

Supporting Statement B for Paperwork Reduction Act Submission

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

Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," the following documentation should be included in Supporting Statement B to the extent that it applies to the methods proposed:

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The potential respondent universe will include individual surveys of park visitors (current, past, and potential) residents of communities near parks and in some cases visitors living elsewhere in the United States. All study proposals must include a description of a survey's particular respondent universe.

Based on experience with the existing NPS Programmatic Clearance Process we are estimating that there will be approximately 32,000 on-site/mail back survey respondents, 5,000 non-respondents and 7,250 respondents participating by other means (telephone surveys, focus groups, on-line surveys, etc.) annually. We are also anticipating that response rates will be at or above levels needed to obtain statistically viable results. Researchers report expected response rates to be between 50% and 80% depending on the type of collections, respondent groups and location. On-site surveys have generally garnered higher response rates (60% and higher) than mail-back surveys (less than 40%). The NPS Social Science Branch is available (as needed) to provide a range of approaches that can be used to maximize response rates based on the type of studies proposed.

2. Describe the procedures for the collection of information including:

- * **Statistical methodology for stratification and sample selection,**
- * **Estimation procedure,**
- * **Degree of accuracy needed for the purpose described in the justification,**
- * **Unusual problems requiring specialized sampling procedures, and**
- * **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The NPS Information Collection Review Coordinator (ICRC) is responsible for reviewing each request to ensure relevance, merit, soundness, and statistical validity. The review will also include an administrative component that will ensure that information collection procedures appropriately represent the needs of the National Park Service and that intended uses of the data will support our missions and goals.

All collections under this clearance will:

- be designed and deployed based upon acceptable statistical practices and sampling methodologies
- be used to gather consistent and valid data that are representative of the target populations
- account for non-response bias
- achieve response rates at or above levels needed to obtain statistically useful results

All collections under this clearance must fully describe the survey methodology. The description must be specific and describe each of the following:

- respondent universe
- sampling methods
- expected response rate and confidence,
- strategy for dealing with potential non-response bias
- any pre-testing and peer review
- an estimate of the respondent burden
- reporting plan

All submissions under this program will be carefully evaluated to ensure consistency with the intent, requirements, and boundaries of this programmatic clearance. The sampling methods and reporting statistical data must include a specific description of:

- the sampling plan and sampling procedure (including stratification and selection methods for individual respondents)
- how the instrument will be administered to respondents
- the planned analysis
- expected confidence intervals

- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

For surveys designed to infer from a sample to a population, we require that proposed collections address issues of potential non-response bias. Surveys must incorporate best practices to maximize initial response rates (i.e., keeping surveys short and to the point, offering electronic submissions, providing multiple opportunities to complete surveys, minimizing respondent burden, etc.). Further, specific strategies for detecting and analyzing non-response bias will be required. These may involve methods that use survey logs to record observable characteristics of all initial on-site contacts as well as asking a number of survey questions to serve as the non-respondents bias check.

The NPS requires that the results of non-response bias analyses be included in any reports or documents discussing the results of the collection. The likely effects of any bias on the interpretation of data and implications must be clearly described.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

Pre-testing and peer review of methods, procedures, and data-collection instruments are required as a means to reduce respondent burden and maximize the validity of NPS-sponsored surveys. In its review of submissions under the programmatic approval, the ICRC acknowledges that many of the surveys, methods and questions have a long history of successful application in the field. Therefore, intensive pre-testing may not be necessary or warranted. However, in problematic cases, where newer methods or questions are proposed, NPS will ask for documentation in peer-reviewed literature referencing previous use. In all cases, NPS will strongly encourage pre-testing on nine or fewer respondents prior to proposal submission to verify respondent comprehension, identify sources of measurement error, and refine estimates of hour burden. Ideally, participants in pre-tests will be from a similar respondent universe as the full sample. However, if this is not feasible, a similar respondent universe (e.g., visitors in nearby park comparable proposed survey sample location) should be selected.

- 5. Provide the names and telephone numbers of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other**

person(s) who will actually collect and/or analyze the information for the agency.

The names and contact information of the responsible NPS liaison and the principal investigator(s) who will collect and analyze the data are included on all submission forms received under the programmatic approval. In addition, the following individuals were consulted on statistical and other design aspects of this program.

NPS Social Science Branch will serve as support to help coordinate the survey design and research efforts of NPS and ensuring that statistical aspects of all surveys remain consistent with the programmatic approval. The Programmatic Clearance Process also requires that each proposed information collection be reviewed by a qualified statistician prior to submission of the collection.

Individuals consulted on statistical aspects of the design of the Programmatic Approval Process

Dr. Lena Le, Director
Social & Economic Sciences Research Center
University of Washington
Phone (202) 208-6997

Dr. Derrick Taff, Assistant Professor
701 H Donald H. Ford Building
Penn State University
University Park, PA 16802
814-867-1756