

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**1Programmatic Clearance for NPS-Sponsored Public Surveys
OMB Control Number 1024-0224**

Terms of Clearance. None

Introduction

The National Park Service (NPS) is requesting a three-year extension of its Programmatic Clearance for NPS-Sponsored Public Surveys (OMB Control Number 1024-0224). Originally approved by the Office of Management and Budget (OMB) in August 1998, the Programmatic Clearance process enables the NPS to collect noncontroversial, high-quality social science information. This clearance continues to inform and improve the management and operations necessary for the NPS to successfully execute its statutory mission.

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

Social science research in support of park planning and management is established in NPS Management Policies 2006 (Section 8.11.1, "Social Science Studies"). The policy mandates that social science research is used to provide an understanding of park visitors, the non-visiting public, gateway communities, and individual interactions with park resources. Such studies are needed to provide a scientific basis for park planning and management.

Further, 54 U.S.C. §100701 and §100702 call for continually improving the ability of the NPS to provide "state-of-the-art" research and "a broad program of the highest quality science and information" to enhance the overall management of NPS units. At park and program levels, this includes the combination of natural and social science research. Relative to social science information collections, the needs of the NPS are as diverse as the resources it manages. For example, studies may include ethnographic interviews with indigenous tribes near a park to understand traditional ecological knowledge relative to the conditions of changing resources to inform inclusive access strategies or a quantitative survey at a national battlefield to capture visitor experiences and opinions regarding interpretive offerings to inform the development of new media.

The National Environmental Policy Act of 1969 requires periodic social science information collections when assessing the impact of development on users, potential users, and residents

near parks as part of General Management and site-specific plans (e.g., River Management Plan). Further, under the direction of the laws and policies, as well as recent executive orders (13985 and 14008) that focus on equity, environmental justice, and climate change, federal and NPS-specific legislation mandates the use of social science research to tackle on-going and emerging issues relative to visitor and non-visitor experience.

In conjunction with the legal requirements mandating social science research to inform park planning and management, the Programmatic Clearance for NPS-Sponsored Public Surveys is necessary because it allows the NPS to collect information that is low-burden, noncontroversial, and specifically tailored to the needs of the agency in an expedited manner. Many parks and programs require one-time or seasonal information collections that use common methodologies, and share general characteristics (e.g., applied research, low burden, uncontroversial, specific areas of inquiry). Leveraging this expedited clearance allows the NPS to collect timely information from the public used to enhance the overall management of NPS units. This process affords the NPS the ability to conduct more than 25 new collections per year versus the approval of one or two new collections per year using the full review process.

The NPS Programmatic Process goes beyond the existing Department of the Interior (DOI) Generic Clearances (1090-0011 - *“DOI Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery* and 1040-0001 *DOI Programmatic Clearance for Customer Satisfaction Surveys*) whose primary focus is on customer feedback and satisfaction. The NPS Programmatic clearance is unique in that it allows the agency to obtain social science and visitor use information, whereas the scope of both DOI Generic Clearances specifically disallows, and bureaus are instructed not to submit, information collection instruments designed to *“obtain social science or visitor use information.”* The ability to collect noncontroversial visitor use and park/program-specific social science information is the cornerstone of the NPS Programmatic Clearance process and allows the agency to make deliberate decisions based on studies designed to meet agency-specific needs. This includes quantitative information collections that are valid, reliable, and generalizable to the target population and qualitative information collections that provide rich and descriptive data.

The renewal of this clearance will allow the NPS to continue using an efficient and systematic process to meet the diverse needs of park units whose resources, use, and visitation vary. The NPS has a 24-year history of managing the Programmatic Process. The NPS Social Science Program will continue to serve as the primary point of contact, providing technical and

administrative reviews, as well as the necessary quality control before collections are submitted to the Office of Information and Regulatory Affairs (OIRA).

Legal Justification:

- *54 U.S.C. §100701 and §100702 - The National Park Service Act of 1916*
- *42 U.S.C. § 4332A - National Environmental Policy Act of as amended in 1982*
- *The NPS Management Policies 2006 (8.11 Social Science Studies)*
- *Executive Order 13985 – “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government”*
- *Executive Order 14008 – “Tackling the Climate Crisis at Home and Abroad”.*

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.

