**FOR PAPERWORK REDUCTION ACT SUBMISSION**

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

**Terms of Clearance.**  This programmatic collection of information is approved to facilitate the NPS Social Science Program. As such, the agency has adopted practices that are consistent with the 2008 Terms of Clearance, including the use of the "Pool of Known Questions" and the restrictions on the use of the stated preference or stated choice techniques to value non-market goods. OMB concurs with such practices. Further, OMB advises that any substantial changes to the "Pool of Known Questions" and methods allowed under this collection be conducted during the regular 3-year review cycle since this collection is reserved for only non-controversial, non-policy relevant, and non-programmatic areas of inquiry. The agency is reminded that it may not proceed with any specific survey unless it receives affirmative notice from OMB. OMB strives to meet the expedited review schedule requested by the agency in this submission. During the next submission, OMB requests that NPS provide the total number of unique questions that are approved under this collection.

> *The NPS Social Science Program continues to manage and operate this programmatic collection of information consistent with the 2008 Terms of Clearance.  The Pool of Know Questions remains the standard operating instrument used to guide the creation of survey instruments.  The Programmatic Guidelines expressly disallows the use of use of the stated preference or stated choice techniques to value non-market goods in any submission.  No collection is allowed to commence until it has received affirmative notice from OMB.*

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

The National Park Service (NPS) 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 enables NPS to conduct research through external standard social science research methods (e.g., questionnaires, focus groups, interviews, etc.).  The approved information collection has historically informed and improved the services and products required to carry out part the NPS statutory mission.

Integral to the operation of the NPS Social Science Program, the Programmatic Clearance process enables expedited approval of public surveys used to provide parks with information to improve the quality and utility of NPS programs and services.  Because many of the NPS surveys are similar in terms of sample populations, questions, and research methods used, the Programmatic Clearance is approved as an alternative approach to comply with the Paperwork Reduction Act of 1995 (PRA). The Programmatic Clearance renewal, allows NPS to provide social science researcher opportunities, through an expedient process, to pursue the relationship between people and parks critically needed to protect resources, provide for public enjoyment, education, and inspiration.

The general scope of the Programmatic Clearance will remain unchanged and will continue to include individual surveys of park visitors (current, past, potential, and now virtual) and residents of communities near parks and in some cases individuals living elsewhere in the United States. The use of the Programmatic Clearance will continue to be for surveys of park visitors, potential park visitors, and/or residents of communities near parks that are not likely to include topics of significant interest in the review process.

The NPS Social Science Program will continue to conduct the necessary quality control, including assuring that each survey instrument comports with the guidelines of the Programmatic Clearance. All questions asked of ten or more members of the public must fall within the scope of 12 topic areas and drawn from the Pool of Known Questions. We will continue to submit each request to OMB for review and approval.

The Programmatic Clearance is limited to applied research that will be used to answer specific questions that have direct applications to the NPS visitor use or management. The focus will continue to be non-controversial collections that do not attract attention to significant, sensitive, or political issues. Basic research driven purely by curiosity and a desire to expand social science research knowledge that is directly applicable to current NPS management and planning needs will be directed to the full review process. The general purpose of the Programmatic Clearance is to improve the service and products that NPS provides to the public. Park managers and planners have used these data to support all aspects of visitor use, planning, monitoring, interpretation and education

Examples of collections that would not generally fall under the Programmatic Clearance Process are:
   (a) surveys that will be used for making significant policy or resource allocation decisions;
   (b) collections whose results are intended to be generalizable to the population of study
   (c) collections that impose significant burden on respondents or significant costs on the Government;
   (d) collections that are on potentially controversial topics or that raise issues of significant concern to other agencies;
   (e) collections that are intended for the purpose of basic research and that do not directly benefit the agency's customer service delivery; and
   (f) collections that will be used for program evaluation and performance measurement purposes.

