SUPPORTING STATEMENT A
National Park Service Common Learning Portal
OMB Control Number 1024-XXXX

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 legislative mandate of the National Park Service Organic Act, found at 54 USC §100101(a), 100301 *et seq*. is to conserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. Meeting this mandate requires the NPS to balance conservation with use. Maintaining a good balance requires information and limits, as well as providing effective training to those responsible for upholding this mandate. The NPS Common Learning Portal (CLP) is focused on increasing the visibility of training available to NPS employees and makes the site available to the public to allow NPS partners, retired NPS employees, and other interested persons not directly affiliated with the NPS access. The information we collect as part of the registration process for the CLP enables non-NPS persons to register and participate with others within the site. The creation of a personal profile provides those using the CLP with basic information that can be used to find others with similar jobs, learning interests or to solve learning problems. All personal information, with the exception of the person's name and email address are optional when creating the profile, and profile information may be edited or deleted at any time, except for the name and email address.

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.**

If a person chooses to participate in the community forum discussions or maintain a profile on the NPS Common Learning Portal, an account must be created on the website. Registering for an account requires the user provide the following information: name, email address, and username. These three information fields are required to validate the person's access to an email address and provide an identity to display alongside their comments in the discussion forums. Once registered, the user may choose to voluntarily provide additional information on their portal profile, to include:
- job title,
- work location,
- expertise,
- job duties,
- biography,
- topic interests,
- photo, and
- Additional personal information such as hobbies or activities they are interested in.

Additional information provided by the individual in these text fields such as hobbies or activities in general are unbeknownst to us; however we reserve the right to remove offending information from the portal at any time.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

This information collection process is required because it is unique to the website application and cannot be performed in a more efficient manner. Accomplishing the same registration process in another way would require intervention by an employee to perform data entry; the current process requires the registrant to enter their own registration information.

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 information requested is site/activity specific to each individual user and is not otherwise available in the NPS or from any other source. The registration system guards against duplication by ensuring a registrant's email address can only be used once in the system. Registering for an account on the system is voluntary and if we did have access to the prospective registrant's information, pre-registering them in the system would be presumptuous.

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

There is no impact to small businesses or other small entities.

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

Without the collection of information by the system registration process, persons will be unable to maintain an account on the system preventing them from participating in community discussion forums or customizing their profile page.

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 January 15, 2016, we published in the Federal Register (81 FR 2234) a Notice of our intent to request that OMB renew approval for this information collection. In that Notice, we solicited comments for 60 days, ending on March 15, 2016. We received two comments in response to the Notice:

Comment received January 15, 2016: Jean Public, jeanpublic1@yahoo.com

> "it is my opinion that the American public/taxpayers cannot continue to provide the vast array of alleged "training" that they formerly did. I am very much in favor of a vastly reduced "training" schedule" and do not favor a common portal so that more "training" can go on. I find the endless conferences where nothing really is accomplished an dhuge hotel and travel costs are involved when Skype is available to be utgter nonsense in sending taxpayers into poverty for the ever overprivileged fat cat bloated bureaucratic employees in this agency.

> we pay for their travel where they plot against the interest of the public and for their own enrichment. we pay for this out of control training costs. its time to cut the budget. its time for those who want to learn to take out a book and read it and go to the library and get copies of journals that will educate them on their nights. the extensive training costs that are mangling the taxpayer class needs to be reduced. the out of control benefits of govt employhees needs to be reduced. the spending is out of control. we cant afford it. we have 4 levels of govt to fund. its just too much. the deficits are rolling in in the trillions of dollars. start some cutting please of all these funds. This comment is for the public record. please receipt. jean publiee jeanpublic1@yahoo.com

fat cat bloated bureaucrats should have the education themselves if they want the job otherwise don't hire them in the first plac"

NPS Response/Action Taken: The NPS responded to thank Ms. Public for her comment and to explain the goal of the portal is to provide more training opportunities at reduced costs – with cost savings achieved through reductions in travel and shipping of training materials. We further explained the proposed system is designed to help reach the entire employee workforce and interested outside persons around the world. No changes were made in response to her comment.

