

Supporting Statement A
for Paperwork Reduction Act Submissions

National Park Service UniDescription Evaluation
OMB Control Number 1024-NEW

Terms of Clearance: None.

A. Justification

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

The U.S. National Park Service (NPS) attracts about 330 million visitors a year. Of those visitors, nearly 80 percent report looking at park brochures. While the NPS cannot track visitors who are blind, have low vision, or have reading disabilities, they comprise a portion of the population who are and will continue to be underserved when alternative formats of one the most utilized and popular interpretive and education NPS products are not provided.

Section 504 of the 1973 Rehabilitation Act (29 USC 798) as amended protects people with disabilities against discrimination. This is further regulated in 43 CFR Part 17, Subpart E in the form of auxiliary aides which “provide an equal opportunity for people with disabilities to participate in and enjoy the benefits of programs and activities conducted by the agency.” To lessen the gap with this underserved population, the NPS, in partnership with the University of Hawaii, is producing audio-described alternative formats of NPS brochures.

Effectively communicating with people with disabilities is another requirement within DOI's 43 CFR Part 17, Subpart E regulations. While some research and resources about effective audio description practices exist for live theater performances and video programs, audio description research, resources, and best practices for static materials, such as print brochures, are limited. This collection of information is necessary to ensure that these alternative formats communicate effectively and equitably to their intended audience.

“Nothing about us without us” is a popular slogan within the disability community supported by legal requirements. The 21st Century IDEA Act (PL 115-336) requires that digital services are accessible to people with disabilities and designed around user needs with data-driven

analysis. Section 508 requires digital materials to be accessible to people with disabilities. OMB's M-24-08 strengthens digital accessibility by also requiring the input of people with disabilities when developing and deploying digital services and products. This collection of information supports these legal and administrative requirements to include people with disabilities in the evaluation and testing of these audio-described alternative formats delivered in a digital environment.

The user feedback received through this information collection is necessary to inform the best practice guidance needed by the NPS to ensure that the audio-described brochures it produces are effectively communicated and delivered to people with disabilities. Based on the mandates of the 1916 Organic Act (54 USC 100101), this collection allows this and future generations of underserved park service visitors an equitable opportunity to learn about, connect to, and enjoy these national park service sites.

The National Park Service is partnering with the University of Hawaii.

Legal Authorizations:

- 29 U.S.C. § 798 Section 508 Rehabilitation Act
- 54 U.S.C §100101 National Park Service Organic Act of 1916
- 54 U.S.C § 100705 Availability of System Units for Scientific Study
- 54 U.S.C § 100706 Integration of Study Results into Management
- PL 115-336 The 21st Century IDEA Act

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 the quality of the content and delivery of audio description, and the impact this quality has on the connections blind, low vision, and Deaf/blind audio description users have to national park service sites and stories.

Uses of the Information

The NPS will benefit from this collection through reliable data concerning the following management and planning topics:

- Providing effective content and delivery methods for NPS accessibility auxiliary aides

through the production of data-driven best practice guidance.

- Increasing Diversity, Equity, Inclusion and Accessibility initiatives, understanding, and opportunities for the public within national parks.
- Enabling direct engagement of the user community to help determine short- and long-term audio description content, delivery approaches, and priorities as required by law, policy, and best practices.

The scientific communities collaborating with the NPS benefit through:

- The development of audio descriptions for already-created NPS print materials used by the public to develop and test audio description content and delivery.
- Efficient and effective field testing “in situ” in a diversity of national park service sites where their use by the public is intended.
- Effective administration and improved methodologies for information collection.
- Peer review that further focuses the data collection.
- More widespread use of the results for best practice development and support for future investigation and research.

Typical Information Collection Methods

We will use three modes to collect information: (1) an Initial Contact Information Form (2) an Online Survey Instrument and (3) an on-site Survey/ focus group session at the end of the site visit. The American Council of the Blind (ACB) will provide the primary investigator with a list of interested respondents. The online and onsite survey/focus groups will use the same set of questions.

Types of Questions Asked

The questions in each section (described below) will be used to confirm the quality, effectiveness, and utility of audio descriptions as a means to communicate information about national park service sites and stories.

1. **Initial Contact:** The purpose is to collect demographic information (e.g., age, education, and level of audio description usage) and confirm participation in the study. All questions here and elsewhere are optional.

Survey Questions

Section 1: Technology. Questions in this section are used to determine the respondents’

overall approach toward mobile technologies. This information will further NPS's knowledge about the technologies used to deliver audio descriptions that will help to focus and prioritize improvements.

Section 2: Visitation Motivation. Questions in this section will provide insight into how audio description services could be used to promote engagement and visitation with NPS sites. Having a better understanding of motivations will provide the NPS with additional information about how members of this underserved audience relate to the NPS and its sites.

Section 3: Quality. Questions in this section focus on the quality, style, and approach of the audio description content. Responses will help further best practice guidelines for audio description content development and writing.

Section 4: Impacts. Questions in this section will help determine the impact of audio description has on visitors. Responses will provide insight related to their experience and connection to the National Park Service and its sites, which will contribute to understanding the level of need and prioritization of audio description services.