Legal Justification:
   • **The National Park Service Act of 1916, (54 USC 100702) (Previously 16 U.S.C. 1a-7)**
     *requires that the National Park Service (NPS) preserve the national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation,*

*public education, facility maintenance and operation, and physical developments that are necessary for public use, health, and safety.*

- **National Environmental Policy Act of as amended in 1982 (Sec 102 [42 U.S.C. § 4332A])**
  *The Federal Government shall utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man's environment*

- *Executive Order 12862 -- "Setting Customer Service Standards"*
  *This Executive Order of September 11, 1993, is aimed at "ensuring the Federal Government provides the highest quality service possible to the American people." The E.O. requires surveys as a means for determining the kinds and qualities of service desired by the Federal Government's customers and for determining satisfaction levels for existing service.*

- *Executive Order 13571 – "Streamlining Service Delivery and Improving Customer Service"*
  *This Executive Order of April 27, 2011, mandates "establishing mechanisms to solicit customer feedback on Government services and using such feedback regularly to make service improvements."*

**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.**

Survey instruments and methods under the authority of this clearance will generally focus on visitor use and satisfaction data. Information collection seeking to collect information beyond the scope of visitor data will be considered outside the scope of this Programmatic Clearance. All information collection instruments will be designed and deployed based upon acceptable statistical practices and sampling methodologies, according to the most recent OMB guidance on "Agency Survey and Statistical Information Collections." The NPS Social Science Program will continue to provide technical and administrative review of proposed surveys and communicate review comments to investigators. There may cases when NPS may recommend that submitted proposals undergo the full PRA review process, rather than the programmatic clearance.

If, after consultation with investigators, a collection is recommended for approval by the Social Science Program, NPS will then transmit the survey instrument and certification to OMB. OMB has agreed to provide a response within ten working days of receiving the submission package. Once it has received a determination from OMB, NPS will assign the OMB control number (1024-0224) and survey completion date. Typically, the survey completion date assigned is six months after the proposed sample period to provide for any unforeseen administrative or procedural situations. Final, the Social Science program will will notify the investigator upon approval.

*Uses of the Information*

The NPS continues to benefits from this collection through reliable data concerning the following management and planning topics:

- Service needs of customers
- Strengths and weaknesses of services
- Barriers and constraints to achieving customer service standards
- Changes to customer service standards
- Changes in service delivery over time
- Improving public trust in government

The scientific communities collaborating with the NPS benefit through:

1) efficient, effective, and timely review process

2) focus on peer review that improves the quality of information collections

3) increased attention to methodological improvements and use of best practices

4) better administration and wider sharing of information obtained from surveys of the public

5) a renewed confidence and willingness to complete the review process

Historically, managers and program specialists have used these data to identify:

- needs
- levels of understanding and knowledge
- ideas or suggestions for improvement
- barriers and constraints to achieving customer service standards
- perceptions and values
- baselines to measurements to observe changes over time
- spending behaviors

*Typical Information Collection Methods*

1.   **In-person or on-site intercept Surveys:** In a face-to-face situation, a survey instrument is provided to a respondent who will be instructed to complete it while on site and then return it to a specified person or location.  This may include oral administration or the use of electronic technology and kiosks.  The survey proctor will be prepared to answer any questions the respondent may have about how to fill out the instrument but will not interfere or influence how the respondents answer the questions. All information collections in this category will be restricted to last no more than 15 minutes. There will be very few exceptions and those will be considered on a case–by-case basis. This burden must be verified by evidence of pretesting with subjects not familiar with the development of the study.  On-site surveys should be implemented in a manner that is consistent with methods that will consider respondent fatigue.  Previous survey results without an examination of respondent burden will not be considered as the sole justification for approval.

