Supporting Statement A
Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys
OMB Control Number 1024-0224
Request for Extension

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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

The National Park Service (NPS) is requesting a one year extension for the Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys (OMB Control Number 1024-0224). The request to extend the current expiration date (August 31, 2014) for one year is for the purpose of revising the current Pool of Known Questions that serves as a primary component of this process. This request is also based upon requests from human dimensions and natural resource professionals that we update the current list of questions and topic areas that are more than 20 years old. This extension is needed to work collaboratively with other researchers in this field to increase the Pool of Known Questions usability as an effective tool in this process. During the extension we will continue to submit collections for FY15 (based upon the currently approved documents) and we will also host a series of workshops to facilitate the revision of the topic areas and questions. This extension will allow for the effective outreach prescribed in item 8 of Supporting Statement Part A.

The scope of the programmatic review process will remain unchanged and will continue to include individual surveys of park visitors (current, past, and potential) residents of communities near parks and in some cases visitors living elsewhere in the United States. The use of the programmatic review will

continue to be limited to non-controversial surveys of park visitors, potential park visitors, and/or residents of communities near parks that are not likely to include topics of significant interest in the review process.

The benefits of this generic ICR program have been significant to the NPS, Department of the Interior, OMB, NPS cooperators, and the public. Since 2012, approval was typically granted in less than 14 days from the date the NPS Information Collection Review Coordinator (ICRC) submits the ICR to OMB for review. This is a significant reduction over the approximately 30-45 days in 2011. From FY 1999 through FY 2014, the generic ICR process has produced an estimated annual cost savings to the Federal government of about $1,175,495.

Legal Justification:

- **The National Park Service Act of 1916, (38 Stat 535, 16 USC 1, et seq.)** *requires that the National Park Service (NPS) preserve the national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments that are necessary for public use, health, and safety.*

- **National Environmental Policy Act of as amended in 1982 (Sec 102 [42 U.S.C. § 4332A])** *The Federal Government shall utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man's environment*

- **The Government Performance and Results Act of 1993 (P.L. 103-62).** *GPRA goals IIa1 and IIb1: IIa1: Visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of park facilities, services and appropriate recreational opportunities.*

  IIb1: Park visitors and the general public understand and appreciate the preservation of parks and their resources for this and future generations.

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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.

The Programmatic Review and Clearance Process is limited to non-controversial information collections that do not attract attention to significant, sensitive, or political issues.   The information collected has

been used to improve the service and products that NPS provides to the public. Park managers and planners use these data to support all aspects of planning, monitoring, interpretation and education.

Examples of significant, sensitive, or political issues include: seeking opinions regarding political figures; obtaining citizen feedback related to high-visibility or high-impact issues like the reintroduction of wolves in Yellowstone National Park, the delisting of specific Endangered Species, or drilling in the Arctic National Wildlife Refuge.

All information collection instruments will be designed and deployed based upon acceptable statistical practices and sampling methodologies, and will be used to obtain consistent, valid data that are representative of the target populations and account for non-response bias, according to the most recent OMB guidance on "Agency Survey and Statistical Information Collections."

Uses of the Information

The Programmatic Review and Clearance Process benefits the NPS by proving data identified by the following management and planning topics:

- Service needs of customers
- Strengths and weaknesses of services
- Barriers to achieving customer service standards
- Changes to customer service standards
- Changes in service delivery over time
- Improving public trust in government

The scientific community who partner with the NPS in administering surveys benefit through:
1) efficient, effective, and timely review process
2) focus on peer review that improves the quality of information collections
3) increased attention to methodological improvements and use of best practices
4) better administration and wider sharing of information obtained from surveys of the public
5) a review that focuses on NPS mission and objectives
6) a renewed confidence and willingness to complete the review process

Typical Information Collection Methods

1. <u>On-Site Intercept Surveys:</u> Respondents will be asked to complete and return the survey while on site. This may include (but not limited to) oral administration, paper forms, or the use of electronic technology.

