

ISSUES SUBMITTAL FORM

Date: 6/7/2021

ISSUE:	Should the replacement fee for an annual affixed park pass (including Aspen Leaf annual passes) be changed to half the cost of the original pass, if proof of eligible replacement need is not provided?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
<p>The current replacement fee for an annual affixed park pass is currently \$5.00 based on regulation Chapter P-7, #708.1.e. This price has historically been kept low due to the affixed nature of these passes. However, more and more requests for replacement annual affixed passes have been processed in recent years, without proof as to why the replacement was necessary (i.e. police report of a stolen or destroyed vehicle, bill of sale for sold vehicle or windshield replacement receipt with pieces of the old pass that were removed, etc.). All that is currently required based on agency policy is the top three panels of the pass from purchase. This has led staff to believe that people are not actually affixing the pass to their vehicle windshield as required, but instead are finding ways to move passes between vehicles without paying the family transferable pass price (\$80 vs. \$120). Claiming passes are lost is also a cheap way to get another annual pass for an extremely lower price tag (\$5.00 vs. \$40.00/or \$80.00).</p> <p>To try to limit this misuse, we are proposing a new, higher replacement fee for an annual affixed pass of half the cost of the original pass (\$40.00 currently for normal pass and \$35.00 for Aspen Leaf) if the customer is unable to provide any proof as to why the replacement was necessary (see attached policy with complete list of valid circumstances). If legitimate proof is provided, the replacement fee would be waived entirely under the preferred alternative. The 50% price point was selected due to: 1) aligning the price with the cost of an affixed multiple; 2) making it more in line with what we charge on the wildlife side of the agency for duplicate licenses. Also, by waiving this fee for those who can provide proof of necessary replacement, we are providing an additional customer benefit to those who legitimately need a replacement, while preventing others from taking advantage of the low replacement cost. Currently we only offer free replacements for Division error, fading passes, or passes that are received damaged from our vendor.</p> <p>Family Annual park passes replacement fees are already priced appropriately at \$60 to discourage misuse or transferring to others living outside of the same address. Volunteer Park Pass replacements would remain free. <i>Another issue paper covers proposed changes to replacement fees for Columbine, Centennial and Blue Spruce transferable parks passes.</i></p>	
<p>STATE LAW REQUIRES CPW TO SOLICIT INPUT FROM STAKEHOLDERS THAT MAY BE AFFECTED POSITIVELY OR NEGATIVELY BY THE PROPOSED RULES. THE FOLLOWING STAKEHOLDERS HAVE BEEN ADVISED OF AND INVITED TO PROVIDE INPUT ON THE REGULATORY CHANGES PROPOSED IN THIS ISSUE PAPER:</p> <p>*IT IS ASSUMED THAT ALL NECESSARTY INTERNAL PARTIES HAVE BEEN NOTIFIED*.</p> <p>Annual affixed park pass holders, including Aspen Leaf Pass holders.</p> <p>No public outreach has occurred related to this proposed regulatory change. It is anticipated that very few customers with legitimate replacement needs will be negatively impacted as long as processes and requirements are clearly explained to customers at time of purchase. Those customers with legitimate replacement needs and proof of such will be positively impacted by this proposed change.</p>	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
<ol style="list-style-type: none"> 1. *Preferred Alternative*: Modify regulation #P-708.1.e to raise the replacement fee for an annual affixed park pass to 50% of the cost of the original affixed annual. Additionally waive this fee entirely for those customers who can provide acceptable proof of the need for replacement and proof of purchase. 2. Modify regulation #P-708.1.e to raise the replacement fee for an annual affixed park pass to 50% 	

of the cost of the original affixed annual. Keep the fee at \$5.00 for those customers who can provide acceptable proof of the need for replacement and proof of purchase to cover administrative costs.

3. Status quo, no change.

Issue Raised by:	Devon Adams and IPAWS Business Team	
Author of the issue paper (if different than person raising the issue):	Danielle Isenhart	
CC:	Lauren Truitt	
APPROVED FOR FURTHER CONSIDERATION BY:	Danielle Isenhart	
REQUIRES NEW SPACE IN THE BROCHURE?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION	LICR	
RECOMMENDED FOR CONSENT AGENDA?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

