labeled. Information in a proposal identified as trade secret information or confidential commercial and financial information will be used by the Government only for the purpose of determining whether the proposed transaction should be approved, except that if the same information is obtained from another source without restriction, it may be used without restriction. The Annual Financial Reports are handled and maintained in accordance with the Privacy Act (Interior, NPS-14, Concessioner Financial Statement and Audit Report Files. (Published November 10, 1983, 48 FR 51701)

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.

We do not ask sensitive questions.

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.

We estimate that we will receive 1,352 annual responses totaling 159,982 burden hours. The total dollar value of the burden hours is approximately \$12,577,150. We used the Bureau of Labor Statistics Occupational Employment and Wages, May 2012 to determine hourly wages. To calculate benefits, we multiplied the hourly wage by 1.4 in accordance with news release USDL 13-1140, June 12, 2013, Employer Costs for Employee Compensation—March 2013.

- Table 11-1021 lists the mean hourly wage for a General Manager as \$55.22. Hourly cost factor including benefits is \$77.00 (rounded).
- Table 17-3026 lists the mean hourly wage for an Engineering Technician as \$25.53. Hourly cost factor including benefits is \$36.00 (rounded).
- Table 13-2011 lists the mean hourly wage for an Accountant as \$34.15. Hourly cost factor including benefits is \$48.00 (rounded).

ACTIVITY	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY RATE WITH BENEFITS	\$ VALUE OF ANNUAL BURDEN HOURS
Proposal - Large Concession	30	240 hours	7,200	\$77.00	\$554,400
Proposal - Small Concession	60	80 hours	4,800	77.00	369,600
Amendments	1	1 hour	1	77.00	77
Appeals	1	30 minutes	1	77.00	77
Request To Construct a Capital Improvement – Large Projects	31	16 hours	496	113.00 ¹	56,048
Request To Construct a Capital Improvement – Small Projects	89	8 hours	712	113.00 ¹	80,456
Construction Report – Large Project	31	56 hours	1,736	161.00 ²	279,496
Construction Report – Small Project	89	24 hours	2,136	161.00 ²	343,896
Application to Sell or Transfer a Concession Operation	20	80 hours	1,600	77.00	123,200
Form 10-356	150	16 hours	2,400	48.00	115,200
Form 10-356A	350	4 hours	1,400	48.00	67,200
Recordkeeping – Large Concessions	150	800 hours	120,000	77.00	9,240,000
Recordkeeping – Small Concessions	350	50 hours	17,500	77.00	1,347,500
TOTALS	1,352		159,982		\$12,577,150

¹ Combined hourly rates for General Manager and Engineering Technician

² Combined hourly rates for General Manager, Engineering Technician, and Accountant

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 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.

The total nonhour cost burden is \$425,000.

Proposals - \$420,000. We estimate that the average cost per respondent is \$3,000 for small operations and \$8,000 for large operations. These costs include, but are not limited to, expenses for printing, travel for onsite visits, and professional fees. Costs will vary due to proximity to the proposed concession operation and the desired involvement of consultants and other professionals outside the company. There are no other costs associated with preparing and submitting an offer.

Application to Sell or Transfer Concession Operation - \$5,000. There are no other costs associated with preparing and submitting an application, other than expenses for printing, which is estimated to be approximately \$250 per application (x 20 applications). Costs for legal and accounting fees and onsite visits are inherent in the transaction even if NPS approval were not required, and are not included in this estimate.

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 that the annual cost to the Federal Government to administer this information collection is \$1,656,373. Salary costs for staff time to process and review applications are \$1,581,373. In addition, we estimate approximately \$75,000 for printing. We used Office of Personnel Management Salary Table 2013-DCB to determine hourly wage rates. We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 13-1140.

