1Supporting 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 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)). The Access Pass is free if obtained in person at an agency location.

U.S. citizens or permanent residents, 62 years or older, may apply for the Interagency Senior Pass. FLREA requires applicants to provide adequate proof of citizenship or permanent residency and age for the Interagency Senior Pass. There are two types of Senior Passes: Lifetime and Annual. 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.

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 applications are currently online as fillable forms that can be submitted electronically or printed and submitted by postal mail. Based on current submission figures, we expect

NPS Form 10-595 Senior Pass –	**NPS Form 10-596 Access Pass** –	**NPS Form 10-597**
• In-person 10% (n=4,000) • Mail 10% (n=4,000) • Electronic: 80% (32,000)	• Mail: 20% (n=4,000) • Electronic: 80% (n-16,000)	• In-person 100% (n=152,000)

Applications for Interagency Senior or Interagency Access Passes are accepted, processed, and issued in the following three ways:

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

Individuals may obtain Passes on-site at the location of their first visit. It is not necessary for Individuals to complete an application form, in person if they possess sufficient documentation demonstrating eligibility:

<u>Interagency Senior Pass applicants must submit the following documentation </u>(1)

<u>A. </u>State-issued driver's license,

<u>B. </u>U.S. Passport, State issued identification card,

<u>C. </u>Permanent Resident Card (Green Card). 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.

<u>Interagency Access Pass applicants must submit the following </u>documentation to verify an individual has been medically determined to have a permanent disability:

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;
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);
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.

If an individual claims eligibility for the Interagency Access Pass, but cannot produce any of the 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

Interagency Access Pass applicants must submit the following:-

A. Completed Application for Mail Order Sales of the America the Beautiful – The National Parks and Federal Recreational Lands Access Pass;
B. Photocopy of identification verifying permanent U.S. residency or citizenship;
C. Documentation of permanent disability as specified by the America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures; and
D. $11.50 for document processing and shipping costs.

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.

Senior Pass applicants must submit the following:

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 America the Beautiful – The National Parks and Federal Recreational Lands Pass Standard Operating Procedures.
C. $11.50 for document processing and shipping costs.

Upon verification of the documentation, an Interagency Senior Pass will be preprinted with the applicant's name and mailed. All materials, including the application and all documentation, will be returned to the applicant or destroyed.

3. Electronic

Interagency Access and Senior Passes can be ordered online through the USGS Store website (https://store.usgs.gov). After the order is complete, a physical pass will be issued through the mail.

The bureau will review completed applications and the applicable documentation to verify the applicant is eligible for either Pass. Upon verification of the documentation, the pass will be preprinted with the applicant's name and mailed. All materials, including the application and all documentation, will be returned to the applicant or destroyed.

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.

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 no 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 by 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 October 28, 2022, we published in the *Federal Register* (87 FR 65244) 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 December 27, 2022. 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:

Table 8.1 Consultations with persons outside the agency

	Private Citizens	***Affiliation***
1.	***Interior Designer***	***Self Employed***
2.	***Instructor***	***Community College***
3.	***Coach***	***Public High School***
4.	***Homemaker***	***Retired***
5.	***Realtor***	***Brokerage***
6.	***Veteran***	***Retired***
7.	***Loan Officer***	***Bank***

"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):

- The forms are short and require minimal information.
- I believe as written the forms are clear in identifying eligibility and the means or process as to how one can obtain a pass.
- The information on the forms is formatted and properly sequenced to aid understanding.
- Not complicated to understand.
- I don't see any unnecessary questions.

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):

- *About 10 minutes*
- *10 to 15 minutes*
- The form is not complicated, and I think it should take 10 minutes to read through it and add one's information, not an unreasonable request.

NPS Response/Action Taken: The NPS will continue to use 10 minutes as the estimated respondent burden to complete each form.

"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):

- Get rid of the warning about making false statements at the bottom of the page. It will not stop people from making false statements and you will never prosecute anyone who does.
- *Possibly Red text in certain areas for emphasis, may be beneficial*.

NPS Response/Action Taken: We feel that it is our responsibility to include the wording at the "bottom of the page" (Federal Law 18 U.S.C. 1001) to create public awareness of the possible penalties related to providing false information to obtain either Access Passes. This information will remain unchanged on the forms.

