

1 Supporting Statement A
For Paperwork Reduction Act Submission

The Interagency Access and Senior Pass Application Processes
OMB Control Number 1024-0252

Terms of Clearance: None.

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

The America the Beautiful – the National Parks and Federal Recreational Lands Access Pass (Interagency Access Pass) is a free, lifetime pass issued by the Bureau of Land Management, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, the U.S. Forest Service, and the National Park Service (agencies) to citizens or persons who are domiciled in the United States, regardless of age, and who have a medical determination and documentation of permanent disability.

The America the Beautiful – the National Parks and Federal Recreational Lands Senior Pass (Interagency Senior Pass) is likewise a lifetime pass issued by the agencies to citizens or persons who are domiciled in the United States, and who are 62 years of age or older. There is a \$10 fee for the Interagency Senior Pass.

The Interagency Access Pass and Interagency Senior Pass were created to meet the requirements of Title VIII, Division J of The Federal Lands Recreation Enhancement Act (FLREA), (16 U.S.C. 6801-6814). The FLREA requires the Secretary of Agriculture and the Secretary of the Interior to make a free America the Beautiful – National Parks and Federal Recreational Lands Access Pass available to any United States citizen or person domiciled (i.e., permanent resident) in the United States who has been medically determined to be permanently disabled for purposes of section 7(20)(B)(i) of the Rehabilitation Act of 1973 (29 U.S.C. 705(20)(B)(i)). FLREA requires applicants to provide adequate proof of citizenship or residency and permanent disability for the Interagency Access Pass and adequate proof of citizenship or residency and age for the Interagency Senior Pass. It also requires that both passes be valid for the lifetime of the pass owner.

- 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.**

Since the early 1980s, agencies have required documentation or a signature on the Statement of Disability (NPS Form 10-597) in order to obtain a Golden Access Passport (now Interagency Access Pass, NPS Form 10-596), and have required identification verifying age in order to obtain a Golden Age Pass (now Interagency Senior Pass, NPS Form 10-595).

In accordance with FLREA requirements and in order to clarify, simplify, and provide uniform guidance for the public, the Secretaries of Agriculture and Interior established eligibility and documentation guidelines for issuing the Interagency Access Pass and Senior Passes. These guidelines are published in the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass Standard Operating Procedures (SOP).

An individual may apply for an Interagency Access or Senior Pass at many of the Federal agencies' entrance stations, or sites where a fee is charged for admission. The Interagency Access and Senior Passes can also be obtained at many of the agencies' staffed offices. Interagency Access and Senior Passes are issued at the same locations where they can be used for free admission, and are immediately issued upon completion of the application process.

Types of documentation accepted to establish permanent residency for both the Senior and Access Pass include, but are not limited to, a driver's license, a U.S. Passport, a State issued identification card, or a Permanent Resident Card (Green Card).

The application process for obtaining an Access Pass in person consists of:

1. The individual identifying him/herself as an applicant for the Interagency Access or Senior Pass to the agency issuing official who is collecting admission fees and/or issuing Interagency Access and/or Senior Passes
2. Presenting documentation specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

For the Interagency Access Pass, acceptable documentation to verify an individual has been medically determined to have a permanent disability includes:

- A. A statement signed by a licensed physician attesting that the applicant has a permanent physical, mental, or sensory impairment that substantially limits one or more major life activities, and stating the nature of the impairment;

OR

- B. A document issued by a Federal agency, such as the Veteran's Administration, which attests that the applicant has been medically determined to be eligible to receive Federal benefits as a result of blindness or permanent disability. Other acceptable Federal agency documents include proof of receipt of Social Security Disability Income (SSDI) or Supplemental Security Income (SSI);

OR

- C. A document issued by a State agency such as a vocational rehabilitation agency, that attests that the applicant has been medically determined to be eligible to receive vocational rehabilitation, benefits, or services as a result of medically determined blindness or permanent disability.

A State-issued motor vehicle department disability sticker, license plate, or hang tag is not acceptable documentation.

Information on documentation requirements is available to the general public through agency websites and publications; however, there are instances where applicants learn about the Interagency Access Pass when arriving at a recreation site and do not have the required documentation available. For those instances, a fourth option is available at recreation sites. If a person claims eligibility for the Interagency Access Pass, but cannot produce any documentation outlined above, that person must read, sign, and date a Statement of Disability Form in the presence of the agency officer issuing the Interagency Access

Pass. If the applicant cannot read and/or sign the form, someone else may read, date, and sign the statement on his/her behalf in the applicant's presence and in the presence of the agency officer issuing the Interagency Access Pass.