ISSUES SUBMITTAL FORM

Date: 6/7/2021

ISSUE:	Should CPW eliminate the replacement fee for the Columbine, Centennial, Blue Spruce, and Independence parks passes?		
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):			
<p>In 2021, an audit was performed to determine all additional fees customers may incur after their purchase of a product from Colorado Parks and Wildlife. After a review of this audit, it was proposed to eliminate the replacement fee of \$5.00 (Chapter P-7, #708.2.b and #701.5.i) for the Columbine, Centennial, Blue Spruce, and Independence Parks Passes. These passes are offered as special programs to disabled or low-income residents of Colorado. Eliminating the replacement fee provides an additional service to the customers who have qualified for these special programs.</p> <p>Since January 2019, CPW has issued 316 replacements for these pass types, averaging 130 replacements per year. The net sales for these replacements during this period was \$725.15 (removing the vendor's commission from the gross sales of these passes).</p> <p>Removal of the replacement fee would not add to CPW's administrative load as the process and locations to receive a replacement pass would not change. These passes are also transferable in nature, so there is a low likelihood of misuse.</p>			
STATE LAW REQUIRES CPW TO SOLICIT INPUT FROM STAKEHOLDERS THAT MAY BE AFFECTED POSITIVELY OR NEGATIVELY BY THE PROPOSED RULES. THE FOLLOWING STAKEHOLDERS HAVE BEEN ADVISED OF AND INVITED TO PROVIDE INPUT ON THE REGULATORY CHANGES PROPOSED IN THIS ISSUE PAPER:			
IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED.			
Columbine, Centennial, Blue Spruce, and Independence parks pass holders. No formal outreach to stakeholder groups has occurred. This is an added customer benefit.			
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):			
<ol style="list-style-type: none"> 1. *Preferred Alternative*: Remove replacement fee of \$5.00 for the Columbine, Centennial, Blue Spruce, and Independence parks passes. 2. Status quo. 			
Issue Raised by:	Lauren Truitt		
Author of the issue paper (if different than person raising the issue):	Sarah Schnacke		
CC:	Danielle Isenhart		
APPROVED FOR FURTHER CONSIDERATION BY:	Danielle Isenhart		
REQUIRES NEW SPACE IN THE BROCHURE?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION	LICR		
RECOMMENDED FOR CONSENT AGENDA?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

Parks Pass Replacement/Duplicate Policy

Regulation P-07 #708

Affixed Passes

- 1PA/1KA/1XA - Vehicle Annual Parks Passes
- 2PA/2KA/2XA/2PL/2PS - Aspen Leaf Annual Parks Passes
- Multiples of the above
 - \$5
 - Customer must have top 3 panels of pass to return
 - Replacements offered in the following situations
 - Vehicle stolen/destroyed
 - Must show police report
 - Windshield replaced
 - Pieces of pass peeled off of windshield OR
 - Must show windshield replacement receipt AND
 - Signed duplicate affidavit
 - Vehicle sold
 - Pieces of pass peeled off of windshield OR
 - Must show bill of sale AND
 - Signed duplicate affidavit
 - Pass damaged
 - Pieces of pass peeled off of windshield
 - New vehicle
 - Pieces of pass peeled off of windshield
 - New name
 - Proof of name change AND
 - Pieces of pass peeled off of windshield
 - New address
 - Pieces of pass peeled off of windshield
 - Replacements are NOT offered:
 - If pass is “lost” as pass needs to be permanently affixed to windshield, and if customer has failed to do so, they are in violation of statute and regulation
 - If customer cannot return top three panels of pass
 - To transfer the pass to another pass holder
 - No-charge replacements offered for
 - Faded passes
 - Pieces of pass peeled off of windshield
 - Passes received damaged
 - All pieces of the pass, including top three panels AND
 - Envelope

- Division error
 - All pieces of the pass, including top three panels

Transferable Passes

- 1FT/1KT/1XT - Family Annual Parks Passes
 - \$60
 - Only ONE per original purchased
 - Customer's ID must match IPAWS record
 - Except in case of name change, as below
 - Replacements offered in the following situations
 - Pass lost
 - Top 3 panels (if not lost) AND
 - Signed duplicate affidavit
 - Pass stolen
 - Police report OR
 - Top 3 panels (if not stolen) AND
 - Signed duplicate affidavit
 - Pass destroyed
 - Top 3 panels (if not destroyed) AND
 - Signed duplicate affidavit
 - Pass damaged
 - Damaged pass parts, including top panels
 - Name change
 - Proof of name change AND
 - Entire pass, including top panels
 - Replacements are NOT offered:
 - To transfer the pass to another pass holder
 - No-charge replacements offered for
 - Faded passes
 - Pieces of pass peeled off of windshield
 - Passes received damaged
 - All pieces of the pass, including top three panels AND
 - Envelope
 - Division error
 - All pieces of the pass, including top three panels
- Columbine Parks Pass
- Centennial Parks Pass
- Blue Spruce Parks Pass
 - \$5
 - Customer's ID must match IPAWS record
 - Except in case of name change, as below
 - Replacements offered in the following situations

