

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

**Education Reservation Request Form
OMB Control Number 1024-NEW**

Terms of Clearance: None.

A. Justification

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

This collection of information is Authorized by the 2016 National Park Service Centennial Act (Public Law 114 – 289 § 301), and Protection, Interpretation, and Research in System (54 U.S.C. 100701). Nearly all units in the National Park Service (NPS) system conduct educational programs for audiences including but not limited to school groups, scouting groups, extracurricular groups, and home school groups. At this time, there is no formalized service-wide process for submitting or receiving applications for reservation from the public to engage in park education programs.

To facilitate operational aspects needed to schedule groups for park education programs, the NPS Washington Support Office (WASO) Division of Interpretation, Education, and Volunteers (IEV) is requesting approval to collect the information necessary to make reservations for NPS education programs, including group leader name, addresses, contact phone number, number of students attending a program, and date of visit. The collection of this information ensures that park units and programs can facilitate the public request for group education programming.

Legal Authorities:

- Public Law 114 – 289 § 301, 2016 National Park Service Centennial Act
- 54 U.S.C. 100701, Protection, Interpretation, and Research in System

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 is a new collection seeking clearance for the use of service-wide Education Reservation Request Form to be used by all NPS units participating in, but limited to the following activities:

- in-park education programs,
- ranger in classroom programs, and

- online distance learning programs.

The Education Reservation Request Form will collect information that will allow managers to determine:

- (1) person(s) or organization(s) requesting education program services
- (2) type of program requested (in-park visit, ranger in classroom, or distance learning)
- (3) logistical details including, date, time, grade level, number of students
- (4) technology available to group for distance learning programming
- (5) eligibility for academic fee waiver

Information collected using the Education Reservation Request Form will be collected only as often as necessary to schedule education programs.

What ask for...	So that we can...
Type of program requested	Provide the correct information for the type of program requested by educators.
SECTION 1: Contact Information	
School/organization name, educator/contact name, title/position, school email address, school contact number, school mailing address, city, state, zip code	Contact the applicant during the application process and after scheduling an education program.
Special accommodation description	Plan for special accommodation needs of students and educators including, but not limited to, physical and programmatic accessibility.
SECTION 2: Park Visit/Field Trip Program	
Proposed date of visit, arrival time, and alternative date(s)	Determine staffing availability and operational feasibility of scheduling an education program for the requested date and time.
Mode of transportation	Determine on-site operational (parking, traffic flow) logistics of accommodating the number of cars, vans, school buses on site during the requested date and time.
Number of chaperones	Determine staffing needs to support a satisfactory educational experience for students and teachers, while balancing the need to protect park resources.
Teacher name	Anticipate the name of the day-of point of contact.
Grade	Schedule a grade appropriate curriculum aligned education program.

Number of students	Determine operational impact of group size, including but not limited to, staffing needs, carrying capacity of buildings and structures, programmatic flow to accommodate various size groups.
Program start time	Determine staffing availability and operational feasibility of scheduling an education program for the requested start time.
Program or subject requested/self-guided	Determine staffing availability and operational feasibility of scheduling the requested education program or subject.
SECTION 3: Ranger-in-classroom Program	
Proposed date of visit, arrival time, and alternative date(s)	Determine staffing availability and operational feasibility of scheduling an out-of-park education program for the requested date and time.
How much time will the ranger have for the presentation?	Determine the appropriate education program structure and delivery.
Teacher name	Anticipate the name of the day-of point of contact.
Grade	Schedule a grade-appropriate curriculum aligned education program.
Number of students	Determine the appropriate in-classroom education program structure and delivery.
Program start time	Determine staffing availability and operational feasibility of scheduling an education program for the requested start time.
Program or subject requested	Determine staffing availability and operational feasibility of scheduling the requested education program or subject.
Does your classroom have digital presentation hardware/software?	Determine appropriate education program delivery techniques.
SECTION 4: Virtual/Distance Learning Program	
Date of proposed learning and alternative date(s)	Determine staffing availability and operational feasibility of scheduling a virtual/distance learning education program for the requested date and time.
How much time will the ranger have for the presentation?	Determine the appropriate education program structure and delivery.
Teacher name	Anticipate the name of the day-of point of contact.
Grade	Schedule a grade-appropriate curriculum aligned education program.

Number of students	Determine the appropriate education program structure and delivery for virtual learning and group size.
Time zone and program start time	Determine staffing availability and operational feasibility of scheduling a virtual/distance learning education program.
Program or subject requested	Determine staffing availability and operational feasibility of scheduling the requested education program or subject.
SECTION 5: Academic Fee Waiver	
Authorized signature, title, date	Document that the signee understands the Code of Federal Regulations pertaining to academic fee waivers for educational purposes.

