

SUPPORTING STATEMENT – PART A

**USACE Recreation Customer Comment Cards**

**for Recreation Areas and Visitor Centers**

A. JUSTIFICATION

1. Need for the Information Collection

Section 4 of the Flood Control Act of 1944, as amended, authorized the Chief of Engineers “to construct, maintain, and operate public park and recreational facilities at water resources development projects under the control of the Secretary of the Army, and to permit the construction, maintenance, and operation of such facilities.” It provided for the projects to be open to the public for recreational purposes, and provide for access to and from areas along the shores in the public interest. Recreation as a project purpose was established under the Federal Water Project Recreation Act of 1965 (Public Law 89-72), as amended. Section 2(a) specified benefits for recreation be included in the economic analysis of contemplated projects. The joint federal/non-Federal sharing of financial responsibilities for the development, enhancement and management of recreation and fish and wildlife resources was authorized under the Water Resources Development Act of 1986 (Public Law 99-662). By their nature, recreation services are provided for the public and the use of social science techniques and surveys is needed to monitor use and quality of services provided to the public.

In response to Executive Order 12862, Setting Customer Service Standards, issued on 11 September 1993, the Corps of Engineers initiated development of a comment card program for monitoring visitor satisfaction at Corps of Engineers lakes and projects. EO 12862 asks agencies to establish customer service standards and “survey customers to determine ... their level of satisfaction with existing services.” This enterprise program allows for the uniform collection of customer feedback from visitors to USACE parks and visitor centers. In 2005, the program was expanded to obtain consistent information across water resources projects with public recreation areas requiring mandatory utilization by projects in a 3 year cycle beginning in 2010. Variations in the mandatory years have occurred due to available funding and to reduce burden on the public.

The USACE Recreation Area and Visitor Center Comment Card program is managed and supported by the USACE Engineer Research Development Center and Institute for Water Resources at the direction of USACE HQ Natural Resource Management Program.

2. Use of the Information

Satisfaction surveys of Corps of Engineer (CE or Corps) recreation visitors have been collected since 1996. Since FY05, the survey instrument has contained questions concerning level of satisfaction with facilities, use of facilities, fee payment, previous visits and demographics.

The target audience for the comment card instrument is an individual representing a group or party visiting a USACE recreation area or visitor center. One method of distribution is in a rack, for example at a visitor center or kiosk, resulting in visitor-initiated response on an ad-hoc basis. The more common method is via a distribution plan developed for each participating project/lake through an online Survey Schedule Generator (Generator). Each schedule identifies the recreation areas/visitor centers and days where the comment card should be administered. This process provides a consistent approach for information collection nationally.

After receiving visitor consent, Corps staff gives hard-copy comment cards to selected visitors at the end of their visit based on the pre-determined survey schedule developed by the Generator. If they refuse to participate, the comment card is offered to a member of each subsequent party, until the card is accepted. Only one member of the party is selected to participate in the survey. Comment cards are not administered to individuals under 16 years old. The visitor is asked to complete the card immediately and return it directly to the Corps staff member. Detailed comment card administration procedures are provided in Attachment 1.

There are two distinct comment card instruments, one for recreation areas (camping and day use) and one for visitor centers. Both of these instruments are available in Spanish-language versions. Copies of the comment card types and both language versions are included at Attachments 2 through 5. The card is printed on regular paper and folded in half with Agency Disclosure facing up. The OMB control number and expiration is displayed above the Agency Disclosure and again on the survey instrument. Privacy Act Statement is not required since no sensitive information is requested. The card is handed to the individual with the disclosure facing them, the survey instrument is on the reverse side. When the instrument is returned, it is folded and the respondent is shown a thank you message.

Results of the comment card instruments are collected in a CE managed central database for institutional use in constructing visitor satisfaction performance results for the recreation business area. The data entry and analysis database is located on a CE maintained server and may only be accessed by personnel with appropriate credentials. The comment card archive database contains results since 2003. Results are summarized as frequency distributions at the Project, District, and Division levels. The use of frequency distribution has been determined to be the most effective and appropriate analysis method for the purposes of the instrument and methodology used to collect information. In addition, the results comprise a source of customer service performance data that is maintained for use by the USACE Natural Resource Management Program.

### 3. Use of Information Technology

This survey does not use electronic collection techniques. At this time, the USACE utilizes hard-copy face-to-face delivery and return of the instrument. The field inputs the public responses on these cards into a central database for institutional use.

Unreliable network access in remote locations, database/network security requirements, and lack of appropriate approved devices limits agency ability to utilize electronic data gathering for this instrument.

