

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 *Interagency Access Pass* and *Senior Pass* (Passes) grant access to Federal recreation lands and are issued on an annual or lifetime basis. The Passes can be used at over 2,000 Federal recreation sites across the nation, including National Parks, National Wildlife Refuges, and many National Forest and other federal recreation lands. The Access Pass admits the Pass owner and any passengers traveling with him/her in a single non-commercial vehicle at per-vehicle fee areas or the Pass owner and three additional adults where per-person fees are charged. The Access Pass may also offer a discount on some expanded amenity fees, such as camping. Discounts offered by the Pass vary widely across the many different types of recreation sites.

The Passes 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 Passes are issued by the Bureau of Land Management, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the U.S. Army Corps of Engineers and the National Park Service (agencies)

The FLREA requires the Secretary of Agriculture and the Secretary of the Interior to make the Interagency Access Pass available to any United States citizen or person domiciled (i.e., permanent resident) in the United States, regardless of age, who has been medically determined and documented to be permanently disabled for purposes of the Rehabilitation Act of 1973 (29 U.S.C. 705(20)(B)(i)).

U.S. citizens or permanent residents who are 62 years or older may apply for the Interagency Senior Pass. FLREA requires applicants to provide adequate proof of citizenship or residency and permanent and age for the Interagency Senior Pass. There are two types of Senior Passes: Lifetime and Annual. The cost for the Lifetime Senior Pass is a one-time fee of \$80. The cost for the Annual Senior Pass is \$20. The Annual Senior pass is valid for one year from the date of issuance. Four Annual Senior Passes purchased in prior years can be traded in for a Lifetime Pass.

Legal Authorities:

- 16 U.S.C. 6801-6814 - The Federal Lands Recreation Enhancement Act (
- 29 U.S.C. 705(20)(B)(i)) - The Rehabilitation Act of 1973

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.

This information is collected in-person by park officials when verifying qualifying documentation to determine whether a Pass will be issued at a park. The information is also collected using mail-in forms or electronic applications which are reviewed by federal staff at the interagency processing center to evaluate an applicant's eligibility to receive a Pass.

The information collected during the application process is solely used by participating agencies to issue the appropriate 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.

Updates to Form 10-596: We are requesting the following change to Form 10-596, because credit cards cannot be processed without providing the expiration date.

Form	Old Instructions	New Instructions
NPS Form 10-596. Application for the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass	1) Under the Payment section, the applicant is instructed to enter "DATE" after the credit card number by inserting digits for the month and year in the boxes provided. It is not specified which date is being requested, e.g. the application date or the credit card expiration date.	1) Clarify that "DATE" means the "Expiration Date" of the credit card, by adding the abbreviation "EXP." in front of "DATE".

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.

Applications for Passes are accepted, processed and issued in following three ways:

1. **In person/on-site:**

Individuals may obtain Passes on-site at the location of their first visit. An application form is not necessary to issue Passes in-person if the individual possess sufficient documentation to demonstrate eligibility for either Pass. Information on documentation requirements is available to the general public through agency websites and publications.

Applicants may use the following forms of documentation to establish permanent residency for both Passes (include, but not limited to): (1) State issued driver's license, (2) U.S. Passport, (3) State issued identification card, or (4) Permanent Resident Card (Green Card).

The process to obtain an Interagency Senior Pass in person requires applicants to 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. 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.

An application is only necessary in-person if an individual claims eligibility for the Interagency Access Pass, but cannot produce any documentation outlined above, that person must read, sign, and date NPS Form 10-597, Statement of Disability 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.

2. Mail

If an applicant wants to obtain an Interagency Access Pass through the mail, he or she must provide the following in addition to payment of a \$10 document processing fee:

- A. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass;
- B. a photocopy of identification verifying permanent U.S. residency or citizenship; and
- C. 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 or destroyed.

If an applicant wishes to obtain an Interagency Senior Pass through the mail, he or she must provide the following in addition to payment of a \$10 document processing fee:

- A. a completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Senior Pass;
- B. 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.

3. Electronically

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

- A. The applicant adds the Interagency Access Pass to their shopping basket on the USGS Store and completes the standard check out process including delivery and payment information.
- B. The applicant will receive an email from USGS with a link to upload the required documentation, as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.
- C. After the order is complete, a physical pass will be issued through the mail.

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.

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

- A. The applicant adds the Interagency Senior Pass to their shopping basket on the USGS Store website and completes the standard check out process including delivery and payment information.
- B. 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.

Since the last renewal submission, the agency has implemented an online application process for both the Access Pass and Senior Pass as described in section 2 above. Prospective applicants may also find information on how to obtain the passes when making a reservation or using other services on the government sponsored Recreation.gov website at <https://www.recreation.gov>. Based on initial submission figures, we expect 30% of Access Pass applications to be ordered online, while the remaining 70% of applications will be mailed in. For the Senior Pass, we estimate 10% of applications will be submitted electronically and 90% will be mailed in. The applications are currently online as a fillable form that can be printed.

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 collection of information is unique to issuances of the Interagency Access and Senior Passes. The information required to issue Passes is collected on a case-by-case basis from each applicant. There are no other means of collecting the information through any other sources. There is duplication of efforts

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 Passes. We cannot collect the information less frequently, because information is only collected on a case-by-case basis at the time of application.

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 March 12, 2020, we published in the *Federal Register* (85 FR 14504) 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 May 11, 2020. We received no comments in response to this notice.

