



COLORADO

Parks and Wildlife

Department of Natural Resources

1313 Sherman St, Room 111
Denver, CO 80203
P 303.866.3203

TO: Members of the Colorado Parks and Wildlife Commission
FROM: Krista Heiner, Regulations Manager
RE: Recommendations on License Reissue Program Changes
DATE: July 2, 2020

Background

In November 2019, the Parks and Wildlife Commission heard a citizen petition requesting the expansion of big game license purchasing options after the start of a season (i.e., online, over the phone, and from agents). The Division's response to the citizen petition was a request to the Commission for more time to look holistically at the reissue program and involve more stakeholders in the process. The Commission supported that recommendation and indicated that they would be interested in larger scale changes to the program. An internal working group was formed to help complete this task.

To understand the perspectives of various stakeholder groups better, the working group surveyed limited license purchasers (i.e., customers), license agents, and CPW staff regarding their preferences on different aspects of the process for reissuing licenses and releasing leftover licenses in March-April 2020 using slight modifications of the same survey. A summary of the results of these surveys is attached.

The following memo highlights the Division's recommendations based on different components of the reissue program: 1) point level for manual reissue requirement, 2) timing of release for new hunt codes, 3) preview list opportunity and 4) expanding sell-through dates and locations. These changes would be implemented for the 2021 big game seasons.

Point Level for Manual Reissue

The Division recommends maintaining the status quo of manually reissuing licenses that take five or more resident preference points to draw for all species. However, due to predicted preference point creep and concerns that the number of licenses that take five or more points to draw may increase over time, the working group recommends reassessing the point threshold prior to the next Big Game Season Structure changes. While manually reissuing licenses does require significant staff time, this recommendation takes into account customer, license agent and staff preference for reissuing licenses directly to the general public via the leftover license list if they took four or fewer points to draw. It also may help



to address preference point creep, as licenses that are manually reissued and accepted reset that hunter's preference point level to zero for that species.

Timing of Release

The Division recommends **maintaining the status quo of releasing licenses randomly throughout the workweek (Tuesday-Friday, 9am-4pm at random times)**. This recommendation takes into account customer and staff preference for maintaining the status quo. While customers also supported releasing licenses at a set time, the Division does not recommend returning to releasing licenses at a set time one day a week right now. In 2016, CPW moved away from this approach due to concerns over creating mini-leftover days with lines at offices in the morning. Additionally, returning to a set release time would require significant database reprogramming. Some customers' concerns with the random release of licenses stem from a perception that CPW staff knows when licenses will be released, giving them an advantage in purchasing them, as well as the advent of computer bots to purchase licenses. (Computer bots can be programmed to automatically purchase licenses as they randomly appear.) The concerns related to bots have been addressed with the use of the reCAPTCHA security service, which requires licenses be purchased by a person.

Preview List

The Division recommends once again **providing a weekly preview list** (displaying the licenses that will be randomly released throughout the week) in addition to the current leftover list (which displays current leftover licenses that are available to purchase). While customers, license agents and staff did not indicate a clear preference for this option, the Division believes a weekly preview list provides more transparency and allows customers to better plan when they need to monitor the leftover list to purchase a randomly released license that week. Furthermore, little additional staff time would be required to provide a weekly preview list. The Division believes this recommendation, in conjunction with the random release of licenses throughout the workweek, provides the best compromise between those who wish to plan for the release of licenses and those who prefer the random release of licenses.

Sell-Through Dates/Locations/Species

The Division recommends **changing regulation #208.A to allow the sale of all big game licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone** (all possible sales channels). This is in response to customers' preference for selling all licenses after the start of the season through all possible channels, with 50% selecting it as a first choice.

Currently, if a hunting season is less than 14 days long, a license for that season can only be purchased at a CPW office or park after the start of the season to cut down on illegal

opportune harvest. (Note: license agents are currently authorized to sell 14-day or longer Private Land Only, archery, disease management, special hunts, season choice, and plains either-sex elk licenses after the start of the season. In addition, license agents may also accept landowner vouchers for licenses after the start of the season.) While the Division notes some of staff's concerns with this option, it feels the customer service benefits outweigh the concerns. Additionally, there have been very few reported instances of law violations in this manner. Furthermore, many states have no such restriction on purchasing licenses online after the season starts, including Arizona, California, Maine, Missouri, Montana, Nebraska, Oklahoma, Ohio, Oregon, South Dakota, Texas, Washington, and Wyoming. This change would also help to alleviate any perception that CPW staff can unfairly purchase licenses due to their proximity to a CPW location during the workweek.

Summary of License Reissue Surveys



JULY 2020



Background

In November 2019, the Parks and Wildlife Commission heard a citizen petition requesting the expansion of big game license purchasing options after the start of a season (i.e., online, over the phone, and from agents). Traditionally, customers have been required to purchase licenses only at CPW offices after the start of a season, to cut down on illegal opportune harvest. Staff's response to the citizen petition was a request to the Commission for more time to look holistically at the reissue program and involve more stakeholders in the process. The Commission supported that recommendation and indicated that they would be interested in larger scale changes to the program. An internal working group was formed to help complete this task.

The following summary highlights changes that were being considered as a part of this process. These potential changes are broken out into different components of the reissue program: 1) point level for manual reissue requirement, 2) timing of release for new hunt codes, 3) preview list opportunity and 4) expanding sell through dates and locations.

Surveys

To better understand the perspectives of various stakeholder groups, the working group surveyed limited license purchasers (i.e., customers), license agents, and CPW staff regarding their preferences on these options in March-April 2020 using slight modifications of the same survey (Appendix A).

Respondent Demographics

Customer Survey

The Customer Survey was open from March 10 - April 13, 2020 and it was available online for customers to take via the Big Game Hunting Webpage. 1,836 people responded to the survey. Of them 77% were residents (Figure 1) and 95% were male (Figure 2). Forty percent (40%) were from suburban areas of the state, 34% were from rural mountain areas, 13% were from rural plains areas, and 13% were from urban areas (Figure 3). The majority of respondents (29%) were between the ages of 30-39, with the 26% of the respondents between the ages of 40-49 (Figure 4). Ninety-seven percent (97%) of respondents had purchased a big game license previously (Figure 5), with the most common licenses applied for or purchased being elk (96%) and deer (91%) (Figure 6).

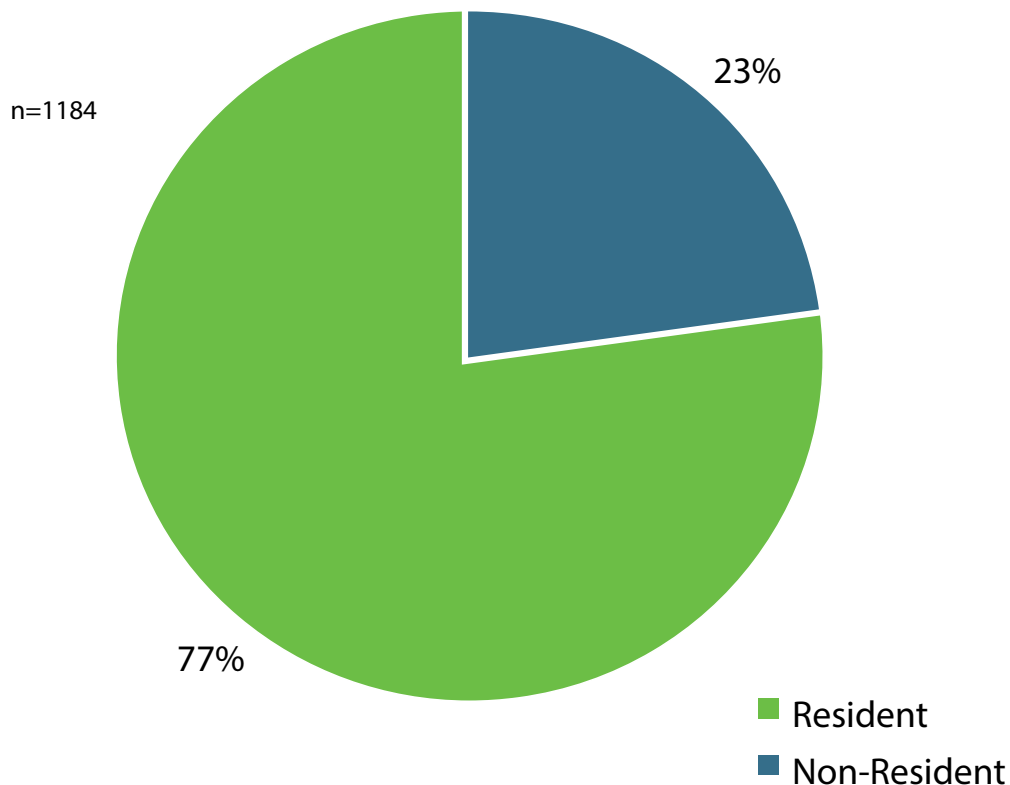


Figure 1: Customer survey respondents' residency status.