#### 4. Non-duplication

While some questions may be similar to those used by other federal land management agencies, there is no other entity asking these questions of visitors to Corps recreation areas and visitor centers. The three-year cycle serves as a means to monitor the level of satisfaction with facilities and services on an ongoing basis, while allowing opportunities to receive feedback at visitor request or as management need arises in the interim years. There are no other data sources available to provide this information, therefore this collection avoids unnecessary duplication.

#### 5. Burden on Small Business

There is the potential that visitors to concessionaires (generally small businesses) within Corps recreation areas will be asked to participate. In these cases, the visitor may use both private (concessionaire) and public (Corps managed) facilities and as such would be relevant for the sample. The target population does not include business owners and staff associated with concessionaire amenities. The impact to small businesses directly is none and the potential burden on their clientele will only occur when those visitors utilize public facilities.

#### 6. Less Frequent Collection

Use of these comment cards is planned on a three year cycle, with one of the three years designated for use of the scheduled approach, to support recreation performance measurement and benchmarking goals. Review of past collection data has already resulted in reduced comment card contacts scheduled through the Generator. The 3-year cycle (year 1 scheduled approach, years 2-3 optional) was implemented to balance agency goals with burden reduction. During the optional years, Projects/Lakes use the comment card at their discretion to provide desired voluntary feedback from recreation users. This decreases the overall annual sampling effort while continuing to separately report customer satisfaction results for visitors to Corps parks and visitor centers.

#### 7. Paperwork Reduction Act Guidelines

This collection is consistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

#### 8. Consultation and Public Comments

a. A notice was placed in the Federal Register on 8 May 2015, (80 FRN 26549). The notice closed on 7 July 2015 with no comments.

A 30-Day Federal Register Notice for this collection published on Monday, October 17, 2016. The 30-Day FRN citation is 81 FR 71489.

b. Consultation with the National Park Service's Information Collections Coordinator was made in 2016. Consultation also occurred since 2015 with Michigan State University's Director, Usability and Accessibility Center, Department of Telecommunications, Information Studies, and Media. These contacts resulted in no significant changes, verifying the appropriateness of instrument delivery method and question content.

#### 9. Gifts or Payment

Participation is 100% voluntary and no payments or gifts are provided to the subjects of the interview or any member of their party.

#### 10. Confidentiality

No personally identifiable information (PII) is collected using this instrument. No Privacy Act Statement or Systems of Records Notice (SORN) are required for these instruments. A PIA is not required because PII is not being collected or stored electronically. A SORN is not required because records are not retrievable by PII.

Paper survey forms are collected from respondents in person and entered into the comment card database within 30 days of collection. Once information has been entered into the database, verified, and records are no longer needed for back-up, the individual completed survey forms are destroyed. The database provides summarized information at the recreation area level is maintained 6 years with option to extend retention based on business use.

#### 11. Sensitive Questions

The instrument has been reviewed by the Department of Army IMCO to insure compliance of race and ethnicity questions with the Federal Statistical Classification for Race and Ethnicity directive.

There is a substantial body of literature related to the patterns in recreational participation and preferences among various racial and ethnic groups. For example Carlson, S. A., Brooks, J. D., Brown, D. R., & Buchner, D. M. (2010). Racial/Ethnic Differences in Perceived Access, Environmental Barriers to Use, and Use of Community Parks. *Preventing Chronic Disease*, 7(3), A49. This studies evaluate barriers to recreational participation that include lack of nearby facilities, access constraints, facility maintenance, and personal safety. And the study evaluated differences in activity participation/level among racial/ethnic groups. Related to outdoor recreation, Buastam, Tinelle, Thapa, Brijesh; & Buta, Natalia (2011). Demographic Differences within Race/Ethnicity Group Constraints to Outdoor Recreation Participation. *Journal of Park and Recreation Administration*, 29(4), pp53-71. This study builds on past studies that found evidence in differences among racial/ethnic groups and further

explores group differences in outdoor recreation participation across factors related to interpersonal, intrapersonal and structural constraints.

Respondents to the comment cards are asked the primary reason for their visit and respond to questions related to importance of and satisfaction with certain features and services provided at recreation areas and visitor centers. By including race/ethnicity questions, Project managers can determine if use compliments regional demographics and if facilities and services address preferences and barriers among certain groups.

