

**1 Supporting Statement A for  
Paperwork Reduction Act Submission**

**Urban Park and Recreation Recovery Program Grants  
36 CFR 72  
OMB Control Number 1024-0048**

**Note:** The information collection requirements associated with the Urban Park and Recreation Recovery Program grants are currently approved under three OMB control numbers, all of which expire on October 31, 2013. During our review for this renewal, we identified some additional requirements that need OMB approval. In this revision of 1024-0048, we are including all of the information collection requirements for the UPARR Program. If OMB approves this revision, we will discontinue OMB Control Numbers 1024-0028 and 1024-0089.

**Terms of Clearance. None.**

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

The Urban Park and Recreation Recovery (UPARR) Act (16 U.S.C. 2501 et seq.) was passed as Title X of the National Parks and Recreation Act of 1978. The UPARR Act authorized the Secretary of the Interior to establish a grant program to help physically and economically distressed urban areas improve recreation opportunities for their residents.

We (National Park Service, NPS) administer the UPARR program in accordance with regulations at 36 CFR 72. These regulations: (1) explain the policies to be followed for awarding grants, (2) list the requirements and criteria to be met for each type of grant and discretionary eligibility, (3) discuss fundable uses and limitations, (4) explain how proposals will be selected and funded, and (5) describe the application process and administrative procedures for awarding grants. The three types of grants available under the program are:

- Rehabilitation - renovate or redesign existing close-to-home recreation facilities.
- Innovation - specific activities that either increase recreation programs or improve the efficiency of the local government to operating existing programs.
- Planning - development of a Recovery Action Program plan.

**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.**

Congress has not appropriated funds for new UPARR grants since FY 2002. We are not currently accepting applications, and there are no open grants for which performance reports must be submitted. However, we still receive requests for conversion of properties improved or developed with UPARR grants through FY 2002 to other than public recreation uses. The President's FY 2014 budget proposal includes the revitalization of UPARR. Although the prospects for future funding are unknown, we are requesting OMB approval for the information collection requirements in case funding is appropriated. Following are the information collection requirements for the UPARR Program:

## **Recovery Action Program.**

In accordance with 36 CFR 72.10–13, any eligible jurisdiction or discretionary applicant desiring to apply for a grant must develop and submit for NPS approval a local Recovery Action Program (RAP). The RAP documents the recreation needs of the community and is linked to the objectives, needs, plans, and institutional arrangements of the community. The RAP consists of two sections: the Assessment and the Action Plan.

The Assessment describes the existing park and recreation system, issues and problems, and goals and objectives. The Assessment summarizes the entire system, including: operation and maintenance, employment and training, programs and services, rehabilitation of existing facilities, and the need for new facilities. The six parts of the Assessment include: Context; physical issues; rehabilitation issues; service issues; management issues; and conclusions, implications, and issues.

The Action Plan is a clear statement of the community's specific objectives, priorities, and implementation strategies in relation to the intent of the UPARR Program and the local government's overall recreation system goals. Citizen involvement in the development of the Action Plan is required and may include surveys, hearings, meetings, and/or consultation, as appropriate, which is essential in the development of goals and objectives and the setting of project priorities. The Action Plan identifies the goals for the system, strategies to address national and local concerns, recommendations, program priorities, and implementation schedule, as well as evaluates and updates the Action Program. In accordance with 36 CFR 72.30, applicants must have an approved RAP on file with the appropriate NPS Regional Office prior to applying for Rehabilitation or Innovation grants. Rehabilitation and Innovation proposals must be based on priorities identified in the applicant jurisdiction's RAP.

## **Recovery Action Program Grant Applications**

In accordance with 36 CFR 72.52, ranking and selection for funding of Recovery Action Program grants will be initiated on the basis of a full application, preparation of which will be assisted through meetings with NPS regional staff. The following documents are required to be submitted with the Recovery Action Program Grant Application:

- Standard Forms such as the SF-424
- RAP Grant Agreement (Form 10–911)
- Narrative statements with a description and scope of the planning product(s) to be developed, a project budget, and a work schedule.