Upon verification of documentation or signature on the Statement of Disability, the applicant is issued an Interagency Access Pass. If the applicant provides actual documentation, that documentation is returned immediately to the applicant and is not retained by the agency.

If an applicant wants to obtain an Interagency Access Pass through the mail, he/she must provide:

1. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass;
2. a photocopy of identification verifying permanent U.S. residency or citizenship; and
3. documentation of permanent disability as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

The application packet is then mailed to the interagency processing center along with any required payment. The agency will review the application and documentation to verify the applicant is eligible for an Interagency Access Pass. Upon verification of the documentation, an Interagency Access Pass will be mailed to the applicant, preprinted with the applicant's name. The application and all documentation will also be returned to the applicant.

The applicant's document or signed statement is used only to verify the individual is qualified to receive the Interagency Access Pass. The issuing agency official may assess only whether adequate documentation has been submitted by the applicant or observe that the applicant has read and signed the statement of disability. No information concerning the applicant's disability is recorded or retained. The agency only notes that an Interagency Access Pass was issued. The information is used for no other purpose.

The process to obtain an Interagency Senior Pass in person requires that applicants present proof of permanent residency and proof of age. There is no application to obtain an Interagency Senior Pass in person. Upon verification of the documentation, the applicant is issued the Interagency Senior Pass. Documentation is returned immediately to the applicant and is not retained by the agency.

If an applicant wishes to obtain an Interagency Senior Pass through the mail he/she must provide:

1. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Senior Pass;
2. a photocopy of identification verifying permanent U.S. residency or citizenship and proof of age, as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

The application packet is then mailed to the interagency processing center along with any required payment. The bureau will review the application and documentation to verify the applicant is eligible for an Interagency Senior Pass. Upon verification of the documentation, an Interagency Senior Pass will be mailed preprinted with the applicant's name. All materials, including the application and all documentation, will be returned to the applicant or destroyed.

An applicant may also obtain an Interagency Senior Pass by ordering the pass through the <https://store.usgs.gov> website. They follow these steps to obtain their pass:

1. The applicant adds the Interagency Senior Pass to their shopping basket on the <https://store.usgs.gov> website and completes the standard check out process including delivery and payment information.
2. The applicant will receive an email from USGS with a link to upload a photo or scanned version of identification verifying permanent U.S. residency or citizenship and proof of age, as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.

The bureau will review the application and documentation to verify the applicant is eligible for an Interagency Senior Pass. Upon verification of the documentation, an Interagency Senior Pass will be mailed preprinted with the applicant's name. All materials, including the application and all documentation, will be returned to the applicant or destroyed.

- 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.**

We anticipate the majority of Interagency Access and Senior Passes will continue to be issued in person. For most applicants, acquiring an Interagency Access or Senior Pass at the first location they visit will be the most convenient and cost efficient. Providing an Interagency Access or Senior Pass through the mail is an additional convenience for visitors who wish to obtain either ahead of time. Mail-in applications increase the cost burden for applicants and agencies because of additional information requirements and processing steps (application, mailing, and verification of documents). The applications are currently online as a fillable form that can be printed. Since the last renewal submission, the agency has implemented an online Senior Pass application process. The agency is currently developing a process for online ordering of Access Passes and expects the process will be implemented before the next renewal submission.

- 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.**

Issuing agencies do not have access to the types of documentation required to obtain Interagency Access or Senior Passes.

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

This information collection does not apply to 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 we do not collect the information, we would not be able to determine the applicant's eligibility in accordance with FLREA and could not issue the pass. We cannot collect the information less frequently, because we only collect the information at the time someone applies for the pass.

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 August 29, 2016, we published in the *Federal Register* (81 FR 59243) a Notice of our intent to request that OMB renew this information collection request (ICR). In that Notice, we solicited comments for sixty (60) days, ending on October 28, 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): Most comments were positive in nature and did not require any action. There were a few grammatical changes that were requested.

NPS Response/Action Taken: The grammatical changes were made as requested.

“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): The times ranged from 3 to 7 minutes.

NPS Response/Action Taken: No action was required. The times reported were in line with the 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): Most comments expressed that the forms were simple and straightforward. One reviewer was confused for the need for the Notices Section as part of the forms.

NPS Response/Action Taken: The Notices Section was added as a separate page to the forms. This should help the users focus on the sections of the forms that they are required to complete, and still provide the required notices.

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

Respondents’ comment(s): There were no comments.

NPS Response/Action Taken: No actions were required.

Other comments received:

Respondents’ comment(s): Almost exclusively the comments were positive.

NPS Response/Action Taken: No actions were required.

