1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION

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

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) requests a three-year extension of its Programmatic Clearance for NPS-Sponsored Public Surveys (OMB Control No. 1024-0224). This clearance is essential for meeting NPS responsibilities under 54 U.S.C. 100702, which authorizes the collection of information needed to improve the management, planning, and protection of national parks. It also supports Federal customer-service requirements established in Executive Order 13571 and Executive Order 12862, which direct agencies to solicit customer feedback and use that information to improve service delivery.

The Programmatic Clearance provides an efficient, PRA-compliant mechanism for collecting timely, management-relevant data from park visitors, potential visitors, and community members. These data are critical for identifying emerging issues, understanding visitor use patterns, addressing resource-management concerns, and informing decisions that directly affect visitor safety, resource protection, and service quality. The expedited approval process is necessary because many information needs arise quickly and cannot wait for the timelines associated with a full PRA review.

The scope of the clearance remains unchanged and continues to include individual surveys of current, past, potential, and virtual visitors, as well as residents of communities near parks. The Social Science Program will maintain rigorous oversight to ensure each submission aligns with Programmatic Clearance requirements, uses approved topic areas, and adheres to methodological standards before being forwarded to OMB for review. The clearance is limited to non-controversial, applied research that directly supports NPS management.

Renewing this clearance ensures that NPS can continue to gather timely, actionable information needed to fulfill its mission to protect resources while providing for public enjoyment, education, and inspiration. Because park managers frequently need information to respond to emerging conditions—such as shifts in visitation patterns, resource pressures, safety concerns, or service delivery issues - timely data collection is critical. The expedited approval process offered through the Programmatic Clearance process provides the most efficient and practical means to collect information required to make informed, science-based decisions.

Since its initial approval in 1998, the Programmatic Clearance has consistently supplied managers with high-quality data that support visitor-use planning, resource stewardship, facility operations, interpretation, education, and overall service delivery. Renewal will ensure that NPS continues to meet its statutory mission with the best available social science information, delivered when it is most needed.

Examples of collections that <u>would not</u> 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.

<u>Legal Justification:</u>

- **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 development 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 ensure 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."*

- ***Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act of 2025, (P.L. 118-234)*** *requires the National Park Service (NPS) to collect and report recreational visitation including recreation activity data. Key data and information needs to generate visitor use and visitation estimates requiring self-reported information/variables*.

---

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 be 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. Finally, the Social Science program will notify the investigator upon approval.

Uses of the Information

The NPS continues to benefit 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

In-Person or On-Site Intercept Surveys
For in-person data collection, respondents are approached on site and provided with a short instrument to complete before leaving the location. Instruments may be administered in paper or electronic format, including through kiosks. A survey proctor may address procedural questions but will not influence respondent answers. Instruments using this method will not exceed 15 minutes in duration unless a justified, case-specific exception is approved. Estimated burden is verified through pretesting with individuals who were not involved in instrument development. On-site administration procedures are designed to minimize respondent fatigue. Prior survey burden estimates that did not incorporate burden testing will not be accepted as the sole justification for approval.

Mail Surveys
Mail surveys follow a multi-contact protocol consistent with Dillman's Tailored Design Method. The initial contact notifies individuals that a survey will be sent and describes its purpose and importance. The second mailing includes the survey instrument and a postage-paid return envelope. Approximately ten days later, a reminder postcard is sent. A final thank-you letter is then issued, which also serves as a reminder for nonrespondents. Respondents are provided with multiple avenues to request assistance or ask questions (e.g., telephone, email, or web). Replacement instruments are provided upon request. Electronic mail may serve as an alternative mode for certain stages of contact; however, response rates associated with this option are considered when selecting the mode of administration.

Telephone Surveys
Telephone surveys utilize existing or newly developed call lists. Interviewers follow an approved callback protocol to reach potential respondents. This method is generally reserved for respondent groups that are difficult to reach using other modes or for follow-up with individuals who have not responded to earlier contacts.