Information collected under this clearance is used system-wide by park managers and program staff to make time-sensitive decisions about all aspects of visitor and non-visitor use, behaviors, expectations, perceptions, and preferences. The NPS, scientific communities, park units, managers and program specialists use this collection to:

Understand:

- visitor needs, experiences, and uses
- barriers and constraints of visitation to National Parks
- visitor attitudes and behaviors related to recreation use and resource management
- transportation and crowding

Have:

- an efficient, effective, and timely review process
- peer reviews that improve the quality of information collections
- increased attention to methodological improvements and use of best practices
- better administration of information obtained from surveys of the public
- a renewed confidence and willingness to complete the review process.

Identify:

- NPS park/program needs
- levels of understanding and knowledge
- ideas or suggestions for improvement
- barriers and constraints to achieving management standards
- perceptions and values of natural resources
- baselines measurements to observe changes over time
- spending behaviors

This generic clearance continues to provide a process for unique site/subject-specific

information collections that are not available from any other sources. This clearance includes quantitative information collections that use systematic, random sampling methods to obtain data that is generalizable to the study population. Having data that is representative of the population and areas of interest specific to the needs of the NPS (e.g., climbers at Yosemite, campers at Yellowstone, or visitors to Glacier) provides park and program managers with the reliable data needed for specific planning and management challenges. Going further, the NPS Programmatic Clearance is also designated for studies that provide descriptive, qualitative social science data. Information collection requests leveraging this clearance are unique to the NPS, providing required social science data that is not obtainable through the currently approved DOI generic clearances.

This clearance is limited to applied research. Longstanding and traditional social science methodologies are used to understand visitor and non-visitor use, attitudes, behavior, experience, expectations, and knowledge related to natural resource and recreation use management. The focus is on noncontroversial information collections that do not attract attention to significant, sensitive, or political issues. All information collection instruments will be designed and deployed according to the most recent OMB guidance on “Agency Survey and Statistical Information Collections.”

Operational Guidelines

Individual information collection requests submitted under this clearance will use NPS Form 10-201, *Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys* to justify and describe the specific aspects of individual studies proposed under this clearance. The information in the form is a requirement of the review process. The form includes the following sections:

Abstract	Provides a brief description and how you will use this information collection
Contact information	Principal Investigator and NPS Liaison
Project Information	Location, Sampling Period and Type of collection
Survey Justification	A description justifying the need for the information collection, its purpose, goals and its direct application and utility towards meeting a relevant NPS information need
Survey Methodology	Respondent Universe, Sampling Plan, Instrument administration, Expected Response rate, Non-response bias testing, and Description of pretest methods

Burden Estimate	Number of responses, completion time, and burden hours
Reporting Plan	Anticipated deliverables
Attachments	Data collection instruments, interview scripts, correspondences, etc.

Further, individual submissions leveraging this clearance employ one or more of the following information collection methods¹ previously approved under this clearance:

- on-site intercept surveys
- e-mail or mail back surveys
- telephone surveys
- mixed-mode surveys
- focus groups or interviews
- electronic or web-based surveys

Due to the diverse nature and complexity of the NPS-- including numerous programs across 12 administrative regions and 423 park units, ranging from historic buildings in urban environments to immense swaths of wilderness — we are requesting that this collection includes the option to offer flexibility in survey design and development. This flexibility includes individual wording of questions, response options, and measurement tools (scales and anchors). While the *Pool of Known Questions* (PKQ)² remains an important tool, especially for researchers new to the information collection request process, we are requesting the flexibility to allow researchers to submit new questions or variations of questions within the PKQ, as long as the questions are within the scope of the Topic Areas. We are also requesting that questions in the PKQ are not required to be cut and pasted (verbatim) into individual survey instruments. Questions must be within the scope of the topic area(s) and germane to the topic described in the justification and demonstrate a relevant correlation to the park and management issues. No controversial or sensitive questions will be permitted under any topic area or within any individual submission.

These are the 11 Topic Areas³:

- **TOPIC AREA 1: Respondent Characteristics**
- **TOPIC AREA 2: Trip Planning**

¹ These information collection methods are further detailed in the *Guidelines for Programmatic Clearance for NPS-Sponsored Surveys* (attached in ROCIS as a Supplementary Document).