Comment received March 4, 2016: Anonymous, sd2013@safe-mail.net

"http://www.nps.gov/training/clp/html/index.cfm

The above link mentions concept from CR Academy. Searching Google found this:

http://learning.nps.gov/cr/join-the-commons/

Where is the SORN for the CR Academy website to operate? Looks to be collecting a lot of data...security breach?

It also mentions it links to other systems like AD, links directly to LMS, and other websites...none of this is mentioned in the SORN

More lies from NPS to the Public. More of the "We will do whatever we want, and ask for mercy later." I guess it's easier to say it was "oversight" than to ask for permission."

NPS Response/Action Taken:

The CR Academy was not intended for public use and is no longer operational. The content that was available in the CR Academy website transferred into the CLP. We have worked with the NPS Privacy Act Officer to develop the required Systems of Records Notice (SORN) and Privacy Impact Assessment (PIA) for approval and publication by the Department of the Interior's Privacy Office. The portal will not be made available to the public until all requirements (such as compliance with the Paperwork Reduction Act and Privacy Act SORN requirements) have been met and the NPS has been granted an authority to operate (ATO) by the NPS Chief Information Officer.

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): Seven respondents responded that they felt the information collected was necessary, practical, and no information collected was considered unnecessary. One respondent indicated he was unsure of the practical utility which would be a question for the portal staff as he wasn't aware of the potential utility of the information.

Another respondent responded they felt it would depend on type of training the public will be able to access and what the NPS needs from them. If the learning is something that requires interaction with the NPS, then login and email would be important: example being a class where student receive credit required for a certification process. They questioned the need to register if the information is solely for learning and felt they should be able to simply receive the information. This respondent further commented that if there is a need to keep track of public learners then the burden upon them is minimal.

NPS Response/Action Taken: The practical utility is NPS learning content accessible by the workforce, our partners, volunteers, youth organizations and others who would benefit from the information, and to connect people with like learning interests, including peer-to-peer, and connections with experts. Once the site is available for public access, training information will be available without having to login. However there are functions that do require login data:

1) The Commons, which is the communities of learning (social media) application requires a login and personal data to enable access for posting and exchange of information, otherwise everyone would be anonymous.
2) The login enables "my learning", which includes personalized data, including bookmarks, journal, my communities and other personalized data.

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): One respondent opined it would take approximately 4-1/2 minutes to complete the setup, email verification, and finalize their profile. They also added they felt it would take an additional 15 minutes to read the privacy notice and suggested creating a "bulleted list summary at the top."

Another respondent noted they were unable to open anything which allowed them to register, but suggested the time required to establish a user name, password and email should take no more than a couple of minutes to complete, with login taking less than a minute after registration.

A third respondent felt the time requirement would be minimal as long as the connection is fast. They reminded the NPS that many people have very slow, unreliable connections which would be a bigger burden (causing delays in the pages to load) than what the person has to fill out on each page.

The remaining six respondents estimated average times of 3-10 minutes to provide the required information.

NPS Response/Action Taken: The NPS is not clear by the comment regarding providing a bulleted list summary and therefore took no action on that suggestion. The respondents were provided screenshots to view due to fact that the system is not available for public access at the time of the survey therefore restricting their ability to perform any hands on testing of the time required to

provide the information. NPS is very sensitive to connectivity issues and is making a great effort to ensure that pages load very efficiently, including for those using mobile devices such as smartphones and tablets. We have also incorporated faceted search technology so that less pages have to be loaded before finding the information that is being sought. The remaining estimates of 3-10 minutes are in line with the NPS estimate of 5 minutes; therefore, no changes were made to our time estimates.

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): One respondent felt the collection of information was a fairly minimal request comparable to information provided for just about anything done online.

A second respondent felt the information requested and the instructions are clear and to the point.

A third respondent recommended the NPS consider the "lowest common denominator" for internet connections (dial up) when building the site. Making it too pretty can really destroy its usability for personnel "out in the wilderness."

NPS Response/Action Taken: The site is being designed with the lowest common denominator as 3G/4G cellular. This is roughly equivalent to "dial-up speeds", which were traditionally 28k or 56k data transfer rates.

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

Respondents' comment(s): One respondent comment that if a person is simply seeking information and interacting with them is not essential, they should be allowed to access the information without having to register.