2. Mail and Electronic Surveys: Respondents will be given the option of completing an electronic or paper version of a survey instrument. Researchers typically use the Dillman's "Tailored Design Method" to increase response rates – or they will clearly describe the method to be used

3. Telephone Surveys: Existing or created databases that include telephone numbers will be used to contact potential respondents. An interviewer will use an approved dial back method until someone is available. Telephone surveys are generally reserved for hard to reach interviewees, or to follow-up with non-respondents.

4. Focus groups and Face-to-face Interviews: Selected individuals will be invited to participate in small group discussions or one-on-one interview sessions. A script is generally used to facilitate the discussions and is designed to encourage respondents to talk about experiences, preferences, needs, observations, or perceptions.

Types of Questions asked

Currently, there are seven topic areas that are used a guide for developing survey instruments.

Topic Area 1 - Individual Characteristics and Knowledge
Demographic questions and socioeconomic are limited to those that are germane to the mission of the park. This section also includes many measures of individual and group characteristics used to describe respondents:

- o age, education, ethnicity, race, and income
- o group type, composition, and size
- o knowledge of park programs and management issues
- o visitation history

Topic Area 2 - Trip Planning
Although not an exhaustive list, most questions in this section include aspects of travel that affect the decisions individuals make prior to or during their trip to NPS sites. These questions help us understand how and why parks are used by visitors; and what affects length of stay and needs during a visit. The questions in this section include:

- o trip purpose
- o visit motives

o information sources

Topic Area 3 – Trip Behaviors

Questions in this section have been used in travel simulation models to describe the range of activities visitors engage in as well in identifying the resources used by visitors. Questions about activities, future visits, itineraries, overnight accommodations, trip information sources, transportation modes, fee payment, trip origins and destinations, length of trip, length of stay, travel itineraries and general uses of the park's resources are used to predict visitor behaviors.

Topic Area 4 –Preferences, Motives and Attitudes

With the continued growth in participation in outdoor recreation, it is important for resource managers understand the needs, motives and preferences of recreational users. This information has been used by managers and planners to understand what visitor need to optimize the quality of their experiences. Over time, the questions in this section have helped managers to acknowledge that a relationship with the public includes an awareness of the breach between biological and social sciences.

Topic Area 5 - Crowding and Visitor Experiences

Perceptions of crowding and use limits, coupled with social and environmental impacts have been the topic of social science research for decades. Each park's General Management Plan is required to identify issues of visitor carrying capacities and management strategies to address the issue. NPS managers needed methods to measure visitors' perceptions of crowding and the Pool of Known Questions three approaches to measure crowding and individual perception of park experiences are used in this section: 1) perceptions, 2) attitudes, and 3) Visitor Experience and Resource Protection (VERP).

VERP-related research focuses on measuring visitors' standards for minimally acceptable impacts. In a typical application visitors are asked to respond to different levels of crowding displayed in a series of manipulated photographs. To date, VERP research has focused primarily on crowding, but FY12 – 14 the approach was modified to understand the perceptions of ecological impacts on campsites, trails, visibility and soundscapes.

Topic Area 6 – Evaluation/Opinions of Services and Facilities

Questions concerning individual evaluations of park services are central to the "visitor enjoyment" component of the NPS mission. The responses to these questions have been used to understand if services offered are meeting visitors' needs. Responses are usually analyzed to determine if gaps exist between services that are important to visitors and their perceived quality/satisfaction ratings for these services.

Topic Area 7 – Economic Impacts and Benefits Analysis

Willingness-to-pay (WTP) questions were added as a part of the previous submission. Under the programmatic process WTP is limited to goods and services currently or potentially provided by the NPS, its cooperating associations, concessioners, and other partners. Questions concerning WTP for non-market goods and services, such as clean air and water, are currently <u>excluded</u> from this program of studies. The questions in this topic area are divided into two sub-topics:

- o individual expenditures in time and/or dollars that occur when visiting parks and surrounding areas; and
- o expenditures in time and/or dollars that people would be willing to incur during future visits to a park or surrounding area

Submittal Process

The primary contact for the collection is required to complete the submission form for any submission under the Programmatic Review and Clearance Process for NPS Public Surveys. The form serves as the supporting statement for the collection. It provides the justification, sampling dates and locations, as well each of the points mentioned above. The submission form must accompany the final versions of all documents that will be used in the collection (questionnaires, interview scripts, photographs, correspondences, etc.).

