

**Supporting Statement for Paperwork Reduction Act Submissions**  
**“Procedures for State, Tribal, and Local Government Historic Preservation Programs: 36 CFR 61”**  
**OMB Control Number 1024-0038**

**Terms of Clearance:** None

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Historic Preservation Act, as amended, (16 U.S.C. 470 *et seq.*) established the programs and 36 CFR 61 further defined the programs for which NPS created the information collections in this Supporting Statement. While Congress amended the relevant portions of the Act most recently on December 22, 2006, (P.L. 109-453) and the National Park Service (NPS) revised 36 CFR 61 most recently on March 9, 1999, (44 FR 11736), the changes made at those times were all minor. The last substantive statutory change to the pertinent parts of the Act was in 1992. The programs relating to these information collections have been in operation for at least 20 years. The programs have not changed since the Office of Management and Budget (OMB) last approved the information collections for 36 CFR 61. However, there has been an evolution in the understanding of which activities meet the definition of an information collection.

The Act does not require State, Tribal, or Local Governments to participate in these programs. Those States, Tribes, and Local Governments that do participate in these programs must meet certain requirements to maintain their eligibility for the programs and the associated funding. Section 2 of the Act provides the declaration of policy of the Federal government with regard to historic preservation. Section 101(b)(2) of the Act requires the Secretary of the Interior to periodically evaluate each State's historic preservation program to make a determination as to whether or not it is in compliance with the requirements of the Act. Section 101(b) of the Act outlines the specific standards that the States must meet in order to obtain such approval. Section 101(c)(1) requires that each approved State program shall provide for a mechanism for the certification of local governments. Pursuant to Section 101(d) of the Act, federally-recognized Indian Tribes, after agreement with the NPS, may assume responsibilities specified in Section 101(b)(3) and therefore use related information collections. Section 101(a)(7)(C) and Section 101(b)(1) of the Act authorize the Secretary to revise or promulgate regulations implementing these approval and certification processes. Section 101(c)(1)(E) requires that each Certified Local Government (CLG) satisfactorily perform the responsibilities delegated to it under the Act. Section 101(b)(3)(A) of the Act requires each State to survey for historic resources and maintain an inventory of such properties. Sections 101(b)(3)(E), (F), and (I) of the Act require participating States to cooperate with, consult, and advise Federal agencies in meeting Federal agency responsibilities under the Act. The short-hand terminology for this process is “Review and Compliance” because States assist Federal agencies in part by reviewing Federal work, undertakings, etc., for compliance with Federal responsibilities under the Act. NPS carries out the authorities that these sections of the Act assign to the Secretary of the Interior.

Section 108 of the Act created the Historic Preservation Fund (HPF) to support activities that carry out the purposes of the Act. Section 101(e)(1) of the Act requires the Secretary of the Interior to administer a program of matching grants to the States. Similarly, sections 101(d) and 101(e) of the Act direct a program of grants to Tribal Historic Preservation Offices (THPOs) for carrying out their responsibilities under the Act. Each year Congress directs NPS to use part of the annual appropriation from the HPF for the State grant program and the tribal grant program. The purpose of both the HPF State grants program and the HPF THPO grants program is to assist States and tribes in carrying out their statutory role in the national historic preservation program. Section 103(c) requires that States pass at least 10 percent of their annual grant award through to Certified Local Governments (CLGs). Section 102 of Act gives the Secretary the authority to require reports from grantees. Section 101(b) mandates that State staff include qualified historic preservation professionals and describes the responsibilities of each State Historic Preservation Officer. Section 102(a) mandates that no grants to States may be awarded unless the applications is in accordance with the Statewide

historic preservation plan. These

program-specific statutory mandates (in combination with governmentwide grant requirements and restrictions) form the basis for determining which activities are eligible for HPF grant support.

Each State and Tribe approved and Local Government certified under these requirements is eligible to receive grant assistance. 36 CFR 61 details the processes for approval of State and Tribal programs, the certification of local governments, and the monitoring and evaluation of State and CLG programs in a manner that ensures the propriety of the uses of this Federal assistance. NPS intends the provisions of 36 CFR 61 to meet minimum standards and requirements that the Act established without imposing additional or unwarranted burdens on States, Tribes, or CLGs. None of these information collections are unfunded mandates. Congress appropriates monies annually from the HPF for distribution to the States and Territories and Tribes, and States pass through HPF grant funds to CLGs.

Congress appropriates monies annually from the Historic Preservation Fund (HPF) for distribution to the 59 States and Territories. Currently Congress appropriates approximately \$35 million annually for all States and local governments through the HPF. These grantees must meet basic requirements expected of all recipients of such Federal assistance. See OMB Circular A-102 as implemented in the Department of the Interior through 43 CFR 12.

NPS developed these program-specific information collections in consultation with SHPOs, THPOs, and CLGs. NPS and its official partners (i.e., SHPOs, THPOs, and CLGs) designed these information collections (and related forms) to serve both NPS and partner needs. Just as NPS needs to describe the grant program and its accomplishments to OMB, Congress, and other Federal Government decision-makers, States (for example) have the parallel need to describe the grant program and its accomplishments to State government decision-makers. NPS has a policy of designing information collections so that they can serve multiple functions. For example, these information collections also produce performance data that NPS uses to assess its progress in meeting goals set in Departmental and NPS strategic plans created pursuant to the 1993 Government Performance and Results Act, as amended.

Some of the information collections covered by this justification relate primarily to the grants process, some relate primarily to becoming and maintaining official partner status regardless of funding, and some information collections relate to both.

HPF grants to States and THPOs have a two-year grant cycle. That is, each State/THPO has the year for which Congress appropriates the funds plus one more to apply for, administer, and close out its HPF Grant. With this Supporting Statement, NPS is seeking OMB clearance for the annualized burden imposed by the information collections associated with a single grants cycle. In broad categories, these information collections relate to applying for the grant, administering the active grant, and reporting on performance achieved pursuant to the grant. Because of differences in statutory authority and program needs, grants to SHPOs and to THPOs have different (although parallel) forms and other program requirements.

These are decentralized program grants. That is, NPS sets broad standards and guidelines, but each State/THPO chooses individual projects and activities to fund in response to its own priorities. NPS presumes that State/Tribal historic preservation officials manage their programs and grants in an accountable way unless situations indicate the contrary. NPS uses a minimum of oversight and limits the use of more intensive Federal management review procedures to high risk situations.

NPS has developed a number of forms to meet government-wide and program-specific requirements for grant applications, grant amendments, financial and program performance reports, and general quality control. OMB Circular A-102, which the Department of the Interior (DOI) implements through 43 CFR 12, requires these program elements. NPS has supplemented these governmentwide requirements and forms to meet program-specific requirements. For States, the forms are the Cumulative Products Table, the Sources of Nonfederal Matching Share Report, the Project/Activity Database Report, the Unexpended Funds Carryover Table and Statement, Project Notifications, Final Project Reports, and the GPRA Annual Products Report for

States. For THPOs, the forms are a “Grants Product Summary Table,” an unexpended funds carry-over statement, and a “THPO Annual Report” (a narrative summary of important accomplishments). For CLGs, the forms are the GPRA Baseline Questionnaire for CLGs and the GPRA Annual Products Report for CLGs.

The State Cumulative Products Table form provides for concise, standardized summary data that functions as part of a State application for grant monies from the HPF. NPS also uses the Cumulative Products Table for performance reports, comparing planned versus actual performance in statutorily-derived program areas. NPS also uses these information collections for summary data that is used in NPS’ and DOI’s strategic plans as well as for data that might be used as a partial basis for apportioning Historic Preservation Fund grants among the States.

NPS originally developed the State Cumulative Products Table and the State Sources of Nonfederal Matching Share Report to address a Congressional request for better information. Congress wanted information on the "level of activity, administrative support, the uses to which Federal matching assistance is put, and the level of State and local financial support" (Conference Committee Report, H.R. 98-399 for the FY 1984 Department of the Interior Appropriations Act). Congress wanted the basis to make better-informed decisions relating to the HPF. Similarly, NPS developed the annual State Project/Activity Database Report as a performance report at the request of the State grantees to serve the function of obtaining better and more useable data on individual projects and activities supported by HPF and matching funds. The Secretary already had the authority to create these (and the other) information collections pursuant to Sections 101, 102, and 103 of the Act as well as pursuant to government-wide requirements for Federal grants. The need for these kinds of data has not changed since NPS created the information collections.

Each State uses the Sources of Non-federal Matching Share Report to provide concise, summary information on the level of (and sources for) the financial support that the State uses to match its Federal HPF grant. NPS uses the Sources of Nonfederal Matching Share Report to help ensure that States meet the statutory requirements for a minimum level of nonfederal matching share. Seven “States” are statutorily exempted from requirements to match Federal grants (48 U.S.C. 1469a) because they are territories.

The Project/Activity Database Report contains concise, summary information on each subgrant and each major (as defined by each State) in-house activity. NPS also uses the Project/Activity Database Report to confirm that States meet statutory requirements concerning subgrants to CLGs. NPS uses Project Notifications (for planned projects) and Final Project Reports (for completed projects) to monitor larger (i.e., greater than \$25,000 Federal share) subgrants and subgrants that high-risk grantees make. The Unexpended Funds Carryover Table and Statement is the means that NPS uses to monitor its "Use or Lose" policy, thus ensuring an effective use of appropriated funds and a high expenditure rate.

The THPO Grants Product Summary Page form provides for concise, standardized summary data that functions as part of a THPO’s performance report on its use of grant monies from the HPF. The THPO Unexpended Funds Carryover Statement is the means that NPS uses to monitor its "Use or Lose" policy for HPF grants to THPOs, thus ensuring an effective use of appropriated funds and a high expenditure rate. NPS also uses these information collections for summary data that is used in NPS’ and Department of the Interior’s strategic plans.