2.   **Mail Surveys:**  Using existing lists of customer addresses, a three contact-approach based on Dillman's "Tailored Design Method" will be employed.  The first contact is a cover letter explaining that a survey is coming to them and why it is important to the agency.  The second contact will be the survey instrument itself along with a postage-paid addressed envelope to return the survey.  The third contact will be a reminder postcard sent 10 days after the survey was sent.  Finally, the respondents will receive a letter thanking them for the willingness to participate in the survey and reminding them to return it if they have not already done so.  At each juncture, the respondents will be given multiple ways to contact someone with questions regarding the survey (including phone, web, and email).  If the survey has been lost, the respondent can request that another be sent to them.  Electronic mail is sometimes used instead of postal mail to communicate with customers.  Although this is a cost-effective mode to survey a large group of people, it does not usually generate the best response rate. Telephone calls to no **Telephone Surveys:**   Existing or created databases that include telephone numbers will be used to contact potential respondents.  An interviewer will use an approved dial back method until someone is available. Telephone surveys are generally reserved for hard to reach interviewees, or to follow-up with non-respondents.

4.   **Focus groups and Face-to-face Interviews:**  Selected individuals will be invited to participate in small group discussions or one-on-one interview sessions. A script is generally used to facilitate the discussions and is designed to encourage respondents to talk about experiences, preferences, needs, observations, or perceptions.  A moderator whose role is to foster interaction leads the conversation. The moderator makes sure that all participants are encouraged to contribute and that no individual

dominates the conversation.  Furthermore, the moderator manages the discussion to make sure it does not stray too far from the topic of interest.  Focus groups are most useful in an exploratory stage or when the bureau/office wants to develop a deeper understanding of a program or service.  Using the best in focus group research practices, groups will be constructed to include a cross-section of a given customer group

5. **<u>Web-based and on-line survey</u>:**  For products or services that are provided through electronic means, whether e-commerce or web-based information, a web or email survey may be most appropriate.  During the course of their web interaction, users can volunteer to add their names to a list of future surveys. From this list recognizing that the group may be self-selected, a respondent pool will be selected in accordance with the sampling procedures outlined above.  An email will be sent to them explaining the need and importance of the survey with a web link to the survey.  Within 5 days, a follow-up email will be sent to the respondents reminding them to complete the survey. Finally, the respondents will receive an email thanking them for the willingness to participate in the survey and reminding them to complete it if they have not already. The respondent will always have the option to submit the survey in paper form, should they elect to do so.

*Types of Questions asked*

There are 11 social science related topic areas that are used to guide the development of survey instruments; however, the topic areas are covered by five general overarching themes. The themes were used to guide the development of the Topic Areas. The five themes are:

1. **General demographics:** General demographic information may be gathered in order to better understand the respondent within the context of the collection.  Demographics data will range from asking customers how many times they have used or visited an NPS site within a specific timeframe, to their ethnic group and race.  Sensitivity and prudence will be used in developing and deploying questions under this topic area so that the respondent does not perceive an intrusion upon his/her privacy.  Additionally, these questions will only be asked as long as the data are critical to understanding customer satisfaction and the character of the respondent base.  Demographics may also be used as part of a non-response bias strategy to ensure responses are representative of the contact universe.

2. **Delivery and use of products, information, and services:** The information requested will be used to target areas such as:  timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with products.  Responses will be assessed to

plan and inform efforts to improve or maintain the quality of service offered to the public. The NPS is also interested in respondents' opinions concerning the accessibility and accuracy of the information provided either on-site or virtually as well as their feedback regarding how well programs are administering specific processes.

3. **Management practices:** This area covers questions relating to how well customers are satisfied with management practices and processes at NPS sites, what improvements they might make to specific processes, and whether or not they feel specific issues were addressed and reconciled in a timely, courteous, responsive manner. Questions within this area may involve feedback regarding how well NPS engaged respondents on a specific topic.

4. **Mission management:** Questions will ask for feedback regarding how well we are carrying out our responsibilities to protect and manage public lands as in our mission statement. Questions will specifically ask customers to provide responses related to our capacity to protect, conserve, and preserve natural, cultural, and recreational resources that we manage.