The Social Science Program will continue to encourage investigators to use the questions developed for this process when it is consistent with the purpose of their studies. We acknowledge that there are other questions, such as those measuring visitor experience, use history, and travel behaviors, etc., that have been used and validated in numerous recreation surveys. Any variations of questions within each Topic Area will be considered (on a case-by-case basis) and the applicably will determined before submitting the final version to OMB for its review and consideration of approval.

Programmatic Submittal Process
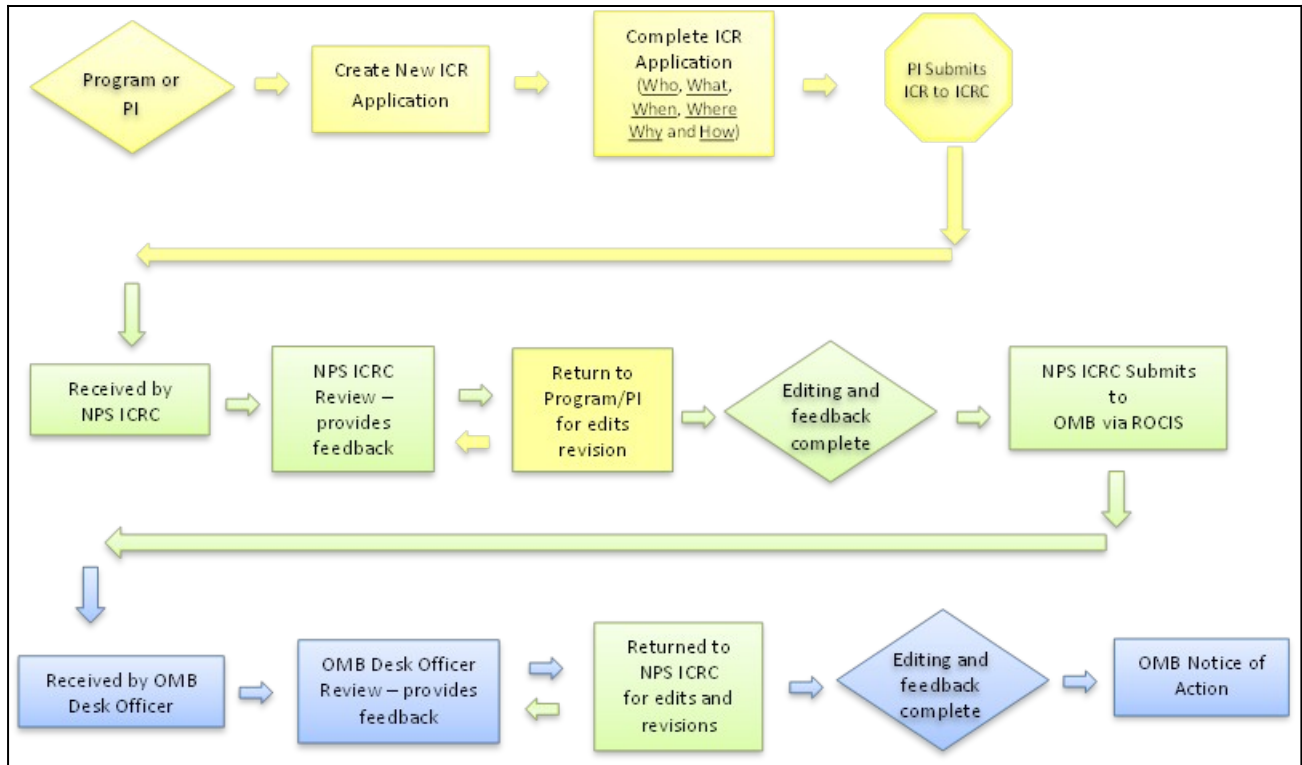
3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Individual surveys conducted under the Programmatic Review and Clearance Process will vary in the

methods used to contact the public. At least 70% of the surveys conducted under this program will be

conducted on-site and returned on-site or returned at a later date. About 50% of those surveys will offer

electronic response options (e.g. Survey Monkey™ or Key Survey™). About 25% will be collected by way

of face to face or telephone interviews or small focus groups; and the remaining 5% will be in the