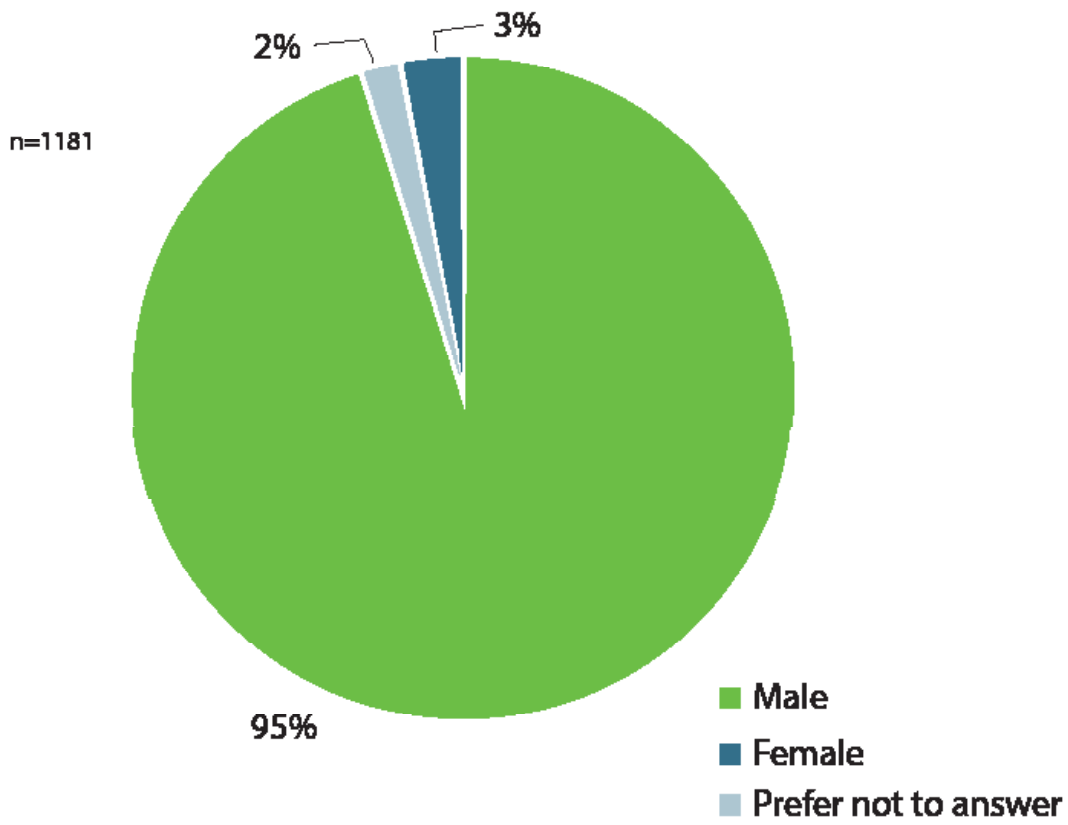


Figure 2: Customer survey respondents' gender.

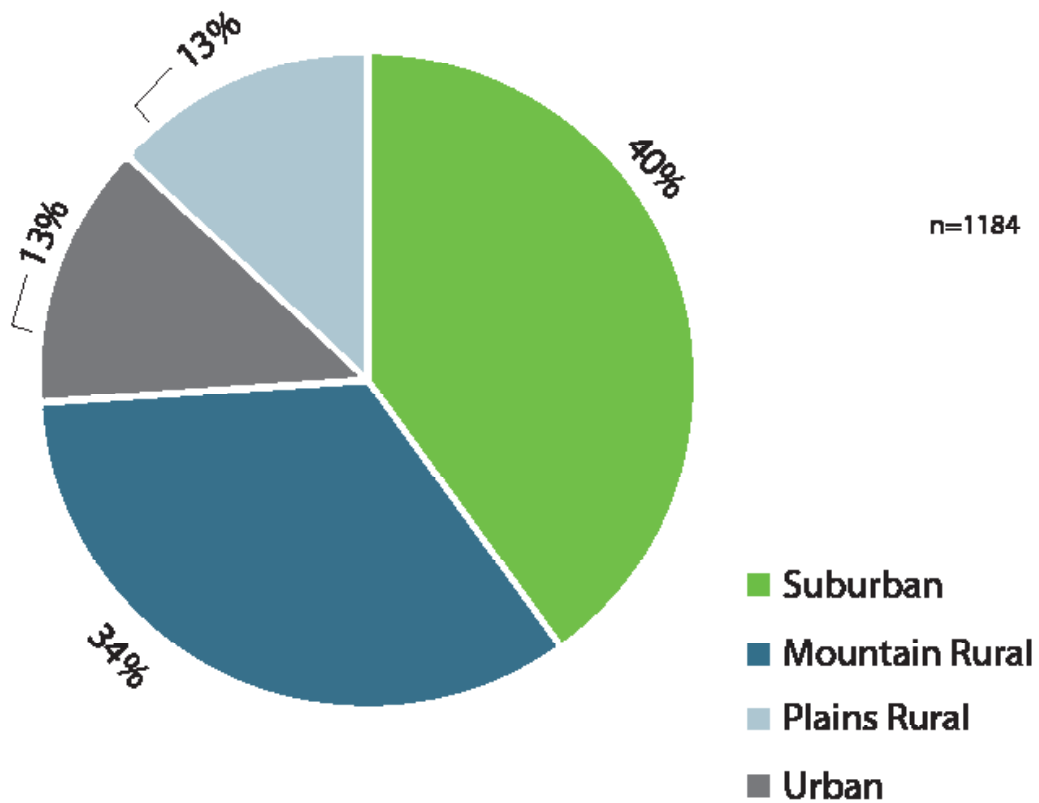


Figure 3: Customer survey respondents' location.

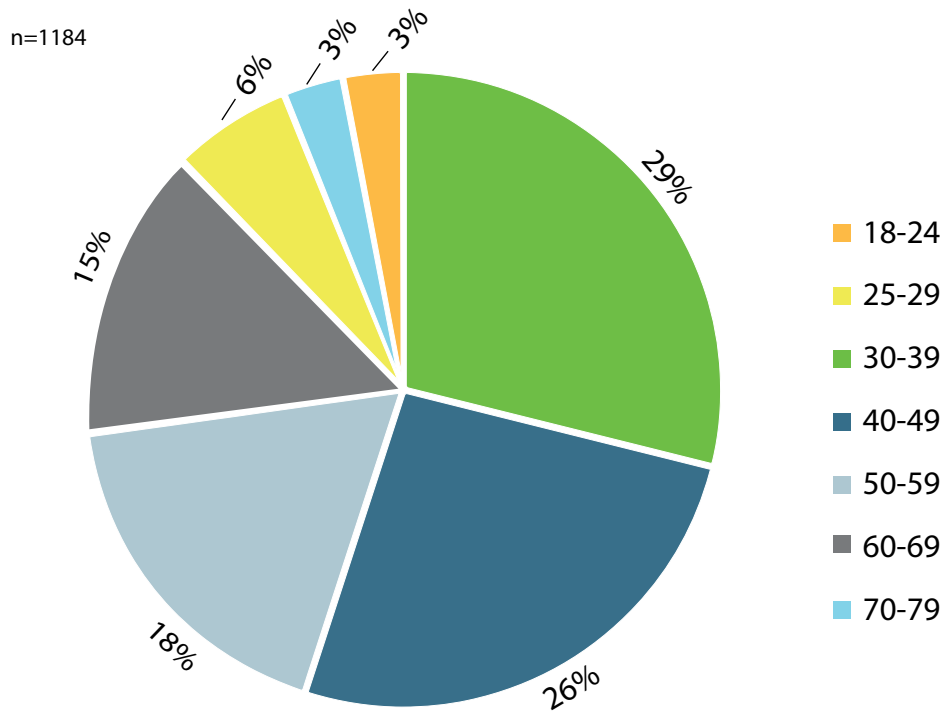


Figure 4: Customer survey respondents' age.

