SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION

Certification of Identity and Consent Form
OMB Control Number 1024-New

Terms of Clearance: None

Justification

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

The Organic Act of 1916 (NPS Organic Act) (54 U.S.C. §100101) authorizes the Secretary of the Interior to develop regulations for national park units under the Department's jurisdiction. Individuals may submit requests under the Freedom of Information Act and/or the Privacy Act of 1974, for access to his or her records when such records are maintained by the National Park Service (NPS). Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552 and the Privacy Act of 1974 (Pub.L. 93–579, 88 Stat. 1896, 5 U.S.C. § 552a), the collection of certain personally identifiable information and/or source documents is necessary to locate applicable records following an access request.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The NPS maintains law enforcement incident reports in the Department of the Interior's Incident and Management Reporting System (IMARS), which is a Privacy Act System of Records (DOI-10). In accordance with the Privacy Act (5 U.S.C. § 552a(b)), the NPS is barred from releasing copies of records contained within IMARS, including but not limited to motor vehicle accident reports, without the prior written request and/or consent of the individual to whom the record pertains unless authorized under appropriate routine-use exceptions. The purpose of the collection is to enable the NPS to respond to requests made under the Freedom of Information Act and the Privacy Act of 1974 and to locate applicable law enforcement case incident reports responsive to the request. Information includes sufficient personally identifiable information and/or source documents as applicable. The detailed personal information, to include the date/place of birth, as well as the requestor's Social Security Number, is needed to identify records unique to the requestor. Failure to provide the required information may result in the NPS being unable to take any action on the request.

The NPS plans to implement the use of Form 10-945, "Certification of Identity and Consent" to collect the minimal information necessary to verify the identity of first-party requesters request information about themselves and document if and when they authorized the NPS to release their information to a third party. NPS Form 10-945 requires for the following information to verify the identity of the requester:

- Full name of requestor;
- Case number;
- Social Security Number;

- Date of birth; and
- City, state, and country of birth.

Additional optional information requested via NPS Form 10-945 includes:
- Home Address;
- Telephone number, and
- Email address.

If the request consents to release information to a third party, the following information regarding the third party to whom records are to be released is required to be provided via NPS Form 10-945:
- Full name, and
- Full mailing address.

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 NPS expects to collect the information via email, fax, and paper form. We estimate that approximately 20 percent of respondents will typically submit the completed Form 10-945 via email or other electronic means.

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 requestor and to each law enforcement case incident report and no similar information is collected elsewhere.

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.

We only require a one-time submittal of a completed Form 10-945 for each unique request; therefore, the frequency of the collection cannot be reduced. If this information is not collected, the NPS will not be able to provide a response to the requester.

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 special circumstances that would cause 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 January 15, 2016, we published in the *Federal Register* (81 FR 2233) a Notice of our intent to request that OMB approve this information collection. In that Notice, we solicited comments for 60 days, ending on March 15, 2016. We received no comments in response to that Notice.

In addition to the Federal Register Notice, we contacted nine individuals and asked for comments on the collection of information. They were provided screen shots of the registration screens and were asked to suggest ways to improve the registration process, and for comments on:

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.

Respondents' comment(s): Respondents felt the form was straightforward and did not ask any questions which were considered unnecessary.

NPS Response/Action Taken: No action required.

What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?

Respondents' comment(s): Respondents provided time estimates of 2-5 minutes.

NPS Response/Action Taken: No action taken. We feel our estimate of 3 minutes is accurate and is within the estimates provided by respondents during our outreach.

Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?

Respondents' comment(s): No suggestions were provided by respondents.

NPS Response/Action Taken: No action required.

Any ideas you might suggest which would minimize the burden of the collection of information on respondents

Respondents' comment(s): No suggestions were provided by respondents.

NPS Response/Action Taken: No action required.

Despite multiple attempts to contact four respondents via email and phone calls to solicit feedback as part of the outreach process, we were unable to obtain comments from them.

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

We do not make any payments or gifts to respondents.

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

The certifications are maintained by the relevant NPS offices that provide the individual with the requested information pursuant to 5 U.S.C. Section 552. While no particular statements offering assurances of confidentiality are provided to the individual on the certification form, the NPS manages the forms in accordance with procedures established in Department of Interior System of Records Notices "Privacy Act Files – Interior, DOI-57" (81 FR 45527) covers Privacy Act request files and "Electronic FOIA Tracking System and FOIA Case Files – Interior, DOI-71" (81 FR 33544) covers FOIA request files. Department of the Interior Systems of Records Notice "Incident Management, Analysis and Reporting System, DOI-10" (79 FR 31974) covers FOIA request files for documents in IMARS. The Freedom of Information and Privacy Acts, agency regulations and policy each establishes authority for protecting the confidentiality of certain information.

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.**

    We do not ask questions of a sensitive nature.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
    * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
    * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
    * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that 2,000 unique respondents will submit 1 request each annually (3 minutes per request), totaling 100 burden hours. We estimate the total dollar value of the annual burden hours for this collection to be $3,405 (100 hours x $34.05).

We used Bureau of Labor Statistics news release USDL 16-1808, September 8, 2016, Employer Costs for Employee Compensation – June 2016, to estimate average hourly wages and to calculate benefits. Table 1 estimates the hourly wage for all workers to be $34.05, including benefits.

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 associated with this collection.

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.

We estimate that the total annual cost to the Federal Government to administer this information collection is $6,158 (100 hours x $61.58/hour).

To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2016-RUS as an average nationwide rate. We multiplied the rate by 1.57 to account for benefits, in accordance with Bureau of Labor Statistics news release USDL 16-1808, September 8, 2016, Employer Costs for Employee Compensation – June 2016.

Grade/ Step	Hourly Rate	Hourly Rate Including Benefits	Percent of time spent on collection	Weighted Average ($/hr)
GS-13/05	$45.86	$72.00	50%	$ 36.00
GS-12/05	$38.56	$60.54	25%	15.14
GS-09/05	$26.59	$41.75	25%	10.44
Total				**$ 61.58**

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

This is an existing 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.

The NPS may publish certain information received by the requester (e.g., congressional inquiry, Freedom of Information Act reporting) in compliance with and under the provisions of the Freedom of Information and Privacy Acts.

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

We will display the OMB control number and expiration date on the form.

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.