² The *Pool of Known Questions* is included as a Supplementary Document (attached in ROCIS).

³ These topic areas are outlined in detail within the *Guidelines for Programmatic Clearance for NPS-Sponsored Public Surveys*

- **TOPIC AREA 3: Trip Characteristics**
- **TOPIC AREA 4: Transportation**
- **TOPIC AREA 5: Visitor Use and Recreation Management**
- **TOPIC AREA 6: Evaluation of Programs and Services**
- **TOPIC AREA7: Human Dimensions**
- **TOPIC AREA 8: Environmental Health and Resource Management**
- **TOPIC AREA 9: Expenditures**
- **TOPIC AREA 10: Environmental Justice**
- **TOPIC AREA 11: Safety and Risk Management**

The PKQ was systematically developed by a team of experienced social science researchers familiar with visitor use surveys and NPS information collections. Originally created as a guide for novice social science survey developers. However, because more and more experienced social science researchers are submitting requests using the NPS generic clearance process, the request for flexibility will underpin the continued utility of the NPS Programmatic Clearance.

The following criteria was used to include questions or topics in the PKQ:

- (1) questions used in surveys that yielded publishable results,
- (2) questions previously approved by OMB, and
- (3) question related to natural resource management and human dimensions.

In preparation for this renewal, the PKQ has been streamlined to remove redundancies and allow for flexible application. The updates to the PKQ are described in Table 2.1.

Table 2.1 Updates to Topic Areas/Subsections

Topic Area	Change/Update	Reason for Change
5	Revision: Subtopic Name Change	The subsection <i>Use of Technology</i> is renamed <i>Technology and Social Media</i> to highlight the evolving cultural importance of social media as a communication tool.
5	Revision: (1) Removed Virtual Visitor Subsection Revision (2) Removed Hunting and Fishing as a standalone subsection	(1) The question in the Virtual Visitor Subsection has been incorporated into other subsections as appropriate because questions related to virtual visitors requires inquiry from different topic areas. (2) The subsection HUNTING and FISHING is updated to be more inclusive of general recreation activities and renamed RECREATION ACTIVITY (REACT).

Topic Area	Change/Update	Reason for Change
8	NEW Subsection: Climate Change	Subsection added to address the need for social science data regarding climate change to inform NPS educational offerings, messaging, and response.
10	NEW - Topic Area Name Change: Changed to Environmental Justice	The former Topic Area 10 Constraints and Barriers is now a subsection under the NEW Topic Area 10: Environmental Justice. This change was made to broaden the Topic Area to be more inclusive of the subjects generally covered in the following subsections: Constraints and Barriers; Diversity, Equity, and Inclusion; Accessibility; and Traditional Ecological Knowledge.
10	Revision: Moved: Subsection: "Stakeholders"	Previously listed under Topic Area 10 Constraints and Barriers. Now included under Topic Area 7: Human Dimensions for better applicability

Scales and Anchors

To address a need expressed by peer reviewers and researchers leveraging this Clearance (see responses to Q8 below), the PKQ has been modified to include a variety of measurement tools (i.e., scales and anchors) that serve as examples of quantitative (discrete and continuous) and categorical (binary, nominal and ordinal) variable options. Like individual question and response options, we are also requesting that scales and anchors in the PKQ be flexible to meet the needs of individual submissions.

Further, the field of Psychometrics, focusing on the techniques of measurement, has advanced considerably in recent years. Maintaining flexibility in measurement options, allows NPS-sponsored data collections to be as useful as possible by remaining responsive to best practices and updates in the literature. For example, a team of researchers identified over 20 psychometric scales for measuring "connection to nature" (Salazar et. al, 2021), which is a topic of interest to many NPS programs, including, but not limited to, interpretation and education and resource management. Validated and sensitive items for measuring an array of visitor experience and natural resource management concepts and outcomes exist and the option to employ these variations to meet study objectives is necessary.

While 5-point scales are still common in the field, there are drawbacks to these balanced 5-point scales. With a neutral mid-point, the true response scale is limited to two points (either negative or positive), leading to a lack of variation in responses. Depending on the intent and needs of

the study, this potential lack of variability results in data that cannot meaningfully differentiate between groups (Vezeau et. al, 2017; Miller 2018; Munshi, 2014).