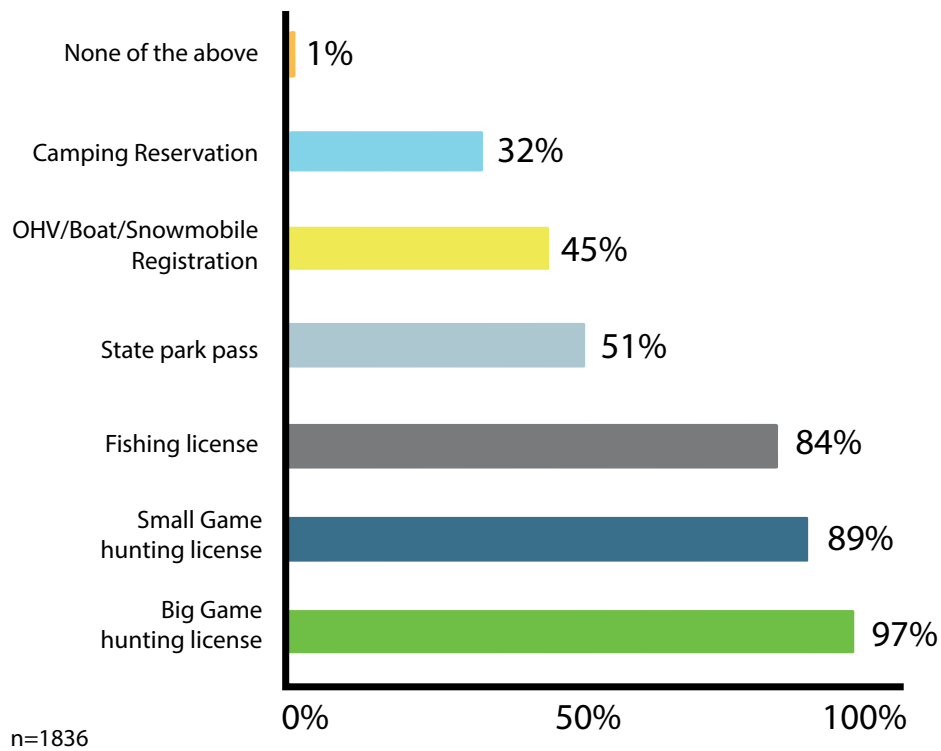


Figure 5: Products customer survey respondents have purchased from CPW.

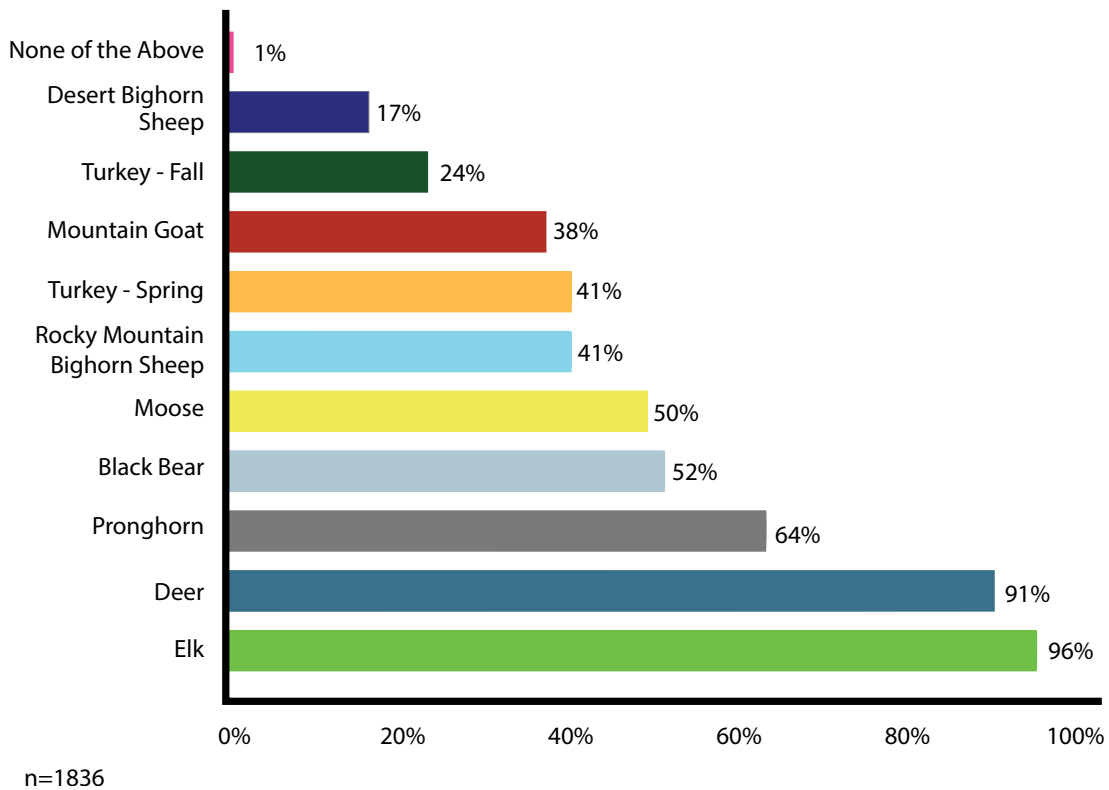


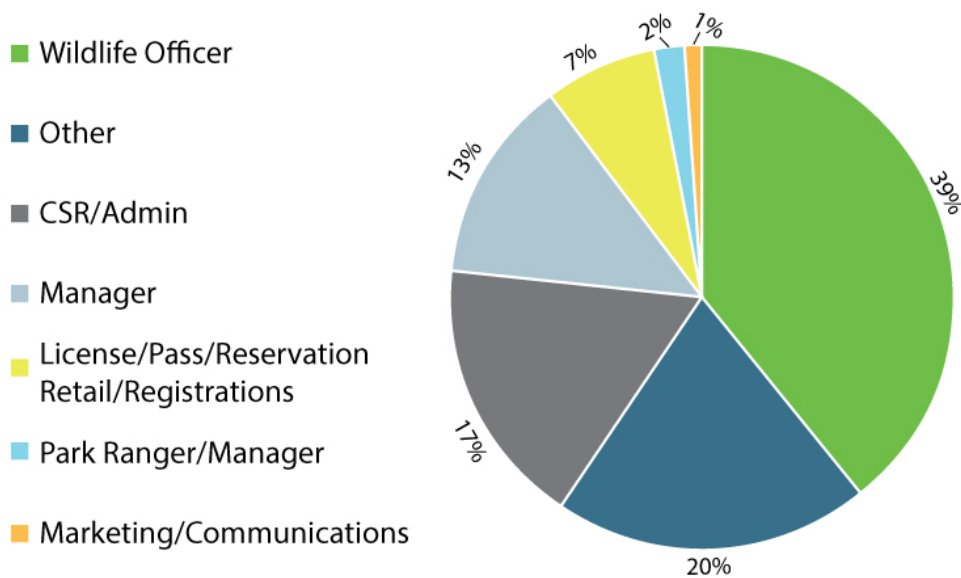
Figure 6: Licenses customer survey respondents have applied for, attempted to purchase, or purchased.

License Agent Survey

The License Agent Survey was open from March 31 - April 15 and it was sent to license agents in the April License Agent Bulletin. Thirty-three (33) license agents responded to the survey. Only 6% of respondents did not sell big game hunting licenses.

CPW Staff Survey

The CPW Staff Survey was open from March 9 - April 9 and it was sent to all staff in an email. 112 people responded to the survey. Of them, the majority were wildlife officers (39%) (Figure 7), and the majority of the staff respondents were based in rural mountain communities throughout the state (58%), followed by urban areas (23%) (Figure 8).



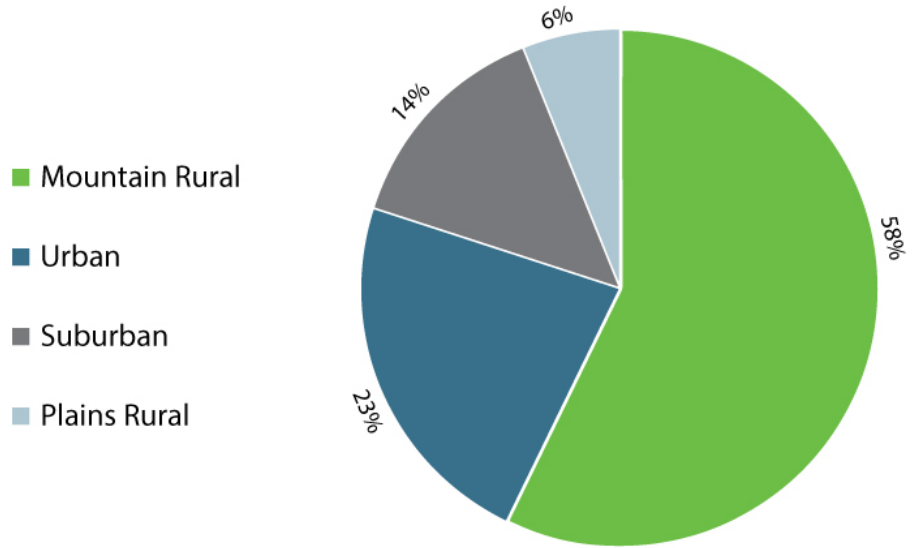
n=109

Figure 7: Respondents to CPW staff survey by job type.

Results

Point Level for Manual Reissue

If a license takes five or more resident preference points to draw, it is manually reissued to the next person in the draw order under the current regulations. If it is a first choice license for the hunter, their preference point level will be reset to zero if they accept the license, which helps combat preference point creep. Licenses that take four or fewer points to draw are reissued to the general public via the leftover list.



Raising the point level would allow greater opportunity for the public to get these highly valued licenses off the leftover list without using preference points, reduces staff time used for the manual reissue process, and increases how far ahead of the season these licenses are available. However, it would not help to alleviate preference point creep to the same degree as the current manual reissue process.

