

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

FILED
4-15-16 2:03 PM
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 is needed facilitate online campsite reservations using a special access pass, a feature that has never been available to pass users 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. Currently, the reservation system cannot track usage by calendar month; only within a 30-day period. The department is seeking this revision to align the rule with actual business practice.

Documents Relied Upon, and where they are available:

N/A

Fiscal and Economic Impact:

The primary reason for this rule revision is align the rule with our actual business practice when allowing special access pass customers to book online using their passes. 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. In general, 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.

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.

Statement of Cost of Compliance:

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

The department does not anticipate this rule to have an impact on state agencies or units of local government. Our partner agencies at the state and local levels may receive some questions about the program changes, but we anticipate any associated costs to be minimal.

The proposed revision does not change the overall benefit for the members of the public who qualify for the program. The roughly 50,000 registered users for this program should be minimally impacted by the rule change. A potential impact may apply to users who utilize their full benefit or close to it. That is less than 1 percent of users. More specifically, the rule change could affect pass holders who want to book most of the entire benefit toward the end of a calendar month and again in the first part of the next month. Overall, customers will be able to use their benefit similarly to the way they do it now. They will still have an opportunity to use benefits close to the end of the "30-day period" and create a new "30-day period" as soon as allowed by our maximum stay rules.

If the rule revision is approved, we will honor all existing reservations for 9 months from the rule adoption date. We will also educate customers on the change and allow for a 3-month grace period for those who were planning on using the current rules and could thus be affected by the proposed rule revision.

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, recordkeeping 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 users of the special access pass program: disabled veterans with a service-connected disability, foster families and adoptive foster families.

Administrative Rule Advisory Committee consulted?:No

If not, why?:

We did not consult an Administrative Rule Advisory Committee for this revision because the change is not significant to the program and because during our last rulemaking effort at the end of 2015, we did consult one. At that time, the committee identified the ability to use the pass to make reservations online as a much-needed customer improvement. The 2015 committee was composed of current users of the Special Access Pass Program, veteran benefits advocates and representatives of the Oregon Department of Veterans Affairs.

<u>05-31-2016 5:00 p.m.</u>	<u>Claudia Ciobanu</u>	<u>claudia.i.ciobanu@oregon.gov</u>
Last Day (m/d/yyyy) and Time for public comment	Printed Name	Email Address