NPS also has information collections/tracking requirements that do not employ a specified form or format or for which a form is optional.

As a part of the grant application, States use an Organization Chart and Staffing Summary to demonstrate the involvement of appropriately qualified historic preservation professionals in grant-supported, HPF-eligible activities. States also provide an Anticipated Activities List to demonstrate both major planned activities in each of the areas of SHPO responsibilities that the Act mandates and (as required by the Act) to demonstrate the connection between planned activities and the Statewide Historic Preservation Plan. Each State’s End of Year Report includes the Significant Preservation Accomplishments Summary, a brief narrative of three to five grant-supported-accomplishments chosen by the State to illustrate its “success stories.” There should be a correlation between the major activities that the State describes in the application and the success stories that the State describes in the End-of-Year Report. On a voluntary basis, States complete a GPRA Annual

Report for States that estimates the number of historic properties designated/protected under State law regardless of the funding source. As a member of the national historic preservation partnership, the Act requires that each State must – after evaluation against national standards -- add properties to the State Inventory and through a “Review and Compliance” process assist Federal agencies in carrying out their historic preservation responsibilities.

Each State (that has general purpose political subdivisions) also has a statutory responsibility to participate in a Local Government Certification Process whereby qualified and willing local governments become official members of the national historic preservation partnership as “Certified Local Governments” (CLGs). On a voluntary basis, CLGs complete a one-time only GPRA Baseline Questionnaire for CLGs that identifies the historic preservation programs that the CLG has created under local law along with an estimate of the number of historic properties that have been designated/protected under those programs (regardless of the funding source) for those activities carried out as a part of the national historic preservation partnership. Thereafter, on a voluntary basis, CLGs complete a GPRA Annual Report for CLGs that estimates the number of historic properties designated/protected under local law regardless of the funding source. States periodically must also conduct a CLG Monitoring and Evaluation Process to ensure continued compliance with statutory requirements for CLGs. Similarly, the Act requires NPS (through the State Program Review Process) periodically to monitor and evaluate State compliance with statutory requirements.

The “THPO Annual Report” is a short narrative summary of important accomplishments carried out as a part of Tribe’s membership in the national historic preservation partnership.

We have attached a copy of the pertinent sections of the National Historic Preservation Act, as amended, and 36 CFR 61.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

The NPS, other Federal agencies, State, Tribal, and Local Governments, public and private organizations, and individuals use – to varying degrees – the data from the information collections that this supporting statement covers.

NPS uses the information provided by State, Tribal, and Local Governments to evaluate whether or not State, Tribal, and Local Governments meet minimum standards and requirements for participation in the national historic preservation program and to meet governmentwide requirements for Federal grant programs. The decision by a State, Tribal, or Local Government to seek approval, certification, or funding is voluntary, but completing the information collections is required to obtain the benefits of participation. NPS must collect this information in order to ensure that State, Tribal, and Local Governments meet the specific requirements and standards that the Act established and to ensure the proper conduct of Federal assistance activities.

Also, NPS may use the information in part (in accordance with an apportionment formula) to determine the amount that each State and Territory are to receive from the HPF appropriation in the next fiscal year. NPS also uses data from these information collections in reports on the grant program’s accomplishments, budget documents, as well as NPS’ and Department of the Interior’s strategic plan documents.

NPS also uses these information collections as verification and validation of data that is used in NPS’ and DOIs strategic plans, the OMBs Program Assessment Rating Tool (PART) performance measurements, as well as for data that might be used as a partial basis for apportioning Historic Preservation Fund grants among the States.

Although NPS establishes the minimum requirements for documentation, NPS generally does not require the use of specific forms or record-keeping formats. Grantees may copy and use the model forms. States may use the NPS-designed, on-line database software to generate required information. Alternatively, for some information collections, State, Tribal, and local government partners may use off-the-shelf word-processing,

database, or spread sheet software to adjust the model format to each grantee's particular situation. Generally speaking, as long as the partner provides all of the required elements, the State, Tribal, or local partner may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. See the collection-by-collection description below for details.

NPS presumes that State and local government historic preservation officials manage their programs in an accountable way unless situations indicate the contrary. NPS uses a minimum of oversight and limits the use of more intensive Federal management review procedures to high risk situations.

NPS developed these program-specific information collections in consultation with SHPOs. NPS and the States designed these information collections and related forms to serve both NPS and State needs. Just as NPS needs to describe the grant program and its accomplishments to OMB, Congress, and other Federal Government decision-makers, States have the parallel need to describe the grant program and its accomplishments to State government decision-makers. NPS has a policy of designing information collections so that they can serve multiple functions.

State, Tribal, and Local Government partners use the information collections to demonstrate their eligibility for grant support, to document their compliance with statutorily-mandated responsibilities for historic preservation offices, to plan for and report on their historic preservation performance, and to demonstrate their contributions to the Federal-State-Tribal-local national historic preservation partnership. Information related to program capability and to program achievements in the identification, evaluation, registration, and protection of irreplaceable historic and prehistoric resources is used by the general public and by decision-makers at all levels of government to assess the success of historic preservation programs everywhere.

The information collections fall into the categories listed below.

- a. Application Requirement – Local Government Certification Application and Agreement. Local governments apply for certification as an official historic preservation partner pursuant to Section 101(c) of the Act and 36 CFR 61. To be eligible for certification, each local government must agree to enforce appropriate preservation laws, maintain a local survey and inventory system for historic resources, maintain a qualified local historic preservation review commission, involve the public in its preservation program, and satisfactorily carry out its responsibilities under the CLG program. Although many local governments already meet the requirements of the rule, it is necessary for them to prepare documentation and request certification. The request for certification is a one-time requirement so long as a local government maintains a certified status. The Act requires that the State and NPS jointly certify each Local Government. Each interested local government prepares the certification materials and sends them to the SHPO for review and certification. After the State certifies the eligibility of the local government, the State forwards the material to NPS to complete the certification process. Successful applicants sign (along with the State) a certification agreement that spells out its rights and responsibilities as a CLG in that State. All 50 States that have local entities that meet the statutory definition of "local government" participate in the CLG program and have at least two CLGs. NPS has posted on its Certified Local Government website, contact information for each State's CLG program.

Each CLG and its SHPO use the certification agreement to define the specific mutual expectations and commitments in this formal partnership. As a public document, the certification agreement directly (or by cross reference) defines for each CLG's citizens how it has decided to organize its program to preserve its irreplaceable community heritage. It is a part of the local blueprint for historic preservation.

Once the certification process has been completed, NPS adds the name of the CLG as well as the CLG's local contact person to NPS' CLG website, thus giving any interested party the means to find out about historic preservation within that local government's jurisdiction. Many States post similar information on their State Historic Preservation Office's website.

- b. Quality Control Requirement – Certified Local Government (CLG) Monitoring. Pursuant to Section 101(c)(1)(E) of the Act and 36 CFR Part 61.6(e), every State that has a CLG program has written

procedures for monitoring its CLGs' compliance with Federal and State requirements as well as the responsibilities specified in each CLG's certification agreement. NPS does not specify how each State conducts its monitoring. Each State determines the details of its own monitoring process. Monitoring is an on-going process that involves State examination of information that CLGs provide routinely to the State over the course of the year. For example, quite often review of materials related to the Federal Historic Preservation Fund-supported and State-selected subgrants to CLGs serves the dual purpose of checking compliance with Federal government-wide grant requirements as well as CLG program requirements. This information collection is subject to NPS review during State Program Review. The information is retained in the State Historic Preservation Office. Except for unusual occasions, NPS sees this information only during State Program Review. State monitoring and evaluation of CLGs gives NPS and others increased confidence in the validity of data that CLGs provide in other venues.

SHPOs and CLGs use the monitoring process for both quality control purposes as well as the means to report to their decision-makers and constituents on the workload and accomplishments associated with each CLG's historic preservation program and CLGs collectively within the State.

- c. Quality Control Requirement – Certified Local Government (CLG) Evaluation. Pursuant to Section 101(c)(1)(E) of the Act and 36 CFR Part 61.6(e), every State that has a CLG program has written procedures for making a periodic formal evaluation of each CLG's compliance with Federal and State requirements as well as the responsibilities specified in each CLG's certification agreement. NPS does not specify how each State conducts its evaluations. Each State determines its own cycle for formal evaluation of each CLG. Cycles vary from State to State but the trend is for States to formally evaluate each CLG at least once very four years, unless individual circumstances dictate the need for a more frequent review. Each State determines the details of its own evaluation process. This information collection is subject to NPS review during State Program Review. Materials related to CLG evaluations are retained in the SHPO. Except for unusual occasions, NPS sees this information only during State Program Review. State monitoring and evaluation of CLGs gives NPS and others increased confidence in the validity of data that CLGs provide in other venues.

State Historic Preservation Offices and CLGs use the formal evaluation process for both quality control purposes as well as the means to report to their decision-makers and constituents that the CLG's historic preservation program continues to meet the Federal and State requirements for membership in the Federal-State-Local Historic Preservation Partnership.

- d. Reporting and Quality Control Option – Baseline Questionnaire for CLGs. On a voluntary basis, CLGs complete a one-time only Baseline Questionnaire for CLGs that identifies the historic preservation programs that the CLG has created under local law along with an estimate of the number of historic properties that have been designated/protected under those programs regardless of the funding source.