Figure 8: Respondents to CPW staff survey by location. n=106

The proposed options are that a license would be reissued to the public via the leftover list (instead of manually reissued to the next person in the draw order), if the license takes:

- 4 or fewer points to draw (status quo)
- 7 or fewer points to draw
- 9 or fewer points to draw
- 14 or fewer points to draw
- 19 or fewer points to draw.

Customers (Figure 9), license agents (Figure 10) and CPW staff (Figure 11) all indicated a preference for keeping the point threshold for reissuing a license to the public through the leftover list at four or fewer points, which is the status quo.

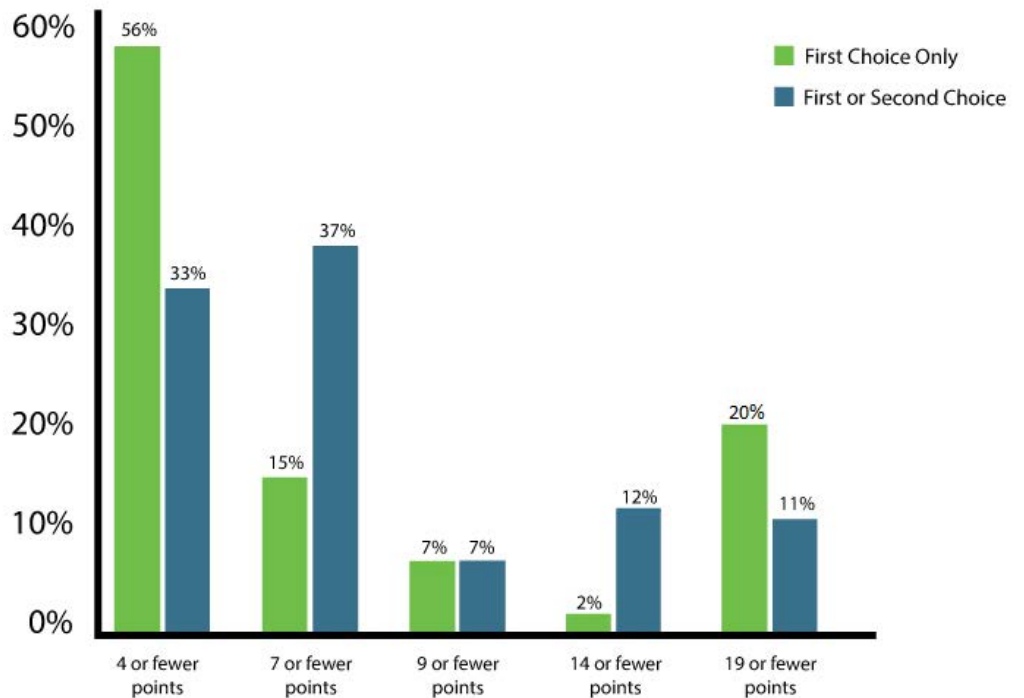
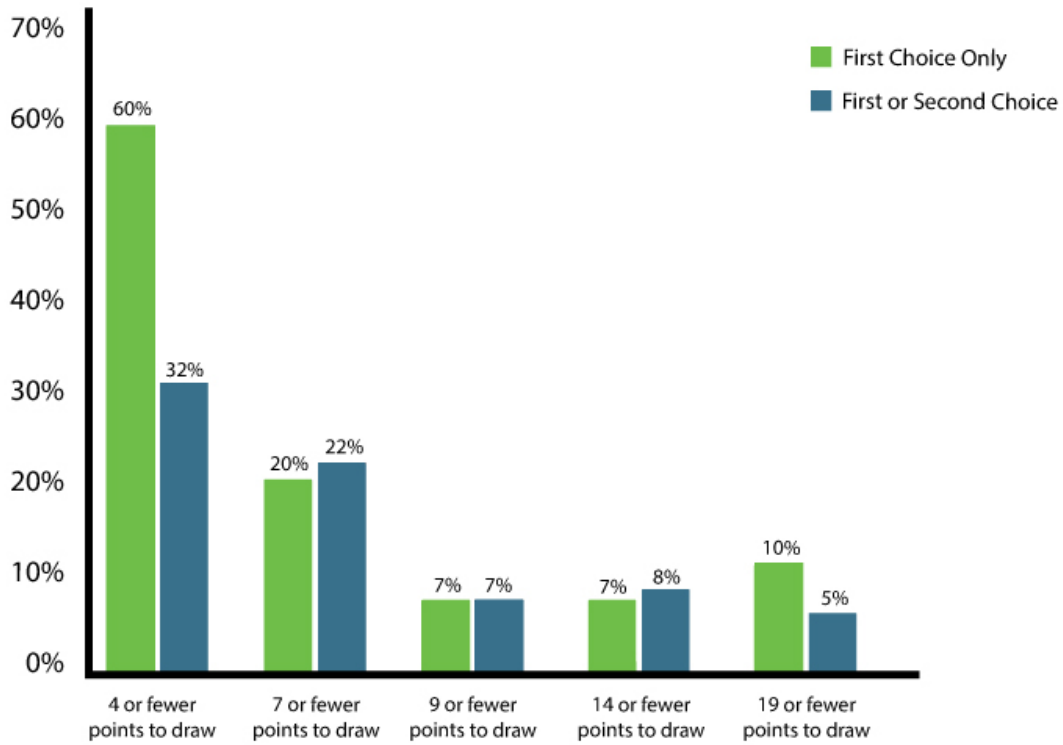
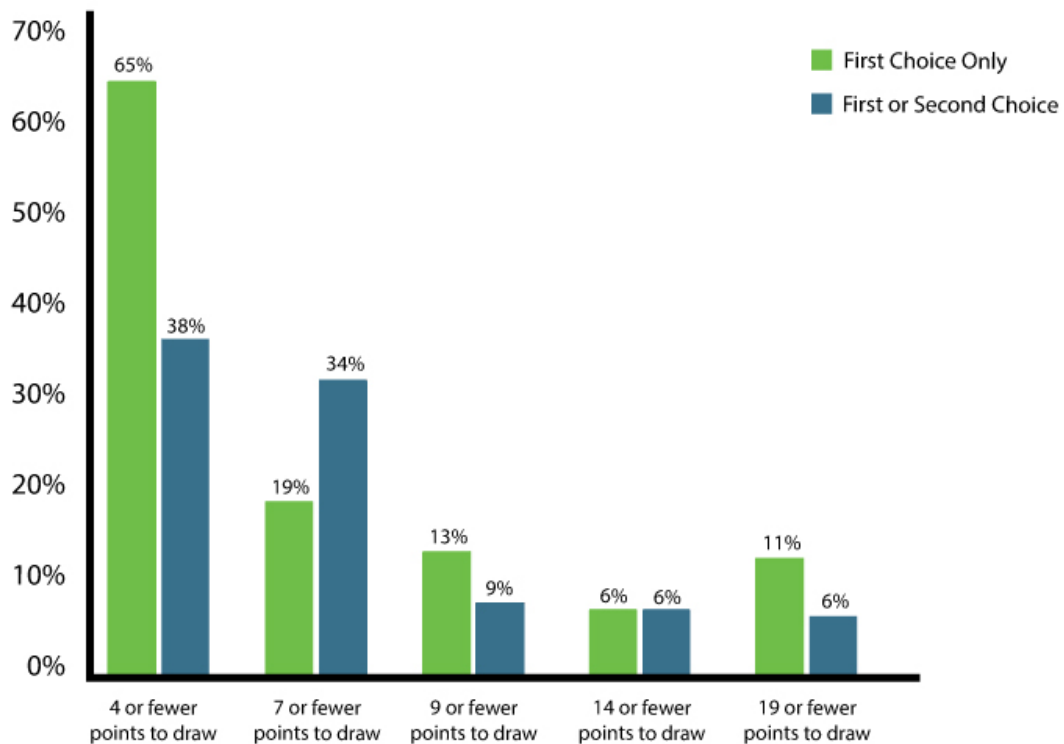


Figure 9: Customers' preference for point threshold to determine whether limited license is reissued to the general public as part of leftover list. n=1188



n=30

Figure 10: License agents' preference for point threshold to determine whether limited license is reissued to the general public as part of leftover list.



n=109

Figure 11: CPW staff's preference for point threshold to determine whether limited license is reissued to the general public as part of leftover list.

Timing of Release

The reissue program currently releases new hunt codes to the leftover list Tuesday-Friday, 9am-4pm at random times. The program has operated like this since 2016 due to feedback from offices that a single weekly release time created mini-leftover days. The random release was also intended to address public concerns that high point value licenses were being purchased by CPW staff who knew what licenses would be released and when. Prior to that, reissued hunt codes were released on Tuesdays at 9am.

The proposed options are:

- Randomly release licenses throughout the workweek (status quo)
- Randomly release licenses during certain hours and days (e.g., Tuesday-Friday 9am-12pm, Tuesday & Thursday 9am-4pm, etc.)
- Release licenses at a set time every day (e.g., 9am)
- Release licenses at a set time one day a week (e.g., Tuesdays at 9am).