5. **Rules, regulations, policies:** This area will focus on gaining insight regarding fairness, adequacy, and consistency in rules, regulations, and policies for which NPS is responsible. It will also help us understand public awareness of rules and regulations and whether or not they are explained in a clear and understandable manner. It will not seek opinions from customers regarding the appropriateness of regulatory rulings themselves.

**TOPIC AREAS WITHIN THE SCOPE OF THE PROGRAMMATIC CLEARANCE**

To qualify for the programmatic clearance process, all questions in a survey must fit within one or more of the approved topic areas. Researchers have flexibility, within accepted standards of good survey design and OMB regulations, to modify or develop specific questions within the topic areas. The scope of the information collected will be limited to those that are germane to the topic being studied and relevant to the park and its management. There are no controversial or sensitive questions included in any topic area. The contribution of the areas will add to the focus of how people's knowledge, values, and behaviors influence and affected by decisions about the use, conservation, and management of national parks. Brief descriptions of each topic area are listed below.

**TOPIC AREA 1: RESPONDENT CHARACTERISTICS**

These questions characterize the population of respondents participating in each sample. Individual characteristics collected will be attributes of individual park visitors or visitor groups, potential visitors or groups, and residents of communities near parks. Individual characteristics collected will be relevant and limited to the mission, management, and/or operations of National Park System units.

**TOPIC AREA 2: TRIP PLANNING**

The section on Trip Planning includes aspects of travel which affect a trip or decisions which individuals make before, during, or after their trips to parks, related areas, and nearby communities. Trip characteristics will be relevant to the mission, management, and/or operations of National Park System units that are included in the scope of this topic area.

**TOPIC AREA 3: TRIP CHARACTERISTICS**

This topic area will address four high level questions used to understand he emotional bond between person and place,: (1) current plans for visiting parks (2) future plans (3) current and future destinations and (4) place attachment. It is a common finding place attachment is thought to increase with greater time spent at it.

**TOPIC AREA 4: TRANSPORTATION**

The questions in this section will be used to fulfill management goals needed to develop strategies to meet transportation needs. These strategies address current and future land use, economic development, traffic demand, public safety, health, and social needs.

**TOPIC AREA 5: VISTOR USE AND RECREATION MANAGEMENT**

The questions in this section will be used to identify individual activities, behaviors, or uses of natural and cultural resources which are relevant to the mission, management, and/or operations of National Park System units. Understanding the current and future uses will be helpful to managers when considering updating park management plans and educational efforts.

**TOPIC AREA 6: EVALUATION OF PROGRAMS AND SERVICES**

Public opinion of the services and facilities helps management teams understand the values people hold in relation to park resources and the visitor experience and is critical to creating a plans that can be successfully implemented. Understanding public values enables the management teams to make informed planning decisions.

**TOPIC AREA7: HUMAN DIMENSIONS**

The questions in this topic area focus on developing fundamental understandings of human behavior associated with resource management. The questions in this topic area will be used to help managers learn about public concerns, issues, expectations, and values. Preferences, motives and attitudes will be measured to determine how individual observations influence overall experiences. For purposes of the programmatic clearance process, perception questions will be limited to topics the park or the NPS can manage and control as well as current or potential goods and services.

**TOPIC AREA 8: ENVIROMENTAL HEALTH AND RESOURCE MANAGEMENT**

Questions in this topic area collect information concerning the public's awareness and observations of the natural and social environments in the parks. The questions in this topic area provide park resource managers with an understanding of the public's awareness well as the social consequences of management actions.

**TOPIC AREA 9: EXPENDITURES**

Visitor expenditure and income information is needed to calculate the economic impact and benefit of park visitation. Economic impact measures how much the money people spend visiting parks and surrounding areas contributes to the local economy in terms of jobs and income. Accurate impact assessment requires identification of those portions of expenditures that occur in the local region and inside the park.

