

1 Supporting Statement Part A for Paperwork Reduction Act Submission for Appalachian Trail Management Partner Survey OMB Control Number 1024-New

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The National Park Service Organic Act of 1916, 38 Stat 535, 16 USC 1, et seq., requires that the NPS preserve national parks for the use and enjoyment of present and future generations. The NPS Organic Act is included as Attachment A. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments as are necessary for public use, health, and safety. The Government Performance and Results Act of 1993 (P.L. 103-62) requires that the NPS develop goals to improve program effectiveness and public accountability, and to measure performance related to these goals. The Appalachian Trail Management Partner Survey (ATMPS) measures performance toward those goals through a partner satisfaction survey. The project is an element of both the NPS Strategic Plan and the Department of the Interior (DOI) Strategic Plan.

The purpose of the ATMPS is to track the satisfaction of federal, state, and not-for-profit partner organizations and agencies receiving support from the Appalachian Trail Park Office (ATPO) to protect trail resources and provide for the public enjoyment and visitor experience of the Appalachian National Scenic Trail (Trail). These partners are organized into a “Cooperative Management System” for the Trail. The ATPO provides support to state and federal agencies and not-for-profit organizations in this System to help them in fulfilling shared and delegated management activities in the management of the Appalachian National Scenic Trail. Achievement of on-the-ground results depends on the actions of these partner agencies and organizations. Progress towards management goals is measured by a satisfaction survey, where key partners evaluate the quality of support provided by ATPO. This effort is required by GPRA and other NPS and DOI strategic planning efforts. Data from the proposed survey is needed to assess performance regarding NPS GPRA goal IIIb0. NPS performance on all goals measured in this study will contribute to DOI Department-wide performance reports.

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.]

Use of Information

Data from the proposed survey will assess the ATPO’s performance regarding NPS GPRA goal IIIb0. The goal states:

By September 30, 2008, 95% of the members of the Cooperative Management System conducting management responsibilities in support of the Appalachian National Scenic Trail are satisfied with the level of support from the Appalachian Trail Park Office.

Question Justification

The members of the Appalachian National Scenic Trail's Cooperative Management System that will be surveyed include non-profit organizations, state agencies, and federal agencies/units.

The ATMPS contains 8 questions. The majority of these relate to specific types of technical assistance provided by the Appalachian Trail Park Office. Partners are asked to rate the importance of, and their level of satisfaction with, this assistance using a five-point scale. The types of technical assistance include:

- Fostering the Trail's Cooperative Management System
- Funding Trail projects and programs
- Law enforcement
- Compliance with the National Environmental Policy Act
- Developing volunteer capacity
- Responding to potential development threats along the Trail
- Developing outreach and education programs
- Working with Trail communities
- Conducting Trail assessments
- Natural resource protection and management
- Cultural resource protection and management
- GIS and other mapping programs
- Volunteer worker safety programs
- Land acquisition
- Fulfilling commitments made to other partners.

In addition, questions 4-6 measure partners' satisfaction with help in achieving existing and future Trail projects and programs, assistance in the partner organization fulfilling its goals and a global satisfaction question rating the overall assistance the ATPO provides. A final open-ended question asks partners if there is anything else they would like to tell the ATPO about facilities, services, or assistance. This question gives partners a chance to comment on aspects of their experience not covered in the previous questions.

The ratings will be used by the Appalachian National Scenic Trail Park Office to improve the quality of service provided to members of the Cooperative Management System in preserving trail resources and providing for public enjoyment and visitor experiences on the Appalachian National Scenic Trail. These questions are necessary in order to understand the organization's level of satisfaction with the different types of assistance the ATPO is providing to partners and how important that type of assistance is to the partner groups' activities and functioning.

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.].

This information will be collected via electronic surveys using the survey monkey web based program. All cooperative management partners have access to email and the web.

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 is the only information collection the Appalachian Trail Park Office will have that satisfies the requirements of GPRA and the DOI Strategic Plan. In addition, there are no current or past information collections of this nature, and for these reasons, the information that the ATMPS provides is unique.

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

The majority of trail management partners are small entities (non-profits, etc), not small businesses. However, the impact on small entities belonging to the Trail's Cooperative Management System is minimized by the use of a short questionnaire and by surveying management partners only every other year.

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

If this information collection is not conducted, the Appalachian Trail Park Office will not be able to determine whether or not it is meeting the goals and objectives in its strategic plan.

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.