While the percentage of customers who chose “released at a set time every day” and “randomly released throughout the work week” as a first choice are the same (33%), when first or second choices were considered, customers showed a slight preference for “released at a set time every day” (Figure 12). License agents indicated a preference for releasing licenses at a set time every day (Figure 13), while CPW staff indicated a preference for randomly releasing licenses throughout the workweek (status quo) (Figure 14).

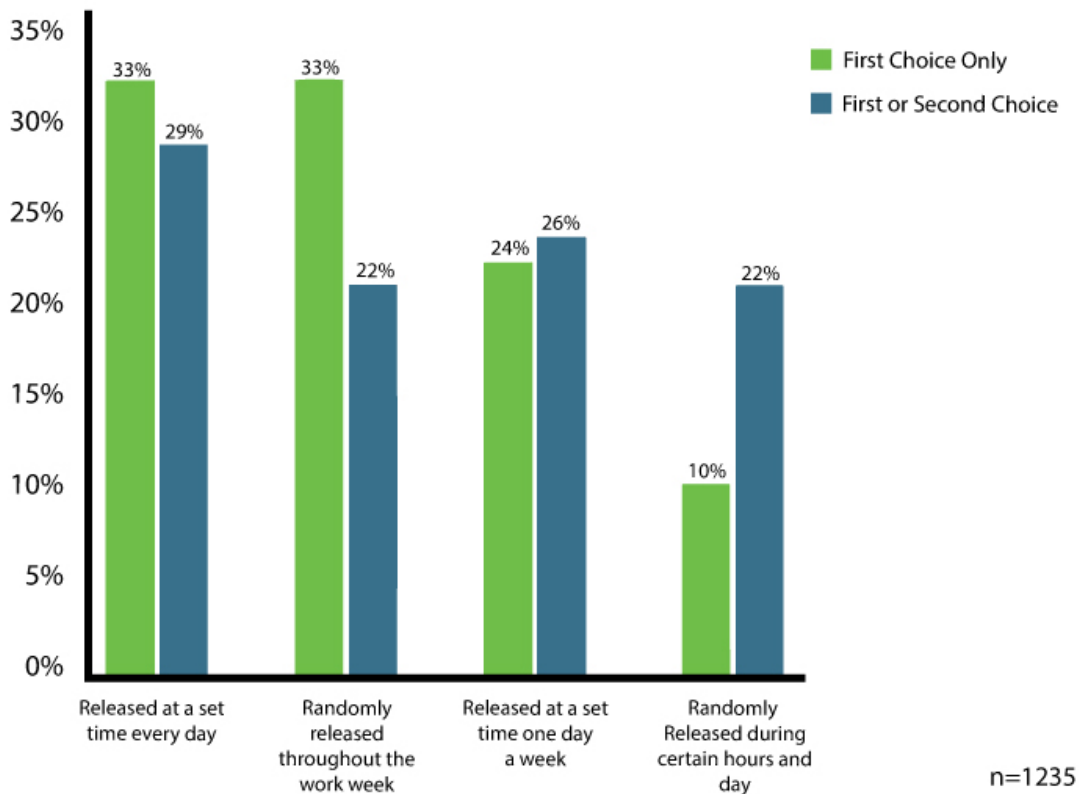


Figure 12: Customers' overall preference for release times for publicly reissued limited licenses.

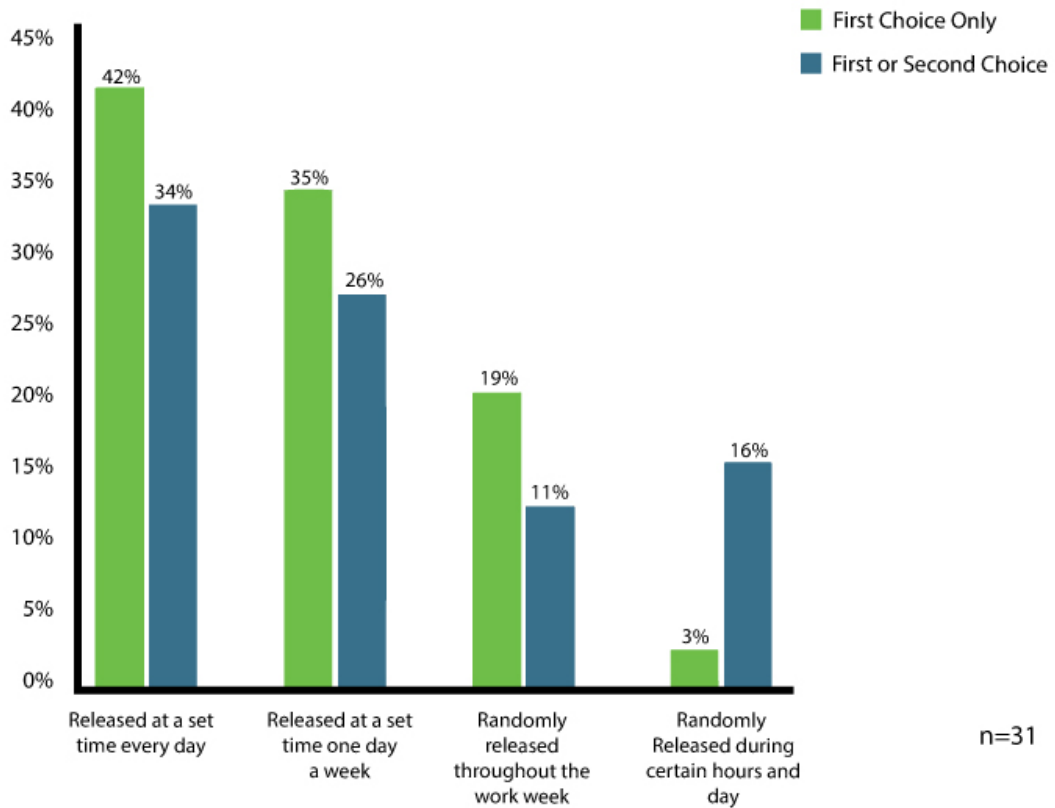


Figure 13: License agents' preference for release times for publicly reissued limited licenses.

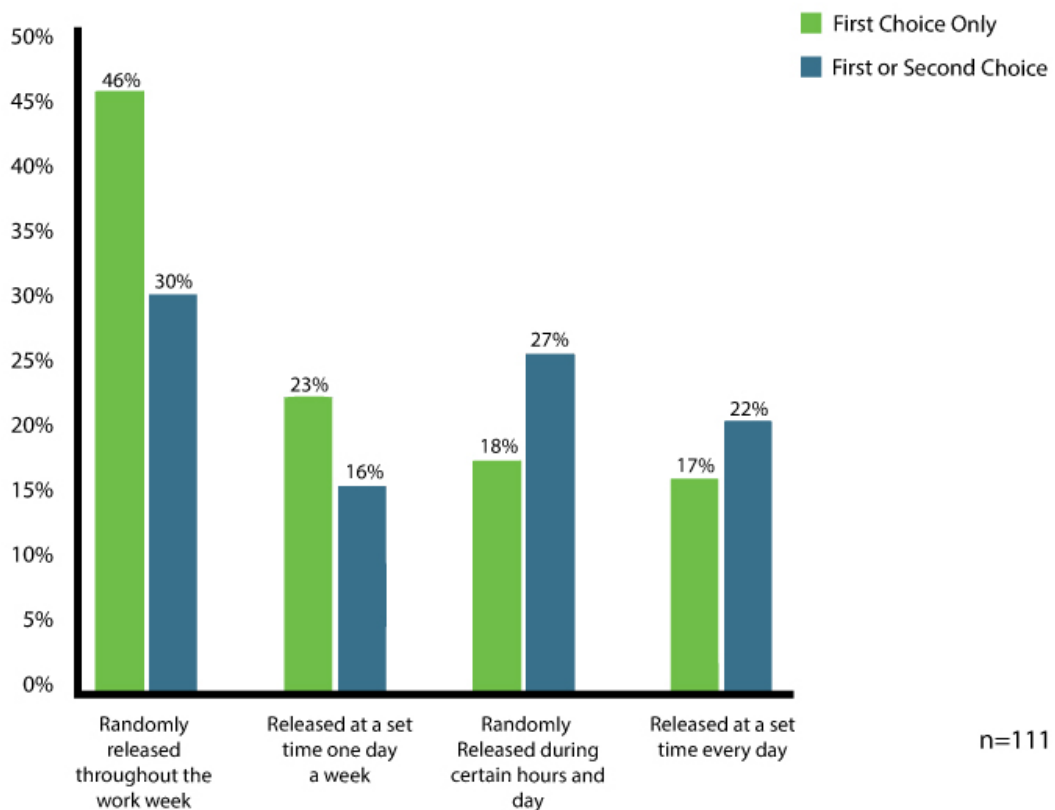


Figure 14: CPW staff's preference for release times for publicly reissued limited licenses.

Preview List

Prior to 2016, a preview list was provided on Mondays so that customers would know which hunt codes would be available on Tuesday mornings. A preview list is not currently available to allow the process to be completely random.