The questions and blanks correspond to standard types of historic preservation (mandated and/or authorized) commonly practiced by CLGs. The data are readily-available information that local historic preservation programs would keep even if they were not a part of the national historic preservation partnership. The blanks in this form were developed in consultation with the partners in the CLG program; i.e., States and local governments both individually and collectively. State CLG Program Coordinators have the option to participate in gathering and reviewing this information. NPS shares the information with all States whether or not they are involved in the gathering of it.

NPS makes several uses of the information data supplied in the Baseline Questionnaire. NPS reviews the Baseline Questionnaire for compliance with national statutory requirements for CLGs by checking for the presence of nationally-required programs and activity. State CLG Coordinators perform the same review for nationally authorized but State-selected requirements. In reviewing the Baseline Questionnaire summary figures for completed products, NPS (and State CLG Coordinators) also check for reasonableness, anomalies, and consistency what is known both about the individual CLGs and other CLGs within the State. NPS and State reviewers will ask for an explanation where a summary number is significantly larger or smaller than one would normally expect.

Finally, NPS uses the actual figures in reports on CLG accomplishments, budget documents, NPS' and Department of the Interior's strategic plan documents. The information that is a part of the Baseline Questionnaire is also useful for decision makers at the State and local government level to understand the scope and scale of historic preservation efforts.

NPS posts the Baseline Questionnaire summary data to NPS' CLG website, thus giving any interested party the means to find out about historic preservation within that local government's jurisdiction. Many States post similar information on their SHPOs website.

CLGs often rely heavily on volunteers to carry out CLG responsibilities. Answers provided on the Baseline Questionnaire are often a good indicator of where technical assistance should be targeted.

- e. Reporting and Quality Control Option – Annual Achievements Report for CLGs. On a voluntary basis, CLGs complete an Annual Report for CLGs that estimates the number of historic properties designated/protected under local law regardless of the funding source but that are accomplished under activities carried out as a part of the national historic preservation partnership.

The questions and blanks correspond to standard types of historic preservation (mandated and/or authorized) commonly practiced by CLGs. The data are readily-available information that local historic preservation programs would keep even if they were not a part of the national historic preservation partnership. The blanks in this form were developed in consultation with the partners in the CLG program; i.e., States and local governments both individually and collectively. State CLG Program Coordinators have the option to participate in gathering and reviewing this information. NPS shares the information with all States whether or not they are involved in the gathering of it.

NPS makes several uses of the information data supplied in the Annual Achievements Report for CLGs. In reviewing the Annual Report summary figures for completed products, NPS (and State CLG Coordinators) check for reasonableness, anomalies, and consistency what is known both about the individual CLGs and other CLGs within the State. NPS and State reviewers will ask for an explanation where a summary number is significantly larger or smaller than one would normally expect.

Finally, NPS uses the actual figures in reports on CLG accomplishments, budget documents, NPS' and Department of the Interior's strategic plan documents. The information that is a part of the Annual Report is also useful for decision makers at the State and local government level to understand the scope and scale of historic preservation efforts.

NPS posts the Annual Report summary data to NPS' CLG website, thus giving any interested party the means to find out about historic preservation within that local government's jurisdiction. Many States post similar information on their SHPOs website.

CLGs often rely heavily on volunteers to carry out CLG responsibilities. Answers provided on the Annual Report are often a good indicator of where technical assistance should be targeted.

- f. Record-keeping Requirement – State Inventory Maintenance. Section 101(b)(3)(A) of the Act and 36 CFR 61 require each State to maintain a statewide inventory of historic resources. NPS requires that State inventory records include a description of the property, information on its location, and the State's opinion on the property's significance. There is no federally-prescribed format for State inventory information and many States maintain information in their inventories beyond NPS' minimum requirements. The Federal inventory requirement generally does not place significant additional burden on States. Maintaining such inventories is a basic historic preservation responsibility in the States that they have conducted at a professionally advanced level for many years. The acquisition of more inventory information facilitates each State's ability to meet its responsibility to advise Federal agencies about historic and archeological resources in the State. Most States have completed or are in the process of completing the automation of their inventories. NPS does not dictate the method that is used for

automation. Automation, however, has changed the nature of the burden. Data entry has become the major burden related to inventory maintenance. NPS has changed its burden analysis and focus accordingly; i.e., to the burden of processing new records into the State inventory.

This information collection is subject to NPS review during State Program Review. It is retained in the SHPO. Except for grant data and unusual occasions, NPS sees this information only during State Program Review.

SHPOs use inventory maintenance data as part of reporting to report to their decision-makers and constituents on the workload and accomplishments associated with each State's historic preservation program.

Each inventory is the repository of what is known about historic and prehistoric resources within each State. As such, Federal, State, Tribal, and Local Government agencies, academic institutions, and members of the public use the information for research, planning, and/or celebratory purposes. A few States have made their inventory data available on-line to their constituents (although reserving locational data for some properties such as archeological sites that might be subject to looting).

- g. Record-keeping Requirement – State Technical Assistance to Federal Agencies (Review and Compliance). Sections 101(b)(3)(E), (F), and (I) of the Act require participating States to cooperate with, consult, and advise Federal agencies in meeting Federal agency responsibilities under the Act. The short-hand terminology for this process is “Review and Compliance” because States assist Federal agencies in part by reviewing Federal work, undertakings, etc., for compliance with Federal responsibilities under the Act. When Federal agencies request assistance under these statutory provisions, NPS requires that States review, monitor, and respond to the request within a prescribed review period (no sooner than 30 days). To be able to check State compliance with this requirement, NPS requires each State to maintain a tracking system that identifies 1) the Federal undertaking being reviewed, 2) the date the State received the request, 3) the result or outcome of the review, and 4) the date the State transmitted the review's result to the Federal agency. This tracking system requirement formalized what most States were already doing. State historic preservation officials want to know about and have a timely opportunity to comment on Federal undertakings that might adversely affect historic and prehistoric resources located within the State.

This information collection is subject to NPS review during State Program Review. It is retained in the SHPO. NPS sees this information only during State Program Review. State monitoring and evaluation of the Review and Compliance process gives NPS and others increased confidence in the validity of data that States provide in other venues.

SHPOs use the monitoring process for both quality control purposes as well as the means to report to their decision-makers and constituents on the workload and accomplishments associated with each with its review and compliance program.

- h. Reporting Requirement – State Program Review. Pursuant to Section 101(b) of the Act, NPS evaluates each State program for conformance with the requirements of the Act as specified in 36 CFR 61. This involves the documentation of basic information concerning historic preservation activities by the State. The State Program Review involves an examination of State activities in the general program areas specified by the Act and related regulations. The examination checks to see that each State has adequate systems in place and that it uses its NPS-approved systems. State Program Review also does a spot check on the results that State systems produce. This gives NPS and others increased confidence in the validity of data that States provide in other venues.
- i. Application and Reporting Requirement – State Cumulative Products Table. The Cumulative Products Table collects information on Outlay (\$), Effort (time spent), and selected Products. States partially fill out (e.g., projected Products) the Cumulative Products Table for the HPF annual grant application. They fill out the remainder (e.g., actual Products) for the End-of-Year Report. Inasmuch as national figures for



Outlay and Effort have shown relatively little variation from year to year, effective with the FY 1996 End-of-Year Report, States no longer report Outlay and Effort on a yearly basis. NPS may require States to report those figures periodically or if the national funding situation changes dramatically. In recent years, the total annual appropriations for the 59 States and Territories have remained fairly level. NPS does not require States to report on actual Products figures in the Cumulative Products Table when the States already provide the information in other documents or when NPS' own records provide a good approximation.

The Cumulative Products Table is divided into "program areas" that correspond to SHPO responsibilities that Section 101(b)(3) of the Act specifies. Each State provides planned and actual performance for the key (and most common) products in each program area. The blanks in this form were developed in consultation with the States both individually and collectively through the National Conference of State Historic Preservation Officers.

In addition to documenting compliance with statutory and grant requirements, SHPOs use the Cumulative Products Table as a means to help plan for their historic preservation activities as well as to report in a summary fashion to their decision-makers and constituents on the workload and accomplishments associated with each State's historic preservation program.

NPS makes several uses of the summary data supplied in the Cumulative Products Table. As part of the State application and End-of-Year Report, NPS reviews the Cumulative Products Table for compliance with SHPO statutory responsibilities by checking for planned and completed tangible products in the various program areas. As part of the quality control review of the application, NPS checks the Cumulative Products Table for reasonableness, anomalies, and consistencies with other parts of the application. The summary figures for planned products should be in an amount that is reasonable given the level of proposed funding. The summary planned numbers in the Cumulative Products Table should be consistent with the descriptions in the Anticipated Activities List (see 2.k. below). Finally, if a proposed summary number (especially for a non-discretionary activity) is significantly larger or smaller than one would normally expect for a given level of funding, NPS staff will ask the State to confirm or alter the estimate. In reviewing the summary figures for completed products, NPS will also check for reasonableness, anomalies, and consistency both with other portions of the End-of-Year Report and with the activities planned in the application. NPS will ask for an explanation where there is a significant difference between planned and actual figures. Finally, NPS uses the actual figures in reports on the grant program's accomplishments, budget documents, NPS' and DOI's strategic plan documents, as well as (potentially) a partial basis for apportioning Historic Preservation Fund grants among the States.

Funding level and NPS' regulatory regime provide the biggest influences on how States distribute Outlay and Effort amongst the various "program areas" of State program responsibility. When there is little change in those factors, there is little change in the national Outlay and Effort figures. In the last 10 plus years, there has been generally level funding and no significant changes in the regulatory regime. The criteria that would lead NPS to ask for Outlay and Effort data again include significant changes in funding, regulatory regime, and/or mutual agreement with the States that enough time has passed to merit checking the figures again.