"other" category. In all cases, appropriate non-response bias strategies will be used to ensure that

responses are representative of the contact universe.

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

This effort attempts to be sensitive to any duplication of efforts being done by other entities. Any possible duplication will be examined during the technical and administrative review of individual submissions. We are currently working with the NPS Research Permitting administrators to link the information collection process and the permitting process so that the submissions that may have an information collection component from other non-federally sponsored programs are known. In the past, some research conducted by Universities or Non-Government Offices (NGO) that included surveys of park visitors were given research permits but were not reviewed by the ICRC. We are actively working to close that gap. The first goal of this effort is to identify duplication within the agency.

We acknowledge that there are other collections and programs[1] that are used to provide information about the outdoor recreation patterns on a national level; however, these collections do not typically cover the types of management and planning issues that are central to individual units of the National Park System.

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

There are no known impacts on small businesses or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This Programmatic Review and Clearance Process for NPS Sponsored Surveys has become an important part of the information collection review process that allows the NPS to successfully navigate the PRA process in an expedited manner. This process simplifies and streamlines the information collection requests to OMB in a manner that allows the NPS to submit and request up to five times as many requests per year as we would through the regular submission route. This allows data collection to occur more frequently and in a timely manner – more specifically during the visitation season of interest – that managers and planners are more apt to be in compliance than not. NPS submission rate is noticeably higher for programmatic process because it is streamlined and predictable. This process has become a

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[1] These include the: *National Survey of Hunting, Fishing, and Wildlife and Recreation* (Fish and Wildlife Service); *National Survey on Recreation and the Environment* (Forest Service); *NPS Comprehensive Survey of the American Public (NPS)*; and the National Visitor Use Monitoring Program (Forest Service).

case study for other generic processes. The consequences of not maintaining this program will fundamentally reduce our ability to produce data needed for decision making and planning.

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.**

This renewal request contains no special circumstances with respect to 5 CFR 1320.5 (2) (i) and (iii-viii) with the exception of (ii). We may be asking respondents to send back their responses in fewer than 30 days after receipt of the survey.

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 27, 2014 a 60-day Federal Register notice (79 FR 30162) was published announcing this information collection. Public comments were solicited for 60 days ending July 28, 2014. We did not receive any public comments in response to that notice. In addition, individuals who had served as principal investigators on NPS-sponsored public surveys in FY 2012-13 were informed that the 60-day *Federal Register* notice was published. We did not receive any public comments as a result of the publication of this 60-Day *Federal Register* notice and the subsequent notice to investigators.

However, we requested that several social scientists and natural resource researchers provide a review of the Pool of Known Questions. Several of the reviewers suggested that it is time to revisit the entire list of questions because "many are considered to be outdated or underused" and "there are other topics areas that should be included (e.g., interpretation and education)". Based on these comments we are requesting an extension of this collection to consider the recommendations to update the Pool of Known Questions.

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

Incentives, remuneration, and gifts are generally deemed inappropriate within the scope of the Programmatic Review and Clearance Process for NPS Sponsored Surveys. In some cases, the provision of gifts and incentives to respondents may appear to be a conflict of interest. However, there may be extraordinary circumstances under which remuneration may be appropriate within the scope of this program. In the event that there are collections that seek to use incentives, the program manager will be required to justify the purpose and need of the proposed incentive.

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

We will not provide any assurance of confidentiality to any respondents. Data collected will only be reported in aggregates and no individually identifiable responses will be reported.

