1Supporting Statement A

National Park Service Visitor Survey Card

OMB Control Number 1024-0216

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 National Park Service (NPS) has the overall federal responsibility of managing visitor service programs that assist in preserving national parks for the use and enjoyment of present and future generations. We are requesting the renewal of the Visitor Survey Card (VSC) to provide up-to-date information necessary to assist with park management and planning. As required by the Government Performance and Results Act (GPRA), the VSC is administered annually to provide an account of visitor satisfaction and to measure performance as stipulated in: 31 U.S.C. 1115; NPS Management Policy Goals IIa1, related to visitor satisfaction; and IIb1, related to visitor understanding and appreciation. Visitor use data is necessary to assess the impact of users and resources against each park's general management plan. The VSC is also used to provide visitor evaluations of service or facility quality as well as awareness of park significance. The results are used by Superintendents and other managers to develop site specific management plans.

The NPS fully adopted the use of the VSC in 2001 as a cost-effective surveying effort rather than relying on select surveys administered on a park-by-park basis. This effort was created to strategically assess visitor satisfaction by using the same program structure and collection methods to provide comparability across park units. As a result, the information is used to answer questions about visitors: who they are, what they do, what they need, and what their opinions are. Parks use the results to improve visitor services and facilities. Businesses within proximity of park units have used the data to determine visitor contributions to the local economy. This information collection continues to be instrumental in providing trend data for annual performance targets. The renewal of the Visitor Survey Card will ensure the integrated use of social science research in decision making.

Legal Authorities:

- **The Government Performance and Results Act of 1993 (31 U.S.C. 1115).**
- **National Park Service Protection Interpretation and research in System (54 USC §100701 and 100702)**
- **National Environmental Policy Act of as amended in 1982 (Sec 102 [42 U.S.C. § 4332A])**

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

The Visitor Survey Card contains three response categories: (1) Park facilities, (2) Visitor services and (3) Recreational opportunities. The seven-question survey evaluates service/facility quality and awareness of park significance. The measures of visitor services are indicators of NPS annual GPRA performance measurements:

Response Categories	
1. **Park Facilities** - The responses to the questions in this section are used to assess the condition of facilities allowing the NPS to mitigate costs, improve visitor satisfaction and increase safety awareness.	• Visitor center • Exhibits (indoor and outdoor) • Restrooms • Walkways, trails, and roads • Campgrounds and/or picnic areas.
2. **Recreational Opportunities** - The following two items are used to determine visitor satisfaction with the recreational and educational experiences available in a park. Tracking these ratings over time allows managers to understand the scope of appreciation for the cultural and outdoor recreational opportunities available in parks.	• Learning about nature, history, or culture • Outdoor recreation (sightseeing, camping, bicycling, boating, hiking, etc.)
3. **Visitor Services** - The ratings in this section are used to understand visitor satisfaction about services offered within the park. Because of previous survey responses, park visitors are now provided with an orientation of services to ensure a safe and enjoyable visit while minimizing visitor related accidents and damages. The following five topic areas are used to rate park services:	• Assistance from park employees • Park map or brochure • Ranger programs • Commercial services in the park (food, lodging, gifts, rentals, etc.) • Value for entrance fee paid.

The NPS Social Science Program uses the VSC to provide park managers with data to improve visitor services and facilities. Local businesses have also used the data to understand how visitors contribute to the area economy. Data from this collection has been used by NPS managers to develop long-term strategic plans and annual goals. The VSC has been administered at more than 330 units to assess visitor services. The twelve activities included and rated in the visitor services survey serve as viable indicators of NPS performance in serving its primary customers, park visitors.

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.

No automated data collection will take place. The survey instrument is a self-addressed and postage paid mail-back postcard. The visitor will have the option of returning the card via postal mail or using a designated survey drop-box before leaving the site.

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.

There is no known 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 will not impact 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.

The GPRA requires each federal agency to prepare three reports: (1) a strategic plan setting forth its broad mission and goals; (2) a performance plan listing its specific goals and indicators to measure the achievement of those goals, with a linkage to its budget; and, (3) a performance report on whether its goals were met and at what costs.

Without this collection NPS will fail to have the information from each park unit needed to establish specific regional and national goals. This collection is the only NPS collection using the same program structure and collection methods to provide comparability across park units. Without the VSC, regional and national comparability would not be possible. Without this collection park managers would have to rely on anecdotal and observation evidence not appropriate to meet the GPRA goals.

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.**

No special circumstances apply to this information collection.

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 June 5, 2020 the National Park Service published in the *Federal Register* (85 FR 34646) 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 August 4, 2020. No public comments were received.

In addition to our Federal Register Notice, comments were solicited from several experts knowledgeable about customer satisfaction surveys. The individuals listed below provided editorial suggestions and feedback concerning the clarity of the process and approximate length of time it would take to complete the questionnaire, based on their previous experiences with similar collections.

