

National Park Service U.S. Department of the Interior

Programmatic Clearance for NPS-Sponsored Public Surveys

Guidelines



Revised: April 2016

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<p><i>Cover Photo Credit: Grant, George A. View of Canyon Looking West Digital image. National Park Service Historic Photo Collection. National Park Service, n.d. Web 30 Sept. 2015.</i> http://www.nps.gov/hfc/cfm/npsphoto.cfm Date taken June 19, 1930. NPS Catalog Number: HPC-000076.</p>
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Introduction

NPS Programmatic Clearance Process

The National Park Service (NPS) sponsors public surveys to provide park managers with information needed for park planning, management, operations and evaluation of performance related to protecting park resources and meeting the needs of the public. In consultation with the Office of Management and Budget (OMB) and the Department of the Interior (DOI), the NPS has developed a programmatic review process for NPS-sponsored public surveys. It streamlines the process required by the Paperwork Reduction Act of 1995. This booklet provides guidelines as of March 2016 for using the programmatic process.

The Programmatic Clearance Process applies to NPS-sponsored public surveys designed to furnish useful applied knowledge to NPS managers and planners. The Programmatic Clearance Process is limited to applied research that will be used to answer specific questions that have direct applications to NPS visitor use or management. The focus will be on non-controversial information collections that do not attract attention to significant, sensitive, or political issues. Questions asked under the programmatic review must show a clear tie to NPS management and planning needs. Investigators who are unsure if a study qualifies under the programmatic review are strongly encouraged to contact the Social Science Branch for clarification early in the planning process.

Scope of the Programmatic Clearance Process

The Paperwork Reduction Act (PRA) requires agencies to demonstrate the practical utility of the information that they propose to collect and to balance this against the burden imposed on the public. Thus, it is critical that agencies describe the need for the information and how it will be used. Without a clear justification, OMB cannot approve the collection. The burden on the public must also be completely accounted for and minimized to the extent practicable while still yielding useful information.

The Programmatic Clearance Process is designed for information collections that focus on the awareness, understanding, attitudes, preferences, or experiences of NPS visitors or other stakeholders relating to existing or future services, products or communication materials. The data collections eligible for the Programmatic Clearance Process will typically be used to improve existing or future services/programs, products, or communication materials.

As a general matter, the following kinds of collections fall under the Programmatic Clearance Process:

- Visitor feedback;
- Focus groups;
- One-time or panel discussion groups;

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- Moderated, un-moderated, in-person, and/or remote-usability studies;
 - Testing of a survey or other collection to refine questions;
 - On-line surveys; and
 - Customer satisfaction qualitative surveys (e.g., those designed to detect early warning signs of dissatisfaction with agency service delivery).

The programmatic review process is designed for data collections meeting the following criteria:

- The purpose of the collection is to assist the agency in improving existing or future service deliveries, products, or communication materials;
- Participation by respondents is voluntary;
- The collection does not impose a significant burden on respondents;
- The collection must have practical utility for improving existing or future service deliveries, products, or communication materials; and
- Public dissemination of results is not intended.

Examples of collections that would not fall under the Programmatic Review Process and would require substantial review and consideration that is outside the scope of this process are:

- Surveys that will be used for making significant policy or resource allocation decisions;
- Collections that impose significant burden on respondents or significant costs on the government;
- Collections that are on potentially controversial topics or that raise issues of significant concern to other agencies;
- Collections that are intended for the purpose of basic research and that do not directly benefit the agency's customer service delivery; and
- Collections that will be used for program evaluation and performance measurement purposes.
- Collections that employ stated preference or stated choice techniques (to estimate economic values for ecosystem services or environmental goods).

Respondent Groups

The programmatic review is limited to three specific segments of the public—park visitors, potential park visitors and residents of communities near parks.

Park Visitors: Park visitors include persons visiting any unit of the National Park System for recreational purposes, to participate in educational activities, to use resources legally available in a given unit, and for non-recreational purposes, such as traveling through or making deliveries. "Visitors" include the general public, participants in organized tour groups, teachers and students participating in NPS programs or activities, commuters, concession or partner employees, and subsistence resource users.

Potential Park Visitors: Potential park visitors include those individuals who might visit any unit of the National Park System for recreational purposes, to participate in educational activities, to use resources legally available in a given unit, and for non-recreational purposes, such as traveling through or making deliveries.

Residents near Parks: Residents near parks include people living in gateway communities near any unit of the National Park System, communities within the boundaries of park units and related areas (e.g., National Heritage Areas, National Scenic Trails), in-holders, concession or partner employees, and subsistence communities within park boundaries or who traditionally use park resources.

Non-visitors: Individuals who had not visited a unit within the previous 24 months, or who could not accurately name a unit they visited, are categorized as non-visitors.

Information Collection Methods

The requirements described in this publication apply to any information collection in which the same questions are asked of ten or more people. This includes all forms of surveys (mail, on-site, telephone, Web-based), focus groups, semi-structured interviews, and field experiments. Studies in which information is collected about people solely through observation are exempt from the approval process. All information collections should follow methods that will use methods that will ensure a reasonable response rate for the sample population (e.g. Dillman 2009¹; Archer 2003²; and Archer, 2008³) and will provide evidence that attempts to reduce respondent burden. All Experimental methods are excluded from this process and therefore will be submitted through the “normal or regular” review process (see page 21).

All submissions must include a full and detailed description of the intended research methods including: sample selection; survey administration (initial contact and follow-up methods), non-response tests, etc. All collections are required to provide a description of (and perform) non-response bias tests without exception.

The National Park Service Programmatic Clearance will accept applications for information collections using the following tools:

In-person intercept surveys: In a face-to-face situation, the survey instrument is provided to a respondent who completes it while on site and then returns it. This may include oral administration or the use of electronic technology and kiosks. The survey proctor is prepared to answer any questions the respondent may have about how to fill out the instrument but does not interfere or influence how the respondents answer the questions. OIRA and the NPS are requesting the respondent burden of on-site surveys to be no more than 15 minutes. This limit is in place to avoid respondent fatigue.