Questions that employ stated preference or stated choice techniques to estimate consumer surplus values and non-market values are <u>outside</u> the scope of this approval. The responses to the questions in this topic area are not intended to be used or combined with any other survey responses outside the scope of the proposed survey request. Results should only be aggregated to the population of visitors to the specific park unit for which the approval is granted. There should be no attempt to disaggregate any values to generalize the results above or beyond of the scope of the intended proposed and approved purpose.

**TOPIC AREA 10: CONSTRAINTS AND BARRIERS FOR NON-VISITORS**

Research is necessary to develop a better understanding of non-visitors, including lapsed and invisible visitors. Surveys should include non-visitors that include virtual visitors, underserved communities and stakeholders so that comparisons and insights are drawn as appropriate.

**TOPIC AREA 11: SAFETY AND RISK MANAGEMENT**

This topic area explores visitor awareness, knowledge and perception of safety and injury prevention measures: Questions are tailored to cover aspects of individual activities and behaviors, and the acceptability of current safety practices. Understanding the factors associated with visitor behavior and perceptions for public risk management are critical to enforcement, education and emergency services that can be successfully implemented to reduce injury in parks

There are no new topic areas in the Pool of Known Questions.

Updates:

- Select questions have been removed to eliminate redundancy created by having the same question repeated in multiple topic areas

- TOPIC AREA names changes are updated to describe accurately the nature of the research topics supported by the questions in each section.

- TOPIC AREA 6: EVALUATION OF PROGRAMS AND SERVICES: The Teacher and Student Evaluation subsections are "new" in this topic area. The questions however, are not new. The questions in these subsections were approved as variations of the questions created for teacher and student surveys.

- Table of Contents. Subsections arranged alphabetically under each topic area.

**Submittal Process**

The NPS sponsor for each collection is required to ensure that the requirements for complete submission are satisfied before submitting the collection under the Programmatic Clearance Process for NPS Public Surveys. The requirements include a completed submission form and the final version of all documents that will be used in the collection (questionnaires, interview scripts, maps, photographs, correspondences, etc.). The submission form serves as the supporting statement for the collection. It provides the justification, sampling dates and locations, sampling procedures and respondent burden

The Principal Investigator (PI) will typically initiate the process by filling out the form and developing the survey instrument; however, the park sponsor is responsible for reviewing the form and the instruments to ensure that park policy, purpose/need, and relevancy is generally guiding the collection. The Social Science Program will continue to encourage investigators to use the *Pool of Known Questions* developed for this process when it is consistent with the purpose of their studies. We acknowledge that there are other questions, such as those measuring visitor experience, use history, and travel behaviors, etc., that have been used and validated in numerous recreation surveys. Any variations of questions within each Topic Area will be considered (on a case-by-case basis) and the applicability will be determined before submitting the final version to OMB for its review and consideration of approval.

