

Supporting Statement A
A Survey of National Parks and Federal Recreational Lands Pass Holders
OMB Control Number 1024-NEW

Terms of Clearance. None. This is a new collection.

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 Parks and Federal Recreational Lands Pass* program is a cooperative effort between five federal agencies: National Park Service (NPS), U.S. Forest Service (USFS), Bureau of Reclamation (BOR), U.S. Fish and Wildlife Service (USFWS), and Bureau of Land Management (BLM). The NPS is the principle administrator of the program and the USGS collects the fees through its website and call center. The pass program was created by the Federal Lands Recreation Enhancement Act, which Congress authorized in December 2004 to replace the Golden Eagle, Golden Age, and the Golden Access Passports as well as the National Parks Pass. Each pass covers entrance fees at national parks and national wildlife refuges as well as standard amenity fees at national forests and grasslands, and at lands managed by the cooperating federal agencies.

The usage of the three types of passes: (1) Annual Pass (2) Senior Pass and (3) free Access Pass purchased online and over the phone will be the focus of this study. The purpose is to learn how passes are being used in recreational areas managed by the five partnering agencies. These passes are intended to provide ease of use and potential cost savings to the public, however there is no centralized tracking system available to determine where, when and how often the passes are used; and with that, there is no way to estimate the division of revenue between the agencies for the sale and use of the passes. The proposed information collection will be used to gather data on use patterns from current pass holders to

provide information that could be used to develop strategies for the equitable division of pass revenues between participating agencies.

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.*
- The Federal Lands Recreation Enhancement Act of 2004 (Public Law 108-447) *requires that the Secretaries issue guidelines to distribute funds generated from pass sales (Sec. 805 (a) (7)). These Secretarial guidelines designate that the funds generated through USGS (Central Sales) in excess of operating expenses be distributed based on a formula derived from the data collection of pass use and agreed upon by all agencies participating in the pass program.*

- 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.**

This is a new collection that the NPS will use to develop strategies for the division of revenues from the pass sales among participating agencies. A survey will be used to provide NPS and the partnering agencies greater context regarding how passes are currently used and viewed by the public. The results will be used to estimate the patterns of pass usage across partnering agencies. The study results will be published by NPS in the form of a final comprehensive technical report available for use by federal and state policy makers and by the general public.

- 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.**

This will be a paper mail-back survey; there are no electronic options available. However, the research team will use the *National Parks and Federal Recreational Lands Pass* electronic database, maintained by the USGS, to randomly select participants for this study.

The names and contact information (i.e. e-mail address, mailing address, and phone number) of pass-holders are maintained on an electronic database by the USGS. Our purpose for accessing this

information is to mail surveys and follow-up materials. Respondent names and contact information will not be used in any of our reports. The records in the database are maintained in accordance to Privacy Act System of Records identified as Computer Registration System. (INTERIOR/USGS-20) published at 74 FR 23430 (May 19, 2009).

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 known duplication of efforts.

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

This data collection will not impact 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.

There are no data to base the equitable division of revenues from the sales of these passes between participating agencies. Without this information, funds will continue to remain inconsistently allocated.

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.**

Following the Dillman Method (2014)¹, we will ask respondents to respond to the survey within 2 weeks of receipt.

- 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.

A notice was published in the *Federal Register* on December 23, 2014, stating that NPS intended to request OMB approval of our information collection associated with the *National Parks and Federal Recreational Lands Pass*. In this notice, we solicited public comment for 60 days ending February 20, 2015. We did not receive any comments as a result of that *Federal Register* notice.

However we did solicit comments from professional peers and former pass holders. We asked four former pass-holders to assess the survey length, understandability, and overall effectiveness of the design. These individuals provided feedback concerning the clarity of the questions and approximate length of time it took to complete the survey. Combined, the peer-reviewers and former pass-holders provided comments indicating the instruments were straightforward and that the instructions were very helpful. The reviewers agreed that the estimated time of 15 minutes was adequate to complete the survey. We incorporated all suggested edits to improve the final instrument.

Reviewers

Christian Crowley	US DOI
Kevin Chesley	US BLM
Todd Horbin	USFS

¹ Dillman, D.A. and J.D. Smyth. 2014. *Internet, Mail and Mixed Mode Surveys: The Tailored Design Method*, forth ed. John Wiley and Sons, Inc., Hoboken, New Jersey.

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

No payments or gifts will be provided to respondents.

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 assurances of confidentiality. Names and contact information (e.g., street address) will be maintained for follow-up purposes only. Respondent names or addresses will not appear in any of our reports or findings. All responses will be anonymous and the respondents' names will never be associated with their responses. The database containing all contact information used in this study will be completely destroyed.

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.

No questions of a sensitive nature will be asked.

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."**

This collection will involve three separate mail-back instruments: one for each type of pass-holder (Annual, Senior, and Access). Based on the comments in item 8 and our experience with similar surveys, we assume that respondents will spend 15 minutes completing the survey; this includes the time to read all correspondences and instructions included within the survey package. We also estimate that those

survey recipients who choose not to respond will spend on average 3 minutes considering the materials we mail them. We estimate the total burden of this collection to be 751 hours (Table 1). Our estimate is based upon our experience with similar collections.

We will use the USGS registration database to randomly select respondents in each of the following categories:

- Annual Pass Holders: We will mail 1,850 surveys and expect to receive 57% (n=1,055) response rate.
- Senior Pass Holders: We will mail 1,850 surveys and expect to receive a 57% (n=1,055) response rate.
- Access Pass Survey: We will mail 877 surveys and expect to receive a 57% (n=500).

We estimate the total dollar value of the burden hours to be \$25,151. We multiplied the estimated burden hours by \$33.49 (for individuals or households). This wage figure includes a benefits multiplier and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-15-1132 for Employer Costs for Employee Compensation— March 2015 at - <http://www.bls.gov/news.release/pdf/ecec.pdf>, dated June 10, 2015).

Individuals and Households					
Activity	Number of surveys	Estimated Completion/ review time per contact	Total Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Burden Hours*
Completing Survey (total)					
<i>Annual Pass Purchasers</i>	1,055	15 minutes	264		
<i>Senior Pass Purchasers</i>	1,055	15 minutes	264		
<i>Access Pass Holders</i>	500	15 minutes	125		
Non-respondents	1,967	3 minutes	98		
TOTAL	4,577		751	\$33.49	\$25,151

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

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account**

costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices

There are no non-hour burden costs resulting from the 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.

There are no federal employee costs associated with this collection. All employee costs are contracted through the University of Montana. The estimates below include the contracting and operational expenses associated with this collection totaling \$74,982.

Non-Federal Employee and Operational and Expenses

Non-Federal Employee Costs			
Position	Hourly Cost	Hours	Total Cost
Principal Investigator	143.75	216	31,049
Economist	46.19	432	17,622
Research Assistant	12.47	256	3,194
Operational Expenses			
Printing and Mailing			11,875
Misc. Expenses			75
Indirect Cost (University of Montana)			11,167
Total			\$74,982

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

This is a new collection.

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.

Data analysis will include frequency distributions, cross tabulations, and multivariate analysis. The final deliverables will include a published report submitted to the NPS. The table below presents a time schedule for this surveying effort.

	Begins	Ends
Survey Information Collection	Immediately following OMB determination of approval.	12 months after collection begins
Data Analysis	3 months after collection begins	6 months after collection ends
Report Preparation and Publication	When analysis ends	+3 months

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 on the information collection instruments associated with this submission.

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.