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

We do not provide payment 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.

When applying in person, all documentation is returned to applicants upon issuance or denial of either the Interagency Access or Senior Pass. For mail-in or online applications, all documentation is either returned to applicants or destroyed when either the pass is issued or denied. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552). The information is protected in accordance with the Privacy Act, and we will maintain the information in a secure system of records (Interior-DOI-06, 80FR63246).

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 only potentially sensitive information collected is confirmation of a medical determination and documentation of permanent disability. This is required to comply with specific language in FLREA. No specific information concerning the applicant's disability is recorded or retained.

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 113,750 responses totaling 12,624 annual burden hours. We estimate the burden for obtaining an Interagency Access Pass in person is 5 minutes, which is the estimated time it takes to either show one's documentation or to read and sign the statement of permanent disability. The burden for obtaining an Interagency Access or Senior Pass by mail is 10 minutes, which is the estimated time it takes to complete the application form and gather the required documentation.

The dollar value of the burden hours is approximately \$431,110. We used Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the total annual burden. Table 1 lists the rate for all workers as \$34.15, including benefits.

Activity	Annual Number of Responses	Average Burden Hours per Action	Total Annual Burden Hours*	\$ Value of Annual Burden Hours* \$34.15/hour
Form 10-597, "Access Pass – Statement of Disability" (In-person Applicants)	76,000	5 minutes	6,333	\$216,272
Form 10-596, "Access Pass" (Mail-in Applicants)	8,000	10 minutes	1333	\$45,522
NPS Form 10-595, "Senior Pass" (Mail-in Applicants)	29,750	10 minutes	4,958	\$169,316
Total	113,750		12,624	\$431,110

*rounded

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.

The total nonhour cost burden is \$402,415. Mail-in respondents will need to make up to two photo copies and pay postage to mail their applications. The estimated cost burden for copying and mailing applications is \$0.66 per mail-in applicant. In addition, there is a processing fee of \$10.00 for each mail-in application.

Activity	Number of Responses	Pass Application Fee	Copying/ Mailing Fees	Total Fees Per Pass	Total Non-Hour Burden Costs
NPS Form 10-595, "Senior Pass" (Mail-in Applicants)	29,750	\$10.00	\$0.66	\$10.66	\$317,135.00
Form 10-596, "Access Pass" (Mail-in Applicants)	8,000	10.00	0.66	10.66	85,280.00
Total	37,750				\$402,415.00

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 cost to the Federal government for reviewing and processing applications is \$488,551 (rounded) (salary and other costs detailed below).

Agency employees who handle the mail-in processing of Interagency Access and Senior Passes are located in Lakewood, CO., and vary in grade level, but average at the GS-5 level. To determine average hourly rates used below, we used the Office of Personnel Management Salary Table [2017-DEN](#) to obtain the hourly rate for a GS 5/step 5. We used Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.57 to obtain a fully burdened rate. We estimate it will take approximately 15 minutes for Federal staff to process each mail-in application, or a total of 9,437.5 hours (15 minutes X 37,750 responses).

Agency employees who handle the in-person distribution of the Interagency Access and Senior Passes average a GS-5 and are located throughout the United States. To determine average hourly rates used below, we used Office of Personnel Management Salary Table [2017-RUS](#) as an average nationwide rate. We used We used Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.57 to obtain a fully burdened rate. We estimate it will take staff approximately 5 minutes to process each in-person request for a pass, or a total of 6,333.33 hours (5 minutes X 76,000 responses).

Salary Costs:

Activity	Grade	2017 Hourly Pay Rate	Hourly Rate Including Benefits (1.57 hourly rate)	Total Hours Spent on Collection	Total Annual Salary Cost (Incl. Benefits)
Process Mail-In Applications	GS 5/step 5 (Denver)	\$19.32	\$30.33	9,437.5	\$286,239.38
Review Documentation (In Person)	GS 5/step 5 (RUS)	17.84	28.01	6,333.33	177,396.57
Total Salary Costs					\$463,635.95

Other Costs: Agency costs to mail passes and documentation back to applicants are calculated to be \$0.66 per respondent for a total of \$24,915 (37,750 mail-in applicants times \$0.66).

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

We are reporting 113,750 responses, totaling 12,624 annual burden hours, and \$402,415 in nonhour burden costs. This is an increase of 4,000 responses, 666 annual burden hours, and \$42,640 in nonhour burden costs from our previous submission.

Based on our experience in administering this collection, we increased the number of responses due to an increase in applications in recent years. The adjusted increase of \$42,640 in nonhour burden costs is a result of an increase in mailing costs.

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.

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

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.