Telephone interviews or questionnaires: Telephone interviewing can be an effective method of data collection when interviewers understand the potential

¹ Dillman, D. A., Smyth, J. D., & Christian, L. M. (2009). *Mail and Internet Surveys: The Tailored Design Method, Third edition*. New York: John Wiley and Sons

² Archer, T. M. (2003). Web-based surveys. *Journal of Extension* [Online], 41(2) Article 4TOT6. Available at: <http://www.joe.org/joe/2003august/tt6.php>

³ Archer, T. M. (2008). Response rates to expect from Web-based surveys and what to do about it. *Journal of Extension* [Online], 46(3) Article 3RIB3. Available at: <http://www.joe.org/joe/2008june/rb3.php>

benefits as well as challenges. Using existing databases, an interviewer will contact customers who have had a specific experience with the agency. The interviewer will dial back until the customer has been reached. Once contacted, the survey respondent is given a brief introduction to the survey, including its importance and use. The interviewer will then expeditiously move through the survey questions. Call back and non-response methods must be addressed during the submittal process.

Mail and e-mail surveys: Using existing lists of customer addresses, a three-contact approach based on Dillman's "Tailored Design Method" will be employed. The first contact is a cover letter explaining that a survey is coming to them and why it is important to the agency. The second contact will be the survey instrument itself along with a postage-paid addressed envelope to return the survey. The third contact will be a reminder postcard sent 10 days after the survey was sent. Finally, the respondents will receive a letter thanking them for the willingness to participate in the survey and reminding them to return it if they have not already done so. At each juncture, the respondents will be given multiple ways to contact someone with questions regarding the survey (including phone, FAX, web, and email). If the survey has been lost, the respondent can request that another be sent to them. Email is sometimes used instead of postal mail to communicate with customers. Although this is a cost-effective mode to survey a large group of people, it does not usually generate the best response rate. Telephone calls to non-respondents can be used to increase response rates.

Web-based: For products or services that are provided through electronic means, whether e-commerce or web-based information, a web or email survey may be most appropriate. During the course of their web interaction, users can volunteer to add their name to a list of future surveys. From this list recognizing that it is self-selected, a respondent pool will be selected in accordance with the sampling procedures outlined above. An email will be sent to them explaining the need and importance of the survey with a web link to the survey. Within 5 days, a follow-up email will be sent to the respondents reminding them to complete the survey. Finally, the respondents will receive an email thanking them for the willingness to participate in the survey and reminding them to complete it if they have not already. The respondent will always have the option to submit the survey in paper form, should they elect to do so.

Focus groups: Some data and information are best collected through more subjective, conversational means. A focus group is an informal, small-group discussion designed to obtain in-depth qualitative information. Individuals are specifically invited to participate in the discussion, whether in person or through technologically enhanced means (e.g., video conferencing, on-line sessions). Participants are encouraged to talk with each other about their experiences, preferences, needs, observations, or perceptions. A moderator whose role is to foster interaction leads the conversation. The moderator makes sure that all participants are encouraged to contribute and that no individual dominates the conversation. Furthermore, the moderator manages the discussion to make sure it does not stray too far from the topic of interest. Focus groups are most useful

in an exploratory stage or when the bureau/office wants to develop a deeper understanding of a program or service. Using the best in focus group research practices, groups will be constructed to include a cross-section of a given customer group. The questions and additional probes used during the focus groups will be consistent with the “guideline menu.”

Limitations of the Programmatic Clearance Process

In accordance with the Open Government Directive's call for clarifying guidance, the availability and uses of "generic" Information Collection Requests (ICRs) was established to significantly streamline the process by which agencies may obtain OMB's approval for particular information collections—usually voluntary, low-burden, and uncontroversial collections. The list below includes, but is not restricted to, some of the limitations of the NPS Programmatic Clearance Process.

- **Previously Approved Questions:** Questions that were previously approved by OMB (for this or another agency), and are not within the scope or the Topic Areas approved under this Programmatic Clearance will not automatically exempt from this review. Each question must be reviewed and approved within the context of the NPS Programmatic Clearance Process and the proposed survey. Some previously used questions may not be approved at the discretion of the NPS Information Collection Review Coordinator.
- **On-Site Intercept Surveys:** All information collections in this category will be restricted to last no more than 15 minutes. There will be very few exceptions and those will be considered on a case by case basis. This burden must be verified by evidence of pretesting with subjects not familiar with the development of the study. On-site surveys should be implemented in a manner that is consistent with methods that will consider respondent fatigue. Previous survey results without an examination of respondent burden will not be considered as the sole justification for approval.
- **Non-Response Bias Testing:** Each submission requesting programmatic approval must include a description of techniques used to minimize and offset bias. All methods will require non-response bias testing and a reporting of what the implications may have on the results of the study. At a minimum, agencies should plan to compare respondents and non-respondents on information available from the sampling frame. Sampling frames that include data on various attributes of the population unit are helpful in examining whether response rates vary on those attributes or whether the characteristics of respondents and non-respondents differ on these characteristics.
- **Pool of Known Questions:** At least 80% of the questions in any information requests submitted through the Programmatic Clearance Process must come from the currently approved *Pool of Known Questions*. If the specific questions are not in the *Pool of Known Questions* a "variation" of a currently approved question will be considered. A "significant" variation of questions outside of the scope of the currently approved topic areas will not be considered for approval.

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- **Socio-Economic Monitoring** The use of questions that employ stated preference or stated choice techniques to estimate consumer surplus values and non-market values associated with park visitation is outside the scope of this approval. The responses to the questions in TOPIC AREA 10 are not intended to be used or combined with any other survey responses outside the scope of the proposed survey request. Results should only be aggregated to the population of visitors to the specific park unit for which the approval is granted. There should be no attempt to disaggregate any values to generalize the results above or beyond of the scope of the intended proposed and approved purpose.