We have not asked for Outlay and Effort data since we suspended its annual reporting. Thus there is not notification document to attach to the supporting statement. After consultation with the States, NPS would notify the States, by letter, fax, and/or email.

The amount of lead time that NPS would give the States after notification that they would need to provide Outlay and Effort figures is like to be more than one year. Assuming that, after consulting with the States – NPS wants a full year of data, States need adequate time to establish/re-establish systems for tracking/estimating Outlay and Effort. NPS would want to provide notice at least 30 days before States would need to start tracking the time and expenditure. This would mean, for example, that NPS would need to notify States by September 1, 2009, if NPS want Outlay and Effort data for FY 2010 that begins on October 1, 2009, and that State report on by December 31, 2010. If an estimating system rather than a

tracking system is selected, less time would be needed between notification and reporting.

States submit the Cumulative Products Table on-line through the “HPF On-Line” system.

- j. Application Requirement – State Organization Chart and Staffing Summary. With its annual application, each State includes an organization chart and staffing summary that shows the SHPOs organization, reporting relationships, historic preservation qualified staff, and which staff members are funded by HPF or matching funds.

The organization chart allows States to demonstrate to NPS and to any of the State’s historic preservation constituents that the State complies with the statutory requirement for a professionally qualified staff and that those staff are in positions and reporting relationships that allow their professional expertise to be appropriately used in decision-making relating to the identification, evaluation, and treatment of historic and prehistoric resources. This adds credibility to the State Office’s historic preservation-related decision making. Finally, the organization chart and staffing summary helps the State government to clearly identify which part of the State’s historic preservation program that is supported by Federal funds and thus is subject to Federal rules.

NPS reviews each State’s organization chart and staffing summary as a part of the documentation that the State has the statutorily mandated qualified staff and that the State office is organized to ensure that federally supported historic preservation activities have the input of appropriately qualified staff. NPS also reviews the organization and staffing summary to ensure that HPF and matching share supported staff have titles and positions that are likely to have activities that are eligible for HPF funding. For example, a law librarian is not likely to be someone whose salary should be paid with HPF or matching funds.

On the “HPF On-Line” system, NPS has posted for down-loading and printing a template for the Organizational Chart and Staffing Summary.

- k. Application Requirement – State Anticipated Activities List. With its annual application, each State includes an Anticipated Activities List that shows for each program area a brief descriptive title of each major (in the State’s view) project or activity and references the Statewide goal or objective (if any) that the project or activity helps to achieve. NPS does not specify the format of the list. In its End-of-Year Report, each State must address the status of every activity or project that was included in its application’s Anticipated Activities List.

In addition to being a useful short-hand list of the year’s planned major activities that the SHPO can share with its constituents, each State uses the Anticipated Activities List to demonstrate to NPS that the grant application satisfies the statutory requirement (Section 102(a) of the Act) that grants only be awarded for applications consistent with the Statewide historic preservation plan. In addition, because program areas coincide with the SHPO responsibilities that Section 101(b)(3) of the Act mandate, the Anticipated Activities List helps to demonstrate that some level of activity will take place for each of the SHPO responsibilities.

NPS reviews the Anticipated Activity List for compliance with Section 102(a) of the Act and to ensure that the application addresses all of the SHPO responsibilities. NPS has no desire to award grants that do not address needs identified in the State Plans. NPS also reviews the list for quality control reasons. NPS reviews each list to ensure that each item on the list will produce a tangible, historic preservation related product that is eligible for HPF grant support. For example, HPF grants to States don’t pay for staff salaries *per se*, but rather for the products that the staff produces. Similarly, HPF grants to States do not pay for lobbying in favor of or in opposition to any piece of legislation.

States use the Anticipated Activities List to provide activity-specific information for State constituents and decision-makers. This provides a narrative counterpart to the summary data that the Cumulative Products Table provides.

- l. Application and Reporting Requirement – State Project Notification. A Project Notification is a summary document that describes key elements of a proposed third-party agreement (subgrant). Pursuant to OMB Circular A-102 and 43 CFR 12, NPS treats subgrants as amendments to the annual grant agreement. NPS requires a State to submit a Project Notification and obtain prior approval before beginning any project with a Federal share greater than \$25,000 and for each subgrant that a high-risk grantee proposes. Less than 12 percent of HPF subgrants exceed \$25,000 in Federal share. This is a significant reduction in burden that NPS' overall quality control system imposes. Formerly, States had to obtain NPS approval before beginning every subgrant. Generally, after 20 calendar days from the date of submitting the Project Notification, a State may proceed with the proposed project unless NPS notifies the State to the contrary.

A State uses a Project Notification to demonstrate to NPS that a proposed third-party agreement (or subgrant) will produce a tangible, HPF-eligible product that meets all of the relevant provisions of the HPF Grant Agreement. Even for experienced and stable grantees such as States, every third part agreement inherently adds some risk of inappropriate use of HPF or matching funds. Where a substantial amount of funds are involved, it is worth the extra effort to carefully examine the proposed project. By seeking NPS approval in advance, the State eliminates the risk of an after-the-fact disapproval and forced recapture of funds. NPS benefits from the same analysis. In addition, States sometimes find it useful (when responding to constituents' questions) to be able to point to NPS concurrence

On the revised version of the "HPF On-Line" system being tested now, States will be able to complete Project Notifications on-line.

- m. Reporting Requirement – State Final Project Report. A Final Project Report is a summary document that describes key elements of a completed third-party agreement (subgrant). When a Final Project Report is necessary, the State must submit it within 90 days of completion of the subgrant. Pursuant to OMB Circular A-102 and 43 CFR 12, the Final Project Report also describes the differences, if any, between planned and actual products and costs. NPS requires a Final Project Report for every subgrant that requires a Project Notification. The substantial reduction in the number of situations requiring a Project Notification has led to a corresponding reduction in the number of required Final Project Reports.

The uses for a Final Project Report are parallel to those for a Project Notification. In addition, in reviewing a Final Project Report, NPS (for quality control purposes) will also check for reasonableness, anomalies, and consistency both with the End-of-Year Report summary documents (e.g., Cumulative Products Table and the Sources of Nonfederal Matching Share Report) and with the activities planned in the Project Notification. NPS will ask for an explanation where there is a significant difference between planned and actual product(s) or cost.

On the revised version of the "HPF On-Line" system being tested now, States will be able to complete Final Project Reports on-line.

- n. Reporting Requirement – State Project/Activity Database Report. The Project/Activity Database Report is a part of the State End-of-Year Report. It contains concise, summary information on each subgrant awarded and/or completed and each major (as defined by each State) in-house activity completed during the just completed fiscal year. The Project/Activity Database Report addresses every program area. A program area is a grouping of activities that corresponds to one or more of the State's statutorily mandated responsibilities.

States and NPS use the Project/Activity Database Report for both compliance and quality control purposes. States use the Report to demonstrate to NPS and other constituents that some level of activity actually took place for each of the SHPO responsibilities. Preparing the subgrant portion of the Report helps States to determine whether they have committed and/or expended sufficient funds to subgrants to CLGs to satisfy the statutory minimum pass-through requirement. NPS will recapture funds in the amount of any shortfall in CLG minimum pass through requirement.

NPS reviews the Project/Activity Database Report to ensure that the State has completed activities that address all of the SHPO responsibilities. NPS reviews each record in the Report to ensure that each item produced or will produce a tangible, historic preservation-related product that is eligible for HPF grant support. For example, HPF grants to States don't pay for staff salaries *per se* but rather for the products that the staff produces. Similarly, HPF grants to States do not pay for lobbying in favor of or in opposition to any piece of legislation. Although NPS does not require prior approval for most subgrants, it does monitor subgrants by means of the Project/Activity Database Report. Third-party agreements inherently add risk to the successful completion of any grant.

In addition, in reviewing the Report, NPS (for quality control purposes) will also check for reasonableness, anomalies, and consistency both with the End-of-Year Report summary documents (e.g., Cumulative Products Table and the Sources of Non-federal Matching Share Report) and with the activities described in the Anticipated Activities List and/or the Project Notification. NPS will ask for an explanation where there is a significant difference between planned and actual product(s) or cost. The figures for products should be in an amount that is reasonable given the level of funding involved. Finally, if a product number or subgrant cost is significantly larger or smaller than one would normally expect, NPS staff will ask the State to confirm or alter the estimate.

States submit the Project/Activity Database Report information on-line via the Internet through the "HPF On-Line" system. Because the on-line system performs the simple math functions (e.g., sums, differences, percentages) automatically, quality control checks for the report are made easier for both the State and NPS. Inasmuch as some of the data in the Project/Activity Database Report is useful for compiling the Sources of Non-federal Matching Share Report and the Unexpended Carryover Funds Table and Statement, States that use HPF On-Line have less burden (for preparing the three information collections) than those States that formerly prepare the three collections separately. The fewer times that data has to be entered, the less chance there is for transcription error. In addition, it is easier for NPS to analyze (for national program purposes) information in a database than information that is not in a database. The HPF On-Line system will automatically identify any shortfall in the minimum required amount of pass-through to CLGs. Depending upon the situation, this will give States the opportunity to re-program additional funds to CLGs or alternatively identify the amount that NPS will recapture.

- o. Reporting Requirement – State Sources of Non-federal Matching Share Report. The Sources of Non-federal Matching Share Report collects information on the sources (State legislature, CLGs, non-profit organizations, etc.) of funds (cash and donated goods and services) that States use to match Federal HPF monies. States fill out the Sources of Non-federal Matching Share Report only for the End-of-Year Report.