Focus Groups and Face-to-Face Interviews
Focus groups and individual interviews are used when more detailed qualitative information is required. Participants are invited to take part in structured discussions that follow a moderator's script designed to elicit experiences, perceptions, needs, and observations relevant to the topic. A trained moderator ensures balanced participation and maintains focus on the subject matter. These methods are particularly appropriate during exploratory phases or when more in-depth

understanding of a program or service is needed. Groups are composed using established practices to ensure representation of the relevant customer population.

Web-Based and Online Surveys

For electronically delivered services or information products, a web-based instrument may be the most appropriate mode. Users may voluntarily provide their contact information for future surveys, and samples are drawn from this pool using standard sampling procedures, with consideration given to the self-selected nature of the list. Respondents receive an email describing the survey's purpose and containing a link to the instrument. A reminder email is sent within five days, and a subsequent thank-you message also serves as a final reminder for nonrespondents. Respondents may request a paper version if they prefer not to complete the survey electronically.

Types of Questions asked

There are eleven social science topic areas that guide the development of survey instruments. The topic areas fall under five overarching themes used to structure and organize the content of the Pool of Known Questions.

1. **General Demographics:** Demographic questions may be included when needed to understand respondents within the context of the collection. These items may address visitation frequency, race and ethnicity, or similar characteristics. Questions are developed with care to avoid unnecessary sensitivity or perceived intrusion. Demographic data are collected only when essential to interpreting customer satisfaction or characterizing the respondent population. They may also support non-response bias analysis.

2. **Delivery and Use of Products, Information, and Services:** Questions in this theme address elements of service delivery, including timeliness, appropriateness, courtesy, efficiency, accuracy of information, and problem resolution. Responses inform efforts to improve or sustain the quality of NPS services provided onsite or virtually. This area may also capture feedback on accessibility, clarity, and administrative processes.

3. **Management Practices:** This theme includes questions assessing customer satisfaction with NPS management practices and processes. It may address perceived responsiveness, timeliness, and courtesy in handling issues, as well as the adequacy of engagement on specific topics.

4. **Mission Management:** Questions seek feedback related to NPS responsibilities for protecting and managing public lands. Respondents may be asked to evaluate NPS performance in conserving, preserving, and protecting natural, cultural, and recreational resources.

5. **Rules, Regulations, and Policies:** Questions in this area gather insight regarding awareness, clarity, fairness, and consistency of NPS rules and regulations. These items evaluate public understanding but do not solicit opinions on the substantive appropriateness of regulatory decisions.

Programmatic Clearance Topic Areas

To qualify under the Programmatic Clearance Process, all questions must fall within one or more approved topic areas. Requests to modify questions must be made in consultation with the NPS Information Collection Social Science Program. Any changes must keep the original meaning and purpose of the question—no expanding, narrowing, or shifting the intent. Adjustments are allowed only when they follow established best practices in survey design and meet all OMB requirements. Every question must be clearly tied to the approved purpose of the study, the specific park involved, and the park's identified management needs. Collectively, the topic areas support understanding how visitor knowledge, values, and behaviors are influenced by, and contribute to, resource management decisions.

Topic Area 1: Respondent Characteristics: Captures relevant attributes of visitors, potential visitors, and nearby residents. Questions are limited to information necessary for understanding mission-, management-, or operations-related issues.

Topic Area 2: Trip Planning: Covers travel-related decisions before, during, or after visits to parks and nearby communities. Content is restricted to trip characteristics relevant to park management needs.

Topic Area 3: Trip Characteristics: Addresses current and future visitation plans, destination choices, and place attachment. This data helps to assess relationships between visitors and specific park settings.

Topic Area 4: Transportation: Supports management strategies related to transportation needs, including land use, traffic demand, public safety, and social considerations.

Topic Area 5: Visitor Use and Recreation Management: Identifies activities, behaviors, and uses of natural and cultural resources relevant to park operations. Findings inform planning and educational efforts.

Topic Area 6: Evaluation of Programs and Services: Collects public feedback on services and facilities to support planning and management decisions. Understanding visitor values assists in developing feasible and effective management actions.

Topic Area 7: Human Dimensions: Focuses on perceptions, preferences, motives, and attitudes that influence visitor experiences. Questions address issues within NPS influence or control and pertain to current or potential goods and services.