The proposed options are:

- Hunt codes appear on the leftover list as they are released (status quo)
- Provide customers a preview list.

Customers indicated a preference for the status quo of hunt codes appearing on the leftover list as they are released (54%) (Figure 15). License agents and CPW staff also indicated a slight preference for the status quo (42% and 46%, respectively), while 39% of license agents and 43% of CPW staff preferred providing customers a preview list once per week prior to the limited licenses being made available (Figure 16 and Figure 17).

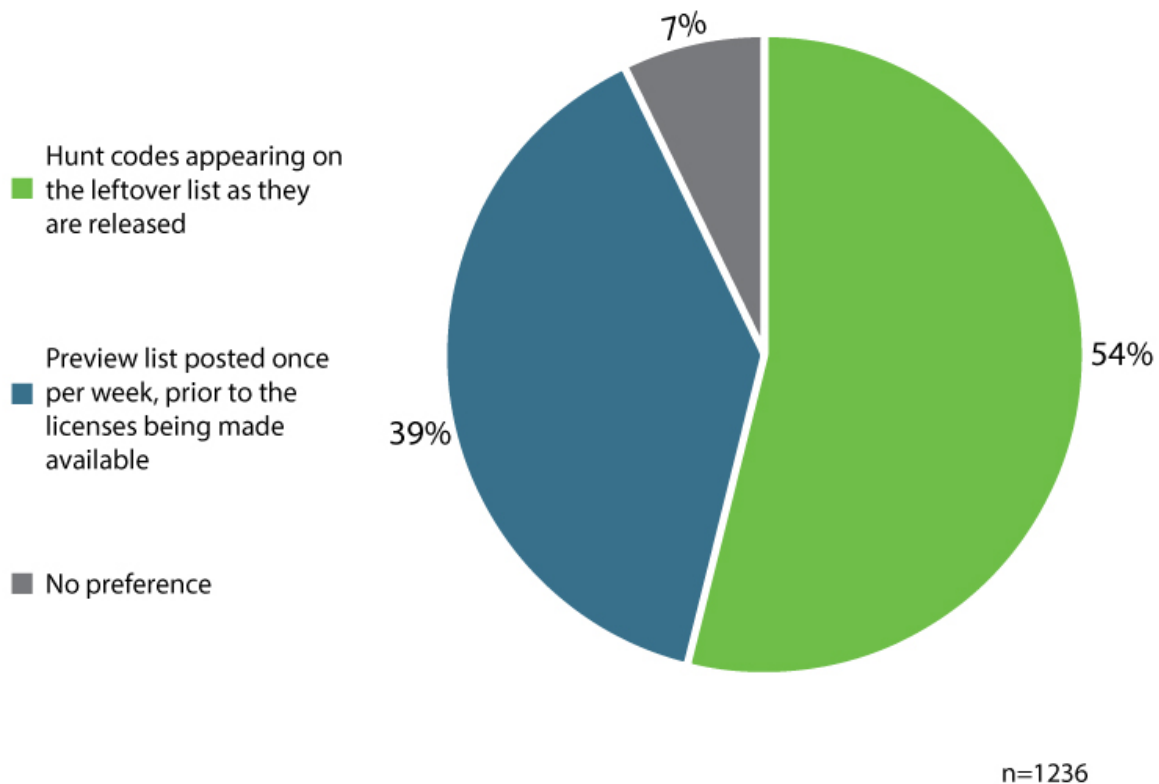


Figure 15: Customers' preference for discovering which reissued limited licenses are available for sale to public.

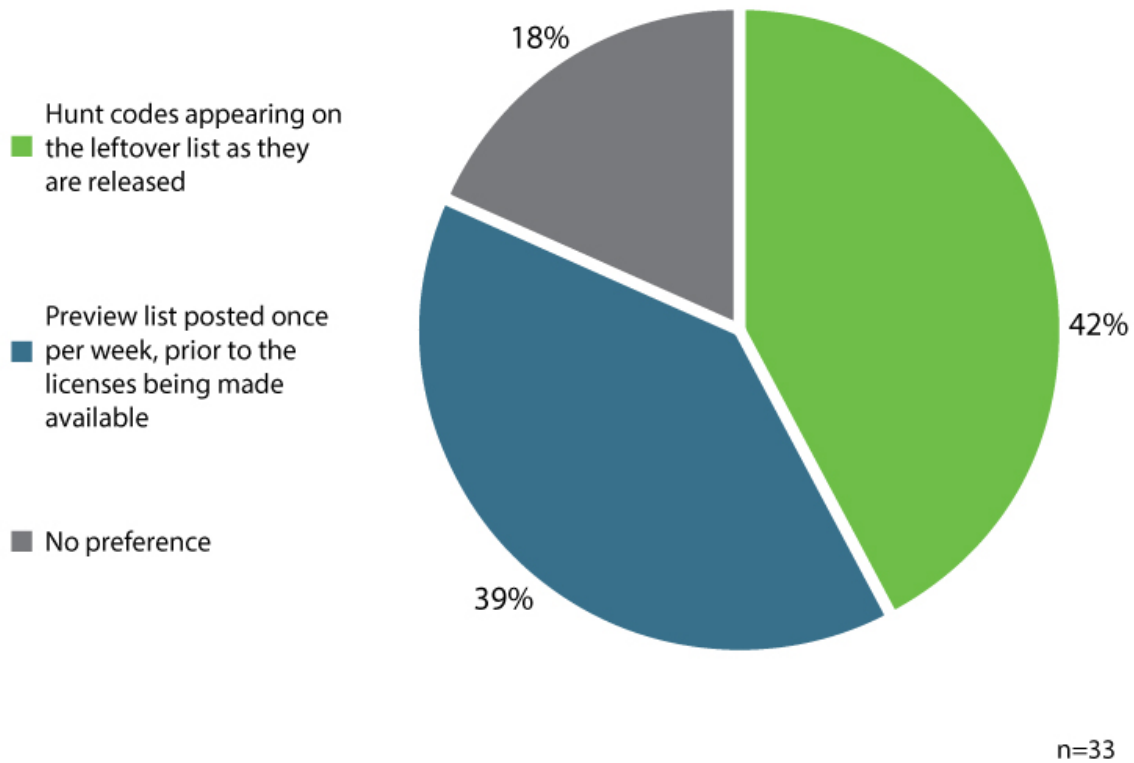


Figure 16: License agents' preference for discovering which reissued limited licenses are available for sale to public.

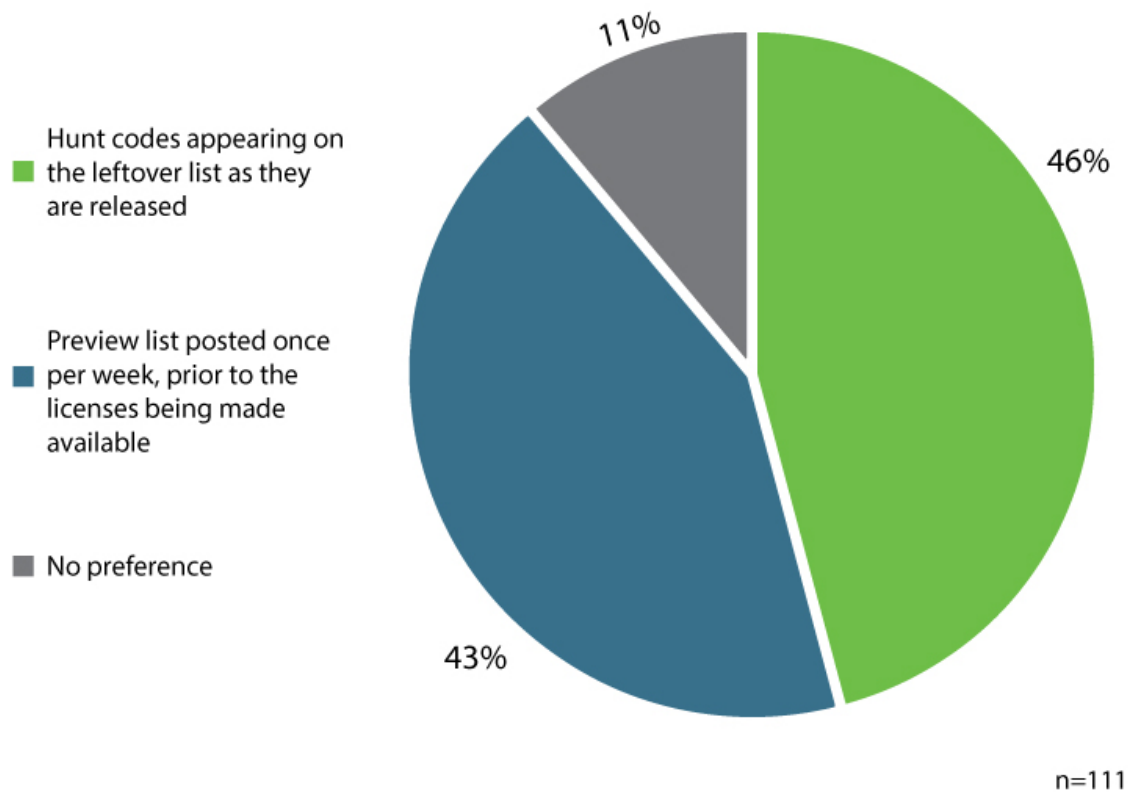


Figure 17: CPW staff's preference for notifying customers which reissued limited licenses are available for sale.