States submit the Sources of Non-federal Matching Share Report information on-line via the Internet through the "HPF On-Line" system. Because the on-line system performs the simple math functions (e.g., sums, differences, percentages) automatically, quality control checks for the report are made easier for both the State and NPS. Inasmuch as some of the data in the Project/Activity Database Report is useful for compiling the Sources of Non-federal Matching Share Report and the Unexpended Carryover Funds Table and Statement, States that use HPF On-Line, have less burden (for preparing the three information collections) than those States that formerly prepared the three collections separately. The fewer times that data has to be entered, the less chance there is for transcription error. In addition, it is easier for NPS to analyze (for national program purposes) information in a database than information that is not in a database.

- p. Reporting Requirement – State Unexpended Carryover Funds Table and Statement. The Unexpended Carryover Funds Table and Statement contains information on expended and unexpended (but committed) funds and thus allows NPS to implement its "Use or Lose" Policy to ensure effective use of grant funds. This policy has proven successful. NPS recaptures and returns to the U.S. Treasury less than 1% of HPF funds appropriated to States. The Unexpended Carryover Funds Table and Statement

also allows NPS to monitor State compliance with the statutory requirement (Section 103(c) of the Act) that States pass through at least 10% of each year's grant to Certified Local Governments. The Unexpended Carryover Funds Table and Statement replaced the Continuation Grant Application that formerly accomplished the same functions with more forms. The data used to complete the Unexpended Carryover Funds Table and Statement is information that each State already has available.

NPS has given States the option to prepare the Unexpended Carryover Funds Table and Statement information on-line via the Internet through the "HPF On-Line" system. The States have taken advantage of this opportunity. Because the on-line system performs the simple math functions (e.g., sums, differences, percentages) automatically, quality control checks for the report are made easier for both the State and NPS. Inasmuch as some of the data in the Project/Activity Database Report is useful for compiling the Sources of Nonfederal Matching Share Report and the Unexpended Carryover Funds Table and Statement, States that use HPF On-Line, have less burden (for preparing the three information collections) than those States that formerly prepared the three collections separately. The fewer times that data has to be entered, the less chance there is for transcription error. In addition, it is easier for NPS to analyze (for national program purposes) information in a database than information that is not in a database.

- q. Reporting Requirement – State Significant Preservation Accomplishments Summary. With its End-of-Year Report, each State includes a Significant Preservation Accomplishments Summary that shows what the State believes to be its three to five most important grant-supported accomplishments ("success stories") of the year. NPS does not specify the format of this summary. NPS reviews this summary to ensure that the State-described activities are eligible for HPF grant support and to ensure that they reflect the parallel items in the Anticipated Activities List that the State submitted as a part of its annual application. In illustrating the accomplishments of the HPF Grants to States program and the national historic preservation partnership, both NPS and States use the success stories as a narrative counterpart to the summary numbers that the other information collections provide.
- r. Reporting and Quality Control Option – Annual Achievements Report for States. On a voluntary basis, States complete an Annual Report for States that estimates the number of historic properties designated/protected under State law regardless of the funding source but that are activities carried out as a part of the national historic preservation partnership.

The questions and blanks correspond to standard types of historic preservation commonly practiced by SHPOs. The data are readily available information that State historic preservation programs would keep even if they were not a part of the national historic preservation partnership. The blanks in this form were developed in consultation with the States both individually and collectively.

NPS makes several uses of the information data supplied in the Annual Achievements Report for States. In reviewing the Annual Report summary figures for completed products, NPS checks for reasonableness, anomalies, and consistency what is known both about the individual State and other similar States. NPS reviewers will ask for an explanation where a summary number is significantly larger or smaller than one would normally expect.

Finally, NPS uses the actual figures in reports on State accomplishments, budget documents, NPS' and DOIs strategic plan documents. The information that is a part of the Annual Report is also useful for decision makers at the State and local government level to understand the scope and scale of historic preservation efforts. NPS makes the Annual Report summary data generally available. Many States post similar information on their SHPOs website.

- s. Reporting and Quality Control Requirement – Tribal Historic Preservation Office (THPO) Grants Product Summary Page. The Grants Product Summary Page is divided into "program areas" that correspond to those of the SHPO responsibilities that Section 101(b)(3) of the Act specifies and that THPOs most commonly assume. Each Tribe provides actual performance data for the key (and most common) products in each program area. In addition to the grants reporting requirement, this collection also

satisfies the reporting requirement explicit in the agreement that each Tribe signs voluntarily to become an official part of the national historic preservation partnership.

In addition to documenting compliance with statutory, grant, and THPO agreement requirements, THPO use the Grants Product Summary Page as a means to help report in a summary fashion to their decision-makers and constituents on the workload and accomplishments associated with each Tribe's historic preservation program.

NPS makes several uses of the summary data supplied in the Grants Product Summary Page. As part of the THPO End-of-Year Report, NPS reviews the Grants Product Summary Page for compliance with THPO statutory and THPO agreement responsibilities by checking for completed tangible products in the various program areas. As part of the quality control review, NPS checks the Grants Product summary Page for reasonableness, anomalies, and consistencies with other parts of the End of Year Report. The summary numbers in the Grants Product Summary Page should be consistent with the descriptions in the THPO Annual Report (see 2.u. below). Finally, NPS uses the actual figures in reports on the grant program's accomplishments, budget documents, NPS' and DOIs strategic plan documents.

- t. Reporting and Quality Control Requirement – Tribal Historic Preservation Office (THPO) Unexpended Funds Carryover Statement. This document is the means that NPS uses to monitor its "Use or Lose" policy for HPF grants to THPOs, thus ensuring an effective use of appropriated funds and a high expenditure rate. The data used to complete the Unexpended Funds Carryover Statement are information that each THPO already has available. Effective and efficient use of appropriates funds is of interest to both Federal and Tribal decision makers.
- u. Reporting and Quality Control Requirement – Tribal Historic Preservation Office (THPO) Annual Report. This report serves dual functions. The agreement that specifies each Tribe's rights and responsibilities as an official member of the national historic preservation partnership requires – as a condition of agreement – that the Tribe provide an annual report, regardless of funding. The THPO Annual report also provides a narrative counterpart to the summary data that the Grants Product Summary Page provides. NPS reviews the THPO Annual Report for completeness and consistency with both 1) the list of responsibilities specified in the THPO agreement and 2) the Grants Products Summary Page. When an inconsistency or apparent anomaly is discovered, NPS will ask for an explanation and/or alteration. NPS and the THPO can use the THPO Annual Report to illustrate THPO accomplishments to Federal and Tribal government officials as well as to other interested parties.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

The de-centralized and flexible nature of NPS' administration of State, Tribal, and Local Government partner historic preservation programs and the varying needs and computer capabilities of States, Tribal, and Local Governments, and the different kinds of information collections covered by this Supporting Statement all are major obstacles to totally or uniformly automating the systems.

For most of the information collections that this supporting statement describes there is no compulsory, paper-based requirement. The information collections that are not grants-related do not produce data that States, Tribes, or Local Governments send routinely to the NPS. For these information collections, NPS gives each State, THPO, and CLG the latitude to use whatever technological collection techniques make sense in its legal, organizational, and information technology environment. Consequently, Government Paperwork Elimination Act (GPEA) requirements are met for those information collections. Even where NPS does require a hard-copy document because of a signature requirement, NPS has attempted to put the spirit of GPEA into effect. See below. Like all Federal grant programs, the Historic Preservation Fund State Grants program and Tribal Grants Program are committed to the governmentwide "E-Grants" Initiative. As soon as

the original signature issues have been solved, the HPF State and Tribal Grants programs will drop their hard copy requirements and become fully compliant with GPEA. States submit electronically the grant-related forms for which NPS does not require hard-copy submittals.

For information collections not related to Grants, NPS has not undertaken an information collection to discover the extent to which States, Tribes, and CLGs use technological collection techniques. Therefore, NPS does not know the percentage of the total number of responses and records conducted using technological collection techniques. From antidotal evidence, however, NPS would conservatively estimate that roughly 40% of the annual total of responses/records involves technological collection techniques.

NPS has embarked on a program to provide the States the option of using better information technology to reduce errors and to make data entry, revision, evaluation, and use easier. States have cooperated in meeting these requirements, thereby reducing the workload. NPS is considering how it can automate more of these requirements without putting an excessive burden on States.

NPS designed the various tables and reports that relate to the HPF grant cycle to allow for easy automation. This project is now well under way. NPS has an on-line, Internet version that uses a Cold Fusion interface with a Microsoft SQL database back-end. Unlike with its stand-alone predecessor, the computer type or capability in the SHPO is not a factor. Any State that has access to the Internet can use the NPS on-line system. The on-line system allows its users to accumulate information about a particular project or activity over the course of the year and then have the on-line system generate automatically the various reports that NPS requires. For a State using this system, neither the State nor NPS has the burden of reviewing for mathematical accuracy and consistency those elements that the systems generate automatically.

Some States, THPOs, and CLGs have used their own spread sheets, databases, and other software to generate the reports that they then submit either in hard-copy form or via e-mail. Some States, THPOs, and CLGs still copy and fill in a hard copy of the form or type the information from scratch. Advances in spread sheets, databases, and other software also have improved the ability of NPS to process and analyze the data that grant application and end of year tables and reports provide. The same is true for reports that are not grant-related.