Authorities and Guidance

The authorities and guidance that apply to the programmatic process are:

- Paperwork Reduction Act of 1995 (P.L. 104-13 May 22, 1995)
- 5 CFR Part 1320: Controlling Paperwork Burdens on the Public; Regulatory Changes Reflecting Recodification of the Paperwork Reduction Act
- United States Code, Title 44, Chapter 25: Coordination of Federal Information Policy
- OMB, The Paperwork Reduction Act of 1995: Implementing Guidance (draft, August 16, 1999)
- NPS Director's Order #78, Social Science, Section III (October 7, 2002)
- NPS, Social Science Surveys and Interviews in the National Parks and for the National Park
- OMB, Guidance on Agency Survey and Statistical Information Collections: Questions and Answers When Designing Surveys for Information Collections (January 2006)

Topic Areas within the Scope of the Programmatic Review

To qualify for the programmatic review, all questions in a survey must fit within one or more of the approved topic areas and must be approved by the NPS and OMB. Researchers have flexibility, within accepted standards of good survey design and OMB regulations, to develop specific questions within the topic areas. The seven topic areas are identified below. A description of the scope of each topic area follows.

Topic Area 1: Respondent Characteristics

The questions in this section will be used to characterize the population of respondents participating in each sample. Individual characteristics collected will be attributes of individual park visitors or visitor groups, potential visitors or groups, and residents of communities near parks. Individual characteristics collected will be relevant and limited to the mission, management, and/or operations of National Park System units. The scope of the information will be limited to those that are germane to the topic being studied and relevant to the park and its management. This information will be used to check the representativeness of each sample against the population. Variables such as age, education, and knowledge are often good predictors of demand and visitation behavior.

Topic Area 2: Trip Planning

The section on Trip Planning includes aspects of travel which affect a trip or decisions which individuals make prior to, during, or following their trips to parks, related areas, and nearby communities. Trip characteristics will be relevant to the mission, management, and/or operations of National Park System units that are included in the scope of this topic area. The scope of the information collected will be limited to those that are germane to the topic being studied and relevant to the park and its management.

Topic Area 3: Transportation

The question in this section will be used to fulfill management goals needed to develop strategies to meet transportation needs. These strategies address current and future land use, economic development, traffic demand, public safety, health, and social needs.

Topic Area 4: Trip Characteristics

This topic area will address five high level questions: (1) who travels to National Parks (2) what information sources are used during visits to National Parks (3) when is technology used during a visit (4) how is transportation used by visitors at their destination, and (5) length of stay, number of people in the travel party, and travel mode.

Topic Area 5: Recreation History

Individuals participate in many activities during their visits to parks, related areas and nearby communities. The questions in this section will be used to identify individual activities, behaviors, or uses of natural and cultural resources which are relevant to

the mission, management, and/or operations of National Park System units. Understanding the current and future uses and purposes of park visitors will be helpful to managers when considering updating park management plans and educational efforts.

Topic Area 6: Visitor Experiences

Crowding and conflict are among the most intractable problems faced by recreation managers. Concern over rising visitation in parks, and accompanying impacts on resources and on visitor experience, has led the National Park Service to focus increasing attention on the concept of crowding and carrying capacity. Crowding and conflict arise from the social encounters and interactions among recreationists ranging from basic competition for space (e.g., crowding) to conflicts between forms of activity and related expressions of acceptable or appropriate use. Research on crowding norms and conflict has been particularly helpful in establishing guidelines for Limits of Acceptable Change planning efforts by identifying key social impact indicators and the data required to monitor them. The questions in this topic area will help managers understand the factors associated with the acceptability of crowding and visitor carrying capacity.

Researchers should note that there may be scenarios where local visitors, who visit a site more frequently and spend less overall in the local tourism economy, have different perceptions on crowding than visitors traveling from afar. Those interpreting survey results should be aware of such patterns when making management decisions or recommendation. Therefore, questions on crowding should be paired with questions on the trip origination point of the respondent and perhaps at least a coarse sense of expenditures.

Topic Area 7: Evaluation of Services and Programs

Public opinion of the services and facilities helps management teams understand the values people hold in relation to park resources and the visitor experience and is critical to creating plans that can be successfully implemented. Underlying all fundamental planning decisions are competing values, which must be resolved by a decision as to which value is of greater importance in a particular situation. A planning decision is the compromise between competing values at a given point in time. Understanding public values enables the management teams to make informed planning decisions. The questions in this topic area will be used to help managers learn about public concerns, issues, expectations, and values.

Topic Area 8: Human Dimensions of Natural Resources

Questions in this topic area will be used to collect information concerning the public's awareness and observations of the natural and social environments in the parks. Preferences, motives and attitudes will be measured to determine how individual observations influence overall experiences. For purposes of the programmatic review process, perception questions will be limited to topics the park or the NPS can manage and control as well as current or potential goods and services. The questions in this topic area could be used to provide information that will provide resource managers with an understanding of the public's values, perceptions and beliefs as well as the social consequences of management actions.

Topic Area 9: Natural/Cultural Resource Management

Questions in this topic area will be used to collect information concerning natural and cultural resource management. This will offer individual opinions on use and conservation of natural resources, protection of habitats and control of hazards, spanning the field of environmental management without regard to traditional disciplinary boundaries. The questions in the section will aim to identify factors affected by conflicts that rise between meeting visitor/public needs and protecting resources.

Topic Area 10: Expenditures

Visitor expenditure and income information is needed to calculate the economic impact and benefit of park visitation. Economic impact measures how much the money people spend visiting parks and surrounding areas contributes to the local economy in terms of jobs and income. Economic benefit measures how much visitors value a park above what they spend, or the increase in social welfare a park provides. Accurate impact assessment requires identification of those portions of expenditures that occur in the local region and inside the park. Questions will be used to develop average spending estimates for visitors to the park and local region. Income and income forgone questions provide information about the value, or economic benefit, of a visit to the park.