Topic Area 8: Environmental Health and Resource Management: Gathers information on public awareness and observations of natural and social park environments. Responses support understanding of visitor perspectives on resource conditions and management actions.

Topic Area 9: Expenditures: Collects visitor spending data needed to estimate local economic impacts of park visitation. Results are limited to the specific park unit and may not be used to generate non-market values or consumer surplus estimates.

Topic Area 10: Constraints and Barriers for Non-Visitors: Supports understanding of non-visiting populations, including underserved communities and virtual visitors. This information helps identify participation barriers and opportunities for engagement.

Topic Area 11: Safety and Risk Management: Addresses visitor awareness and perceptions of safety practices, risk mitigation, and injury prevention. Results inform enforcement, education, and emergency response strategies.

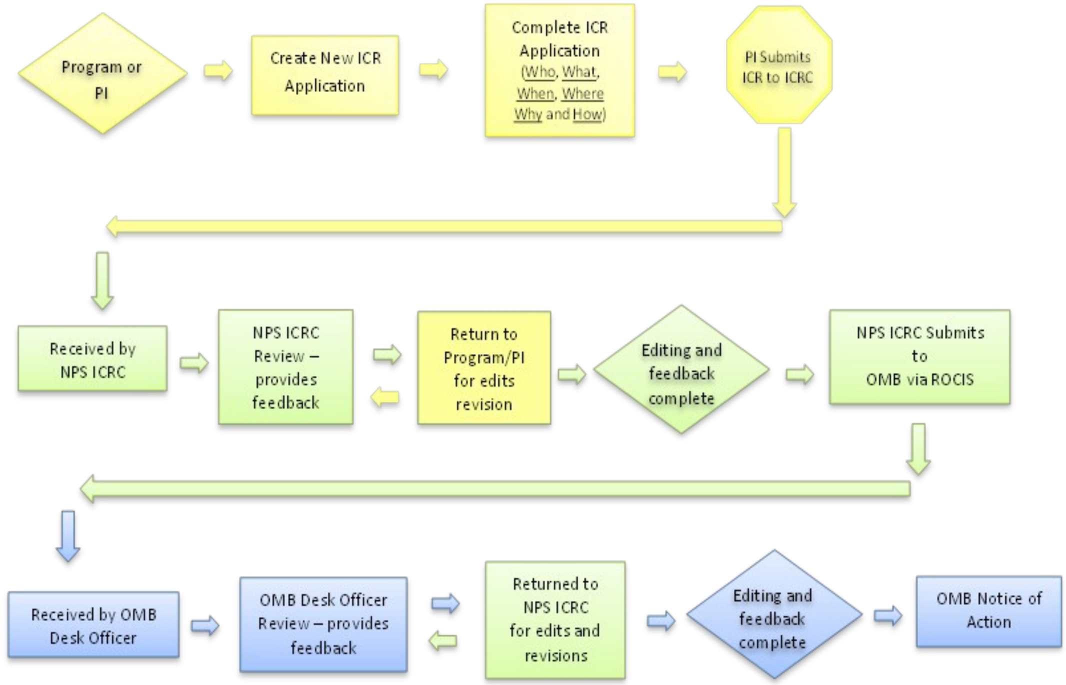
Submittal Process

Before submitting a collection under the NPS Programmatic Clearance Process, the NPS sponsor must ensure the package is complete. A complete submission includes the required submission form and final versions of all materials to be used in the collection (e.g., questionnaires, interview scripts, maps, photographs, and correspondence). The submission form functions as the supporting statement and must provide the justification for the collection, sampling dates and locations, sampling procedures, and respondent burden.

The Principal Investigator typically prepares the submission form and drafts the survey instrument. The park sponsor is responsible for reviewing these materials to confirm alignment with park policy, purpose, and relevancy.

The Social Science Program encourages use of the Pool of Known Questions when appropriate to the study purpose. Other validated questions—such as addressing visitors' experience, use history, or travel behavior — may also be considered. Any variations within a Topic Area will be reviewed on a case-by-case basis to determine applicability prior to submission of the final package to OMB for review and 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.