- 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 collection of information will be 100% electronic. On-line surveys will be administered via the Internet (www.unidescription.org). On-site surveys and focus groups will be conducted verbally; however the facilitator will use an electronic device (i.e., iPad or other tablet device) to record the information.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no duplication of effort within the Department of Interior. There are no other known studies available to understand or gauge the effectiveness of audio-described brochures used to communicate with people who are blind, have low vision, or have reading disabilities.

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

There is no impact on small businesses or other small entities.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The National Park Service (and all federal agencies) are mandated under Section 504 of the Rehabilitation Act to provide alternative formats to effectively communicate to their intended audiences. Failure to understand the effectiveness and impact of current methods to deliver information in digital format, like audio description will limit our ability to provide alternative remedies and service to ensure accessibility.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that would cause this information to be collected in a manner inconsistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A Federal Register notice requesting public comments was published on February 21, 2023 (88 FR 10537). The notice announced that we would submit this information collection request to OMB for approval. In the notice, we solicited public comments for 60 days, ending April 24, 2023. We received no comments. No actions were required.

In addition to the Federal Register Notice, we contacted 5 media-accessibility stakeholders who previously participated in our program and who are familiar with this collection of information by email and asked them to provide comments on the updated versions of the forms and our process to collect information.

Respondent	Organizational Affiliation
1. Alternate Media Specialist	De Anza Community College, Cupertino, CA
2. UniD Senior Judge	Canadian Council of the Blind
3. UniD Participant	American Council of the Blind
4. Audio Description Specialist	Audio Description Consumer
5. UniD Senior Judge	American Council of the Blind

Specifically, we asked for comments on:

1. ***“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: Without these research questions, there would be little guidance for describers on what makes sense to describe, and how it should best be done.

Respondent #2: The collection of information is very necessary to establish whether or not the information is of good quality and therefore provide a description that can easily tell the story to the person listening and therefore can make informed decisions on visit the national site or not.

Respondent #3: Most of the questions that are being asked are appropriate. There are several questions about my connection to the National Park Service about being helpful or not helpful that I don't think are appropriate because the info provided is usually very complete. The attention that I am usually given at national parks by park rangers has always been excellent and very customer

Respondent #4 I feel all of the questions are necessary and have practical utility.

NPS Response/Action taken: No action is required.

Respondent #5 The collection of information is necessary to get a broad set of responses from the blind and low vision community. Not everyone in this community uses the exact same accessibility tools to access the app and each person unique skill levels regarding technology. In order to continue to improve on the UniD app, this type of information is necessary. That being said, maybe some context could be added to questions like, would you share this description with a friend. That questions always catches me off guard. Would you ask the same question of a sighted person? Would a sighted person share every image on a brochure with a friend? Maybe would you share information from the overall brochure with a friend would be more appropriate? Also the questions regarding the personal connection with the place being described could be worded in a better way if that is what you are trying to understand, the personal connection that a person feels to a park due to the history of the park connecting to their own culture or upbringing.

NPS Response/Action taken: The NPS has reviewed all proposed questions with these comments in mind. As a result, the question has been revised from *"Would you share this description with a friend?"* to *"How likely are you to share information about the brochure with a friend?"*

"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?"

Respondent #1: As an experienced user, each form takes me about a half hour. Less experienced users could take as long as two hours, but once they gain the experience filling in these forms, they will need less time.

Respondent #2: It takes approximately 20 minutes or longer depending on to complexity of the material in a particular section. Sometimes it takes longer and sometimes it is very short. To ensure an accurate description it will take longer.

Respondent #3 Usually more than 30 minutes it takes an hour for me as I prefer to give longer answers and more complete answers. There is a way to just give one or two word answers in some of the narratives and I feel that is where my insights can make the most difference. This is a very good project and deserves our best attention.

Respondent #4 I estimate it could take 30 minutes or longer to complete the form.

Respondent #5 30 minutes to 1 hour.

NPS Response/Action taken: Based on these responses the NPS has increased the estimated time to complete the online survey from 20 minutes to 60 minutes.

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

Respondent #1: No. The UniDescription project is doing a great job of collecting information about both the quality of description and the needs of the audience who will ultimately benefit from these descriptions when visiting parks or making choices about which parks to visit.

Respondent #2: Sometimes the clarity is a bit difficult to ensure the quality is accurate. This has improved more recently in explaining exactly what is needed.

Respondent #4 No, I do not. I think the current information provided is fine.

NPS Response/Action taken: No action required.

Respondent #3: Allowing individuals to have grammar and spell check capabilities in the narrative portions of the survey would be helpful. Grammar and spell check would be helpful to the accuracy for the information being submitted. Coming back to the portions of the survey group to discuss results or propose results would also be helpful. We put the data in but we don't always know what the technical results of the analysis is by the survey group or national park services. Lastly, being able to chart the improvements over time would make for a very interesting part of the survey so that individuals can see that they are making a difference.