Outside of race/ethnicity, no other sensitive questions are being asked.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

| USACE Recreation Customer Comment Cards for Recreation Areas and Visitor Centers | Annual Number of Respondents | Number of Responses Per Respondent | Total Annual Responses | Response Time (in Minutes) | Annual Respondent Burden Hours |
|----------------------------------------------------------------------------------|------------------------------|------------------------------------|------------------------|----------------------------|--------------------------------|
| Comment Card - Recreation Areas, Day Use/Campgrounds, English & Spanish          | 39,185                       | 1                                  | 39,185                 | 5                          | 3,265                          |
| Comment Card - Visitor Centers, English & Spanish                                | 5,815                        | 1                                  | 5,815                  | 5                          | 485                            |
| TOTAL                                                                            | 45,000                       | 1                                  | 45,000                 | 5                          | 3,750                          |

b. Labor Cost of Respondent Burden

| USACE Recreation Customer Comment Cards for Recreation Areas and Visitor Centers | Number of Responses | Response Time Per Response (minutes) | Respondent Hourly Wage | Labor Burden per Response | Total Labor Burden |
|----------------------------------------------------------------------------------|---------------------|--------------------------------------|------------------------|---------------------------|--------------------|
| Comment Card - Recreation Areas, Day Use/Campgrounds, English & Spanish          | 39,185              | 5                                    | \$17.40*               | \$1.45                    | \$56,818.25        |
| Comment Card - Visitor Centers, English & Spanish                                | 5,815               | 5                                    | \$17.40*               | \$1.45                    | \$8,431.75         |

|       |        |   |          |        |          |
|-------|--------|---|----------|--------|----------|
| TOTAL | 45,000 | 5 | \$17.40* | \$1.45 | \$65,250 |
|-------|--------|---|----------|--------|----------|

\* The Labor cost burden is calculated with the median hourly wage of all occupations as reported by the Bureau of Labor Statistics in their National Occupational Employment and Wage Estimates ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)). The reported value was \$17.40 at the time this document was prepared (checked July 1, 2015, based on site value is from May 2015).

### 13. Respondent Costs Other than Burden Hour Costs

There are no capital and start-up costs to the respondent for this survey. There are no additional costs to the respondent other than the time required to participate in the survey(s).

### 14. Cost to the Federal Government

Annualized Federal costs are summarized in the table below and are based on similar surveys administered.

| <b>Labor Cost to the Federal Government</b>                                                                              |                                                           |                                                   |             |
|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------|-------------|
|                                                                                                                          | Recreation Areas, Day Use/ Campgrounds, English & Spanish | Comment Card - Visitor Centers, English & Spanish | Total       |
| Number of Responses                                                                                                      | 39,185                                                    | 5,815                                             | 45,000      |
| Processing Time Per Response (in hours)                                                                                  | 0.05                                                      | 0.05                                              |             |
| Hourly Wage of Worker(s) Processing Responses                                                                            | \$15.49*                                                  | \$15.49*                                          |             |
| Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses) | \$0.77                                                    | \$0.77                                            |             |
| Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)                        | \$30,348.78                                               | \$4,503.72                                        | \$34,852.50 |

\* Typically responses are processed by entry level park rangers. Wage used is the “Rest of US” rate for GS5, step 1 as reported on the OPM website (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages>) on 1 July 2016. The majority of USACE civil works projects are located outside of metropolitan areas and not subject to other locality pay rates.

| Operational and Maintenance Costs |          |         |                    |                 |       |         |
|-----------------------------------|----------|---------|--------------------|-----------------|-------|---------|
| Equipment                         | Printing | Postage | Software Purchases | Licensing Costs | Other | Total   |
| \$0                               | \$2,500  | \$0     | \$0                | \$0             | \$0   | \$2,500 |

| Total Cost to the Federal Government |                                      |                                     |
|--------------------------------------|--------------------------------------|-------------------------------------|
| Operational and Maintenance Costs    | Labor Cost to the Federal Government | Total Cost (O&M Costs + Labor Cost) |
| \$2,500.00                           | \$34,852.50                          | \$37,352.50                         |

15. Reasons for Change in Burden

This was previously cleared under 0710-0001, OMB has requested that the USACE resubmit this as a new collection. The estimated burden for this collection is 3,750.

16. Publication of Results

The data produced by these instruments are primarily for internal use only. As appropriate, summarized results may be published as part of customer satisfaction reporting at the Project, District, Division or Agency level. Such reports are published to USACE websites.

17. Non-Display of OMB Expiration Date

The instrument provides the OMB control number and expiration date in the upper right hand corner of the questionnaire and in the disclosure notice.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exemptions to the provisions certified.