- a. Application Requirement – Local Government Certification Application and Agreement. NPS leaves it up to each State to determine in what format and via what transmittal means a local government supplies the supporting information that the State needs to confirm the local government's qualifications for certification. Similarly, once the State certifies the local government, the State can submit by whatever means it chooses the supporting information that NPS needs to make its evaluation. Most States send hard copies because NPS requires that the certification agreement have original signatures from both the chief elected local official as well as the SHPO. As soon as the original signature issue has been satisfactorily solved and implemented for NPS grant programs, NPS plans to give States and local governments the option to use the same (or substantially similar) technology for the CLG program as an alternative to mailing hard copy documents.
- b. Record-keeping Requirement – Certified Local Government (CLG) Monitoring. NPS leaves it up to each State to determine in what format and via what transmittal means each CLG supplies the information that the State needs to monitor the local government's conformance with Federal and State requirements for retaining certified status. The only exception is grant documents (in the case of CLGs, subgrant documents) that require original signatures. As soon as the original signature issue has been satisfactorily solved and implemented for NPS grant programs, NPS plans to give States and local governments the option to use the same (or substantially similar) technology for subgrant documents as well (including subgrants that States award to CLGs).

In addition, NPS is in the initial stages of developing a system to offer each SHPO (or his/her designee) the option to make on-line updates to the State CLG Coordinator information and the individual CLG contact information that currently resides on NPS' CLG website.

- c. Record-keeping Requirement – Certified Local Government (CLG) Evaluation. NPS leaves it up to each

State to determine in what format and via what transmittal means each CLG supplies the information that the State needs to make a formal evaluation of the local government's conformance with Federal and State requirements for retaining certified status. The only exception is grant documents (in the case of CLGs, subgrant documents) that require original signatures. As soon as the original signature issue has been satisfactorily solved and implemented for NPS grant programs, NPS plans to give States and local governments the option to use the same (or substantially similar) technology for subgrant documents as well (including subgrants that States award to CLGs).

- d. Reporting and Quality Control Option – Baseline Questionnaire for CLGs. While NPS provides a form for the general convenience of CLGs, NPS leaves it up to each State/CLG to determine in what format and via what transmittal means each CLG supplies the basic program information requested by the Baseline Questionnaire. CLGs vary tremendously in the nature of the internal administrative of their historic preservation programs. In some States, the State CLG Coordinator collects the Baseline Questionnaire data and then forwards the results to NPS. In other States, the CLGs communicate directly with NPS. NPS receives Baseline Questionnaires that are mailed, faxed, e-mailed using a “.pdf” attachment, e-mailed using a spreadsheet, or just e-mailed using the question number and the answers with no format at all. All these are acceptable. NPS cares more about the content than the format or the means used to communicate the information.

In addition, NPS is in the initial stages of developing a system to offer each State Historic Preservation Officer (or his/her designee) an online option to make or up-date Baseline Questionnaires.

- e. Reporting and Quality Control Option – Annual Achievements Report for CLGs. While NPS provides a form for the general convenience of CLGs, NPS leaves it up to each State/CLG to determine in what format and via what transmittal means each CLG supplies the basic program information requested by the Annual Achievements Report. CLGs vary tremendously in the nature of the internal administrative of their historic preservation programs. In some States, the State CLG Coordinator collects the Annual Report data and then forwards the results to NPS. In other States, the CLGs communicate directly with NPS. NPS receives Annual Reports that are mailed, faxed, e-mailed using a .pdf attachment, e-mailed using a spreadsheet, or just e-mailed using the question number and the answers with no format at all. All these are acceptable. NPS cares more about the content than the format or the means used to communicate the information.

In addition, NPS is in the initial stages of developing a system to offer each SHPO (or his/her designee) an online option to make or up-date Annual Reports.

- f. Record-keeping Requirement – State Inventory Maintenance. Most States have completed or are in the process of completing the automation of their inventories. NPS does not dictate the method that is used for automation. Automation, however, has changed the nature of the burden. Data entry (especially of old inventory records) has become the major burden related to inventory maintenance. In many States, the State-designed State inventory is available electronically or on-line. This allows surveyors in the field to enter data directly into a State inventory form (on a lap top or a similar portable device) which can later be down-loaded directly into the State inventory thus eliminating the need for multiple data entries and thereby eliminating a potential for transcription errors. A few States have made at least part of their inventory data available on their website for use by their constituents.
- g. Record-keeping Requirement – State Technical Assistance to Federal Agencies (Review and Compliance). NPS leaves it up to each State to determine in what format and medium to track the progress and results of State reviews of Federal undertakings for compliance with Federal historic preservation laws. There are many off-the-shelf tracking/tickler system software products available that could do the job. NPS requirements are so minimal that standard database and/or spreadsheet programs could be customized to do the job relatively easily.
- h. Reporting Requirement – State Program Review. NPS uses lap-top computers on the on-site visits during State Program Reviews. This allows review teams to leave draft reports with the States when they leave.



Use of the lap tops helps to reduce the cost to the Federal Government by making it easier to draft reports while also providing more immediate feed-back to each State.

- i. Application and Reporting Requirement – State Cumulative Products Table. NPS has given States the option to submit the Cumulative Products Table on-line through the “HPF On-Line” system. States have taken advantage of this opportunity. In addition, the form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Cumulative Products Table, NPS is GPEA compliant for this information collection.
- j. Application Requirement – State Organization Chart and Staffing Summary. On the “HPF On-Line” system, NPS has posted for down-loading and printing a template for the Organizational Chart and Staffing Summary. As a template, it is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., a Word table) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Organization Chart and Staffing Summary, NPS is GPEA compliant for this information collection.
- k. Application Requirement – State Anticipated Activities List. On the “HPF On-Line” system, NPS has posted for down-loading and printing a template for the Anticipated Activities List. Nevertheless, NPS specifies neither the format of the list nor the submittal medium for the Anticipated Activities List. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Anticipated Activities List, NPS is GPEA compliant for this information collection.
- l. Application and Reporting Requirement – State Project Notification. Though it does provide a sample form, NPS leaves it up to each State to determine in what format a State submits a Project Notification. The form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) that it chooses to present the data. Currently States must send hard copies because NPS requires that the Project Notification (because it is an amendment to the grant agreement) have an original signature from the State Historic Preservation Officer (or his/her designee). As soon as the original signature issue has been satisfactorily solved and implemented through the “E-Grants” Initiative, NPS plans to give States the option to use electronic/on-line submittal as an alternative to mailing hard-copy documents.
- m. Reporting Requirement – State Final Project Report. Though it provides a sample form, NPS leaves it up to each State to determine in what format a State submits a Final Project Report. The form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) that it chooses to present the data. Currently States must send hard copies because NPS requires that the Final Project Report have an original signature from the State Historic Preservation Officer (or his/her designee). As soon as the original signature issue has been satisfactorily solved and implemented through the “E-Grants” Initiative, NPS plans to give States the option to use electronic/on-line submittal as an alternative to mailing hard-copy documents.
- n. Reporting Requirement – State Project/Activity Database Report. NPS has given States the option to submit the Project/Activity Database Report information on-line via the Internet through the “HPF On-Line” system. The States have taken advantage of this opportunity. In addition, the form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Project/Activity Database Report, NPS is GPEA compliant for this information collection.

- o. Reporting Requirement – State Sources of Nonfederal Matching Share Report. NPS has given States the option to submit the Sources of Nonfederal Matching Share Report information on-line via the Internet through the “HPF On-Line” system. States have taken advantage of this opportunity. In addition, the form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Sources of Nonfederal Matching Share Report, NPS is GPEA compliant for this information collection.
- p. Reporting Requirement – State Unexpended Carryover Funds Table and Statement. NPS has given States the option to prepare Unexpended Carryover Funds Table and Statement information on-line via the Internet through the “HPF On-Line” system. The States have taken advantage of this opportunity. In addition, the form is a template. It is not a required format. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) that it chooses to present the data. Currently States must send hard copies because NPS requires that the Unexpended Carryover Funds Table and Statement (pursuant to NPS’ Use or Lose policy) have an original signature from the SHPO (or his/her designee). As soon as the original signature issue has been satisfactorily solved and implemented through the “E-Grants” Initiative, NPS plans to give States the option to use electronic/on-line submittal as an alternative to mailing hard copy documents.
- q. Reporting Requirement – State Significant Preservation Accomplishments Summary. On the “HPF On-Line” system, NPS has posted for down-loading and printing a template for the Significant Preservation Accomplishments Summary. Nevertheless, NPS specifies neither the format of the Summary nor the submittal medium for the Significant Preservation Accomplishments Summary. As long as the State provides all of the required elements, the State may use whatever format (e.g., spread sheets) or transmittal means (e.g., e-mail) that it chooses to submit the data. Inasmuch as there is no compulsory, paper-based requirement for the Summary, NPS is GPEA compliant for this information collection.
- r. Reporting and Quality Control Option – Annual Achievements Report for States. While NPS provides a form for the general convenience of States, NPS leaves it up to each State to determine in what format and via what transmittal means each State supplies the basic program information requested by the Annual Achievements Report. NPS receives Annual Reports that are mailed, faxed, e-mailed using a .pdf attachment, e-mailed using a spreadsheet, or just e-mailed using the question number and the answers with no format at all. All these are acceptable. NPS cares more about the content than the format or the means used to communicate the information.
- s. Reporting Requirement – THPO Grants Product Summary Page. While NPS provides a form and instructions for the general convenience of THPOs, NPS leaves it up to each THPO to determine in what format and via what transmittal means each THPO supplies the Grant Product Summary Page. NPS receives Grants Product Summary Pages that are mailed, faxed, e-mailed using a .pdf attachment, e-mailed using a spreadsheet, or just e-mailed using the question number and narrative answers with no format at all. All these are acceptable.
- t. Reporting Requirement – THPO Unexpended Funds Carryover Statement. While NPS provides a form and instructions for the general convenience of THPOs, NPS leaves it up to each THPO to determine in what format and via what transmittal means each THPO supplies the Unexpended Funds Carryover Statement. NPS receives Unexpended Funds Carryover Statements that are mailed, faxed, e-mailed using a .pdf attachment, e-mailed using a spreadsheet, or just e-mailed using the question number and narrative answers with no format at all. All these are acceptable.
- u. Reporting Requirement – THPO Annual Report. While NPS provides a form and instructions for the general convenience of THPOs, NPS leaves it up to each THPO to determine in what format and via what transmittal means each THPO supplies the THPO Annual Report. NPS receives Annual Reports that are mailed, faxed, e-mailed using a .pdf attachment, or just e-mailed narrative answers with no format at all. All these are acceptable.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

No similar information for the CLG program certifications, monitoring, evaluations, or program/accomplishment reports exists elsewhere in the Federal Government.