NPS Response/Action taken: Doing this would be outside the scope of the software development process for this segment of the collection. We anticipate that the respondent will have grammar/spell check imbedded in their personal computer software.

Respondent #5 Use relatable wording in the questions as I mentioned above. Also, only ask each question once, not the same questions so many different ways.

NPS Response/Action taken: The NPS has deleted redundant questions based on feedback.

4. ***“Do you have any suggestions on ways to minimize the burden of the collection of information on respondents.”***

Respondent #1: I don't see that for me at least that it was any sort of burden.

Respondent #2: I am not sure how to minimize this burden but I think the burden is important to get a good description.

Respondent #3: Not at present. I think that being able to have narrative responses should take up the most time and might provide the most insights to the national park.

Respondent #4: No, I do not. I think if the form were shortened, critical data could be missed.

NPS Response/Action taken: No action required.

Respondent #5: As I mentioned above, only ask each question once, not the same question in many different ways. I often feel like I am repeating myself when filling out a questionnaire that does this. Focus on questions that will truly impact the quality of the brochure for blind and low vision users.

NPS Response/Action taken: The NPS has deleted questions to remove redundancy.

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

The National Park Service does not offer any monetary payments. However, the University of Hawaii in partnership with the American Council of the Blind will provide a stipend to participants completing the on-line survey and travel expenses for the on-site tours.

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

We do not provide any assurance of confidentiality. We will maintain the information in accordance with Privacy Act System of Records (SORN) DOI-16, Learning Management System (83 FR 50682, October 9, 2018).

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

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

The total estimated annual burden for this information collection is 108 burden hours.-

- **Initial Contact:** 32 respondents will be sent a link and asked to answer the questions in the initial contact form. The time to complete to initial contact is estimated to be 15 minutes per respondent.
- **On-site Activities** - Four site visits comprised of 5 respondents per site visit will occur annually. Upon arrival, each respondent will tour the site while listening to the descriptions within the audio-described brochure. The respondent will complete an onsite survey administered by the facilitator. Each tour will last about an hour.
- **Focus group Sessions:** At the end of the tour all 5 respondents in the group will gather to participate in a focus group. The focus group sessions are not anticipated to last more than 1 hour.
- **On-line Survey:** At total of 12 respondents will be asked to review a set of five (5) audio-described brochures. The review and response for each brochure is estimated to take 60 minutes per respondent.

We estimate that there will be approximately 132 annual responses totaling 108 annual

burden hours. We estimate the total dollar value of the annual burden hours for this collection to be \$4,915 (rounded). We used the Bureau of Labor Statistics news release USDL-24-0485, March 13, 2024¹, Employer Costs for Employee Compensation—December 2023. to calculate the hourly rate (including benefits) for private individuals at \$45.52.

TABLE 12. 1. Total Estimated Annualized Burden

Activity	Annual Responses	Completion Time per Response (minutes)	Annual Burden Hours	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden Hours **
Initial Contact	32	15	8	\$45.52	\$364
On-site Activity	20	60	20	\$45.52	\$910
Focus Group Sessions	20	60	20	\$45.52	\$910
On-line Survey*	60	60	60	\$45.52	\$2,731
<i>Total</i>	132		108		4915

*12 respondents x 5 responses each

(**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

¹ <https://www.bls.gov/news.release/ecec.nr0.htm>

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 burden cost to respondents.

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 combined annualized cost to the Federal government is \$136,980. This includes the costs for federal salaries (\$31,980) and Operational Expenses (\$105,000)

The annual cost to the National Park Service to administer this information is based upon occasional government staff support services (Table 14.1). To determine average hourly rates, we used the Office of Personnel Management 2024 Salary Table for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2024-DCB²). We also used the Bureau of Labor Statistics news release referenced above to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.6 to obtain a fully burdened rate.

Table 14.1 Annualized Cost to Federal Government

Title	Grade/ Step	Hourly Rate	Fully Burdened Rate (1.6)	Total Annual Hours	Annual Cost (rounded)
Media Accessibility Coordinator	GS-13/5	64.06	102.50	312	31,980

Table 14.2 below shows operational expenses (such as equipment, overhead, printing, and support staff) associated with this collection.

Table 14.2. Estimated Operational Expenses

Activity	Total Annual Cost *
Principal Investigator - University of Hawaii	\$50,000
Research Assistant - University of Hawaii	\$30,000
Travel	5,000
Software Development/Maintenance	15,000
Miscellaneous Supplies (e.g., postage, paper printing, envelopes, etc.)	5,000

² https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx

Total	25000

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

This is a new collection.

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

1. Analyze data and prepare reports: December 2024

- Product: draft reports with frequencies and descriptive statistics regarding visitor experience.

2. Submit final report to the NPS Office of Communication, Media Accessibility Coordinator, Harpers Ferry Center

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 all documents associated with this collection. form.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.

Supporting Statement B:

There are no statistical analyses or complex sampling methods associated with this collection. All participation is based on a vetted convenient sample provided by the American Council of the Blind (ACB). Simple frequency distributions will be used to provide descriptive information for reports submitted to the National Park Service.