

**Supporting Statement A for
Paperwork Reduction Act Submission**

**National Park Service Common Learning Portal
OMB Control Number 1024-0284**

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 National Park Service (NPS) is authorized by 54 U.S.C. 101321, to maintain the Common Learning Portal (CLP). The CLP is an online training platform used to host virtual training courses and facilitate user interaction with various electronic training tools. This service is provided to increase communication within the NPS training community and to promote the visibility of training available to NPS employees as well as the public to allow NPS partners, retired NPS employees, and other interested persons not directly affiliated with the NPS to access the system. The information we collect as part of the registration process for the CLP enables non-NPS persons to register and participate with other users 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 the ability to collaboratively solve learning problems. All personal information, with the exception of the person's name and email address, are optional when creating the profile. Personal profile information may be edited or deleted at any time, except for the user's name and email address.

Legal Authorizations:

- National Park Service Organic Act, 54 USC §100101(a), 100301 *et seq*

- 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.**

Anyone choosing to participate in community forum discussions or maintain a profile on the CLP, must create an account on the website. Registering for an account requires the user to provide the following information: name, email address, and username. These three information fields are required to validate the user's email address and provide an identity to display alongside their comments in discussion forums. Once registered, the user may choose to voluntarily provide the following information to be included in their portal profile:

- Job title,
 - Job series,
 - Work location,
 - Expertise,
 - Job duties,
 - Biography,
 - Topic interests,
 - Photo, and
 - Additional personal information such as hobbies or activities the user is interested in.
- 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 information collection is entirely electronic and processed through the CLP website. The web portal is the primary vehicle used to communicate with other users. The registration process only requires the information necessary to identify new users.

- 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 required to register as a user of the CLP and is not otherwise available to the NPS nor from any other source. The information is specific to each individual user. The system guards against duplication so that a registrant's email address can only be used once in the system.

- 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 this information users would be unable to register and maintain an CLP account, preventing them from participating in potential training opportunities, community 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 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 9, 2020, we published in the Federal Register (85 FR 1180) 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 9, 2020. No public comments were received regarding the notice.

In addition to the Federal Register Notice, we contacted four (4) individuals familiar with this collection. We received feedback from three (3) of the individuals contacted, however after several attempts by email and telephone we abandoned the follow-up protocol for the fourth remaining individual. We solicited feedback through individual telephone conversation that were scheduled first by email. During the telephone conversation, we specifically requested feedback on:

- Estimated length of time to complete a submission
- Clarity of the instructions
- Overall usefulness of the information requested

The three individuals listed below provided editorial suggestions and feedback concerning the clarity of the information based on their previous experiences with registration tools of this general nature and scope. There were no suggested edits to improve the clarity of instructions the reviewers said that the brief instructions on each page made the steps easy to navigate. The respondents also said that the access to the portal is straightforward and the registration is simple to complete. The reviewers concurred with our estimated burden of no more than five (5) minutes per respondent to follow the instructions and complete the registration process. We believe that this estimate reflects the time it takes each respondent to read the instructions and complete the questionnaire.

Table 8.1 Individuals contacted

| Title | Organization |
|------------------------------------|---|
| Training Specialist | Forest Service Allegheny National Forest |
| Education and Outreach Coordinator | NOAA/Cordell Bank National Marine Sanctuary |
| Previous User | None/Unaffiliated individual |

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 provide 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. We maintain information collected in accordance with Privacy Act System of Records, Learning Management System DOI-16 (83 FR 50682, October 9, 2018).

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.**

Based upon our experience and recalculation of respondent type, we estimate that we will receive 250 responses totaling 21 annual burden hours with a total annual burden hour cost of \$778. This collection previously targeted individuals 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-19-2195, September 2019, Employer Costs for Employee Compensation—December 18, 2019 to calculate the total annual burden

(<https://www.bls.gov/news.release/pdf/ecec.pdf>). Table 1 lists the rate for all individuals/civilian workers as \$37.03, including benefits.

Table 12.1 Estimated Annual Hour Burden

| Activity | Number of Annual Responses | Completion Time per Response (Minutes) | Total Annual Hours | Hourly Rate incl. Benefits | \$ Value of Annual Burden Hours* |
|---|----------------------------|--|--------------------|----------------------------|----------------------------------|
| Common Learning Portal Account Registration | 250 | 5 | 21 | \$37.03 | \$778 |

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

\$469,320, rounded (2,080 hours annually x \$204/hr = \$424,320 + \$45,000 for other costs). To determine average hourly rates, we used Office of Personnel Management Salary Table 2020-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx). The benefits rate was calculated from Bureau of Labor Statistics (BLS) News Release USDL-19-2195, December 18, 2019, Employer Costs for Employee Compensation—December 2019 (<https://www.bls.gov/news.release/pdf/ecec.pdf>). We multiplied hourly rates by 1.6 to account for benefits.

Table 14.1 Estimated Annualized Cost to the Federal Government

| Personnel | GS Level | Hourly Rate | Hourly Rate Including Benefits (x1.6) | Percent of time spent on collection | Weighted Average (\$/hr) |
|---------------------------------|----------|-------------|---------------------------------------|-------------------------------------|--------------------------|
| Program Manager- | 13/5 | \$55.75 | \$89.20 | 20% | \$17.84 |
| System Manager | 13/5 | \$55.75 | \$89.20 | 80% | \$71.36 |
| Communities of Learning Manager | 11/5 | \$39.12 | \$62.59 | 100% | \$62.59 |
| Web Writer-Editor | 9/5 | \$32.33 | \$51.73 | 100% | \$51.73 |
| Total | | | | | 02 |

Other Costs - \$45,000- We estimate approximately \$45,000 annually for hosting equipment and other incidental costs.

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

Prior to the deployment of the system in 2017, we estimated that the CLP would receive 6,000 annual users and 500 burden hours. The total annual burden hours requested for approval mistakenly accounted for both federal and civilian users. Removing federal users from the equation, reduces the number to 250 of responses. Table 12.1 reflects the expected annual number of civilian users interfacing with the system. This correction caused a net decrease in the total annual burden associated with this information collection by -479 hours and -5,750 responses.

Table 15.1 Changes in Annual Burden Hours (since 2017 submission)

| Activity | Previously Approved | | Current Request | | Net change | |
|--------------------------|---------------------|----------------|-----------------|----------------|------------|----------------|
| | Responses | Burden (hours) | Responses | Burden (Hours) | Responses | Burden (Hours) |
| CLP Account Registration | 6,000 | 500 | 250 | 21 | -5,750 | -479 |

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.