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 questions used on these surveys will not be 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. Instead, this cost should be included under "Annual Cost to Federal Government."**

Based on experience with the existing Programmatic Review and Clearance Process, we estimate that there will be approximately 53,500 annual respondents. Given these estimates, NPS anticipates a budget of 17,080 hours per year for these proposed collections.

We estimate the total dollar value of the annual burden hours for this collection to be $545,364 (rounded). We arrived at this figure by multiplying the estimated burden hours by $31.93 valuation of volunteer time and the projected burden hours, an approximate aggregate annual cost to This wage figure included the multiplier for benefits and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics (BLS) Occupation and Wages for average full compensation for private industry, (hour costs based on BLS news release USDL-11-849 for Employer Costs for Employee Compensation—June 11, 2014 at - http://www.bls.gov/news.release/pdf/ecec.pdf), dated March 2014).

	Annual Number of	Estimated Completion	Total Annual	Dollar Value of Burden Hour	Total Dollar Value of

	Responses	Time per Response	Burden Hours	Including Benefits	Annual Burden Hours*
On-site/Mail-back surveys	50,000	18 minutes	15,000	$31.93	$478,950
Telephone Surveys	1,000	30 minutes	500	$31.93	$15,965
Focus Groups/In person interviews	1,500	60 minutes	1,500	$31.93	$47,895
Other	1,000	5 minutes	80	$31.93	$2,554
TOTAL	53,500		17,080		$545,364

Total is 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 is no non-hour cost burden, record keeping nor any fees associated with collection of this

information.

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.

The total annualized cost to the Federal government is estimated to be $1,522,644. This estimate is based upon our experience and the program's determination of the development and execution of each collection. Because this is determined on a case-by-case basis we have assumed a ratio of 20 hours of time per Federal worker associated with the development of a programmatic submission. We estimate that there will be 20 submissions in FY15. This estimate is based on the average of the number of annual submissions between FY11 through FY13.

The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2011 General Schedule (GS) Locality Pay Tables to determine the hourly rate (see: http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/14Tables/html/RUS_h.aspx). We multiplied the hourly rate by 1.5 to account for benefits (as implied by the BLS news release mentioned above).

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time (hours) per task	Cost Per submission	Annual Cost (x20)
Project Manager	12/5	$37.74	$56.61	20	$1,132	$22,644

We estimate that the operational cost to the Federal Government to be $1,500,000. This cost includes the expenses listed in Table 2 below. This includes non-federal FTE, travel, equipment and operating costs associated with this information collection (Table 2).

Table 2. Costs associated with this information collection

Operational Expenses	Cost Per submission	Annual Cost (x 20)
Researcher/Principal Investigator	$25,000	$500,000
Contracts and Support (Survey Design and Development, Survey Administration, Data Collection, Data entry, Data analysis and Reporting)	$50,000	$1,000,000
TOTAL	$75,000	$1,500,000

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

The program change is due to the number of anticipated submissions in FY2015. The hour burden request decreased because the NPS Visitor Services Program (VSP) was restructured in FY2013. We are estimating that until the VSP surveys are fully functioning under the new structure we will have about 53,500 responses totaling 17,080 burden hours in FY2015. We expect that the VSP will be fully operational in FY2016 and our annual information requests will return to previous levels.

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.**

Each information collection considered under the Programmatic Review and Clearance Process will use a submission form to describe the proposed collection. The information will include a justification, location, sampling methods, and respondent burden. Each submission will include a method to check for non-respondent bias and the intended use of the results of the tabulated data.

The analyses will typically include response frequencies, means, standard deviations, and confidence intervals used to address concrete management and planning issues. In the cases when expenditure data is collected, the NPS Money Generation Model (MGM) may be used. This model is used to estimate the economic impact of visitor spending on gateway regions. In some cases, more complex multivariate statistical analyses are performed, as when estimating coefficients for models based on the Theory of Planned Behavior. In other cases, data from qualitative studies may involve transcripts of interviews or focus group discussions, followed by content analyses to identify general themes.

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 and expiration date.

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

There no exceptions to the certification statement.