State inventories are the only complete record of the current status of information on historic resources within each State.

No consolidated and comprehensive State-by-State information that tracks each State's review and compliance responsiveness to Federal agency requests exists within the Federal Government.

There is no duplication in the State Program Review process with other processes. In 1992, NPS and the States completed a major study aimed at eliminating duplication within the State Program Review administrative procedures. For the State Program Review Process, NPS prepares for on-site visits in part by looking at its own records. NPS checks nothing on-site that it can fully evaluate from its own records.

For the grant-related information collections that this supporting statement describes, there is no similar information available on an annual basis. NPS collects no information from States or THPOs if NPS has similar (even though not identical) data. In 1992 and again in 1995 and 1997, NPS completed a thorough analysis in consultation with the States to ensure that NPS was not collecting unnecessary data. The information collections described by this supporting statement do not have any duplication. NPS has been rigorous (with the help of its grantees) to ensure that there is no overlap of information between forms, reports, and other information collected from States and THPOs. It is far more common for a given information collection to serve multiple purposes (e.g., the State Cumulative Products Table and the THPO Annual Report). One area with a small bit of overlap is between Project Notifications and the subgrant portion of the Project/Activity Database. The submittal timing is very different, but there is some overlap in content. To deal with this situation, NPS is currently developing a means in its HPF On-Line system through which common data between the two collections would only have to be entered once.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collections that this supporting statement describes do not impact small businesses or other small entities. These collections of information involve only States, Tribes, and local governments. Nonetheless, NPS through its "Management-by-Exception" policy (see item 6 below) has taken steps to minimize the burden for all of its partners.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The statutory mission behind the programs and information collections covered by this supporting statement is to identify, evaluate, and protect irreplaceable historic and prehistoric districts, buildings, structures, sites, and objects. Once a historic or prehistoric property is destroyed, it is gone and cannot be replaced. NPS has designed all of the information collections covered by this supporting statement to measure directly or indirectly the capabilities of and success of our partners in carrying out their statutory responsibilities.

As 36 CFR part 61.3 explains and pursuant to OMB governmentwide grant policies as implemented in the DOI through 43 CFR 12, NPS uses a "Management by Exception" approach to administer all of the programs and information collections covered by this supporting statement. That is, NPS assumes that all of its State, Tribal, and Local Government partners are carrying out their responsibilities appropriately. Thus, as a matter of policy, all information collections are designed for the minimum frequency and burden possible unless an individual partner has demonstrated itself to be high risk (e.g., through a pattern of recaptured funds) or a particular activity is inherently high risk (such as the renovation of a National Historic Landmark). Once

high-risk partners have demonstrated a pattern that indicates that the risk of fraud, waste, or abuse has been reduced, NPS will return that partner to a reduced-review status. See below for details.

- a. Application Requirement – Local Government Certification Application and Agreement. The National Historic Preservation Act, as amended, requires the joint Federal-State certification process of local governments to qualify for CLGs. State CLG certification procedures and local government certifications are one-time events and therefore cannot occur less frequently. No application for a Federal benefit or certification can be made without some demonstration that the applicant meets the applicable statutory requirements. NPS’ regulatory requirements closely parallel the statutory requirements and were promulgated after a thorough consultation with State and local government organizations. The de-centralized nature of the program and the varying computer capabilities among States and especially local governments makes it difficult to find a uniform approach that will reduce burden in all cases. Resolving and implementing a legally sufficient and easily useable way to substitute for original signatures currently required on applications and certification agreements may reduce burden in some cases.
- b. Record-keeping Requirement – Certified Local Government (CLG) Monitoring. The National Historic Preservation Act, as amended, requires that CLGs successfully carry out their responsibilities. “Monitoring” by definition is an on-going process. State monitoring procedures mostly piggyback on documents that routinely come into State offices for other purposes (e.g., grant documents, National Register nominations, etc.). No State requires CLGs to submit information solely for monitoring purposes more often than four times a year. Once-a-year annual reports are the most common approach. No monitoring can be done without some information.

Failure to monitor would be a violation of statutory requirements as well as a violation of standard quality control precepts. Government historic preservation programs exist for the appropriate identification, evaluation, and protection of historic and prehistoric resources. Problems with a government historic preservation program could lead to the unnecessary and irrevocable loss of irreplaceable resources.

The de-centralized nature of the program and the varying computer capabilities among States and especially local governments makes it difficult to find a uniform approach that will reduce burden in all cases. Finally, because the number of CLGs continues to grow, the national total burden is likely to grow also even though the burden for monitoring an individual CLG remains constant or diminishes.

- c. Record-keeping Requirement – Certified Local Government (CLG) Evaluation. The National Historic Preservation Act, as amended, requires that CLGs successfully carry out their responsibilities. NPS requires States to formally evaluate CLGs at least once every four years. This minimum cycle parallels the statutory requirement for how often NPS must evaluate State programs. The minimum cycle for State evaluation of CLGs guarantees that each state will have evaluated all of its CLGs at least once during the period under review for the State Program Review process. State evaluation procedures draw on the results of CLG monitoring which in turn mostly piggyback on documents that routinely come into State offices for other purposes (e.g., grant documents, National Register nominations, etc.). A few States evaluate their CLGs once every three years but most States follow the minimum requirement of once every four years. No evaluation can be done without some information.

Failure to evaluate CLGs would be a violation of statutory requirements as well as a violation of standard quality control precepts. Evaluating CLGs less often than once every four years would create the potential of quality control problems going too long without correction as well as weakening the effectiveness of the State Program Review process. Government historic preservation programs exist for the appropriate identification, evaluation, and protection of historic and prehistoric resources. Problems with a government historic preservation program could lead to the unnecessary and irrevocable loss of irreplaceable resources.

The de-centralized nature of the program and the varying computer capabilities among States and

especially local governments makes it difficult to find a uniform approach that will reduce burden in all cases. Finally, because the number of CLGs continues to grow, the national total burden is likely to grow also even though the burden for evaluating an individual CLG remains constant or diminishes.

- d. Reporting and Quality Control Option – Baseline Questionnaire for CLGs. The National Historic Preservation Act, as amended, requires CLGs – regardless of the availability of funding – to carry out a number of responsibilities including enforcing appropriate state and local law for the designation and protection of historic and prehistoric properties. The Baseline Questionnaire and Annual Report (see below) are the sole means for the Federal Government to track quantitatively CLG success in addressing their statutory mission. Unless there is a change in local programs or an error has been made, CLGs are asked to complete a Baseline Questionnaire only once.

Failure to request CLGs to complete a Baseline Questionnaire would be a violation of statutory requirements as well as a violation of standard quality control precepts as there would be no baseline against which to assess subsequent Annual Reports. Government historic preservation programs exist for the appropriate identification, evaluation, and protection of historic and prehistoric resources. Problems with a government historic preservation program could lead to the unnecessary and irrevocable loss of irreplaceable resources.

- e. Reporting and Quality Control Option – Annual Achievements Report for CLGs. The National Historic Preservation Act, as amended, requires CLGs – regardless of the availability of funding – to carry out a number of responsibilities including enforcing appropriate state and local law for the designation and protection of historic and prehistoric properties. The Annual Report and Baseline Questionnaire (see above) are the sole means for the Federal Government to track quantitatively CLG success in addressing their statutory mission. Unless an error has been made, CLGs are asked to complete an Annual Report only once a year.

Failure to request CLGs to complete an Annual Report would be a violation of statutory requirements. Government historic preservation programs exist for the appropriate identification, evaluation, and protection of historic and prehistoric resources. Failure to collect information on CLG accomplishments would lead to an incomplete assessment of CLG statutorily-mandated contributions to the national historic preservation partnership.

The NPS' annual contact with CLGs also serves a useful communications function. CLGs are created through a joint certification by States and NPS. For many CLGs, this annual report is the only annual direct or indirect contact that they have with NPS. Many CLGs find it useful to know that not only the State but also the Federal government annually is interested in, recognizes, and promotes their contributions to the national historic preservation partnership.

Finally, because the number of CLGs continues to grow, the national total burden is likely to grow also even though the burden for monitoring an individual CLG remains constant or diminishes.

- f. Record-keeping Requirement – State Inventory Maintenance. Maintaining historic property inventory records is by its nature an on-going activity. Each undertaking is only tracked once. Failure to update inventory information would violate a statutory mandate and undermine the reliability of planning and land-use decision making decisions that are dependent upon information of presence of absence of historic and prehistoric resources in potential project areas. An updated and easily usable inventory system reduces the need for (and therefore the burden of) repeated surveys for historic and prehistoric resources. The de-centralized nature of the program and the varying computer capabilities and directives among States makes it difficult to find a uniform approach that will reduce burden in all cases. NPS defers to States on which technology to use for their record-keeping responsibilities.
- g. Record-keeping Requirement – State Review and Compliance Project Tracking. Tracking the status and results of State responses to Federal agency requests for assistance is by its nature an on-going activity. Each undertaking is only tracked once. Failure to track State responses would eliminate the most time

and cost efficient documentation of each State's compliance with its statutory responsibilities (to assist Federal agencies) thus weakening the effectiveness of the State Program Review process. The decentralized nature of the program and the varying computer capabilities and directives among States makes it difficult to find a uniform approach that will reduce burden in all cases. NPS defers to States on which technology to use for their record-keeping responsibilities.