Sell Through Dates/Locations/Species

Currently, if a hunting season is less than 14 days long, a license for that season can only be purchased at a CPW office or park after the start of the season. The petitioner asked to expand the opportunity for customers to purchase licenses after the start of a season through additional sales channels, including the potential following alternatives:

- Sell only licenses at CPW offices after the start of the respective season if the season is less than 14 days long (status quo)
- Sell all licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone (all possible locations)
- Sell only sheep, goat and moose licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone (all possible locations)
- Sell only high preference point licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone (all possible locations)
- Sell all licenses after the start of the respective seasons at CPW locations and sales agents only (no online or phone sales).

Customers indicated a preference for selling all licenses after the start of the season at all possible locations (CPW locations, sales agents, online and by phone), with 50% selecting it as a first choice and 33% selecting it as either a first or second choice (Figure 18). License agents indicated a preference for selling all licenses at CPW locations and sales agents only (Figure 19). Staff indicated a preference for selling all licenses at CPW locations only after the season starts (Figure 20).

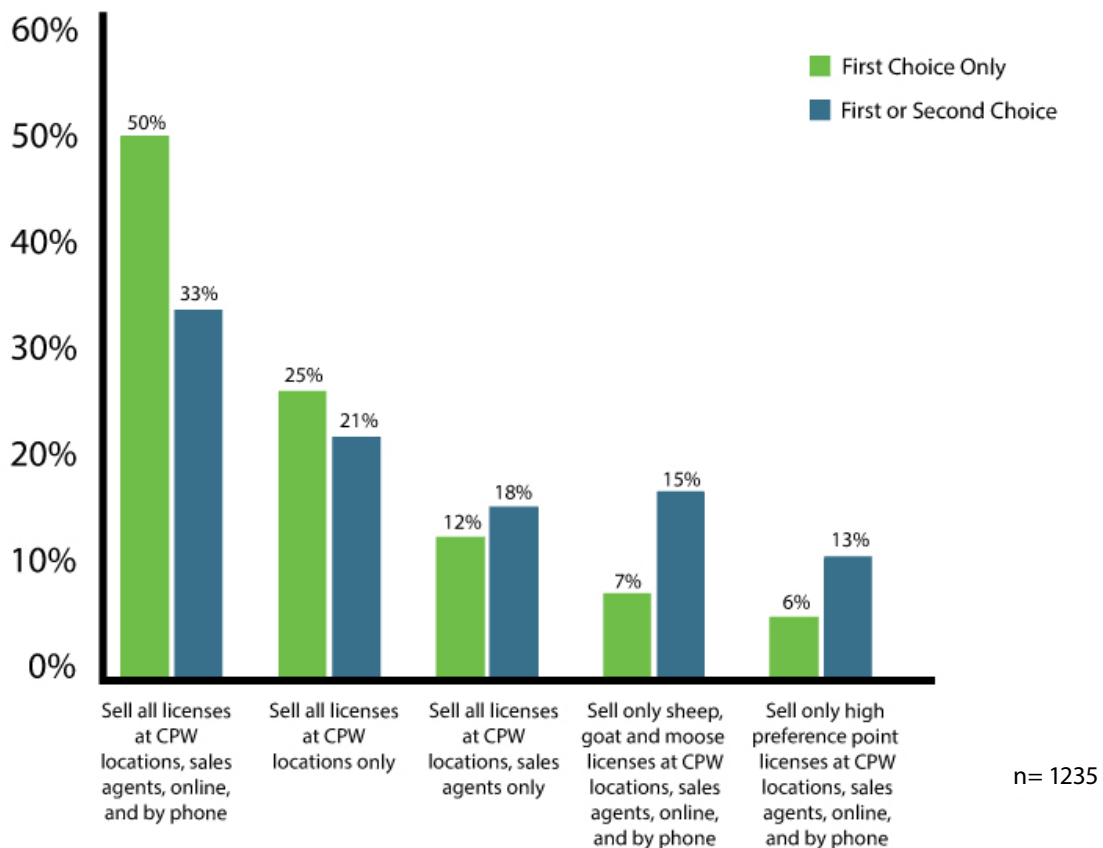


Figure 18: Customers' preference for how licenses should be available for sale once a season starts.

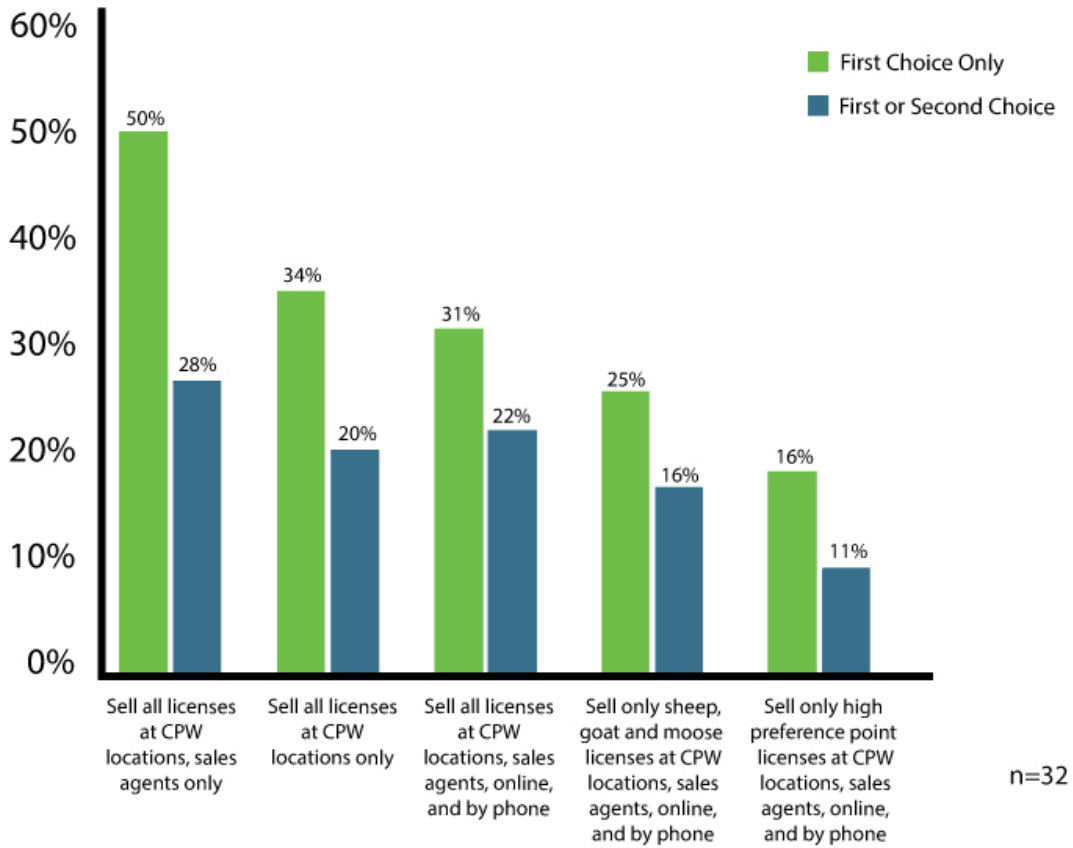


Figure 19: License agents' preference for how licenses should be available for sale once a season starts.