These circumstances are not applicable to our collection of data. Our strategic plan specifies a biennial survey, in which frequency of reporting, preparation or submission of documents, retaining of records, and revealing of trade secrets do not apply. It is a statistical survey designed to produce valid and reliable results, using only data classifications to be reviewed

and approved by OMB. No pledge of confidentiality is offered, although, as discussed in section A(10), the survey is anonymous.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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 60-day notice was published in the *Federal Register* on January 30, 2008 (Vol. 73, No. 20, pgs. 5588 - 5589). A copy of this notice is included as attachment B. One public comment was received as a result of the publication expressing concern that tax dollars should not be spent on this survey. A response was sent explaining the necessity of the survey for the National Park Service to work with its partners to better manage the Appalachian Trail lands.

Comments on study parameters, including the design of the survey and methods, were solicited from members of the study team, which is comprised of survey research experts. In addition, members of the NPS Social Science Program also were consulted during the design stage.

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

No payments or gifts will be provided to respondents.

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

No assurance of confidentiality will be provided to respondents, since the Department of the Interior does not have the statutory authority to protect confidentiality or to exempt the survey from a request under the Freedom of Information Act. Instead, those who inquire about this issue will be told that reports prepared from this study will summarize findings across the sample so that responses will not be associated with any specific, identifiable individuals. E-mail addresses will be collected; however, these will not be linked with individual responses. Once data collection is completed, the link between e-mail addresses and data will be destroyed. Thus, anonymity will be ensured, but confidentiality will not be pledged.

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.

No questions of a sensitive nature will be asked. In addition, respondents are advised that their answers are voluntary.

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. Instead, this cost should be included in Item 14.

On a biennial basis, partner satisfaction surveys will be distributed to approximately 100-management partners. Thirty-six of the partners are non-profits, five are National Park units, eight are National Forests, and 40 are state partners. Thus, 13 of these partner organizations are NPS units or National Forests, making 13 potential respondents federal employees, completing the survey during their working day. Therefore, these respondents are exempt under the Paperwork Reduction Act and not included in the burden estimate.

The burden estimate for this study includes 76 potential respondents (36 non-profit partner organizations and 40 state agencies). Based on other NPS surveys with follow-up measures and the close relationship of APTO with its partner groups, a 75% response rate is expected. Thus, the burden associated with non-profit partners is five hours (nine non-respondents at one minute and 27 respondents at 10 minutes). The burden associated with state government partners is five hours (10 non-respondents at one minute and 30 respondents at 10 minutes). The resulting annual burden for this study is 10 hours. Using the Bureau of Labor Statistics national wage information, the most recent published report (March 2009) lists an average hourly wage of \$29.18 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). Within this hourly figure, \$20.37 is accounted for in hourly wages and salaries and \$8.81 for benefits. Thus, the estimated annualized cost to respondents for the hour burden is \$291.80.

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 shown in Items 12 and 14).
 - * 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]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The cost burden on respondents and record-keepers, other than hour burden, is zero.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annualized cost to the Federal government for this information collection is \$108,062.20. This total cost is outlined in the table below. These figures are based upon the 2009 OPM Salary Schedule for the DC area (<http://www.opm.gov/oca/09tables/html/dcb.asp>). In addition, based upon information from the Bureau of Labor Statistics, a multiplier of 1.5 is used to account for benefits. The salary information is combined with the operating expenses in order to calculate the total annual cost.

Name	Title	Grade/Step	Annual Salary	Salary + Benefits (1.5)	% of time	Total
Rita Hennessy	Recreational Specialist	GS-13/Step 7	\$104,314.00	\$156,471.00	30%	\$46,941.30
Casey Reese	Physical Scientist	GS-11/Step 2	\$63,021.00	\$94,531.50	20%	\$18,906.30
Angela Walters	Management Assistant	GS-8/Step 9	\$57,811.00	\$86,716.50	40%	\$34,686.60
Operating Exp						\$7,528.00
TOTAL COSTS:						\$108,062.20

15. Explain the reasons for any program changes or adjustments reported.

This is a new information collection request for a new program.

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.

No program publication is anticipated. However, the internal report that will be generated will contain a breakdown of responses by question. The majority of the internal report will be frequency distributions; no complex analytical techniques will be used.

Task	2009			2010
	Spr (Mar – May)	Sum (Jun- Aug)	Fall (Sep- Dec)	Win/Spr (Jan- Jun)
1 Survey Design	X			
2. Conduct Email Surveys			X	
3. Analyze Surveys				X
4. Final Report				X

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 are not seeking such approval.

18. Explain each exception to the certification statement, "Certification for Paperwork Reduction Act Submissions," of OMB.

There are no exceptions to the certification statement.