- Pass lost
 - Top 3 panels (if not lost) AND
 - Signed duplicate affidavit
 - Pass stolen
 - Police report OR
 - Top 3 panels (if not stolen) AND
 - Signed duplicate affidavit
 - Pass destroyed
 - Top 3 panels (if not destroyed) AND
 - Signed duplicate affidavit
 - Pass damaged
 - Damaged pass parts, including top panels
 - Name change
 - Proof of name change AND
 - Entire pass, including top panels
 - Replacements are NOT offered:
 - To transfer the pass to another pass holder
 - No-charge replacements offered for
 - Faded passes
 - Pieces of pass peeled off of windshield
 - Passes received damaged
 - All pieces of the pass, including top three panels AND
 - Envelope
 - Division error
 - All pieces of the pass, including top three panels
- Volunteer Parks Pass
 - \$0
 - Customer's ID must match IPAWS record
 - Except in case of name change, as below
 - Replacements offered in the following situations
 - Pass lost
 - Top 3 panels (if not lost) AND
 - Signed duplicate affidavit
 - Pass stolen
 - Police report OR
 - Top 3 panels (if not stolen) AND
 - Signed duplicate affidavit
 - Pass destroyed
 - Top 3 panels (if not destroyed) AND
 - Signed duplicate affidavit
 - Pass damaged
 - Damaged pass parts, including top panels
 - Name change

- Proof of name change AND
 - Entire pass, including top panels
- Replacements are NOT offered:
 - To transfer the pass to another pass holder
- No-charge replacements offered for
 - Faded passes
 - Pieces of pass peeled off of windshield
 - Passes received damaged
 - All pieces of the pass, including top three panels AND
 - Envelope
 - Division error
 - All pieces of the pass, including top three panels

Notes

- Any duplicates **MUST** have a note on the order as to why the duplicate was issued
 - In the cart, select the order and click “add note/alert”
- Iron Ranger receipts and Temporary Annual passes are **NOT** replaceable or refundable. Customers need to treat them like cash.
- If the replacement situation does not fit the above situations, please contact the agent line at 1-800-526-9503 for guidance

ISSUES SUBMITTAL FORM

Date:

6/7/2021

ISSUE: Should CPW update the camping and day-use cancellation and change policy in P-07?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Current Regulations

#704.6

6. The cancellation fee for group camping reservations at all group camping sites in the system shall be equal to the amount of the first night's fee if the cancellation is made within fourteen days of the first reserved date.

#706.2

2. All permits and reservations must be received in advance. The group picnic area cancellation fee for all group picnic sites within the system shall be equal to 25% of the base fee if the cancellation is made more than fourteen days prior to the reserved date. If the cancellation is made within fourteen days of the reserved date, then the cancellation fee shall be 100% of the base fee.

#708.8

8. The fees associated with the reservation system for phone or internet sales are as follows:

a. Each reservation change or cancellation.....\$6.00/each

(1) For cancellations made fourteen days or more prior to the beginning date of the reservation, the cancellation fee will be charged.

(2) For cancellations made less than fourteen days prior to the beginning date of the reservation, the cancellation fee will be charged as well as the first night's camping fee.

#708.10

j. Cancellation fees for event facility reservations are equal to 25% of the base fee if the cancellation is made more than fourteen days prior to the reserved date. If a cancellation is made within fourteen days prior to the event, the cancellation fee shall be 100% of the total event permit fee.

Current Policy

No refund exceptions provided for:

- Bugs
- Fire restrictions/bans
- Bad weather
- Water levels
- Boat launch closures
- Waterway closures
- Blue algae
- Road closures if park remains open

Grace period

- Customers who cancel their reservation within 24 hours of making the reservation are eligible for a full refund.
 - Except if the date of arrival is the date of reservation. In these cases, Aspira often refers the case to the Reservations office to review.

Proposed Changes

Overall

- Move
 - All change/cancellation information in one section in regulation
- Update
 - Tiered cancellation/change pricing
 - Update language across site-types to match, including group picnic areas
- Add
 - No-Show policy
 - If a customer fails to occupy the site of their reservation or contact the park/vendor the fees for all nights which have passed will be retained and the customer will be ineligible for a refund for those nights.
 - Cancellation fees are non-refundable unless bona fide emergency or division error
 - Change fees are non-refundable unless division error - no refunds for emergency or otherwise
 - Bona fide emergency is defined in CPW administrative policy
 - Customers who make a reservation outside of the maximum window (six months) will have their reservation frozen to any changes for two weeks.