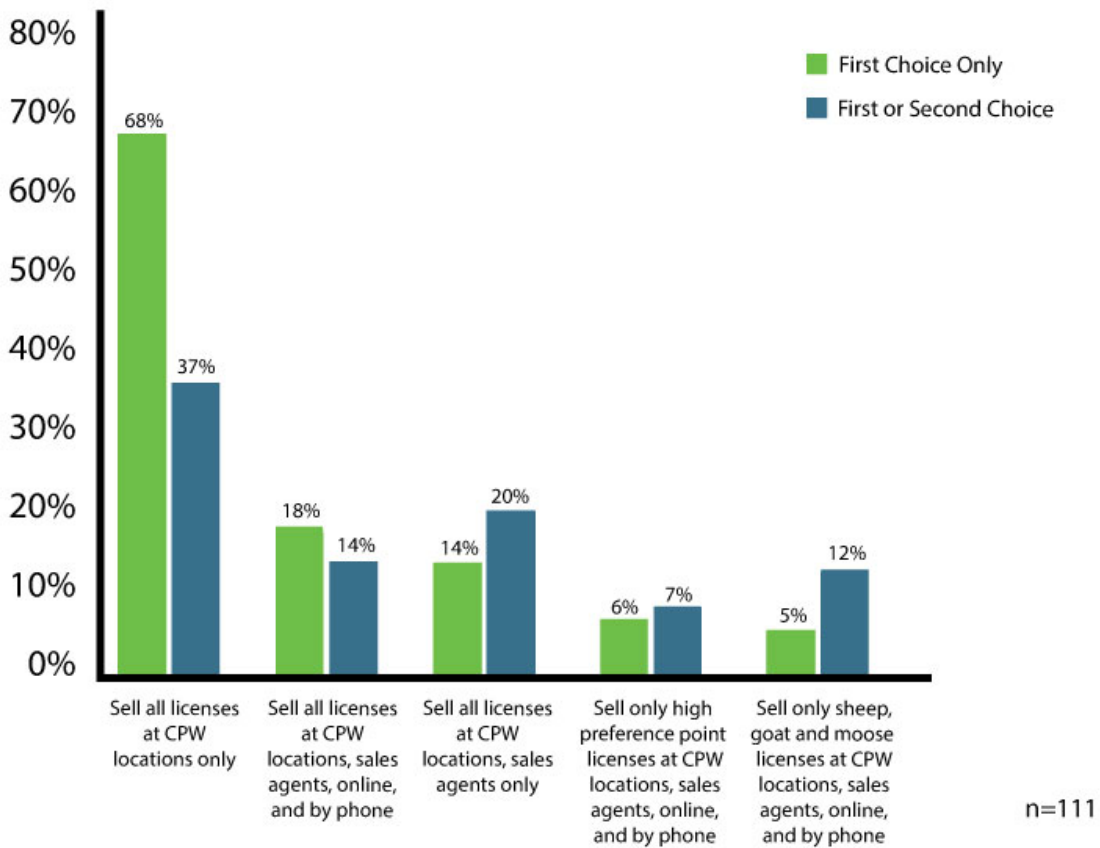


Figure 20: CPW staff's preference for how licenses should be available for sale once a season starts.

Customer Open-ended Responses:

Response	Number of Responses
Recommend keeping the status quo	99
Concern with bots	67
Recommend issuing all or more tags to next draw applicant	66
Recommend giving residents priority	61
Concern with difficulty of getting tag because of IT challenges	61
Recommend allowing purchase of license after the season starts online & in person	36
Recommend having a set release time for licenses with a preview list	34
Recommend having random release of licenses	34
Concern with release time of licenses being too late in the season	31
Concern with preference point creep	31
Support for secondary draw	23
Concern with difficulty of getting tag because too complex	22
Concern that there are too many fees	20
Concern with difficulty of getting tag because too competitive	19
Unrelated or uncertain	17
Concern with CPW employees unfairly getting licenses	13
Recommend increasing the preference point threshold for manual reissue	10
Recommend allowing purchase of license after the season starts in-person only	9
Concern about herd populations	9
Recommend change in how many licenses someone can purchase during a season	9
Recommend email notification for reissued licenses	8
Concern about prioritization of youth	4
Concern with secondary draw	4
Support for prioritization of youth	3

License Agent Open-ended Responses:

Response	Number of Responses
Concern with difficulty getting tag because too complex	3
Recommend keeping the status quo	1
Recommend allowing purchase of licenses after the season starts in-person only	1
Concern with bots	1

CPW Staff Open-ended Responses:

Response	Number of Responses
Concern with bots	9
Recommend keeping the status quo	8
Recommend allowing purchase of licenses after the season starts in-person only	8
Recommend having a set release time for licenses with a preview list	6
Concern with release time of licenses being too late in the season	6
Concern with preference point creep	4
Recommend having random release of licenses	4
Concern with difficulty of getting tag because too competitive	3
Recommend reissuing all or more tags to next draw applicant	3
Recommend allowing purchase of licenses after the season starts online & in person	3
Recommend allowing purchase of licenses after the season starts at CPW office only	3
Concern with difficulty getting tag because too complex	1
Unrelated	1

Appendix A: License Reissue Survey for Customers

Colorado Parks and Wildlife is currently seeking public input related to our leftover and reissued license processes. Your feedback is important in guiding future decisions related to these programs. Your responses will be anonymous, unless you choose to share your contact info with us. Thank you for your time.

	Question	Answer Type	Answers
1	Have you ever purchased any of the following from Colorado Parks and Wildlife (CPW)?	Checkboxes	Small Game Hunting License Fishing License Big Game Hunting License State Parks Pass Camping Reservation OHV/Boat/Snowmobile Registration None of the Above
2	What species have you applied for, attempted to purchase or purchased licenses for in Colorado?	Checkboxes	Black Bear Deer Desert Bighorn Sheep Elk Moose Mountain Goat Pronghorn Rocky Mountain Bighorn Sheep Turkey - Fall Turkey - Spring None of the Above - skip to 4
A leftover limited license is a hunting license that is leftover after the draw process and is made available to the public starting in August annually. A reissued limited license is a license that is returned by a customer and made available for resale.			
3	Have you ever purchased a leftover limited license?	Radio buttons	Yes No
4	Are you aware that when a customer returns a limited license, CPW reissues some of these licenses to the public (i.e., a reissued limited license)?	Radio buttons	Yes No - skip to 9
5	Have you ever accepted a reissued limited license offered to the next person in the draw order?	Radio buttons	Yes No
6	Have you ever attempted to purchase a reissued limited license offered to the public (i.e., on the leftover list)?	Checkboxes	Yes - Online Yes - By Phone Yes - At a CPW Office/Park Yes - At a Sales Agent No - skip to 9
7	Have you successfully purchased a	Checkboxes	Yes - Online

	reissued limited license offered to the public?		Yes - By Phone Yes - At a CPW Office/Park Yes - At a Sales Agent No - skip to 9
8	How difficult/easy was the process of purchasing a reissued limited license offered to the public?	Scale	Very Difficult Somewhat Difficult Average Somewhat Easy Very Easy
9	How satisfied are you with the following aspects of the leftover & reissue processes?	Matrix Scale	Very Dissatisfied Somewhat Dissatisfied Neutral Somewhat Satisfied Very Satisfied Not Applicable --- -How hunters are notified of what licenses are available to purchase -The preference point threshold for what reissued limited licenses are available to the public vs offered to the next five people in the draw order -Where licenses are available for purchase after a season starts -When reissued limited licenses are released for sale -The overall leftover limited license process -The overall reissued limited license process
CPW is considering making changes to the leftover and reissued limited license programs because of interest expressed by certain stakeholders. We are seeking feedback related to how these programs work.			
10	For licenses with seasons less than 14-days in length (e.g., second season elk license valid October 24-November 1), please rank your preference for how licenses should be available for sale once a season starts, with 1 being your most preferred and 5 being your least preferred.	Rank	-Sell all licenses after the start of their respective seasons only at CPW locations -Sell all licenses after the start of their respective seasons at CPW locations, sales agents, online, and by phone -Sell only sheep, goat and moose licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone (all other licenses would only be available at CPW locations after the start of the season) -Sell only high preference point licenses after the start of the respective seasons at CPW locations, sales agents, online, and by phone (all other licenses would only be available at CPW locations after the start of the season) -Sell all licenses after the start of the respective seasons at CPW locations and sales agents only

11	Please rank your preference for the following release times for public reissued limited licenses, with 1 being most preferred and 5 being least preferred.	Rank	-Randomly released throughout the work week -Random released during certain hours and days -Released at a set time every day -Released at a set time one day a week
12	How would you prefer to discover what reissued limited licenses are available for sale to the public.	Radio Button	-Preview list posted once per week, prior to the licenses being made available -Hunt codes appearing on the leftover list as they are released (e.g., listed on the same list with all other available leftover licenses as the license becomes available) -No preference
<p>Currently there is a preference point threshold (i.e., 5 or more points) which determines whether a license must be offered to the next five people in the draw order. This manual reissue process uses preference points when the license is purchased (in most cases). Otherwise, returned limited licenses are offered to the general public (if they took 4 or fewer points to draw or are not taken by the first 5 people in the draw order) via the leftover list without uses preference points when purchased.</p>			
13	Please rank your preference for what point threshold should determine whether a returned limited license is reissued to the general public as part of the leftover list instead of to the next person in the draw order?	Rank	-Reissued to the public if the license took 4 or fewer points to draw -Reissued to the public if the license took 7 or fewer points to draw -Reissued to the public if the license took 9 or fewer points to draw -Reissued to the public if the license took 14 or fewer points to draw -Reissued to the public if the license took 19 or fewer points to draw
14	Are there any other comments you wish to make regarding the leftover and reissued limited license processes?	Text field	
Demographic Information			
15	Are you a resident of Colorado?	Radio buttons	Yes No
16	What is your age range?	Radio buttons	18-24 25-29 30-39 40-49 50-59 60-69 70-79 80+
17	With what gender do you identify?	Radio buttons	Male Female Non-Binary

			Other Prefer Not to Answer
18	What type of area do you live in?	Radio buttons	Urban Suburban Mountain Rural
19	Would you be interested in participating in further discussions on these topics?	Radio buttons	Yes No - End Survey
20	If you are interested in participating in further discussions on these topics, please provide your name and email address.	Text fields	

Thank you for your participation!