We make every effort to avoid duplicating work already being done by other organizations. Any potential overlap is identified during the technical and administrative review of each submission. We continue to coordinate with NPS research permitting staff so that projects involving information collections — especially those sponsored by universities or non-governmental organizations — are visible to the Social Science Program. Historically, some of these research projects collected visitor information under research permits without Social Science Program review. We will continue working to close that gap by first identifying where duplication may occur within parks and across the agency.

Although other national programs collect information about outdoor recreation, their data usually does not address the specific management or planning needs of individual National Park Service units.

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

A key advantage of this process is that it allows us to collect the information we need while minimizing burden on small entities. We use sampling to limit the number of people who must respond, and we keep survey instruments as short as possible. Electronic options are offered when feasible to further reduce burden.

Because these surveys primarily target National Park Service visitors and focus on understanding the relationship between people and parks, we estimate that fewer than 2% of all collections will involve small businesses. In the rare cases where small entities may be included, the burden is minimal and limited to only the information necessary for the purpose of the collection.

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 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 does not include any special circumstances under 5 CFR 1320.5 (2)(i) and (iii) through (viii). The only exception is section (ii), because in some cases we may ask respondents to return their surveys in fewer than 30 days.

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 June 1, 2026, a 60-day Federal Register notice (91 FR 32430) was published announcing this information collection renewal. Public comments were solicited for 60 days ending August 1, 2026. We did not receive any comments in response to this notice.

In addition to soliciting public comment, feedback was gathered from three principal investigators regarding their experiences with the Programmatic Clearance Process (Table 8.1). Overall, the commenters expressed strong support for continuing the programmatic approval pathway. They noted that the Pool of Known Questions (PKQ) has been thoughtfully updated to remove redundancies across topic areas, improving clarity and usability. All three agreed that the inclusion of recurring, standardized questions remains beneficial—particularly for novice survey designers—by illustrating the range of acceptable question formats and categories. Commenters also acknowledged that the PKQ update successfully addressed previous grammatical and typographical errors, thereby strengthening the quality and consistency of the question bank.

Table 8.1

Organization	Title
Oregon State University Forest Ecosystems and Society	Assistant Professor
Penn State University College of Health and Human Development	Assistant Professor
University of Tennessee Knoxville Outdoor Recreation and Park Management	Assistant Professor

1. Commenters highlighted a few instances where updated terminology could improve the clarity of questions and instructions. They also noted that the diversity of questions in the PKQ was appropriate for visitors and park management.

   NPS Response: *We appreciate the commenters' observations regarding opportunities to refine terminology within the Pool of Known Questions (PKQ). We interpret this feedback as affirmation that the current PKQ offers an appropriately diverse and functional set of questions for the types of research conducted under the NPS Programmatic Clearance. While the suggestions point to emerging or more specialized terminology, these refinements do not alter the core intent or scope of the PKQ. Instead, they highlight areas where the program may continue to evolve over time to remain aligned with contemporary language and practice.*

2. One commenter suggested that ecosystem services and choice modeling be incorporated into the PKQ.

   NPS Response: *The proposed additions—such as questions related to ecosystem services or choice modeling—were carefully considered. While these concepts are important within certain research contexts, incorporating them directly into PKQ could introduce valuation-based constructs that fall outside the boundaries of this clearance. For that reason, the program determined that these suggestions, although valuable, are better addressed, with OIRA, on a case-by-case) basis rather than incorporated universally into the PKQ.*

3. Commenters suggested that Topic Area 5 could be updated to reflect terminology used in the Interagency Visitor Use Management Council's guidance, noting that some elements of the Visitor Experience Resource Protection (VERP) Framework may no longer align with current visitor use management language.

   NPS Response: *We agree that guidance and terminology have evolved from the VERP Framework toward the Interagency Visitor Use Management Council's approach. To address this, NPS proposes convening a small working group of subject matter experts to evaluate and incorporate appropriate terminology updates. This will help ensure that Topic Area 5 remains accurate and consistent with current visitor use management practices while continuing to meet bureau information needs.*

4. Reviewers noted considerations related to the use of question scales and the importance of maintaining flexibility for future collections. At the same time, they recognized the value of consistent structure and repeatability provided through the programmatic clearance process.