The use of Contingent Valuation (CVM) or Willingness to pay (WTP) questions to estimate consumer surplus values and non-market values associated with park visitation is outside the scope of this approval.

Topic Area 11: Constraints and Barriers for Non-Visitors

Over the years, the NPS has used the programmatic clearance process to develop an understanding of current visitors which continues to build a detailed picture of its core users. In order to underpin and complement this knowledge, research is necessary to develop a better understanding of the non-visitor market, including lapsed and invisible visitors. Specifically, the research was required to identify the demographic and regional profile of these groups, and to clarify the relationship between perceptions of the National Parks, key influences and the decision making process. In order to optimize the usefulness of this topic area, surveys should include non-visitors that also include virtual visitors, underserved communities and stakeholders so that comparisons can be made and insight drawn as appropriate.

Topic Area 12: Safety and Injury Prevention

This is a brand new topic area that will be used to explore visitor awareness, knowledge and perception of safety and injury prevention measures: Questions are tailored to cover aspects of individual activities and behaviors, and the acceptability of current safety practices. Understanding the factors associated with visitor behavior and perceptions for public risk management are critical to enforcement, education and emergency services that can be successfully implemented to reduce injury in parks

Surveys outside these topic areas and the scope of the programmatic review will require clearance through the normal or regular information collection review process outlined in the Paperwork Reduction Act and on Page 20 of this document. The scope of the information collected must be limited to those that are germane to the topic being studied and relevancy to the park mission, management, and/or operations of National Park System sites.



Submission and Review Process

The Principal Investigator (PI) is responsible for initiating a request for programmatic review and providing a complete and accurate package of review materials. PIs may be park resource management specialists, NPS interpretive designers, agency scientists, researchers from universities, and individuals from organizations cooperating with the NPS, among others. The submission must include:

- ✓ A completed programmatic review form,
- ✓ A complete copy of the proposed data-collection instrument (e.g., survey or interview guide), and
- ✓ Other supporting materials (such as cover letters, introductory scripts, follow-up letters, and survey logs).

An example of the programmatic review form is available in this booklet and online at the following Web site: http://www.nature.nps.gov/socialscience/docs/ex_guide.pdf The request for programmatic review and submission of a complete and accurate package must be made **at least 60 calendar days** prior to the first day the PI wishes to administer the instrument to the public.

Submissions received in the busiest months of May and June will likely experience significant delays in review times.

The NPS Information Collection Review Coordinator (ICRC) is responsible for reviewing each request to ensure relevance, merit, soundness, and statistical validity. The review will also include an administrative component that will ensure that information collection procedures appropriately represent the needs of the National Park Service and that intended uses of the data will support our missions and goals.

All collections under this clearance will:

- be designed and deployed based upon acceptable statistical practices and sampling methodologies
- be used to gather consistent and valid data that are representative of the target populations
- account for non-response bias
- achieve response rates at or above levels needed to obtain statistically useful results

All collections under this clearance must fully describe the survey methodology. The description must be specific and describe each of the following:

- respondent universe
- sampling methods
- expected response rate and confidence,
- strategy for dealing with potential non-response bias
- any pre-testing and peer review
- an estimate of the respondent burden
- reporting plan

All submissions under this program will be carefully evaluated to ensure consistency with the intent, requirements, and boundaries of this programmatic clearance. The sampling methods and reporting statistical data must include a specific description of:

- the sampling plan and sampling procedure (including stratification and selection methods for individual respondents)
- how the instrument will be administered to respondents
- the planned analysis
- expected confidence intervals

A description of the steps in the programmatic review process follows below on pages 13 through 15.

Step 1: The Programmatic Review Form

The PI completes the Programmatic Review Form and prepares the proposed data-collection instrument. Instructions are provided for each item on the form

The submission form requires you to provide summary information, including a short description of the purpose and use of the information, an estimate of the burden, information about the respondents, and a copy of the questions that will be asked in the form or format that they will be asked (e.g., if you are asking questions using a web-based application, the screen shots must be provided; if you are conducting a focus group, the script for the focus group facilitator must be provided).

In addition, questions in the proposed data-collection instrument must have each topic area clearly identified. Please list topic areas by number and title (see page 29 for an example). Submissions not following this format will be returned to the PI, resulting in delays in the review process.

Step 2: NPS Survey Request Tracking Solution (SRTS)

Starting in 2016 all proposed submissions must be submitted and will only be received through the NPS Survey Request Tracking Solution (SRTS).

(<https://irma.nps.gov/Srts/>). All non-NPS employees must register before using SRTS. Upon registration your request must be approved and your status “activated” before you will be able to use the program.

The PI submits the completed form and a copy of the proposed survey instrument to the NPS Information Collection Review Coordinator for review. The submission package **must include**:

1. any introductory script used in contacting the public,
2. all correspondences to be sent to potential respondents,
3. all survey or interview questions, each question being clearly identified as to the topic area under which it is being submitted (topic area number and title),
4. necessary Paperwork Reduction Act compliance language inserted into the survey instrument,
5. if applicable, scripts for non-response bias analysis follow-ups, and
6. any other supporting materials (such any maps and photographs).

For all qualitative surveys (including focus groups) the scripts used must include the necessary PRA compliance language. For person-to-person information collections, such as on-site interviews, telephone interviews and focus groups, a short statement describing how the PI intends to communicate PRA compliance information to respondents is required in the description of the survey methodology. All submission packages must be formatted as MS Word documents (**NOTE:** Please do not send materials in PDF format, as these will be returned) and sent through SRTS.

Step 3: NPS Review

The NPS Social Science Branch staff conducts an administrative and technical review of the submission. The staff recommends either: approval, revision, resubmission under the Standard Paperwork Reduction Act approval process, or rejection of the proposed survey. The NPS Information Collection Review Coordinator will make the decision based upon a complete review of the submitted package, and the PI will be promptly notified.

Should a submission be rejected, the PI may submit an appeal, in writing, to the Associate Director, Natural Resource Stewardship and Science, for a final decision.