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

Respondents' comment(s):

- Maybe add a QR code.

NPS Response/Action Taken: The website URL is included in the Instructions for ordering online. We do not think it is necessary to also have a QR code.

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.

Any documents or signed statements submitted are used only to verify the individual qualifications to receive the Interagency Access Pass. 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. All documents are 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 according to 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** annual responses totaling **22,668** annual burden hours (Table 12.1). We estimate the dollar value of the burden hours is **$962,936** (rounded). We used the rates listed below by Bureau of Labor Statistics (BLS) News Release USDL-23-0488, December 2022 Employer Costs for Employee Compensation— released March 17, 2023, to determine hourly wages and calculate benefits to complete the application process.

- Private Individuals. Table 1 lists the total compensation as **$42.48**, including the multiplier of 1.6 for benefits.

Table 12.1 Estimated hour burden of the collection of information

Activity	Number of Responses	Completion Time per Response (minutes)	Total Annual Burden Hours	Hourly Rate Including Benefits	$ Value of Annual Burden Hours*
NPS Form 10-595, “Senior Pass” (electronic)	**32,000**	10	5,333	$42.48	$226,546
NPS Form 10-595, “Senior Pass” (Mail-in)	**4,000**	10	667	$42.48	$28,334
NPS Form 10-595, “Senior Pass” (in-person)	**4,000**	10	667	$42.48	$28,334
Form 10-596, “Access Pass (electronic)	**4,000**	10	667	$42.48	$28,334
Form 10-596, “Access Pass” (Mail-in)	**16,000**	10	2,666	$42.48	113,294
Form 10-597, “Access Pass – Statement of Disability” (In-person)	**152,000**	5	12,667	$42.48	$538,094
Total	**0**		**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 **$686,000**. Mail-in respondents will need to make up to two photocopies and pay postage to mail in their applications. The estimated cost for processing and shipping is $11.50 (Processing = $5.00 Shipping = $6.50). Individuals using the postal service as the option to mail applications will be responsible for the standard postage rate (current estimate $0.85).

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

Activity	Number of Responses	Mailing costs	Processing and Shipping Fee	Copying/ Mailing Fees	Total Fees Per Pass	Total Non-Hour Burden Costs
NPS Form 10-595, "Senior Pass" (electronic)	**32,000**	-X-	11.50	-X-	$11.50	**$368,000**
NPS Form 10-595, "Senior Pass" (Mail-in)	**4,000**	$0.85	$11.50	$1.25	$13.60	**$54,400**
NPS Form 10-595, "Senior Pass" (in-person)	**4,000**	-X-	-X-	-X-	-X-	**-X-**
Form 10-596, "Access Pass (electronic)	**4,000**	-X-	$11.50	-X-	$11.50	**$46,000**
Form 10-596, "Access Pass" (Mail-in)	**16,000**	$0.85	$11.50	$1.25	$13.60	**$217,600**
Form 10-597, "Access Pass – Statement of Disability" (In-person)	**152,000**	-X-	-X-	-X-	-X-	**-X-**
Total	**0**					**0**

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 estimated annual cost to the Federal Government is 593,611$. This includes the cost to the Federal Government for salaries and benefits for administering this information collection as shown (Tables 14.1 and 14.2) We used the Office of Personnel Management Salary Table 2023-DEN and 2023 RUS (to determine the hourly rate). We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-23-0488 mentioned above).

Table 14.1 Estimated salary (including benefits)

Position	Hourly Rate	Hourly Rate incl. benefits*	Weighted Rate
Administrative (GS 5/5 DEN)	**$20.79**	**33.26**	**31.80**
Administrative (GS 5/5 RUS)	**$18.96**	**30.34**	**31.80**

*Hourly Rate x Benefits multiplier (1.6 rounded)
** Rounded

Table 14.2 Estimated of annualized cost to the Federal government

Activity	Applications	Time per Application (minute)	Total Hours	Annual Cost*
Process Application (Mail-in)	**20,000**	**15**	**6,000**	**190,800**
Process Application (in-person)	**152,000**	**5**	**12,667**	**402,811**
TOTAL	**172,000**		**0**	**0**

*Weighted hourly rate - $31.80

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

The change reported is a net increase of $20,000 Annual Cost Burden. This increase is due to an adjustment in estimates based on the anticipated increase in processing and shipping 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.