

# 1 Supporting Statement A for Paperwork Reduction Act Submission

## National Park Service Form 10-166, "Lost - Found Report" OMB Control Number 1024-New

**Terms of Clearance:** None – This is a new collection in use without an OMB Control Number.

### Justification

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

The NPS Organic Act of 1916 (Organic Act) (54 U.S.C. §100101 et seq.; P.L. 113-287), gives the NPS broad authority to regulate the use of the park areas under its jurisdiction. The Act requires that the NPS preserve national parks for the enjoyment, education, and inspiration of this and future generations. Each year, visitors to the various units of the National Park System file reports of lost or found items. Reporting of lost or found personal property in national parks is governed by 36 CFR 2.22, "Disposition of Property" which requires unattended property be impounded and deemed to be abandoned unless claimed by the owner or an authorized representative within 60 days. The 60-day period commences upon notification to the rightful owner of the property, if the owner can be identified, or from the time the property was placed in the superintendent's custody, if the owner cannot be identified.

Unclaimed property must be stored for a minimum period of 60 days and unless claimed by the owner or an authorized representative, may be claimed by the finder, provided the finder is not an employee of the National Park Service (NPS). Found property not claimed by the owner, an authorized representative of the owner, or the finder, shall be deemed abandoned and disposed of in accordance with Title 41 Code of Federal Regulations.

In order to comply with the requirements of 36 CFR 2.22, the NPS utilizes NPS Form 10-166, "Lost - Found Report" to allow the park to properly identify personal property reported as lost or found and to return found items to the legitimate owner, when possible, or to the finder if the item is not claimed by the owner or their authorized representative.

- 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.**

Individuals completing Form 10-166 are only required to provide information in Part I of the form. Information collected in Part I of the form pertaining to the individual reporting lost personal property or filing a report of found property is:

- Park name, receiving station (if appropriate), and date item was lost or found;
- Name, address, city, state, zip code, email address, and contact phone numbers (cell and home);
- Type of item, detailed description of item, dollar value of item, and location where the item

- was last seen or found; and
- Photograph of item (if available).

The information requested in Part I of the Form 10-166 is necessary for park staff to properly document property reported as lost or found. The information in Part 1 of the form will enable the park to return the lost item to its owner or their authorized representative, should it be located, or to the finder of the found property if it is not claimed by the owner or their authorized representative within the 60-day time period. The value of the item is needed when documenting the disposition of unclaimed property.

Part II of the form is reserved for internal use only by NPS park property management staff to document the disposition of property found and turned in to the park.

- 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.**

The collection of information will be in a fillable version available to download from the NPS and park websites in keeping with Government Paperwork Elimination Act (GPEA). Forms can be submitted electronically via email, submitted by hard copy in the mail, by fax, or in person. Parks will be allowed to electronically collect the same information approved in Form 10-166 via their websites to reduce the burden on the public who are no longer visiting the park but wish to file a report of lost or found property. The websites will display the required OMB Control Number and expiration date, as well as the Privacy Act, Paperwork Reduction Act and Estimated Burden Statements. Visitors will also have the option of mailing the completed form to the park where the item(s) was lost. We estimate that approximately 25% of respondents will submit their response electronically after departing the park.

Efforts are being made to make the form electronically submittable via Interior's new "Enterprise Forms System", eliminating the need to print hard copies and fax or email them, which will better support the GPEA requirements and reduce the time requirement of the both the visitor and the NPS. However, there will always be an option to submit the forms in hard copy.

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

The requested information is unique to each visitor reporting lost or found property, and no other source is available.

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

This collection does not impose a burden on small businesses.

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

If the collection of information is not conducted, the NPS may be unable to return property to the legitimate owner or their authorized representative, or to identify the finder of the property resulting in the property being disposed of in accordance with 36 CFR 2.22 and 41 CFR.

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

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

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On, June 10, 2015, we published in the Federal Register (80 FR 32977) a Notice of our intent to request OMB approval of this information collection. In that Notice, we solicited comments for 60 days, ending on August 10, 2015. We did not receive any comments in response to that Notice.

In addition, we contacted nine (9) individuals familiar with this collection of information and asked them to provide comment on the collection of information:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility, whether there are any questions they felt were unnecessary;
- the accuracy of our estimate of the hour and non-hour burden estimates for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

Summary of Comments: The respondents all confirmed the accuracy of the NPS burden estimate and necessity of the collection of information. They felt the questions on the form are clear, appropriate for the purpose of the form, and easy to complete. All nine respondents were complimentary of the NPS process to locate and return lost/found items.

NPS Response: No changes were made to the collection in response to the comments received.

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

No payment or gifts of any kind are made 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 protect personally identifying information in accordance with the Privacy Act of 1974. Personal addresses, phone numbers, and email addresses of owners and applicants are not released without consent.

NOTE: On July 2, 2016, the NPS Privacy Act Officer determined that this program requires a Systems of Records Notice (SORN). We are currently in the process of developing the SORN.

**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 sensitive questions of this nature are 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.**

We estimate that we will receive 7,500 annual responses totaling 625 burden hours for this collection. We have no way of knowing when reports of lost or found property will be filed by visitors, nor do we have data on how many reports have been filed in the past. Submission data for reports of lost or found property have never been tracked Servicewide.

The dollar value of the burden hours is approximately \$21,213 (rounded). We used Bureau of Labor Statistics news release USDL-16-0463, March 10, 2016, Employer Costs for Employee Compensation —December2015, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to estimate average hourly wages and to calculate benefits. Table 1 of the bulletin lists the hourly wage plus benefits for all workers as \$33.94. For the purposes of this information collection, we are using the same rate for both individuals and the private sector.

Table 12.1 - Annual Burden Estimates

Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden Hours
Form 10-166, "Lost-Found Report"	7,500	5 minutes	625	\$33.94	\$21,212.50
Total	7,500		625		\$21,212.50

**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 to the respondents.

**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 time required to process each Form 10-166 is approximately 30 minutes per form. The cost per form breakout is shown in the table below. We estimate that the annual cost to the Federal Government to administer this information collection is \$147,075 (7,500 forms x \$19.61).

To determine average hourly rates, we used Office of Personnel Management Salary Table 2016-RUS. We multiplied hourly rates by 1.57 to account for benefits.

Position	Grade	Hourly Pay rate	Hourly Rate Including Benefits (1.57 x Hourly Rate)	Time Spend on Each Form	Weighted Average
Clerical	GS-7, Step 5	\$21.75	\$34.15	10 minutes	\$5.69
Property Management Specialist	GS-9, Step 5	\$26.59	\$41.75	20 minutes	\$13.92
Total Gov't Cost per Form					\$19.61

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

This is a new collection in use without OMB approval.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

We will not publish the results of this information collection.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Displaying the expiration date is undesirable. NPS Form 10-166 has remained basically the same since 1974. The form pre-dated the Paperwork Reduction Act and the Program Office just recently learned of the requirement to have it approved by OMB. During the clearance process, the NPS discovered a conflict in authorities governing property management which necessitated an update to the previous version of the form. It is not expected to require any additional changes for many years. Although the form will be automated via Interior's "Electronic Enterprise Forms System

(eEFS)", the NPS will continue make the form available in hard copy format to the public due to inadequate network connectivity in many parks and in backcountry areas. The cost of reprinting the forms every three years due when the expiration date changes would be extraordinary. It is better not to display an expiration date.

**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.