## **Preapplication for Rehabilitation and Innovation Grant**

In accordance with 36 CFR 72.53, a preapplication procedure is used to reduce the amount of time and documentation needed for a full application, and to foster the competitive aspects of the UPARR Program. The preapplication must include:

- Letter of transmittal
- SF–424
- Proposal description statement
- Narrative describing how the project meets the selection criteria
- Maps, photographs (for construction projects), cost estimates, and pass through certifications (if applicable)

The application must describe the problem addressed by the proposal, including existing conditions, the reason for the problem or why the condition exists, and what the UPARR assistance would do to alleviate the problem or condition. Discretionary applicants must also submit in their preapplication a narrative statement, signed by the chief executive of the applicant jurisdiction, explaining and quantifying the degree of physical and economic distress in the community.

### **Final Application—Rehabilitation and Innovation Grants**

In accordance with 36 CFR 72.54, once a Rehabilitation or Innovation proposal has received a tentative grant offer, applicants will be responsible for completing a full application, which addresses compliance with OMB Circulars A–102 and A–87, as well as other applicable Federal laws and regulations such as environmental and historic preservation laws. A list of specific Acts and Executive Orders is in 36 CFR 72.56. A grant will not be approved until the applicant has completed a full application, which is due 120 days from the date of the grant offer. Grant respondents must also complete and sign the UPARR Program Grant Rehabilitation and Innovation Agreement (currently approved under 1024–0089; Form 10–912). We use this information to document the obligations assumed by the respondent through its acceptance of Federal assistance including the rules and regulations applicable to the conduct of a project under the UPARR Act and any special terms and conditions to the project established by the NPS and agreed to by the respondent. This information also obligates the Federal government to provide grants up to the designated amount for eligible costs incurred on the project on the basis of information and estimates contained in the proposal.

### **Amendments** (currently approved under 1024–0089)

Grantees must request prior written approval from NPS for an amendment to a project if the revision causes substantial changes in the scope, objective, or work elements such as the project period. To alter the grant agreement, grantees must complete and sign the Amendment to UPARR Grant Agreement (Form 10-915). The request must also include an SF–424, an explanation of and justification for the change(s), and if applicable, new budget information.

### **Performance Reports** (currently approved under 1024–0028)

The UPARR Program Project Performance Report details the annual status of the projects and any changes that need to be implemented. We use this information to ensure that the grantee is accomplishing the work on schedule and to identify any problems that the grantee may be experiencing in accomplishing that work. Performance Reports are needed to show quarterly or annual progress reports on the physical completion per percentage of each grant, financial expenditures to date, budget revisions if needed, work planned for the next year, and any additional information pertinent for grant completion.

### **Conversion of Use** (currently approved under 1024–0048)

In accordance with Section 1010 of the UPARR Act and as codified in 36 CFR 72.72, no property improved or developed with UPARR assistance can be converted to other than public recreation uses without the approval of the NPS. A conversion will only be approved if it is found to be in accord with the current local park and recreation Recovery Action Program and/or equivalent recreation plans and only upon such conditions as deemed necessary to assure the provision of adequate recreation properties and opportunities of reasonably

equivalent location and usefulness. To request a conversion, the grantee must submit the following documentation: an amendment request, a narrative statement comparing the site to be converted with the proposed replacement site addressing factors such as physical size, location, carrying capacity, and facilities; maps (location, site, and Section 1010 boundary); and evidence of the grantee's control and tenure over the replacement site.

### **Recordkeeping Requirements**

In accordance with 36 CFR 72.60(b), applicants must maintain adequate financial records to support all expenditures or costs covered by a Recovery Action Program, Rehabilitation, or Innovation project grant, as specified in OMB Circular A- 87 and OMB Circular A-102 for a period of 3 years after final payment on a project. The records must be retained beyond the 3-year period if audit findings have not been resolved.

- 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.**

Grant Agreement and Amendment forms (10-911, 10-912, and 10-915) will be available on our website in a pdf fillable format if and when new funding is appropriated for this program. There are no forms for the other collection requirements; however, we will accept the information electronically through email.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication. The information collected is specific to the project.

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

This collection does not impact small businesses or other small entities. All respondents are urban governments, which are traditionally cities with populations greater than 50,000.

