Forest Service ePermitting / Special uses

# Prototype testing / findings & recommendations

October 19, 2016

#### A. Pre-permit permittee experience

### A1. Permittees struggle to identify the right kind of permit to use.

Permittees struggled to figure out whether their organizational status meant they were "non-commercial." They wondered whether collecting donations for a trip made them commercial or whether being a 501c3 exempted them from any commercial permitting process. The answers varied by Forest.

Suggested user story: As a permittee, I want to understand the Forest Services' definition of "noncommercial" before I chose a permit application.

### A2. Permittees usually find the current permit application via a phone call to permit administrators.

The vast majority of permittees receive their application via email from a permit administrator (usually after calling the forest). Very few found this information online, initially.

Recommendation: Although outside the scope of this project, the Forest Service should consider how they will market the ePermitting system (on their website and through other sources).

#### B. Permit fields

### Primary Permit Holder Information



### B1. Permit administrators expect a single permit holder

Despite spaces for multiple permit holders on the permit application form, permit administrators said they needed permittees to identify, empowered a single permit holder. That permit holder can be an individual or an organization. If it's an individual acting on behalf of an organization, that person needs to be legally empowered to represent it (either as one of its officers, or by delegation from them).

Suggested user story: As a permittee, I can enter only one permit holder name. It can be either an organization or an individual. If it's an organization, I can also enter a contact name.

## B2. Precisely articulating the location is very difficult for a permittee and the results often slow the permit administrator.

The current application form asks permittees to describe where their activities will take place. According to permit administrators, this description is almost never accurate. It uses uncommon names or is not precise enough. Permittees express frustration that the Forest Service usually cannot accept a digital map (because of email attachment size limitations) and they have to scrawl their plan on a paper map and bring it to an office.

#### **Suggested user stories:**

- As a permittee, I can indicate points on an official Forest Service map where my activity will take place.
- As a permittee, I can indicate a route for my activity on an official Forest Service map.
- As a permit administrator, I can view a map of an activity's proposed routes and spots.

# B3. Permit administrators expect a varying set of accompanying paperwork, including operational plans, to accompany each permit application.

Some permit administrators require all non-commercial group use permittees to submit an operational plan. The required elements of this plan vary. Other administrators require proof of insurance. Some permit administrators always request this document accompany an initial application, others request it after an application.

Recommendation: The Forest Service should clarify the documentation requirements for a non-commercial group use permit, because we solidify the requirements of the ePermit.

#### C. Submission

### C1. Permittees are frustrated when they don't receive any estimate of when they will receive their permit.

In the current process, permittees often have no idea when they will receive a permit (even though the FS has a very limited time and number of reasons to reject noncommercial group use permits).

#### Suggested user stories:

- As a permittee, I receive an estimate as to when my application will be approved (not just when I'll receive a response) when I submit my permit application.
- As a permit administrator, I can configure the estimated response and approval time estimates the system displays for my Forest.

### C2. Permittees are frustrated when they don't know who to contact about their permit.

Suggested user story: As a permittee, I receive a permit administrators name, email address and phone number after I submit a application.

#### D. Acceptance and denial



Permit Status: Needs Approval

Approve application	Deny application
Reason for denying application	

### D1. Permit administrators need to be able to easily correspond with permittees.

Permit administrators almost always ask follow up questions of permittees via email or phone.

Suggested user story: As a permit administrator, I can click the email address of a permittee to open an email to them.

# D2. Permit administrators expect SUDS, not an ePermitting system, to continue to generate and issue the permit documents themselves.

Currently, after permit administrators review an application, they manually enter it into SUDS. They make a number of decisions as they enter a permit into SUDS. In turn, SUDS generates a permit with a custom set of clauses, relevant to that forest and activity. In general, permit administrators expect an ePermitting system to pre-populate some (but not all) fields of a SUDS special use permit.

Recommendation: Remove permit printing functionality from the ePermitting system.

#### D3. Permit administrators expect clicking the "Approve" button to enter that permit into SUDS with "accepted" status.

The overwhelming benefit of this system for permit administrators is reducing manual data entry time. As a result, when they receive a permit, they want the "approve" button to automatically pre-populate as many SUDS fields as possible.

Suggested user story: As a permit administrator, when I approve a permit, it is automatically entered into SUDS and removed from the ePermitting system.

### B1a. When permits are automatically entered into SUDS, they need to be matched with an existing contact name.

NRM contains a contact database that attempts to be a single, normalized source of permittee contact information. Any number of entities, including special use permits, can be associated with a contact in NRM. Permit administrators are adamant that the system match automatically entered permits to the correct entry in the contact database.

Recommendation: Investigate approaches to matching submitted permit applications to the correct record in the contact database.

# D4. Permit administrators want to be able to chose which permit applications are entered into SUDS and marked as accepted.

If all applications must be entered into SUDS, why have an "approve/deny" screen at all? Why not have a permit just appear in SUDS after submission? When a permit is entered into SUDS, it is automatically marked as accepted. Once a permit is accepted, permittees gain legal appeal rights. As a result, permit administrators want to be able to chose which permits are entered into SUDS.

Recommendation: Continue storing application data in the ePermitting system (as in our prototype), rather than simply directly inputting all the application data into SUDS.

#### D5. Most permit administrators believe they cannot deny non-commercial use permits.

Most permit administrators believe they cannot deny non-commercial permits, but can simply "return" them with suggestions or questions.

Recommendation: Rename the "deny" button to "return" and label the text box "comments" instead of reasons.

### D6. Some permit administrators prefer the word "application" over "proposal" and "accept" over "approve."

Right now, the permittees submit "applications" for permits and permit administrators can choose to "approve" or "deny" them. Some administrators argue that the correct wording is "proposals" and "accept" or "return."

Recommendation: Investigate if there is a policy "source of truth" or other authority for these names.

#### Proposed next steps

- Decide whether to keep prototype code base for production system. (Based on this research, that would be fine.)
- Decide which user stories to implement or include in RFP.
- Follow up on recommendations, including:
  - Investigating approaches to matching submitted permit applications to the correct record in the contact database.
  - ☐ Investigating if there is a policy "source of truth" or other authority for permit names.
  - □ Figuring out a standard for what documents to submit to the system.