Step 4: OIRA Review

If approved by the NPS, the NPS Social Science Branch staff transmits the submission to The Office of Regulatory Affairs (OIRA) for final review.

The OIRA Desk Officer will review the submission and notifies the NPS of approval or necessary revisions. Should the Desk Officer have specific questions about the survey instrument or proposed methodology, the NPS Information Collection Review Coordinator will immediately inform the PI and work with the PI to make necessary revisions. The NPS Information Collection Review Coordinator will submit the PI's revisions and inform the PI of the results.

Step 5: OMB Approval

If approved, the NPS Information Collection Review Coordinator will notify the PI immediately and will assign a survey expiration date. The standard survey expiration date will be no more than six months after the survey end date listed on the approval form. If OMB requires any special conditions for the approval (e.g., furnishing actual response rates to surveys), the PI will be informed and the conditions must be met for approval. Individual survey expiration dates will not exceed the expiration date OMB assigns to the Programmatic Clearance Process.

Additions or changes to a survey instrument after it has been approved, even within the specific topic areas, are not allowed by OMB. An exception is that questions may be deleted after approval by OMB, if necessary and if there's no significant potential for ordering bias. In addition, the PI must provide the NPS Social Science Branch with an archive copy of the final report describing the results of the survey.

The final survey instrument must (without exception) display the following:

- a) the OMB Control Number 1024-0224
- b) the OMB Control Number expiration date
- c) the Paperwork Reduction Act statement

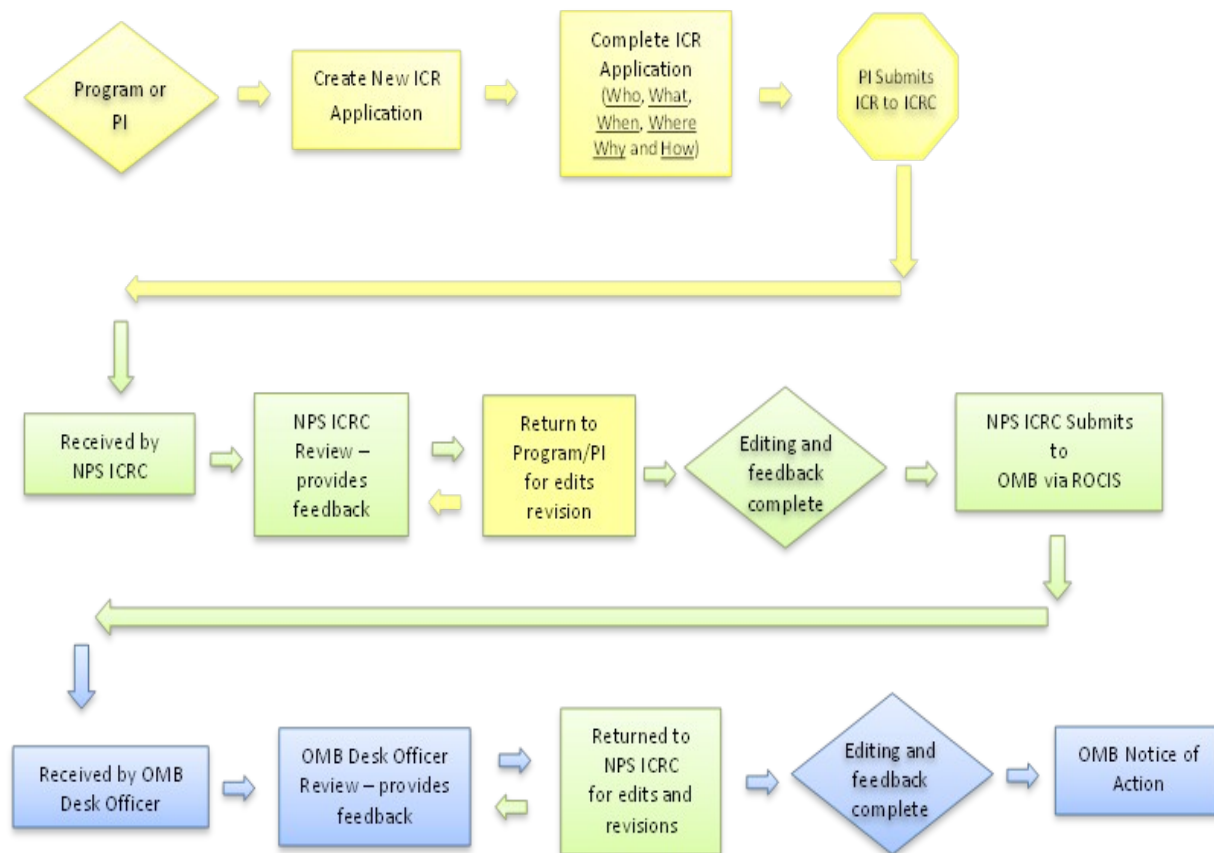
Step 6: Final Report

The requesting official will submit a final (or interim – for on-going projects) report to the NPS Social Science Branch at the conclusion of the approved collection. The report should include:

- A descriptive reporting of the data
- A reporting of the response rates
- Any implications of non-response bias

All archive copies of reports will be catalogued in the Social Science Studies archives and electronically housed in the NPS DataStore collection.