Individuals Contacted Outside the Agency

Director Social & Economic Sciences Research Center Washington State University
Assistant Professor Department of Recreation, Park and Tourism Management College of Health and Human Development Pennsylvania State University
Assistant Professor College of Forestry & Society Oregon State University

The reviewers said that the process was straightforward and that the instructions were very helpful. The respondents suggested that, based on their review of the final version of the surveys, the estimated burden time to complete the questionnaire should take no more than three minutes per respondent as we suggest in Table 12.1 (below). This estimate reflects the time it takes each respondent to read the instructions and complete the questionnaire.

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

No payments or gifts will be given 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 to any respondents. Data collected will only be reported in aggregates and no individual or identifiable responses will be reported.

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.

No questions of a sensitive nature will be asked.

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. Instead, this cost should be included under "Annual Cost to Federal Government."**

We anticipate that each year we will ask 132,000 visitors to complete the VSC. Of the total number of visitors contacted, we estimate that 55% (n=*72,600*) will agree to complete and return the survey card before leaving the park, or by mail at a later time. The initial contact time, needed to explain the purpose of the survey, will take no more than one minute per person and an additional 3 minutes will be used to complete the and return the survey card (*72,600*x 4 minutes = 4,840 hours). These estimates are based upon return rate during previous survey seasons, plus the outreach described in item 8.

Based upon this anticipated return rate, we expect that 45% (n=*59,400*) will refuse the initial request, however, at least 10% (n=*5,940*) will agree to complete the non-response survey. We anticipate that it will take an additional minute to complete the non-response survey questions (5,137 x 2 minutes = 198 hours). See Table 12.1 for the estimated annual return rate and Table 12.2 for the estimated hour burden for this collection.

Table 12.1. Total Annual Return Rate

Respondent Group	Total number of Initial Contacts	Completed Responses	All refusals	Completed Non-response survey
All On-site Visitors	*132,000*	*72,600*	*59,400*	*5,940*

Table 12.2. Total Annual Burden

Respondent Group	Estimated Number Responses	Estimated Time per Response (min)*	Total Annual Burden Hours
Completed Visitor Survey Cards	*72,600*	4	4,840
Completed Non-Response Surveys	5,940	2	198
TOTAL	0		0

**Includes the initial contact time*

The estimated annual cost burden for this collection is to be $178,043. The rate listed below is the hourly rate $35.34, including benefits, for the private sector. The rate is in accordance with 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 12.3. Total Annual Dollar Value of The Burden Hours

Completed Responses	Total Annual Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Annual Burden Hours*
Visitor Survey Card	4,840	$35.34	$171,046
Non-Response Survey	198	$35.34	$6,997
TOTAL	*0*		*0*

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour cost burden associated with collection of this 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.

The total estimated cost to the Federal Government for collecting data, analyzing results and preparing reports as a result of this collection of information is $245,856 ($118.20 x 2,080 hours).

To determine average hourly rates used below, we used the Office of Personnel Management Salary Table 2020-SEA table (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SEA_h.pdf) to convert the hourly rate for the non-federal FTEs listed below. 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: 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)
Project Director	13/5	$54.27	$89.20	20%	$17.84
Project Manager	12/5	$45.64	$73.02	35%	$25.58
Project Analyst	11/5	$38.08	$60.93	20%	$12.19
Technical Assistant	9/5	$31.47	$50.35	20%	$10.07
Survey Administration	7/5	$25.73	$41.17	15%	$6.18
Data Entry and Quality Control	7/5	$25.73	$41.17	20%	$6.18
Data Analysis and Final Report	12/5	$45.64	$73.02	55%	$40.16
				Total	**00**

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

The adjustments in this collection due to the previous miscalculation of the non-response bias contact in the previous request. The initial contact of one minute is now added to the competition time for the on-site survey and the non-response survey. Based upon experience, the initial contact time for those refusing to participate is de minimis and should not be counted as a separate burden. Therefore, we removed the initial contact time for all visitors and updated the request combining the initial contact time (1 minute) with the time to complete the on-site survey (3 minutes) and the non-response survey (1 minute). This change caused a net decrease of 132,000 responses and 891 burden hours. This adjustment is a better reflection of the time used to complete the 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.

All returned surveys are electronically scanned. Frequency distributions will be calculated for each indicator and category. All percentage calculations will be rounded to the nearest percent.

Individual and regional reports are created and distributed for each participating National Park. A separate System-wide Report provides information for all participating sites. Copies of the reports are archived with the National Park Service Social Science Program for inclusion in the Social Science Studies Collection.

The sampling period each for year will begin in February and end in August. Reports are typically available by mid-October of each year.

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.

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.