Programmatic Clearance Workflow
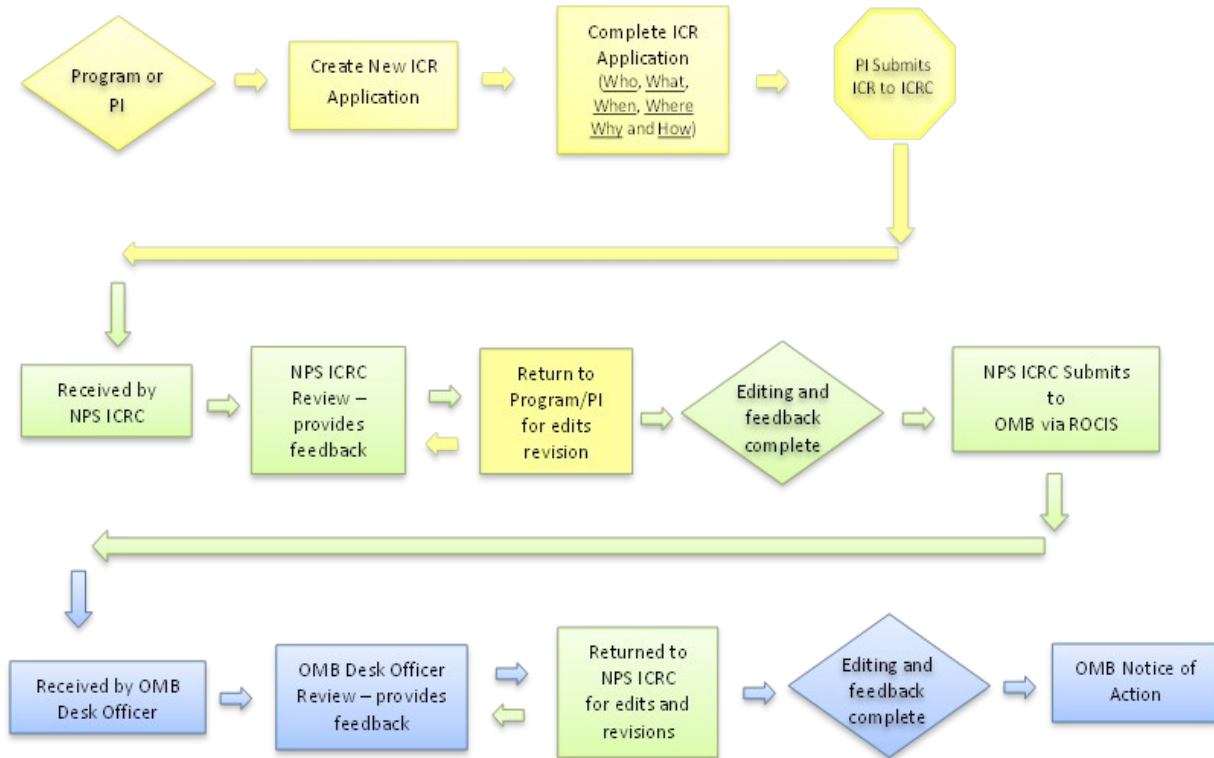


*NPS ICRC – NPS Information Collection Review Coordinator    *PI – Principal Investigator    *ICR – Information Collection Request

**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.**

Individual surveys conducted under this Programmatic Clearance will vary in the methods used to contact the public. At least 70% of the surveys conducted under this program will consist of on-site and or mail back surveys.  About 50% of those surveys will offer electronic response options (e.g., Survey Monkey, Qualtrics, etc.). About 25% will be collected by way of face to face or telephone interviews or small focus groups; and the remaining 5% will be in the "other" category.  In all cases, appropriate non-response bias strategies will be used to ensure that responses are representative of the contact universe.

**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.**

This effort attempts to be sensitive to any duplication of efforts by other entities. Any possible duplication will be determined during the technical and administrative review of individual submissions. We continue to work with the NPS research permitting administrators to link the information collection process and the permitting process so that the submissions that may have an information collection component from other non-federally sponsored programs are known. In the past, research conducted by Universities or non-Governmental Organizations (NGO) including surveys of park visitors were given research permits but were not reviewed by the NPS Social Science Program. We continue work to close that gap. The first step is to identify duplication onsite and within the agency.

We acknowledge that there are and have been other collections and programs[1] that provide information about the outdoor recreation patterns on a national level; however, these collections do not typically cover the types of management and planning issues that are central to individual units of the National Park System.

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

A significant advantage of this process is to gather information needed without putting additional burden on small entities. Sampling will be used and the number of questions on the surveys will be kept to a minimum. Use of electronic means also potentially reduces the burden on 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.**

This Programmatic Clearance Process has allowed the NPS to navigate the PRA process in an expedited manner. This process simplifies and streamlines the information collection requests to OMB in a manner that allows the NPS to submit significantly more requests per year than we could through the regular submission route. The expeditious review and approval process allows data collections to occur more frequently and in a timely manner – more specifically during high visitation seasons. On average, 25 new surveys are approved in support of NPS management and planning. This is nearly ten times more than we have submitted through the regular submission route.