   NPS Response*: NPS reviewed the feedback on question scales and confirmed that the scale options permitted under the clearance already appear in the current PKQ. These scales serve as examples that can be appropriately applied or integrated across all questions within the PKQ, supporting both flexibility for investigators and structural consistency across programmatic submissions.*

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

In general, the Programmatic Clearance Process for NPS-sponsored surveys does **not** allow incentives, payments, or gifts. However, in rare situations, small payments or minimal-value gifts may be appropriate. If a project requests to use any type of incentive, the program manager must explain why it is needed and how it will be used. This justification will then be submitted to OMB for review and approval.

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 in these collection will not ask for sensitive information.

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 our experience with the current NPS Programmatic Clearance, we estimate that about **44,250 people** will respond each year. Using this estimate, NPS expects the total annual burden for these collections to be **11,792 hours**. This renewal request does **not** include any information collections that are already approved under this OMB control number.
To calculate the annual burden cost, we used data from the **Bureau of Labor Statistics (BLS) News Release USDL-26-0505**[1], **(March 20, 2026), Employer Costs for Employee Compensation—December 2025**. These wage figures include the cost of benefits.

Using the BLS hourly rate of **$48.78 for civilian workers**, we estimate the total annual cost of the burden hours to be **$431,706 (rounded)**. This was calculated by multiplying the total estimated burden hours by the hourly compensation rate.

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	$48.78	$365,850
Mail-back surveys	2,000	20 minutes	667	$48.78	$32,536
All non-response surveys	5,000	3 minutes	250	$48.78	$12,195
Telephone Interviews	250	30 minutes	125	$48.78	$6,098
Focus Groups/In person interviews	2,000	60 minutes	2,000	$48.78	$97,560
On-line surveys	5,000	15 minutes	1,250	$48.78	$60,975
Annual TOTAL	**442504425 0**		**117921 1792**		**575214**
3 YEAR Total	**132,750**		**35,376**		**1,725,642**

[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**

[1] https://www.bls.gov/news.release/pdf/ecec.pdf

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 or 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 estimated annual cost to the Federal government is $**1,736,016**. This amount includes the cost of federal staff time **($26,016)** and other operational expenses **($1,710,000).** The estimate is based on past experience and on how much effort is typically required to develop and carry out each information collection.

Because each project is different, we used a standard estimate of 20 hours of Federal staff time for each programmatic submission. We expect to receive at least 15 submissions each year, based on the average number of submissions from FY19 through FY25.

The table below outlines the Federal staff and grade levels involved in these activities. To calculate the hourly rates, we used the 2026 Office of Personnel Management (OPM) General Schedule (GS) Locality Pay Table for Denver (DEN): https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DEN_h.pdf. We multiplied the hourly rate by **1.6** to include the cost of employee benefits, as recommended in the referenced BLS guidance.

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 (x15)
Program Manager	12/5	$54.20	$86.72	20	$1,734	$26,016

We estimate that the operational cost to the Federal Government to be $1,710,000. 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 15)
Researcher/Principal Investigator	$30,000	$450,000
Contracts and Support (Survey Design and Development, Survey Administration, Data Collection, Data entry, Data analysis and Reporting)	$70,000	$1,260,000
TOTAL	$100,000	1710000

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

There are no changes.

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

Each information collection submitted under the Programmatic Clearance Process will include a form describing the purpose of the study, the need for the information, the data-collection location, the participant selection approach, and the estimated response time. The form will also describe how nonresponse bias will be assessed and how the results will be used.

Each submission will outline the procedures for organizing, analyzing, and summarizing the data. Because the results are primarily for internal NPS use, they are not typically published. When publication or public sharing is intended, this will be stated clearly in the project's Justification Form.

Analyses generally rely on basic descriptive statistics—such as counts, averages, standard deviations, and confidence intervals—to support management and planning. When a study includes visitor spending data, the NPS Money Generation Model (MGM) may be used to estimate economic effects on nearby communities. Some projects may use more advanced statistical methods, including models informed by the Theory of Planned Behavior. For qualitative studies, interview or focus-group transcripts will be reviewed to identify key 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 survey instruments 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.