In addition to the Federal Register Notice, we contacted seven private citizens and asked for comments on the collection of information. They were provided pdf copies of the application forms and instructions and were asked for comments on the questions below. Of the seven contacted, five individuals responded:

“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): All comments were positive in nature and did not require any action.

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): The times ranged from under 5 to 15 minutes, with most around 10 minutes for the applications. The comment for possibly taking 15 minutes included the time needed to print, sign, scan and email or upload a digital copy of the documentation, depending on the user’s familiarity with performing these tasks. The reviewer felt they could do this in under 15 minutes. The Statement of Permanent Disability was estimated to take less than 5 minutes.

NPS Response/Action Taken: The times reported were in line with current burden estimates. No action required.

“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 suggested similar wording should be used for both form instructions with regards to explaining that the \$10 fee is for processing the applications.

NPS Response/Action Taken: No changes are required to the application forms. One minor change will be made to the Access Pass instructions to include the word “processing” if space allows. The new wording will be “The cost of obtaining an Access Pass online is ten dollars (\$10) for *processing* the Access Pass.” (change is in italics)

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

Respondents’ comment(s): One reviewer suggested informing users, in the form instructions, of locations where the Senior and Access passes may be obtained directly rather than through the mail or online. This does not affect the application form itself as the form is used only for online or mail orders.

NPS Response/Action Taken: We will include on the application instructions a link to "Pass Issuing Offices" to provide this information via other media.

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.

All applicant documentation is returned (in person or by mail upon request) or destroyed upon the issuance or denial of Passes. Only authorized individuals with a need to use the information will have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130 and may be exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552). We maintain the information in a secure system of records (Interior-DOI-06, America the Beautiful—The National Parks and Federal Recreational Lands Pass System, 80 FR 63246).

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 212,000 responses totaling 22,667 annual burden hours. We estimate the following burden for obtaining 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.
- by mail is 10 minutes, which is the estimated time it takes to read the instructions, complete the application form and gather the required documentation.

The estimated dollar value of the burden hours associated with this information collection is \$855,226. We used Bureau of Labor Statistics news release USDL-20-1232, June 18, 2020, Employer Costs for Employee Compensation—March 2020 (<https://www.bls.gov/news.release/pdf/ecec.pdf>), to calculate the total annual burden. Table 1 lists the rate for civilian workers as \$37.73, including benefits.

Table 12.1 Estimated hour burden of the collection of information

Activity	Number of Annual Responses	Completion Time per Response	Total Annual Burden Hours	Hourly Rate Including Benefits	\$ Value of Annual Burden Hours*
Form 10-597, "Access Pass – Statement of Disability" (In-person Applicants)	152,000	5 minutes	12,667	\$37.73	\$477,926
Form 10-596, "Access Pass" (Mail-in and Online Applicants)	20,000	10 minutes	3,333	\$37.73	\$125,754
NPS Form 10-595, "Senior Pass" (Mail-in and Online Applicants)	40,000	10 minutes	6,667	\$37.73	\$251,546
TOTAL	212,000		0		0

*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 estimated annual non-hour cost burden is \$666,000. Mail-in respondents will need to make up to two photocopies and pay postage to mail in their applications. The estimated cost burden for copying and mailing applications is \$1.10 per mail-in applicant plus a processing fee of \$10.00 each.

Table 13.1 Estimate of the total annual non-hour cost burden

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)	40,000	\$10.00	\$1.10	\$11.10	\$444,000
Form 10-596, "Access Pass" (Mail-in Applicants)	20,000	\$10.00	\$1.10	\$11.10	222,000
Total	60,000				\$666,000

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 annualized cost to the Federal government for reviewing and processing applications is \$935,717 (\$884,717 for salaries and \$51,000 for other direct costs).

To determine average hourly rates used below, we used the Office of Personnel Management Salary Table 2020-DEN (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DEN_h.pdf) to obtain the hourly rate for processing mail-in applications and the 2020-RUS table (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/RUS_h.pdf) to obtain the hourly rate for reviewing documentation in person. We used Bureau of Labor Statistics news release USDL-20-1232, June 18, 2020, Employer Costs for Employee Compensation—March 2020 (<https://www.bls.gov/news.release/pdf/ecec.pdf>), to calculate the benefits rate for government employees to obtain a fully burdened rate.

Table 14.1 Estimated of annualized cost to the Federal government

Position	Grade/Step	Hourly Pay Rate	Hourly Rate Including Benefits (1.6 x hourly rate)
Administrative	GS-5/5 (DEN)	\$20.79	\$33.26
Administrative	GS-5/5 (RUS)	\$18.96	\$30.34
Weighted Average (\$/hr)			0

Table 14.2 Estimated salary (including benefits) / Cost of each activity per permit

Activity	Total Responses	Minutes per Response	Total Annual Hours	Weighted Average Cost (\$/hr)	Total cost (\$)
Process Application (Mail-in)	60,000	15	15,000	\$33.26	\$500,400
Process Application (in-person)	152,000	5	12,667	\$30.34	384,317
Total	0		0		0

Other Costs: Agency costs to mail passes and documentation back to applicants are calculated to be \$51,000 (\$.85 per respondent x 60,000 mail-in applicant).

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

Based on our experience in administering this collection in recent years, we are anticipating a 50% increase in the number of applications received and passes issued. We are reporting 212,000 responses, totaling 22,667 annual burden hours, and \$666,000 in non-hour burden costs. This is an increase of 98,250 responses, 10,043 annual burden hours, and \$263,585 in non-hour 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.