Proposed Pricing Tiers

Timing	Cancel	Change Dates	Extend Stay	Shorten Stay	Change Sites*	No Show
0-7 DBA	100% of 1 night/day	20% of 1 night/day	\$0	20% of 1 night/day	\$0	N/A
8-28 DBA	50% of 1 night/day	15% of 1 night/day	\$0	15% of 1 night/day	\$0	N/A
29+ DBA	25% of 1 night/day	10% of 1 night/day	\$0	10% of 1 night/day	\$0	N/A
DAA-DD	Any nights/days passed	N/A	\$0	Any nights/days passed	\$0	Any nights/days passed

DBA = days before arrival

DAA = day after arrival

DD = departure day

If a customer changes sites, they will be charged or refunded the difference in site prices, but will not be charged an additional change fee.

Issues Addressed

Sliders

These are individuals who make reservations outside of the maximum window to get prime reservation days and later change their reservations. Providing discounted prices for making changes early encourages people to not wait until the last minute and provides the opportunity for other people to make reservations.

Freezing any reservations made outside the maximum window for a set period of time, preventing them from being changed, can be helpful for people who “inchworm” into a reservation by changing it repeatedly.

Note: Pennsylvania State Parks was experiencing similar issues with sliders and implemented a 21-day freeze period for any reservations made outside or at the maximum window. They received zero complaints about the freeze and eliminated all of their complaints about sliders.

Avoidance of Cancellation Fees

Customers who wish to cancel their reservations but are subject to the first night penalty will change their reservation and then cancel it in order to avoid that penalty. Increasing the change fees discourages this behavior by increasing the cost of the change fee the closer one gets to a reservation.

No Shows

Customers will not show up for their reservation and then request a refund. This means that sites will go unoccupied for extended periods of time and costs administrative time doing refund investigations and prevents those sites from being re-sold, thus costing CPW revenue. Codifying that we do not provide refunds after the fact will help encourage customers to contact the park/Aspira prior to/during their stay instead of after.

Outdated Timeframes

Penalizing people who cancel within two weeks with the first night's stay plus cancellation fee is too restrictive. With the volume of reservations made within the last week before arrival date, we want to encourage people who need to cancel their reservations to do so earlier to allow more opportunity for other customers. Two weeks made sense when the system was more manual, but with it becoming more automated and with live reservations, the two week timeframe doesn't make sense.

Cancellation Balances

Customers with single-night stays who cancel within 14 days of their arrival date are currently charged the first (only) night PLUS a cancellation fee. That is punitive and can leave them with a balance they have to pay prior to making any additional reservations. Removing the cancellation fee and just taking the first night within a week results in the customers not potentially having to pay MORE than their original reservation to cancel.

Financial Sustainability

- When a full cancellation is granted, CPW not only loses the revenue but also the amount of vendor's commission. Cancellation and change fees help to cover these costs. By tiering them, it covers the fees more appropriately than a flat rate.
- Keeping change fees lower than cancellation fees encourages customers to change, rather than cancel, their reservations.
- Removing the change fee in situations where the customer is extending their reservation rewards the customer for spending more money with us.
- Creating a no-show policy gives parks the ability to make sites available to other customers.

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***IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.**

Park Managers & Staff

Park Managers, District Regional Managers, and staff were all provided the opportunity to review and comment on this proposal. This issue paper has been revised and encompasses their feedback.

Customers

Customer feedback has universally been that they shouldn't have to pay more than the first night's fee when cancelling, that the cancellation policies are too confusing for the different site types, and that the 14-days seems punitive. The number one complaint we receive in regards to reservations are sliders "gaming the system" for popular weekends. In addition, customer behavior shows that when change fees are waived, they are more likely to stay with the park instead of trying to cancel.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

A. *Preferred Alternative*:

1. Move
 - a. All change/cancellation information in one section in regulation
2. Update
 - a. Tiered cancellation/change pricing
 - b. Update language across site-types to match, including group picnic areas
3. Add
 - a. No-Show policy
 - i. If a customer fails to occupy the site of their reservation or contact the park/Aspira the fees for all nights which have passed will be retained and the customer will be ineligible for a refund for those nights
 - b. Cancellation fees are non-refundable unless bona fide emergency or division error

- c. Change fees are non-refundable unless division error - no refunds for emergency or otherwise
- d. Bona fide emergency is defined in CPW administrative policy
- e. Customers who make a reservation outside of the maximum window (six months) will have their reservation frozen to any changes for two weeks.

B. Status quo

Issue Raised by:	Devon Adams	
Author of the issue paper (if different than person raising the issue):	Devon Adams	
CC:	Danielle Isenhart	
APPROVED FOR FURTHER CONSIDERATION BY:	Danielle Isenhart	
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