Social scientists are frequently using larger scales, such as 7- and 9-point scales and different scale anchors, including unbalanced scales, to ensure reliability and sensitivity. Oftentimes, applications for unbalanced scales are utilized when evaluations of services and facilities have been previously studied and demonstrated nearly or an entirely positive valence in the context of parks and protected areas (e.g., dimensions of ranger-led and youth program services, recreation experiences, etc.). In such cases, using an unbalanced scale provides the necessary sensitivity required to obtain meaningful, actionable results. Further, the use of larger scales can reduce respondent cognitive burden and increase reliability and variability in response (Powell, et. al., 2019; Dawes 2008; Hawthorne et al., 2006; Streiner and Norman 2008; Huguet, Stinson, and McGrath 2010; Manworren and Stinson 2016).

Example of a 9-point scale:

Please indicate the extent to which you agree or disagree with each of the following statements. (*Check one box for each statement or indicate that you don't know.*)

[Example statements...]	Strongly Disagree	Disagree	Moderately Disagree	Slightly Disagree	Neutral	Slightly Agree	Moderately Agree	Agree	Strongly Agree	Don't Know
Where necessary to better manage trails, hikers should be asked to sign-in at trailheads	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The needs of the NPS require the ability of individual studies to utilize scales and anchors that meet study objectives, whether it's to maintain a 5-point scale to compare data from a previous study or expand to an unbalanced, 9-point scale to achieve the sensitivity needed to collect informative data regarding a popular interpretive offering.

Submission Process

Any request seeking to collect information beyond the scope of this programmatic clearance process will be returned and required to submit under the full PRA review process. Additionally, any collection driven purely by curiosity and a desire to expand social science research knowledge or anything that is not directly applicable to current NPS management and planning

needs will be considered outside the scope of this collection and will also be directed to the full review process.

The NPS Social Science Program will continue to provide technical and administrative review of all proposed information collections submitted for review under this generic clearance. After a collection has completed the NPS review process, the NPS will transmit NPS Form 10-201, *Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys*, the survey instrument(s) and accompanying materials to OIRA for review. Once a determination is received, the NPS will assign the OMB control number (1024-0224) and survey expiration date. In the past, based on the thorough review process and administrative oversight of the NPS Social Science Program, OIRA has agreed to provide a response within ten working days of receiving the submission package.

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.

Approximately 70% of the submissions employ on-site surveys, nearly 95% include the use of electronic methods to collect responses. 25% are face-to-face or telephone interviews or focus groups. The remaining 5% are mail-back surveys which typically includes 75% electronic response and 25% paper response.

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 administrative review process for this collection provides oversight for any duplication of efforts by other entities. The NPS Social Science Program will continue working with the NPS research permitting process to link information collections with requests for in-park research permits to avoid duplication or increased burden in a particular park/place. Further, the Social Science Program will interface with park contacts to understand the context of the proposed information collection within the larger park/program framework.

We acknowledge that there are other information collections and programs⁴ related to outdoor recreation use patterns conducted on a national level; however, these collections do not investigate the unique management and planning issues that are central to the mission and goals of the NPS.

Further, the NPS is also aware of and leverages the DOI generic clearances (1090-0011 and 1040-0001) to conduct evaluations of customer services. The Programmatic Clearance is distinctly different from both of those generic clearances because the primary focus, breadth and depth goes beyond customer satisfaction by using social science methods which is not an approved function of either DOI Generic Clearances.

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

There are no significant impacts to small businesses. Any requests for information will be no more than what is required as a course of regular business practices.

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.

In accordance with *16 U.S.C. §100701 and §100702 - The National Park Service Act of 1916*, this generic clearance provides the timely application of social science data needed to support all aspects of the NPS mission, goals, and operations. Without this collection, the studies leveraged under this clearance would not provide NPS managers, and staff with time sensitive information relevant to management and planning that is not available from any other source.