**7. Explain any special circumstances that would cause an information collection to be conducted**

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[1] 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)*

**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).  We may be asking respondents to send back their responses in fewer than 30 days after receipt of the survey

**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 May 28, 2019, a 60-day Federal Register notice (84 FR 24536) was published announcing this information collection renewal.  Public comments were solicited for 60 days ending July 29, 2019.  We did not receive any comments in response to this notice.

In addition to the request for public comment, we requested feedback from four individuals who had served as principal about their impressions of the Programmatic Clearance Process. The overarching theme from the commenters was in support of continuing the programmatic approval process and suggested that we update the *Pool of Known Questions* by removing redundant questions across the topic

areas.  All commenters agreed that this would reduce the page length and that the reappearing questions not necessary for experienced researchers, however they acknowledged that novice survey designers could benefit from having repeated questions associated by categories. The Pool of Know Questions was updated to remove grammatical and typographic errors.  Three of the commenters contributed by copy editing a draft version of the revised Pool of Known Questions to improve clarity questions and instructions.  Finally, the commenters suggested combining all questions related to visitor activities under Topic Area 5: Visitor Use and Recreation Management – subtopic area Activities.

NPS Response:  The *Pool of Know Questions* was updated and revised based on the comments and edits received.

The questions in the revised *Pool of Known Questions* are from the following four sources:
1. Current and expired OMB approved recreation based surveys (all federal agencies)
2. Previous non-federally funded studies conducted by the working group members
3. Surveys found in peer-reviewed literature, and
4. Variations of any question in the currently approved *Pool of Known Questions* approved by OMB between 2016 and 2019.

**Table 8.1**

| Organization | Title |
| --- | --- |
| Washington State University<br>Social and Economic Sciences Research Center, | Program Director |
| Penn State University<br>College of Health and Human Development | Assistant Professor |
| Kansas State University<br>Park Management and Conservation | Associate Professor |
| University of Montana<br>Mathematics | Research Specialist |

**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 remunerations or de minims gifts may be appropriate within the scope of this program.  In the event that there are collections that seek to use incentives, the program manager will be required to justify the purpose and need of the proposed incentive; the proposed purpose will be submitted to OMB for review and consideration.

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

We will not provide any assurance of confidentiality to any respondents. Data collected will only be reported in aggregates and no individually identifiable responses will be reported

**11.  Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.  This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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 44,250 annual respondents. Given these estimates, NPS anticipates a budget of 11,792 hours per year for these proposed collections.  This renewal does not includes any existing ICs currently approved under this OMB control number.

We used the Bureau of Labor Statistics (BLS) News Release [USDL-19-1649](#), September 17, 2019, Employer Costs for Employee Compensation—June 2019, to calculate the total annual burden. This wage figure includes benefits. We estimate the total dollar value of the annual burden hours for this collection to be $$431,706 (rounded). We arrived at this figure by multiplying the estimated burden hours by $36.61 for civilian worker (public). This figure includes wages and benefits.

**TABLE 12. 1**. **Total Estimated Annualized Burden**

|  | Annual Number of Responses | Estimated Completion[1] Time per Response | 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 minutes | 7,500 | $36.61 | $274,575 |
| **Mail-back surveys** | 2,000 | 20 minutes | 667 | $36.61 | $24,419 |
| **All non-response surveys** | 5,000 | 3 minutes | 250 | $36.61 | $9,153 |
| **Telephone Interviews** | 250 | 30 minutes | 125 | $36.61 | $4,576 |
| **Focus Groups/In person interviews** | 2,000 | 60 minutes | 2,000 | $36.61 | $73,220 |
| **On-line surveys** | 5,000 | 15 minutes | 1,250 | $36.61 | $45,763 |
| **Annual TOTAL** | **00** |  | **00** |  | **0** |
|  |  |  |  |  |  |
| **3 YEAR Total** | **132,750** |  | **35,376** |  | **1,295,118** |

[1]*Average time*   [2]*Total 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.**

The total annualized cost to the Federal government is estimated to be $2,028,304. This includes federal salaries and operational expenses. This estimate is based upon our experience and the program's determination of the development and execution of each collection. Because this is determined on a case-by-case basis we have assumed a ratio of 20 hours of time per Federal worker associated with the development of a programmatic submission. We estimate that there will be at least 20 submissions in FY20.  This estimate is based on the average of the number of annual submissions between FY16 through FY19.