- 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.**

If the collection of this information is not conducted, we would be unable to properly manage the UPARR program. This information collection allows us to establish proper legal obligations to ensure that Government funds are properly expended and comply with OMB requirements regarding the management of Federal grants.

- 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.

There are no special circumstances that would cause us to collect the information in a manner inconsistent with OMB guidelines.

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 May 2, 2013, we published in the Federal Register (78 FR 25760) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 1, 2013. We did not receive any comments.

Since the last renewal, we have received three requests for conversion of UPARR-assisted sites. We were able to consult with two sponsor agencies to validate our estimates. We consulted with:

Don Hudson Director, Parks and Recreation Department Oxford, AL 256-831-2660	Nick Hall Director of Planning Gadsden, AL 256-549-4520
--	--

One commenter reported that it took 60 hours to complete a conversion of use request; the other reported that it took 80 hours. As a result of this outreach, we increased our estimated completion time to 70 hours (see item 12). We were not able to consult on other information collection requirements, since the UPAAR program has not been funded since 2002.

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

We do not provide any payments or gifts to respondents.

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

We do not provide any assurance of confidentiality.

**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 questions of a sensitive nature.

**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.

Congress has not appropriated funds for new UPARR grants since FY 2002. We are not currently accepting applications, and there are no open grants for which performance reports must be submitted. However, we could still receive requests for conversion of properties improved or developed with UPARR grants through FY 2002. We are estimating one response as a placeholder for each of the requirements in this collection.

We estimate that we will receive 8 annual responses totaling 182 annual burden hours. The total dollar value of the burden hours is approximately \$12,149 (rounded) (\$66.75 x 182 hours). We used the Bureau of Labor Statistics Occupational Employment and Wages, May 2012 to determine hourly wages. Table 11-1021 lists the mean hourly wage for a General Manager, local government as \$44.50. To calculate benefits, we multiplied the hourly wage by 1.5 in accordance with news release USDL 13-1140, June 12, 2013, Employer Costs for Employee Compensation—March 2013, resulting in an hourly cost factor of \$66.75.

ACTIVITY	NUMBER OF ANNUAL RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL BURDEN HOURS*
Recovery Action Program	1	1	80 hours	80
Recovery Action Program Grant Applications	1	1	3.5 hours	4
Preapplication for Rehabilitation or Innovation Grants	1	1	10 hours	10
Final Application for Rehabilitation or Innovation Grants	1	1	10.5 hours	11
Grant Amendments	1	1	3.5 hours	4
Performance Reports	1	1	1 hour	1
Conversion of Use Request	1	1	70 hours	70
Recordkeeping	1	1	2 hours	2
<b>TOTALS</b>	<b>8</b>	<b>8</b>		<b>182</b>

\*rounded

**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.

There are no nonhour burden costs.

**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 \$1,105 (rounded) (\$46.06 x 24). The actual average hourly rate including benefits for staff (GS-9 to GS-12) involved in the review and processing of UPAAR documents is \$46.06. We estimate that staff will spend approximately 24 hours on this information collection.

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

We are reporting 8 responses totaling 182 annual burden hours for this information collection, which is an increase of 7 responses and 157 burden hours from our last submission.

We are reporting as program changes 4 responses and 109 burden hours associated with requirements in existing regulations that were not previously approved:

- Recovery Action Program – 1 response, 80 hours.
- Recovery Action Program Grant Application – 1 response, 4 hours
- Preapplication-Rehabilitation and Innovation Grant – 1 response, 10 hours
- Final Application-Rehabilitation and Innovation Grant – 10 hours
- Amendments – 3 hours
- Recordkeeping - 1 response, 2 hours

We are reporting as adjustments an increase of 3 responses and 48 hours as follows:

- Conversion of Use – increase of 45 hours. Increased completion time based on outreach.
- Amendments – 1 response, 1 hour – previously approved under 1024-0089. Only completion time for Form 10-915 was previously approved.
- Performance Reports – 1 response, 1 hour – previously approved under 1024-0028.
- Final Application-Rehabilitation and Innovation Grant – 1 response, 1 hour – previously approved under 1024-0089. Only completion time for Form 10-912 was previously approved.

**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.**

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 OMB control number 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.