



United States Department of the Interior
NATIONAL PARK SERVICE
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Washington, D.C. 20240

IN REPLY REFER TO:

(2410)

APR 14 2014

Memorandum

To: Regional Concessions Chiefs
From: Chief, Commercial Services Program *Paul Chalfant*
Subject: Approved Information Collection Forms for Commercial Use Authorizations

The Office of Management and Budget (OMB) recently approved the Commercial Use Authorization (CUA) Application, Monthly Report, and Annual Report Forms. You will find these forms on the Commercial Services SharePoint site at <http://cs.inside.nps.gov/cua/sites/CUATools/CUA%20Forms/Forms/AllItems.aspx> Parks should immediately remove old versions of the Application and Annual Report from their webpages and start using these forms.

We developed the forms for broad application to the multitude of services and situations across the NPS. We plan to update these forms and develop additional forms to suit more complex operations that require additional information. Until this occurs, the WASO Commercial Services office will provide guidance for these complex operations on a case-by-case basis. Contact Paul Chalfant to discuss any alterations or modifications of the forms.

These approved forms will replace all of the CUA applications and annual reports currently in use. Because OMB has approved the text and the formatting of the approved forms, most alterations of the forms and use of other forms for this purpose will create an unapproved collection of information and should not occur. We have the ability to make minor changes, and again, you must contact Paul Chalfant for case-by-case guidance.

The Forms

- Form 10-550 is the CUA Application form.
- Form 10-660 is the Annual Report form
- Form 10-660A is the Monthly Report form. Park staff should use this form only when it is necessary to collect monthly visitation statistics.
- We have also created a new version of the Authorization, form 10-115 (similar to the SUP 10-114). You must use this form for all future CUAs.

Park staff may lock the fillable form so that only the fillable areas can be edited by applicants. We recommend this prior to sending the forms to potential CUA holders. For the Annual and Monthly visitation forms, park staff should define the visitation statistics they need and the

reporting format they require. This could be as simple as requesting a single number each month or more complex information to determine impact on resources, (e.g., location, route, number of horses, number of guides, distance traveled). Form 10-660A provides some samples of tables. Park staff should develop tables or charts that meet their needs. Parks should clearly explain the reporting requirements in the CUA application.

The System of Records Notification (SORN)

As a condition of the form approval process, we prepared a System of Records Notification (SORN) under the Privacy Act. The SORN requires that we no longer collect social security numbers. The Debt Collection Improvement Act of 1996 requires us to collect an Employer Identification Number (EIN) or Social Security Number (SSN). Since we no longer collect SSNs, all CUA applicants must have an EIN. The IRS issues EINs for free at <http://www.irs.gov/Businesses/Small-Businesses-&-Self-Employed/Employer-ID-Numbers-EINs>.

The Privacy Act also requires us to secure CUA records 24 hours a day so that only the CUA program staff has access. This includes electronic records. Hard copies of CUA records must be stored in secure filing cabinets and electronic records must be stored on secure drives, not shared drives that allow access by unauthorized personnel. Business information that is necessary to contact or arrange the commercial services is not confidential.

Additional Information

In some cases, parks will require CUA holders to have licenses, certifications or skills in order to operate. CUA managers should determine what requirements or documentation must be provided by CUA holders beyond that collected in the application. Park staff must detail such information in a separate document attached to the application. This document must notify CUA applicants that upon receiving the CUA, they must provide the additional documentation before operating. This document should include any first aid requirements, certifications, licenses, operating plans and limitations to the activities (time, days, group size, parking...). Until OMB approves an information collection form that includes these requirements, it must be a separate document applicable after NPS issues a CUA.

If you have any questions, comments, or concerns regarding the approved forms, please contact Paul Chalfant, Concession Management Specialist, Commercial Services Program at paul_chalfant@nps.gov, or at 928-638-7900.