- 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 application will be 100 percent electronic in a fillable/fileable or fillable/printable format. The application will be available on participating park web pages to download. Once completed, the application can be returned by email or postal mail to the park specific address provided on the website or form. We anticipate 90 percent of submissions will be returned electronically and the remaining 10 percent will be submitted by postal mail.

- 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 effort.

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

There is no impact on 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 a formalized registration process, parks will continue to be inconsistent in the methods to gather information needed to register schools for programs that carry out the mission of the NPS to provide *for the enjoyment, education, and inspiration of this and*

future generations. A standardized information collection process will allow the parks to identify potential challenges in program planning and development as well as provide a means to generate quantifiable reports related to program administration.

- 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 would cause this information to be collected 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 19, 2021 we published a Federal Register Notice (86 FR 5247) informing the public of our intent to ask OMB for approval of this new information collection. We solicited comments for a period of 60 days, ending on March 22, 2021. We did not receive any comments in response to this notice.

In addition to the Federal Register Notice, we contacted eight (8) teachers at universities that previously participated in our program and who are familiar with this collection of information. They were provided copies of the application forms and instructions requested feedback on the questions below. We received feedback from the following (3) three of the (8) eight individuals contacted. Specifically, we asked 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.”

Comment #1: “The information collected seems necessary and is practical. Questions did not seem unnecessary.”

Comment #2: “This form seems necessary and is typical of other organizations that offer field trips.”

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?”

Comment #1: “It took me five (5) minutes to fill out the first two pages of the form...it might be helpful to indicate you only need to fill out sections 2,3, or 4 depending on your type of program request.”

NPS response/Action Taken: We used the respondent feedback when estimating the burden associated with completing the form.

“Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?”

Comment #1: “The fee waiver section was a bit confusing. Do all persons have to fill out this section? How do I know if a park collects a fee, therefore needing a fee waiver?”

Comment #2: “NPS should provide additional guidance with the form on how to respond to various sections of form.”

NPS response/Action Taken: Each NPS site using the form should provide site-specific guidance on program fees and programs available for request.

“Ways to minimize the burden of the collection of information on respondents”

Comments: No respondents were able to offer suggestions on further minimizing the burden of this information collection.

NPS response/Action Taken: No action required.

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

We do not provide payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. We will maintain the information in accordance with Privacy Act System of Records DOI-16, Learning Management System (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.

We do not ask 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.**

We estimate that we will receive 62,000 responses totaling 5,167 annual burden hours. We estimate the dollar value of the burden hours is \$199,408 (rounded).

We used the Bureau of Labor Statistics news release USDL-21-0437, March 18, 2021, Employer Costs for Employee Compensation—December 2020 (<https://www.bls.gov/news.release/pdf/ecec.pdf>), to calculate the hourly rate for civilian workers at \$38.60.

Table 12.1 Annualized Cost to Respondents

Activity	Total Annual Responses	Completion Time per Response (minutes)	Total Annual Burden Hours	Total Dollar Value of Annual Burden Hours* (\$38.60/hour)
Education Reservation Request Form (Public)	52,000	5	4,333	167,254
Education Reservation Request Form (Private)	10,000	5	833	32,154
Total	62,000		5.166	199408

(*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.

There are no non-hour costs associated with this collection.

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 annual cost to the National Park Service to administer this information collection is \$188,959 (rounded). NPS staff spend an estimated 5,167 annual burden hours reviewing reservation requests. To determine average hourly rates, we used Office of Personnel Management Salary Table 2021-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/RUS_h.aspx). We used the Bureau of Labor Statistics news release Bureau of Labor Statistics news release USDL-21-0437, March 18, 2021, Employer Costs for Employee Compensation—December 2020 (<https://www.bls.gov/news.release/pdf/ecec.pdf>), to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.6 to obtain a fully burdened rate.

Table 14.1 Annualized Cost to Federal Government

Title	Grade/Step	Hourly Rate	Fully Burdened Rate (*1.6)	Total Annual Hours	Annual Cost (rounded)
Interpretive Park Ranger/ Education Specialist	5/5	\$18.96	\$30.34	1,550	\$40,027
Interpretive Park Ranger/ Education Specialist	7/5	\$23.49	\$37.58	2,067	\$77,678
Interpretive Park Ranger/ Education Specialist	9/5	\$28.73	\$45.97	1,550	\$71,254
Total				5,167	\$188,959

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

This is a new collection.

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

The information obtained will not be published.

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.