POSITION/ GRADE/STEP	NO. OF RESPONSES	ESTIMATED TIME PER RESPONSE	TOTAL HOURS	HOURLY RATE	HOURLY RATE W/ BENEFITS*	TOTAL ANNUAL COST*
Proposals – Large Concession						
Supv. Concessions Specialist GS-13/5	30	40 hours	1,200	\$48.35	\$72.53	\$ 87,036
Concessions Specialist GS-11/5 (2 FTE)	30	80 hours	2,400	33.92	50.88	122,112
Lawyer GS-14/5	30	40 hours	1,200	57.13	85.70	102,840
Proposals - Small Concession						
Supv. Concessions Specialist GS-13/5	60	16 hours	960	48.35	72.53	69,629
Lawyer GS-15/5	60	16 hours	960	67.21	100.82	96,787
Amendments						
Supv. Concessions Specialist GS-13/5	1	4 hours	4	48.35	72.53	291
Lawyer GS-15/5	1	4 hours	4	67.21	100.82	403
Appeals						
Concessions Specialist GS-11/5	1	20 hours	20	33.92	50.88	1,018
Lawyer GS-15/5	1	20 hours	20	67.21	100.82	2,016
Request To Construct a Capital Improvement – Large Projects						
Supv. Concessions Specialist GS-13/5	31	16	496	48.35	72.53	35,975
Concessions Specialist GS-11/5	31	16	496	33.92	50.88	25,236
Request To Construct a Capital Improvement – Small Projects						
Supv. Concessions Specialist GS-13/5	89	8	712	48.35	72.53	51,641
Concessions Specialist GS-11/5	89	8	712	33.92	50.88	36,227
Construction Report – Large Projects						
Supv. Concessions Specialist GS-13/5	31	56	1,736	48.35	72.53	125,912
Concessions Specialist GS-11/5	31	56	1,736	33.92	50.88	88,328
Construction Report – Small Projects						
Supv. Concessions Specialist GS-13/5	89	24	2,136	48.35	72.53	154,924
Concessions Specialist GS-11/5	89	24	2,136	33.92	50.88	108,680
Application to Sell or Transfer Concession Operation						
Supv. Concessions Specialist GS-13/5	20	80	1600	48.35	72.53	116,048
Lawyer GS-15/5	20	40	800	67.21	100.82	80,656
Form 10-356						
Financial Analyst GS-13/5	150	16	2,400	48.35	72.53	174,072
Form 10-356A						
Financial Analyst GS-13/5	350	4	1,400	48.35	72.53	101,542
Total						\$1,581,373

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are reporting 1,352 annual responses totaling 159,982 burden hours and \$425,000 in nonhour burden costs. This is an increase of 852 responses, 156,182 burden hours, and

\$425,000 nonhour burden costs from our previous submission.

We are reporting as adjustments, an increase of 351 annual responses totaling 18,681 burden hours, and \$425,000 in nonhour burden costs. This burden is currently approved under OMB Control Numbers 1024-0125, 1024-0126, and 1024-0231, which we will discontinue upon approval of this consolidated request.

We are reporting as a program change, an increase of 501 annual responses totaling 137,501 burden hours associated with the following information collection requirements in existing regulations, but not previously approved under the Paperwork Reduction Act:

- Amendments – 1 response totaling 1 burden hour
- Recordkeeping – 500 responses totaling 137,500 burden hours

Historically, we have sought OMB approval for information collection requirements associated with many aspects of applying for and operating NPS concessions, but not all. This ICR consolidates information collection requirements currently approved under several different OMB Control Numbers. For example, OMB Control Number 1024-0231 approved the information collection associated with appeals of preferred offeror determinations, and OMB Control Number 1024-0126 approved the information collection associated with the application to sell or transfer concession operation. This ICR contains details on what information collection was previously approved as well as the additional reporting requirements for which we are seeking approval.

The relevant regulations require recordkeeping. We decided not to enumerate asset management and contract management reporting requirements as separate information collection requirements, but instead to add the burden of recordkeeping. We made this decision because the reporting of asset and contract management information is required by a concession contract, which places this information collection into a different context (that of fulfilling contracted requirements). Recordkeeping estimates were provided by staff from the corresponding program branches. We do not believe that this information collection overlaps with information collected for the purpose of reporting to the IRS. Burden calculations are as follows:

Asset Management	Large Concession - Hours	Small Concession - Hours
Annual Fixtures Replacement Report	16	0
Annual Concessioner Maintenance Plan	96	0
Annual Concessioner Maintenance Reporting	48	0
Repair and Maintenance Reserve Report	48	0
Personal Property Report	16	0
Weekly Summary Report	104	0
Monthly Reporting	36	0
Contract Management		
Environmental Management Program	16	8
Acknowledgement of Risk Form	2	2
Balance Sheet	16	8
Fire Inspection Report	8	0

Lost and Found Program	2	2
Employee Handbook	16	6
Risk Management Plan	32	6
Waste Management Plan	16	2
Merchandise Plan	16	0
Updated Environmental Management Program	8	1
Environmental Report	8	0
Updated Risk Management Program	16	1
Updated Emergency Action Plan	8	0
Updated Waste Management Plan	4	0
Inventory of Hazardous Substances	16	1
Inventory of Waste Streams	96	1
Management Listing	4	1
Annual Budget	40	8
Hours of Operation	4	1
Updated Merchandise Plan	4	0
Updated Employee Handbook	8	1
Pesticide Use	8	1
Updated Integrated Pest Management Plan	4	1
Pesticide Use	24	1
Franchise Fee Payments	8	1
Financial, Visitor Use and Operational Statistics	8	1
Rate Request Changes	32	4
Insurance Certificates	8	1

796

59

Rounded to 800

Rounded to 50

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 and other actions.

We do 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 expiration date on forms and other appropriate materials.

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

There are no exceptions to the certification statement.