Programmatic Clearance Workflow



NPS ICRC – NPS Information Collection Review Coordinator *PI – Principal Investigator *ICR – Information Collection Request

APPENDICES

Programmatic Clearance Form

Instructions

- Insert a title for the proposed study and include park name, if appropriate (e.g., Yosemite National Park Visitor Study). Include the date of submission of the approval request to NPS.
- Summarize the proposed study with an abstract not to exceed 150 words.
- ~~The NPS Social Science Branch will use the PI information as the primary point of contact for this collection. However, the Park Liaison will be responsible for reviewing the final submission for relevancy and appropriateness before a final review will be performed by the NPS Information Clearance Coordinator. For studies in which students (doctoral, graduate and undergraduate) are taking an active role, the faculty advisor or park liaison must be listed as the PI and not the student. The NPS social science program will have limited interaction with students in the application process.~~
- List the park(s) in which the data collection will be conducted or the park(s) for which the data is being collected.
- List the time period in which the survey will be conducted, including specific starting and ending dates. The starting date should be at least 60 days after the submission date.
- Check the type(s) of information collection instrument(s) that will be used. If “other,” please explain.
- Provide the justification for the study. Describe why you need to collect the information. Outline the background, need, and circumstances. In general terms, a collection may be justified if needed to achieve a result within our statutory mission. This means, however, that there must be a plan to use the information for program objectives. Detail any specific program problems you hope to resolve. If NPS or a state/local partner is already collecting information from the same universe of respondents, briefly describe how those collections relate to the proposed collection.
- Provide a description of the survey methodology. This description must be specific and include each of the following:
 - a) the respondent universe (e.g., all adult visitors over 16 years of age to Yosemite National Park from Memorial Day to Labor Day 2012);
 - b) the sampling plan and all sampling procedures, including how individual respondents will be selected and a justification for the planned sample size;
 - c) how the instrument will be administered in the field, including follow-up procedures to increase response rates;

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- d) expected response rate and confidence levels, including a justification of the anticipated response rate by citing specific studies similar to the proposed one and their response rates;
 - e) a plan for analyzing and reporting the implications of any non-response bias detected (include a copy of your survey log, if applicable);
 - f) A description of any pre-testing and peer review of the methods and/or instrument.
- Fill in the total number of initial contacts and the total number of expected respondents.
 - Fill in the estimated time to complete the initial contact and the survey instrument (in minutes).
 - Fill in the total number of burden hours. Burden hours refer specifically to interaction with the sample, including initial contact, reviewing instructions, and filling out a survey. Burden on non-respondents (such as initial contact interviews with individuals declining to participate) should be included in this total.
 - Provide a brief description of the reporting plan for the data being collected. This might include a final technical report to the park, a briefing for park managers, a Park Science article, a peer-reviewed journal article, etc. A copy of all survey reports must be archived with the NPS Social Science Branch for inclusion in the Social Science Studies Collection.

Checklist for Submitting a Request for Programmatic Review

- Survey population includes only park visitors, potential park visitors, and/or residents of communities near parks.
- All questions in the survey instruments are within the scope of the topic areas covered by the Programmatic review, are non-controversial, and are designed to furnish useful applied knowledge to NPS managers and planners.
- The Programmatic review package is being submitted to the NPS Social Science Branch at least 90 days prior to the first day the PI wishes to administer the survey to the public.

The Programmatic review package includes:

- A completed Programmatic review form
- A copy of the survey instrument or telephone interview script (with each question clearly identified as to the topic number and area under which it is being submitted)
- Other supporting materials, such as
 - Cover letters to accompany mail-back questionnaires
 - Scripts for initial contact of respondents and for any follow-up calls as part of a non-response bias check
 - Necessary Paperwork Reduction Act compliance language
 - Follow-up letters/reminders sent to respondents

The survey methodology presented on the Programmatic review form includes a specific description of:

- The respondent universe
- The sampling plan and all sampling procedures, including how respondents will be selected and a
- Justification for the planned sample size
- How the instrument will be administered, including follow-up procedures
- Expected response rate (with justification) and confidence levels
- Plan for non-response bias analysis
- A description of any pre-testing and peer review of the methods and/or the instrument
- The burden hours reported on the programmatic review form include the number of burden hours associated with the initial contact of all individuals in the sample (i.e., including refusals), if applicable, and the burden associated with individuals expected to complete the survey instrument.

Other Types of Approvals

National Park Service's Research Permit

In addition to OMB approval, all PIs conducting surveys within units of the National Park System must meet requirements of the National Park Service Research Permit and Reporting System (RPRS). Research permits under this system are issued by the specific park unit(s) in which the research takes place. Parks may have additional requirements as well. PIs should contact staff members of respective park sites to make this determination.

To apply for a permit on the National Park Service's Research Permit and Reporting System web page, go to: <http://science.nature.nps.gov/research> and submit an application and a full research proposal (see the Guidelines for Study Proposals at the same web site).

NOTE: the NPS Research Permitting process and the Paperwork Reduction Act Process are two separate and independent processes. ALL information collection sponsored by the National Park Service must be reviewed in accordance to the PRA.

#1040-0001 - DOI Programmatic Clearance for Customer Satisfaction Surveys

The Programmatic Clearance enables all Interior bureaus and offices to conduct customer research through external surveys, such as questionnaires and comment cards. This information is collected to improve the services and products that DOI provides to the public and thus better carry out part of its statutory mission.

#1090-0011 - Fast-Track Qualitative Feedback

Qualitative feedback is limited to information that provides useful insights on perceptions and opinions, but are not statistical surveys that yield quantitative results that can be generalized to the population of study. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. An Agency may submit a collection for approval under this generic clearance only if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;

-
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and

#1024-NEW - Normal or Regular Clearance Process

The PRA establishes specific timeframes and responsibilities for the submission, review, and approval of information collections. This process requires a minimum of 145 days to complete. The normal or regular clearance package will be required to publish a 60 and a 30 day *Federal Register* notices, the supporting documentation, survey instrument, and all instructions and attachments.

Frequently Asked Questions

1. Why is OMB approval necessary?

The Paperwork Reduction Act (PRA) requires Federal Agencies to submit proposed collections of information for review and approval by the Office of Management and Budget (OMB). Under the PRA, OMB's Office of Information and Regulatory Affairs (OIRA) reviews agency information collection requests for approval, modification, or disapproval. For more information on the PRA and how it applies to information collection activities, see http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRAPrimer_04072010.pdf

2. What is OIRA?

The Office of Information and Regulatory Affairs (OIRA, pronounced "oh-eye-ruh") administers the Paperwork Reduction Act of 1995, which calls for clearance and assessment of information collection requests by agencies. OIRA is part of the Office of Management and Budget (OMB), responsible for providing reviews that help ensure that the agency has adequately defined the problem that it intends to address; considered alternatives; assessed available information, risks, costs, and benefits (both qualitative and quantitative); consulted affected parties and promoted transparency and participation; and tailored the collection to focus on the problem in a simple and clear way that does not conflict with other rules or statutes. OIRA seeks to ensure, to the extent permitted by law, that the benefits of agency actions justify the costs and that the chosen approach maximizes net benefits to society.

