



NPS PROGRAMMATIC APPROVAL: UPDATE TO THE FIELD

This is an update on the status of the programmatic approval for NPS-sponsored information collection requests (ICRs), including surveys, interviews, and focus groups. Under the 1995 Paperwork Reduction Act, all federally sponsored ICRs must be approved by the Office of Management and Budget (OMB). This update applies only to the programmatic approval (aka expedited review). It does not apply to the longer and more complex Paperwork Reduction Act submission process (the process involving publication of two *Federal Register* notices and 90 days of public comment). The majority of social science research sponsored by the NPS goes through the programmatic approval.

*On **February 26, 2010**, the Social Science Division will stop accepting information collection requests for studies with a proposed start date **before September 1, 2010**. This is because all submission slots to OMB through June have been committed to proposals now in our queue.*

Parks, programs, and cooperators may continue to submit proposals for studies with start dates after September 1, 2010.

Requests for 2010 research that already have been submitted to the Social Science Division are not affected by this closure. These ICRs are listed at the end of this update. At this time, we expect that all ICRs currently on hand will be acted upon by OMB near their planned start dates. However, this expectation is not a guarantee and depends on factors listed below that affect review times.

By closing the acceptance window for summer studies on February 26, we will provide seven weeks to submit additional summer ICRs. A few, *but not all*, of these may be reviewed and approved in time to be fielded in July or August 2010. If you send in a proposal for a summer 2010 project before February 26, we will provide you with our best assessment of the chance of meeting your start date. Unless you advise otherwise, we will assume that studies that cannot be fielded in 2010 should be placed in the queue for a summer 2011 start.

According to the terms of the agreement between NPS and OMB, not all social science studies qualify for the NPS programmatic approval. Expedited review is not suitable for national programmatic evaluations, significant policy evaluations, or non-market good valuations using either contingent value or hypothetical behavior questions. These ICRs must go through the regular PRA review process. Studies eligible for the programmatic approval are routine in nature, inform park management, and involve park visitors, potential visitors, or residents of communities near parks. One or two willingness-to-pay questions (for example, for a higher entrance fee, shuttle fee, etc.) can be included as part of routine surveys. All questions must fall into the seven topic areas described in the submission *Guidelines* document available at:

http://www.nature.nps.gov/socialscience/pdf/Expedited_Guidelines_06-06.pdf

How NPS Maximizes the Number of OMB Submissions within Current Constraints

In planning its OMB submission schedule, the Social Science Division employs an aggressive “bundling” strategy. Bundling combines separate studies into a single submission. Under current OMB rules for programmatic approvals, only one submission at a time can be in the expedited review process. However, there is no specified limit on the number of individual studies that can be included in that submission (although practical considerations exist). In general, we bundle studies that have similar themes or research methods or otherwise “fit” together. If bundles are too diverse or complex, OMB can reject them, slowing the approval process. Almost every ICR submitted by NPS is a bundle of two or more studies, often from different parks and PIs.

In rare cases, a study may be submitted to OMB well before its planned start date. This occurs when it is bundled with other proposals that have approaching start dates.

Factors Affecting Review Times

1. OMB turnaround rates: OMB strives to act on submissions within 10 working days (two weeks) of receipt. However, this turnaround may be longer because of work load. The Social Science Division plans its OMB submission schedule based on an average turnaround of two full weeks. Significant deviations from this schedule affect when we can submit studies.
2. PI responsiveness to OMB passback comments: If OMB returns review comments that require PI expertise to answer, any delay in this response will delay other submissions in the queue. This is because NPS cannot enter a new ICR into the review system until all action is concluded on the active submission.
3. Social Science Division staffing to conduct technical reviews: The Social Science Program has been elevated to Division status within the NPS Natural Resource Program Center. In the long run, this will improve NPS review times. But for the present we are short-staffed as federal position descriptions are developed and classified. This affects the time it takes for the Social Science Division to complete its technical reviews.
4. Time spent on the longer, more complex Paperwork Reduction Act proposals: The same people at NPS and OMB who conduct expedited reviews also review the more complex PRA proposals. Time spent on one process is time not spent on the other.
5. External interventions on behalf of specific studies: If an external intervention is effective in gaining OMB’s attention, it changes the ordering of submissions, which requires modifying our submission plan. These modifications can affect bundling, since any study submitted because of an intervention goes to OMB individually to increase the likelihood of rapid review.

NPS and DOI Response to the OMB Federal Register Notice

Both NPS and the Department of the Interior responded to the *Federal Register* notice published by OMB on October 27, 2009 requesting comments on improving implementation of the Paperwork Reduction Act. The NPS response was submitted by Director Jon Jarvis. The full texts of both the NPS and DOI comments are attached to this e-mail. Thanks to everyone who contributed input to these responses, both inside and outside the NPS.

Information Collection Requests Currently in the Programmatic Approval Queue

Rocky Mountain NP Leave No Trace Backcountry Survey
Yosemite NP Wilderness Visitor Travel Patterns Survey
Grand Teton NP “Bear Aware” Visitor Survey
Olympic NP Creel Survey

Yellowstone NP Traveler Information Needs Survey
Yosemite NP Integrated Transportation and Visitor Experience Surveys
Klondike Gold Rush NHP Visitor Surveys
Biscayne NP All Taxa Biodiversity Inventory Volunteer Survey
Ozark NSR River Users Surveys
Devils Postpile NM/Sequoia-Kings Canyon NP Visitor Experience Surveys
Sequoia NP Soundscape Experiment
Yosemite NP Soundscape Experiment
Kennesaw Mountain NBP African American Focus Groups
NPS Point-of-Sale Surveys
Kenai Fjords NP Visitor Survey
NPS Visitor Services Project Survey Bundle