⁴ These include the: *National Survey of Hunting, Fishing, and Wildlife and Recreation* (#1018-0088); *National Survey on Recreation and the Environment* (#0596-0127); *NPS Comprehensive Survey of the American Public* (NPS); the National Visitor Use Monitoring Program (#0596-0232) and the *Interagency Recreation and Transportation Survey* (#0596-0236)

On average, 25 new studies are approved each year, which is over five times as many as we would expect going through the full review process. The absence of this clearance would result in an unprecedented backlog of requests. The expedited review is in stark contrast with the full review process, which can be upwards of 18 months for a single ICR package. Without this programmatic clearance, the NPS will be negligent in its responsibility forcing parks to use obsolete or anecdotal data to make emerging management decisions.

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.

This renewal request contains no special circumstances with respect to 5 CFR 1320.5 (2) (i) and (iii-viii) with the exception of (ii). There may be instances where a subset of respondents may be asked to complete and return a survey on-site or within 30 days of receipt.

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 February 8, 2022, a 60-day Federal Register notice (87 FR 7206) was published announcing this information collection renewal. Public comments were solicited for 60 days, ending April 11, 2022. We did not receive any comments in response to this notice.

In addition to the request for public comment, we requested feedback from six (6) individuals who have submitted requests as principal investigators through this process. Specific feedback is outlined below.

Table 8.1 Persons consulted with outside the agency

Organization	Title
1. Virginia Tech - College of Natural Resources and Environment	Professor
2. Penn State University - College of Health and Human Development	Assistant Professor
3. Clemson University - College of Behavioral, Social, and Health Sciences	Endowed Professor
4. University of Montana - Department of Society and Conservation	Assistant Professor
5. Central Michigan University - Department of Recreation, Parks, and Leisure Services	Professor
6. RRC Associates - Boulder, Colorado	Chief Operating Officer & Director of Tourism and Visitor Research

“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.”

Respondent #1: Stressed that social science information collections are imperative to NPS management, and the unique nature of this Programmatic Clearance differentiates it from other information collection efforts.

Respondent #2: Provided feedback on the importance of timely reviews under this Clearance, pointing out that longer review processes lead to information being out of date before it is collected and missing important visitation windows for sampling, as well as administrative costs associated with longer reviews and any delays.

Respondent #5: The reviewer highlighted the importance of the Clearance as vital to the NPS's ability to conduct social science information collections in a timely manner.

Consolidated NPS Response: We concur with the importance of this expedited review process and will continue to provide thorough reviews of individual submissions in a timely fashion. Further, we recognize the unique nature of this Clearance and its importance to the NPS.

“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?”

No reviewers specifically spoke to the burden request to complete NPS Form 10-201, *Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys*. The burden to complete this form does not include the time to develop, design and pretest the survey instrument. The burden estimate reflects the time to complete and submit the form and supplementary documents. Anecdotal evidence supports that it takes no more than one hour to complete and submit the supplemental documents. Based upon their experiences, the respondents agreed with our assessment of the completion times estimated for each collection time listed in Table 12.1 below.

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

Respondent #1: Provided feedback related to the *Pool of Known Questions*, including requesting the ability to generalize questions for increased usability rather than a predefined question set.

NPS Response: Updated the PKQ to provide more generalized version of the questions.

Respondent #2: Stated that while topic areas cover the overarching social science needs of the NPS, flexibility is needed within study design, especially with question wording and response options.

NPS Response: Based on this feedback, individual questions and corresponding measurement tools (scales and anchors) were updated and generalized throughout the PKQ to allow for flexibility.

Respondent #3: Provided feedback regarding the need for measurement options to be flexible to meet study needs and allow for the incorporation of emerging best practices in survey design and question wording. Cited recently published literature pointing to a preference for unbalanced scales, including the number of scale points, and using extreme anchors, where applicable. (Chyung et. al., 2020; Miller, Z.D., 2018).

NPS Response: As previously stated, we generalized items and scales/responses within the PKQ. Further, we have added clarifying language within this renewal, stating that all questions must fall within the approved topic areas, but balancing that requirement with the need for flexibility in individual question wording.

Respondent #4: Similar to other reviewers, this reviewer pointed to the need for flexibility within survey design, stating that predetermined question sets are unable to keep up with advancements in science and bureau priorities.