3. Do I need to submit an approval for a survey at a National Park?

An Information Collection Request (ICR) must be completed and OMB approval must be granted for any situation where 10 or more respondents are involved in a collection of information sponsored, co-sponsored (or have the appearance of sponsorship) by the National Park Service. If the questions are standardized in nature and will be used to inform management or planning decisions, OMB approval must be obtained. This is general guidance on assessing if an ICR is required. One notable exemption is information collections of Federal Employees. If there are any questions it is best to consult the NPS Information Collection Review Coordinator.

4. Will I be required to submit a 60 day Federal Register notice if I use the NPS Programmatic Review Process?

The NPS Programmatic Review Process is limited in scope and not all NPS sponsored surveys will be eligible, to be submitted through this process. However, if a submission is eligible a *Federal Register* notice is not required because the collection will be managed in accordance to the provisions set forth in the approval of OMB Control Number 1024-0224 and not individually.

5. What is the Federal Register?

The *Federal Register* is the official daily publication for notices of Federal agencies and organizations, as well as for Executive Orders and other presidential documents. The Federal Register is published by the Office of the Federal Register within the National Archives and Records Administration (NARA). To learn more, visit the Federal Register website at: <https://www.federalregister.gov>.

6. Is approval required for information collected in focus groups or field experiments?

There is no exemption for focus groups in the PRA. Information collected in focus groups or field experiments must be approved if the participation includes ten or more persons and they are asked identical questions. If a series of focus groups is conducted on the same topic using substantially similar questions and the total participants in all groups combined is more than ten, then approval is required. Although each focus group may not be asked the exact same questions in the same order, focus groups should be treated as information collections under the PRA if the same information is being sought from the groups.

7. I am a graduate student conducting a study of national park visitors. I have an approved IRB from my university; will I need OMB approval for my study?

NPS and OMB approval is required if the study is conducted, sponsored, or funded by the NPS. If you are receiving financial or in-kind support from the NPS, approval will be required. The submission should list your major professor or faculty advisor as the PI. Approval by university Institutional Review Boards (Human Subjects Committees) does not substitute for NPS and OMB approval. However, research occurring in national park units that is funded by external sources (e.g., independent grants) and is not assisted or reviewed by the NPS in any way does not require NPS and OMB approval.

8. How long does the Programmatic review process take?

The request for Programmatic review, and submission of a complete and accurate review package, must be made at least 60 calendar days prior to the first day the PI wishes to administer the survey in the field.

9. I intend to study visitor response to interpretive exhibits. I will observe visitors' behavior as they approach, read, and interact with the exhibits under different experimental conditions. Will I need approval?

Observations are exempt from the review and PRA approval process if no information is solicited from the public.

10. How do I provide Paperwork Reduction Act compliance information to the respondents of my survey?

Respondents to NPS-sponsored surveys must be informed that the information collection is approved and in compliance with the Paperwork Reduction Act. Depending on the type of survey instrument used, compliance information is passed along to the respondents in different ways. The compliance information can be printed on an on-site or mail-back questionnaire. General compliance information can be presented verbally in face-to-face interviews, focus groups, or telephone surveys. Additional information will need to be made available to respondents upon request. Sample compliance information appropriate to different situations can be found on the NPS Social Science Branch Web site.

11. I will be surveying small groups of park visitors. Is approval required?

NPS and OMB approval is required if identical questions are asked of 10 or more persons.

12. Do I need approval if I am pre-testing a survey for later submission?

Pre-testing of survey instruments and methodology is encouraged. If pre-testing involves collecting the same information from ten or more members of the public, clearance for the pre-test is required. The request for approval of the pre-test can be submitted separately or with the final survey package, whichever is appropriate.

13. I intend to offer respondents to my survey an incentive or small token of thanks from the park cooperating association. Is this acceptable?

While incentives have been used in the private sector without much controversy, most Federal Government surveys do not provide incentives to respondents, and the use of incentives by Federal agencies has raised a variety of concerns about their cost, the use of taxpayer funds, impact on survey responses, and implications for the “social contract” between the Federal Government and citizens. The regulations implementing the Paperwork Reduction Act (PRA) of 1980 prohibited the use of incentives for respondents to Federal surveys unless agencies could demonstrate a substantial need. The regulations implementing the 1995 reauthorization of the PRA require agencies to justify any payments to respondents. Under certain circumstances, non-monetary incentives can be used when the agency provides a clearly justified need for the incentive and can demonstrate positive impacts on response and data quality by using an incentive. You should contact the NPS Social Science Branch to discuss your proposed use of an incentive in your survey.

14. Are there any restrictions on the use of web surveys?

Use of web or on-line surveys as an option for respondents is acceptable. The Web should not be the only method of survey administration. There are restrictions on surveys of Web site users. If you intend to do a survey of this population, please contact the NPS Social Science Branch early in your planning process. Further, in terms of sample selection, the Web should not be the means by which a sample population is recruited, since this will bias the sample. An exception occurs when the population being surveyed consists of visitors to a Web site, such as www.nps.gov. Contact the Social Science Branch if you are planning such a survey.

15. How should I anticipate my expected response rate?

Expected response rates should be based on previous studies in which the method of data collection and sample population were similar (please see OMB Standards and Guidelines for Statistical Surveys, Section 1.3, and American Association for Public Opinion Research response rate definitions). In reporting your expected response rate, please be sure to justify it with specific reference to these similar studies. If you are having difficulty with this, please contact the Social Science Branch for assistance.