The remaining eight respondents had no suggestions and/or commented they felt the collection of information did not impose any undue burden on users.

NPS Response/Action Taken: Once the site is available for public access, training information will be available without having to login. However there are two reasons for requiring login data:

1) The Commons, which is the communities of learning (social media) application requires a login and personal data to enable access for posting and exchange of information, otherwise everyone would be anonymous.
2) The login enables "my learning", which includes personalized data, including bookmarks, journal, my communities and other personalized data.

Other comments received:

Respondents' comment(s): One respondent did not understand is why this is called a Common Learning Portal and who the targeted audience would be - all Interior employees, NPS employees, or open to the public.

NPS Response/Action Taken: One respondent felt the name of the portal implied all NPS learning would be hosted in a common location. Right now, there are dozens of websites and portals that are used to link to training events, which makes it very difficult to find and share training. With the advent of the CLP, these will be moved and shared under one common location. The main audience is intended to be the NPS workforce; however, we recognize the importance of including our partners, other bureaus, volunteers and others who may not currently have access to training that is behind firewalls. The NPS intends to make most of the CLP training available to public and not restrict it to just NPS employees. The CLP does have the capability of limiting access to sensitive or specialized training only to DOI/NPS employees with network access, but we estimate that will be less than 5% of the sites training opportunities.

A second respondent commented that projects like this need to have users actually use the site to get worthwhile feedback. They felt previous programs were always too fuzzy, inconsistent, too complicated, or "wonky" — i.e., the NPS Learning Place; the Interior Learning Place; the OPM Learning Place.

A third respondent requested that as the NPS goes forward, that we make sure it works fast, and links to competencies, training offerings, etc. They were concerned it would lead to "dead ends" and make people go around in circles. They commented that when a system has more than two levels and things don't work well, people just give up.

A fourth respondent felt all land management agency employees deserve the best training and development processes possible. They felt that as long as the NPS keeps that as the goal, it will be successful.

NPS Response/Action Taken: The NPS agrees with the comments and advice and intends to make the site as efficient as possible.

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.**

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. The NPS Privacy Act Officer has determined this collection requires a Privacy Act System of Records Systems of Records Notification (SORN). NPS SORN "Common Learning Portal – NPS-31" is currently in development but is expected to take 6-9 months to complete and publish. The NPS did not want to delay the submission of this PRA approval request and will update ROCIS with the required publication information as soon as it is published in the Federal Register. The CLP will not go live until the SORN requirement has been completed and OMB is provided the required information regarding the date and FR reference for the

document.

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.**

The Information Collection does not contain 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.**

This is a new collection of information and we have no quantitative data to support our burden estimate. We estimate that we will receive 6,000 responses totaling 500 annual burden hours with a total annual burden hour cost of $17,025. This collection targets individuals only, to include NPS partners, retired NPS employees, and other interested persons not directly affiliated with the NPS access.

We used Bureau of Labor Statistics news release USDL-16-1808, September 8, 2016, Employer Costs for Employee Compensation—June 2016, to calculate the total annual burden. Table 1 lists the rate for all workers as of $34.05, including benefits.

Activity	Annual Responses	Completion Time per Response	Total Annual Hours	$ Value of Annual Burden Hours ($34.05/hour)
Common Learning Portal Account Registration	6,000	5 mins	500	$17,025
Totals	**6,000**		**500**	**$17,025**

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 are no non-hour burden costs associated with this collection of information.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate that the annual cost to the Federal Government to administer this information collection is $192,210 ($155,210 salaries and $37,000 equipment and other incidental costs).

Salary Costs - $155,210 (rounded) (based on 2,080 hours annually x $74.62/hr = $155,209.60). To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2016-RUS as an average nationwide rate.

Grade/Step	Hourly Rate	Hourly Rate Including Benefits	Percent of time spent on collection	Weighted Average ($/hr)
System Manager, GS-13/5	$45.86	$72.00	80%	$57.60
Program Manager, GS-14/5	$54.19	$85.08	20%	$17.02
Total				**$74.62**

Other Costs - $37,000 - We estimate approximately $37,000 annually for equipment and other incidental costs.

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

This is a new collection.

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

The NPS will not publish information from this 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.

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.