NPS Response: As mentioned throughout this section, the NPS responded by noting the importance of flexibility in question wording and has attempted to be transparent in this need throughout this renewal submission.

Respondent #5: Suggested the following subsection for topic areas: environmental justice, accessibility, social media, climate change, and diversity, equity, and inclusion.

NPS Response: The NPS adopted these suggestions by expanding Topic Area 10 and renaming it Environmental Justice with subcategories to include constraints and barriers; accessibility; diversity, equity, and inclusion; and traditional ecological knowledge. Further, social media was added to the existing technology subsection under Visitor Use and Recreation Management (Topic Area 5), and climate change was added as a subsection under Environmental Health and Resource Management (Topic Area 8).

Respondent #6: Outlined a need for better, clearer communication throughout the review process and within the electronic and print materials pertinent to this Clearance.

NPS Response: The NPS has updated the Guidance document as part of this renewal. Further, the NPS will continue to work on updating its information collection web pages. The NPS will better communicate anticipated review timelines to the best of its ability, as well as provide status updates for individual submissions as needed.

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

In general, incentives, remuneration, and gifts are not within the scope of the Programmatic Clearance Process for NPS Sponsored Surveys. However, in some cases, there may be extraordinary circumstances under which incentives, honorariums or de minimis gifts may be appropriate within the scope of this program. A request to use incentives, honorariums or de minimis gifts must be approved by OMB.

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

No assurance of confidentiality will be provided during this study. We will explain to respondents that all comments in our written summary of findings will remain anonymous and we will not include the names of any study participants with the results or the findings from this study.

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 questions used on these surveys will not be 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 on experience with the existing NPS Programmatic Clearance, we estimate that there will be approximately 44,125 annual respondents, totaling 11,792 annual burden hours, resulting in a 3-year burden total of 35,376 hours. We estimate the total dollar value of the annual burden hours for this collection to be \$493,614 (rounded) with a 3-year total of \$1,480,842. We used the rates listed below in accordance with Bureau of Labor Statistics (BLS) News Release [USDL-22-1892](#), September 2022 Employer Costs for Employee Compensation— released December 15, 2022.

- Private Individuals. Table 12.1 lists the total compensation as \$41.86, including benefits.

TABLE 12. 1. Total Estimated Annualized Burden

	Annual Number of Responses	Estimated Completion Time per Response ¹ (minutes)	Total Annual Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Annual Burden Hours ²
On-site Surveys	30,000	15	7,500	\$41.86	\$313,950
Mail-back surveys	2,000	20	667	\$41.86	\$27,921
All non-response surveys	5,000	3	250	\$41.86	\$10,465
Focus Groups/ interviews	2,125	60	2,125	\$41.86	\$88,953
On-line surveys	5,000	15	1,250	\$41.86	\$52,325
Annual Subtotal	44,1250		00		0
3 YEAR Total	132,750		35,376		\$1,480,842

¹Average time

²Total Hours 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 is no non-hour cost burden, record-keeping nor any fees associated 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.

We estimate the annual cost to the Federal Government to administer this information collection will be \$2,433,101. This includes federal salaries (Table 14.1) and operational expenses (Table 14.2). We used the Office of Personnel Management Salary [Table 2023-DEN](#) and [Table 2023-RUS](#) to determine hourly wage rates. To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with Bureau of Labor Statistics (BLS) News Release [USD-L-22-1892](#), September 2022 Employer Costs for Employee Compensation— released December 15, 2022.

The estimate is based upon our experience. We have assumed that it will take no more than one (1) hour to complete and submit NPS Form 10-201 *Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys*. We estimate that we will receive at least 20 generic requests in FY23. This estimate also includes the average time (20 hours) for the NPS ICRC to review, process, and submit each request to OIRA.

14.1. Annualized Cost to the Federal Government

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time per submission (hours)	Cost Per submission	Annual Cost (x20)
NPS Information Collection Review Coordinator	12/5	(DEN) \$49.83	\$79.73	20	\$1,595	\$31,900
NPS POC or Program Manager	11/5	(RUS) \$37.53	\$60.05	1	\$60.05	\$1,201

Total \$33,101

We estimate that the operational cost to the Federal Government to be \$2,400,000. This cost includes the expenses listed in Table 14.2 below.

