

Secretary of State
STATEMENT OF NEED AND FISCAL IMPACT
A Notice of Proposed Rulemaking Hearing accompanies this form.

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ARCHIVES DIVISION
SECRETARY OF STATE

Parks and Recreation Department
Agency and Division

736
Administrative Rules Chapter Number

Amend Special Access Pass Rules

Rule Caption (Not more than 15 words that reasonably identifies the subject matter of the agency's intended action.)

In the Matter of:

Amendments to the Special Access Pass Program rules in OAR chapter 736, division 15 - Rates

Statutory Authority:

ORS 390.124

Other Authority:

Statutes Implemented:

ORS 390.111; ORS 390.121; ORS 390.124

Need for the Rule(s):

This rule change will allow disabled veterans who use the program to reserve campsites online, a feature that has never been available to them and is a much-requested customer service improvement. It will also allow for greater accountability of the benefit provided and a more efficient way to manage the discount program. Furthermore, the rule will provide consistent application of rules and policies to all types of customers we serve.

Documents Relied Upon, and where they are available:

Historic data of program usage and individual account usage, available from the Oregon Parks and Recreation Department, Communications and Research Division.

Fiscal and Economic Impact:

The fiscal and economic impact of each change is as follows:

- 1) Ability to receive the benefit online - This is a customer service improvement that will allow program users greater flexibility and convenience. They will be able to reserve online and receive the discount. Without this change, when users choose to reserve online, they pay in full and write in for a reimbursement, which is inefficient for our customers and for the department. The fiscal impact would be positive for customers, who will not tie up funds for online reservations, which could be made nine months in advance, and have to wait for a refund, which could take several weeks to receive. In addition, the department will save time and money by not processing refund requests for discounted stays.
- 2) Simplifying the stay limits - This is a customer service improvement, as customers who want to stay longer than five days have to pay the additional days, and those who want to use their full benefit for a month have to leave the park to receive the remaining benefit. This change will waive camping fees for up to ten days in a stay, which will provide greater convenience for customers, and transaction efficiency and monitoring for the department. Customers who currently stay longer than five nights in one stay will save money, as they will no longer have to pay for the nights in excess of their first free five nights. The department will gain efficiencies by no longer splitting reservations and explaining the rules to program users.
- 3) Shower benefit - This change expands the benefit to include free showers at facilities that allow showers to non-campers. Program users will save money by not paying for the shower, and the department will eliminate a current problem, where program users register for a site they do not need just so they can take a shower.
- 4) Replacement fee - This rule would charge customers a \$5 fee to issue replacement cards for those that are lost. This provision will have a negative economic impact on program users, but the impact is very small compared to the benefit received and it will affect a very small portion of the current population of users. The department will be able to recoup a small portion of the costs associated with managing the program and provide an incentive for safeguarding the pass.

5) Pass suspension - Currently, the department's option for enforcing program rules is to revoke passes for abuse. This rule will allow the department to temporarily suspend a pass, which is a softer approach to enforcing program rules. We rarely revoke passes; therefore, this rule will affect a small number of pass holders. Those whose pass is temporarily suspended could be economically affected, as they could not receive waived camping fees for the duration of the pass' suspension.

6) Late cancellations and no shows - This rule change will charge pass holders an amount equal to one night's stay fee if they do not cancel a reservation three or more days before their arrival day, or if they do not occupy a site by 1:00 PM on the second day of their reservation. This amount currently ranges from \$17 to \$31 depending on the type of site reserved. While this fee will have a negative impact on pass holders who currently do not cancel reservations timely or fail to show up for a reservation, this is not a new fee for the department. Non-pass holders currently pay an amount equal to one night's fee if they do not cancel a reservation three or more days before their arrival, or if they fail to check in by 1:00 PM. Therefore, this rule aligns business practices for pass holders with the rules currently in effect for the general population. In addition, this rule change will release inventory timely and allow other users to use unoccupied sites, which will increase revenue for the department.

7) Early departures - This rule change will affect pass holders who leave a park before their scheduled departure and do not notify the park of their departure. These individuals could potentially lose part of their monthly benefit, which would have a negative fiscal impact if they planned to use their full benefit in that month. This change will affect a small number of pass holders and will allow the department to achieve

Statement of Cost of Compliance:

1. Impact on state agencies, units of local government and the public (ORS 183.335(2)(b)(E)):

As with all rule changes, the department may incur some small costs in the short-run while it educates pass holders of the new provisions. Our partner agencies at the state and local levels may also receive more questions about the program changes. We anticipate these efforts and associated costs to be minor.

2. Cost of compliance effect on small business (ORS 183.336):

a. Estimate the number of small business and types of businesses and industries with small businesses subject to the rule:

This rule change does not affect small businesses.

b. Projected reporting, recordkeeping and other administrative activities required for compliance, including costs of professional services:

There are no reporting, record keeping or other administrative activities required of small businesses, as this rule does not apply to them.

c. Equipment, supplies, labor and increased administration required for compliance:

There are not costs associated with equipment, supplies, labor, recordkeeping or additional administration for small businesses, as this rule does not apply to them.

How were small businesses involved in the development of this rule?

Small businesses were not included in the development of this rule change because the rule does not impact them. This rule affects disabled veterans with a service-connected disability and active-duty personnel on leave.

Administrative Rule Advisory Committee consulted?: Yes

If not, why?:

We consulted an Administrative Rule Advisory Committee composed of current users of the Special Access Pass Program, veteran benefits advocates and representatives of the Oregon Department of Veterans Affairs.

12-18-2015 5:00 p.m.	Claudia Ciobanu	claudia.i.ciobanu@oregon.gov
Last Day (m/d/yyyy) and Time for public comment	Printed Name	Email Address