The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2019 General Schedule (GS) Locality Pay Table 2019-DEN to determine the hourly rate (see: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/ DEN_h.pdf).  We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release mentioned above).

### 14.1. Federal Salaries

| Position | Grade/ Step | Hourly Rate | Hourly Rate incl. benefits (1.6 x hourly pay rate) | Estimated time (hours) per submission | Cost Per submission | Annual Cost (x20) |
|---|---|---|---|---|---|---|
| Program Manager | 12/5 | $44.23 | $70.76 | 20 | 1,415 | $28,304 |

We estimate that the operational cost to the Federal Government to be $2,000,000. This cost includes the expenses listed in Table 14.2 below. This includes non-federal FTE, travel, equipment and operating costs associated with this information collection (Table 14.2).

**Table 14.2. Operational Expenses associated with this information collection**

| Operational Expenses | Cost Per submission | Annual Cost (x 20) |
|---|---|---|
| Researcher/Principal Investigator | $30,000 | $600,000 |
| Contracts and Support (Survey Design and Development, Survey Administration, Data Collection, Data entry, Data analysis and Reporting) | $70,000 | $1,400,000 |
| **TOTAL** | $100,000 | $2,000,000 |

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

The net increase of 1,527 burden hours is based on the increase in the average number of total responses (n= 2,750) per request using the NPS generic approval.
.

| Request Type | Responses | | | Burden Hours | | | Reason for Change |
|---|---|---|---|---|---|---|---|
| | Previous Request | Current Request | Net Change | Previous Request | Current Request | Net Change | |
| **On-site Surveys** | 20,000 | 30,000 | +10,000 | 5,000 | 7,500 | +2,500 | Annual increase in size and scope of on-site surveys |
| **Mail-back surveys** | 10,000 | 2,000 | -8,000 | 3,333 | 667 | -2,666 | Mail-back surveys are increasingly more expensive and time consuming compared to other methods. We have noticed a significant decrease in the number of requests for mail-back surveys. |
| **All non-response surveys** | 6,500 | 5,000 | -1,500 | 325 | 250 | -75 | The reduction in mail-back surveys caused a decrease in the number of attempts to contact non-respondents. |
| **Telephone Interviews** | 1,000 | 250 | -750 | 500 | 125 | -375 | Traditional telephone sampling methods are not as effective with the decreased number of landlines as the primary telephone number. Telephone interviews are reserved for known entities and stakeholders. |
| **Focus Groups/In person interviews** | 1,500 | 2,000 | +500 | 1,500 | 2,000 | +500 | The net decrease in phone interviews have been replaced by in-person, on-site and focus group interviews. |
| **On-line surveys** | 2,500 | 5,000 | +2,500 | 625 | 1,250 | +625 | The option of mail back survey method have been replaced by on-line survey options. Sampling methods used for mail back surveys are optimized using on-line surveys. |
| **Annual Subtotal** | 41,500 | 0 | +2,750 | 11,283 | **00** | 509 | |
| **3 year total** | 124,500 | 132,750 | 8,250 | 33,849 | 35,376 | 1,527 | |

**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 a submission form to describe the proposed collection. The information will include a justification, location, sampling methods, and respondent burden.  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 data will be gathered primarily for internal NPS use, so it is not expected that such data will be published.  However, if the results of a particular survey are to be published or otherwise made public, that fact will be disclosed in the completed Justification Form for that survey.

The analyses will typically include response frequencies, means, standard deviations, and confidence intervals used 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 complex 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.

**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.