Table 14.2. Operational Expenses associated with this information collection

Operational Expenses	Cost Per submission	Annual Cost (x 20)
Contracts and Support Travel, Survey Design, Development and administration, Data Collection, Supplies, Data entry, Data analysis and Reporting)	\$120,000	\$2,400,000

15. Explain the reasons for any program changes or adjustments in hour or cost burden.
There are no hour or cost burden changes.

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.

Each information collection considered under the Programmatic Clearance Process will use NPS Form 10-201 *Programmatic Review and Clearance Process for NPS-Sponsored Public Surveys* to describe the proposed collection. Each submission will include a method to check for non-respondent bias and the intended use of the results.

Each information collection will provide an explanation of the specific tabulation methods to be used to synthesize, analyze, and aggregate the data collected. The analyses will typically include response frequencies and distributions to address concrete management and planning issues. In the cases when expenditure data is collected, the NPS Money Generation Model (MGM) may be used. This model will estimate the economic impact of visitor spending on gateway regions. Some studies may use multivariate statistical analyses, as when estimating coefficients for models based on the Theory of Planned Behavior. In other cases, data from qualitative studies may involve transcripts of interviews or focus group discussions, followed by content analyses to identify general themes. The intended use of data and planned reports will be summarized within the Programmatic Form.

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.

The OMB control number and expiration date will appear on all surveys instrument or via automated collection in any format.

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.

References

- Chyung, S. Y., Hutchinson, D., & Shamsy, J. A. 2020. Evidence-based survey design: Ceiling effects associated with response scales. *Performance Improvement*, 59(6): 6-13.
- Dawes, J. G. 2008. "Do Data Characteristics Change according to the Number of Scale Points Used? An Experiment Using 5 Point, 7 Point and 10 Point Scales." *International Journal of Market Research* 50 (1): 61–77. doi:10.1177/147078530805000106.
- Hawthorne, G. J. Mouthaan, D. Forbes, and R. W. Novaco. 2006. "Response Categories and Anger Measurement: do Fewer Categories Result in Poorer Measurement?." *Social Psychiatry and Psychiatric Epidemiology* 41 (2):164–172. doi:10.1007/s00127-005-0986-y
- Huguet, A., J. N. Stinson, and P. J. McGrath. 2010. "Measurement of self-reported pain intensity in children and adolescents." *Journal of Psychosomatic Research* 68 (4): 329–336. doi:10.1016/j.jpsychores.2009.06.003.
- Lindqvist, A., Sendén, M. G., & Renström, E. A. 2021. What is gender, anyway: a review of the options for operationalising gender. *Psychology & sexuality*, 12(4): 332-344.
- Lussenhop, A. (2018). Beyond the male/female binary: Gender equity and inclusion in evaluation surveys. *Journal of Museum Education*, 43(3): 194-207.
- Manworren, R. C. B., and J. N. Stinson. 2016. "Pediatric Pain Measurement, Assessment, and Evaluation." *Seminars in Pediatric Neurology* 23 (3): 189–200. doi:10.1016/j.spen.2016.10.001.
- Miller, Z. D. 2018. "Finding the Unicorn: Evidence-Based Best Practices for Improving Quantitative Measures." *Journal of Park and Recreation Administration* 36 (4): 149–155. doi:10.18666/JPra-2018-V36-I4-8889.
- Munshi, J. 2014. "A Method for Constructing Likert Scales." *Social Science Research Network*. doi:10.2139/ssrn.2419366.
- Powell, R.B., Stern, M. J., Frensley, B.T., & Moore, D. 2019. Identifying and developing crosscutting environmental education outcomes for adolescents in the 21st Century (EE21). *Environmental Education Research*, 25(9): 1281-1299. DOI:10.1080/13504622.2019.1607259
- Salazar, G., Monroe, M. C., Jordan, C., Ardoin, N. M., & Beery, T. H. 2021. Improving assessments of connection to nature: A participatory approach. *Frontiers in Ecology and Evolution*, 498.
- Vezeau, S.L., Powell, R.B., Stern, M.J., Moore, D., & Wright, B. 2017. Development and validation of two scales to measure elaboration and behaviors associated with stewardship in children. *Environmental Education Research*, 23(2): 192-213.