16. Can I assure my participants that their identity (if known) will remain confidential?

Information collections approved under this program are subject to Freedom of Information Act requests. The Department of the Interior has no statutory authority to exempt studies from such requests. Therefore, confidentiality cannot be pledged. However, any information on surveys that identifies respondents can be removed or stored separately from survey databases so that the two are not linked. These steps should be disclosed to respondents.

17. What does it mean for an agency to conduct or sponsor an information collection?

An agency conducts or sponsors an information collection if the agency collects the information using its own staff and resources, or causes another agency or entity to collect the information, or enters into a contract or cooperative agreement with another person or contractor to obtain the information. If the agency requests the collection directly or indirectly through another entity or contractor or exercises control over those collecting the information, the agency is conducting or sponsoring the collection.

18. How can I request approval for collections that are not eligible for the NPS Programmatic Review Process?

If you would like to collect any information that is not covered by the NPS Programmatic Review Process you will have to draft the information collection instrument and then publish a *Federal Register* notice to solicit public comment (for 60 days) on the information collection. Concurrent with the 60-day *Federal Register* notice, the supporting statement (s) and information collection instrument(s) will be reviewed by the NPS. After the 60-day comment period has ended, the agency will consider any public comments submitted in reference to the 60 day *Federal Register* notice and make any revisions to the collection that the agency believes are necessary or desirable. The final submission will be reviewed by the Department of Interior (DOI) and upon the completion of that review the agency will be allowed to publish the 30-day notice and submit the proposed collection to OIRA. During its review, OIRA will either approve the collection as submitted, or approve the collection in part (and disapprove it in part), or disapprove the collection altogether. Only after OMB assigns an OMB control number may the agency proceed with the collection.

19. Can I collect personally identifiable information (PII) under the Programmatic Review Process?

Yes, but only in limited circumstances, such as when an agency collects contact information PII in order to have follow-up contact with a respondent (e.g., in order to provide a follow-up survey or phone call). And in those limited circumstances, the agency may collect PII only to the extent that its collection is a necessary element of the Information Collection Request. Moreover, in such circumstances, the agency must comply (as is also the case with other PII that the agency collects) with the applicable requirements, restrictions and prohibitions of the Privacy Act and other privacy and confidentiality laws that govern the agency's collection, retention, use, and/or disclosure of such PII.

20. What should I do if my submission for fast-track request is returned as improperly submitted or as outside scope of the generic clearance?

If your request is returned as improperly submitted, it means that you have not provided all the required information, you have not filled out the form correctly, or your submission is otherwise incomplete. If it is unclear why you improperly submitted, you should ask the NPS clearance coordinator what needs to be done for resubmission. If OIRA returns a collection as outside the scope of the generic collection, the collection will not be approved. You should discuss with your clearance coordinator why it was outside the scope of the generic approval.

Template - Programmatic Clearance Form

A copy of this document can be downloaded at:

<http://www.nature.nps.gov/socialscience/expedited.cfm>



Programmatic Clearance Process for NPS-Sponsored Public Surveys

The scope of the Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys is limited and will only include individual surveys of park visitors, potential park visitors, and residents of communities near parks. Use of the programmatic review will 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. Additionally, this process is limited to non-controversial information collections that do not attract attention to significant, sensitive, or political issues. 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.

Do not revise any part of this form

Submission Date:

Project Title:

Abstract (not to exceed 150 words)

Principal Investigator Contact Information

Name:
Title:
Affiliation:
Address:

Phone:
Email:

Park or Program Liaison Contact Information

Name:
Title:
Park:
Address:

Phone:
Email:

(b) Respondent Universe:

(c) Sampling Plan/Procedures:

(d) Instrument Administration:

(e) Expected Response Rate/Confidence Levels:

Location	Number of Initial Contacts	Expected Response Rate	Expected Number of Responses	Margin of Error +/- %	Confidence Level
TOTAL					

(e) Strategies for dealing with potential non-response bias:

(f) Description of any pre-testing and peer review of the methods and/or instrument (recommended):

Burden Estimates

Estimated Total Number	
Initial Contacts	_____
On-site Refusal/ nonresponse	_____
Responses	_____
Total	_____

Estimation of Time (minutes)	
Initial Contact	_____
On-site Refusal/ nonresponse	_____
To complete response	_____

Estimation of Burden (hours)	
Initial Contact	_____
On-site Refusal/ nonresponse	_____
To complete response	_____
Total	_____

Reporting Plan

Template - Submitted Survey



NPS sponsored surveys require NPS arrowhead - DOI optional

Always in this location - never on the last page

OMB Number: 1024- 0224
Expires:XX/XX/XXXX

SURVEY TITLE

OPTIONAL COVER ART

The PRA Statement must appear on the first page of the survey instrument.

This should be specific to the purpose and need for this survey. **NOT** - "This information will be used to better serve the public".

PAPERWORK REDUCTION ACT STATEMENT: The National Park Service is authorized by 16 U.S.C. 1a-7 to collect this information. This information will be used by park managers to manage the Isle au Haut district for a high quality visitor experience and a visitor capacity as mandated by Public Law 97-335. Your response to this request is voluntary and no action may be taken against you for refusing to supply the information requested. Your responses will be anonymous. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

Burden Estimate Statement: The estimated time to complete this collection is 3 minutes per response. Direct comments regarding the burden estimate or any other aspect of this form to: CONTACT INFORMATION GOES HERE



YES

Do not leave empty headers

All questions must be annotated using the following format as an example:

TOPIC AREA 1 - GR3

OR

TOPIC AREA 1 - GR3 (Variation)

Using the overall broad Topic Area - only - will **not** be acceptable.



NO

TOPIC AREA 1 - Respondent Characteristics

For more information please contact

NPS Social Science Program
Natural Resource Stewardship and Science
National Park Service
1201 Oakridge Drive
Fort Collins, CO 80525-5596,

<http://www.nature.nps.gov/socialscience/expedited.cfm>