- h. Reporting Requirement – State Program Review. NPS has reduced the frequency of State Program Review to the statutory [Section 101(b)(2) of the Act] minimum of once every four years. To further reduce the frequency of review would violate statutory directives. Government historic preservation programs exist for the appropriate identification, evaluation, and protection of historic and prehistoric resources. Problems with a government historic preservation program could lead to the unnecessary and irrevocable loss of irreplaceable resources.
- i. Application and Reporting Requirement – State Cumulative Products Table. This information collection cannot be conducted less often. The Cumulative Products Table collects information on Outlay (\$), Effort (time spent), and selected Products. States partially fill out (e.g., projected Products) the Cumulative Products Table for the HPF annual grant application. They fill out the remainder (e.g., actual Products) for the End-of-Year Report. Inasmuch as national figures for Outlay and Effort have shown relatively little variation from year to year, effective with the FY 1996 End-of-Year Report, States no longer report Outlay and Effort on a yearly basis. NPS may require States to report those figures periodically or if the national funding situation changes dramatically. In recent years, the total annual appropriations for the 59 States and Territories have remained fairly level. NPS requires the Cumulative Products Table (products portion) one time per year per State application. NPS requires a single End-of-Year Report including the Cumulative Products Table) per year per State and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an incomplete and less useable picture of what States are doing with Federal monies. HPF grants are programmatic, not project specific. Without the summary forms (e.g., the Cumulative Products Table and the Sources of Non-federal Matching Share Report), the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

The major technical challenge to further burden reduction is that most States made the change to on-line preparation/submittal (and thus reaping reduced burden for them and the Federal government) prior to a previous clearance cycle. Nearly 100% of States now use the on-line reporting option and thus reap the associated benefits.

- j. Application Requirement – State Organization Chart and Staffing Summary. This information collection cannot be conducted less often. NPS requires the Organization Chart and Staffing Summary one time per year per State application and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not indicating that there qualified staff to carry out planned activities and that Federal monies will only be used for staff that have HPF eligible organizational responsibilities. It would also result in non-compliance with the National Historic Preservation Act, and an incomplete and less useable picture of what States are doing with Federal monies. HPF grants are programmatic, not project specific. Without the summary forms, the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

- k. Application Requirement – State Anticipated Activities List. This information collection cannot be conducted less often. NPS requires the Anticipated Activities List one time per year per State application

and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an incomplete and less useable picture of what States are doing with Federal monies. HPF grants are programmatic, not project specific. Without the summary forms, the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

- l. Application and Reporting Requirement – State Project Notification. This information collection cannot be conducted less often. NPS requires one Project Notification before beginning and one Final Project Report after the completion of each third party agreement, but only if the Federal share exceeds \$25,000.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an incomplete and less useable picture of what States are doing with Federal monies.

One technical challenge to further burden reduction is that pursuant to OMB governmentwide precepts, subgrants are inherently higher risk than the basic grants to States. As such, Project Notifications and Final Project Reports -- when necessary --require original signatures. The only broad area of potential improvement has to do with finding a suitable electronic substitute for the original signature requirement for certain grant-related documents. When this problem is solved on a governmentwide basis through the “E-Grants” Initiative, NPS will make parallel changes to its program-specific information collections. The “E-Grants” Initiative’s impact on reducing burden will most likely appear in the next clearance cycle.

- m. Reporting Requirement – State Final Project Report. This information collection cannot be collected less often. NPS requires one Project Notification before beginning and one Final Project Report after the completion of each third party agreement, but only if the Federal share exceeds \$25,000.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an incomplete and less useable picture of what States are doing with Federal monies.

One technical challenge to further burden reduction is that pursuant to OMB governmentwide precepts, subgrants are inherently higher risk than the basic grants to States. As such, Project Notifications and Final Project Reports – when necessary – require original signatures. The only broad area of potential improvement has to do with finding a suitable electronic substitute for the original signature requirement for certain grant-related documents. When this problem is solved on a governmentwide basis through the “E-Grants” Initiative, NPS will make parallel changes to its program-specific information collections. The “E-Grants” Initiative’s impact on reducing burden will most likely appear in the next clearance cycle.

- n. Reporting Requirement – State Project/Activity Database Report. This information collection cannot be conducted less often. NPS requires a single End-of-Year Report (including the Project/Activity Database Report) per year per State and does not duplicate information that it collects elsewhere during any other grant-related process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an

incomplete and less useable picture of what States are doing with Federal monies.

The major technical challenge to further burden reduction is that most States made the change to on-line preparation/submittal (and thus reaping reduced burden for them and the Federal government) prior to a previous clearance cycle. Nearly 100% of States now use the on-line reporting option and thus reap the associated benefits.

- o. Reporting Requirement – State Sources of Non-federal Matching Share Report. This information collection cannot be conducted less often. NPS requires a single End-of-Year Report (including the Sources of Nonfederal Matching Share Report) per year per State and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in an incomplete and less useable picture of how States are matching Federal monies. HPF grants are programmatic, not project specific. Without the summary forms (e.g., the Sources of Non-federal Matching Share Report), the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

The major technical challenge to further burden reduction is that most States made the change to on-line preparation/submittal (and thus reaping reduced burden for them and the Federal government) prior to a previous clearance cycle. States now use the on-line reporting option and thus reap the associated benefits.

- p. Reporting Requirement – State Unexpended Carryover Funds Table and Statement. This information cannot be conducted less often. NPS requires a single End-of-Year Report (including the Unexpended Carryover Funds Table and Statement) per year per State and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in a less efficient distribution of Federal monies. This information is the means by which NPS implements its “Use or Lose” policy that ensures the grants funds are obligated as Congress intended. Without the summary forms (e.g., the Unexpended Carryover Funds Table and Statement), the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

The major technical challenge to further burden reduction is that most States made the change to on-line preparation/submittal (and thus reaping reduced burden for them and the Federal government) prior to a previous clearance cycle. States now use the on-line reporting option and thus reap the associated benefits. States using the HPF On-line submittal process have almost no burden in generating this collection. States need only enter one number. The on-line program does the rest using information from other parts of the database.

- q. Reporting Requirement – State Significant Preservation Accomplishments Summary. This information collection cannot be conducted less often. NPS requires a single End-of-Year Report (including the Significant Preservation Accomplishments Summary) per year per State and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in an incomplete and less useable picture of what States are doing with Federal monies.

- r. Reporting and Quality Control Option – Annual Achievements Report for States. The National Historic Preservation Act, as amended, requires the Federal Government (through NPS) to assist States “to expand and accelerate their historic preservation programs and activities” – regardless of the availability of funding. Historic Preservation programs (and related accomplishments) are a part of the national historic preservation partnership that the Act mandates. The Annual Report is the sole means for the Federal



Government to track quantitatively State success in addressing this part of their statutory mission. Unless an error has been made, States are asked to complete an Annual Report only once a year.

Failure to request States to complete an Annual Report would be a violation of statutory requirements. Failure to collect information on State accomplishments would lead to an incomplete assessment of State statutorily-mandated contributions to the national historic preservation partnership.

- s. Reporting and Quality Control Option – THPO Grants Product Summary Page. This information collection can not be conducted less often. NPS requires a single End-of-Year Report (including the Grants Product Summary Page) per year per THPO and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in non-compliance with the National Historic Preservation Act, a less efficient distribution of Federal monies, and an incomplete and less useable picture of what THPOs are doing with Federal monies. HPF grants are programmatic, not project specific. Without the summary forms (e.g., the Grants Product Summary Page),

the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

- t. Reporting and Quality Control Option – THPO Unexpended Funds Carryover Statement. This information collection cannot be conducted less often. NPS requires a single End-of-Year Report (including the Unexpended Carryover Funds Statement) per year per THPO and does not duplicate information that it collects elsewhere during any other application process.

Failure to collect this information would result in a less efficient distribution of Federal monies. This information is the means by which NPS implements its “Use or Lose” policy that ensures the grants funds are obligated as Congress intended. Without the summary forms (e.g., the Unexpended Carryover Funds Statement), the information would not be available other than by sending questionnaires or requiring detailed narratives, or requiring individual project and activity approval and reporting.

- u. Reporting and Quality Control Option – THPO Annual Report. This information collection cannot be conducted less often. NPS requires a single End-of-Year Report (including the THPO Annual Report) per year per THPO and does not duplicate information that it collects elsewhere during any other application process. The Annual Report also does double duty as the sole means to track THPO accomplishments under its certification agreement that are not supported by the HPF grant award.

Failure to collect this information would result in non-compliance with 43 CFR 12 (and OMB Circular A-102) by not reporting on planned activities and accomplishments. It would also result in an incomplete and less useable picture of what THPOs are doing with Federal monies.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* **requiring respondents to report information to the agency more often than quarterly;**
- \* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- \* **requiring respondents to submit more than an original and two copies of any document;**
- \* **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- \* **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- \* **requiring the use of a statistical data classification that has not been reviewed and approved by**

**OMB;**

- \* **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- \* **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that require conduct of the information collections in a matter inconsistent with standard government procedures. The same is true for record-keeping requirements with the exception of each State's inventory of information on its historic resources, which by its nature requires retention longer than three years. Maintenance of the State inventory is a requirement of the Act [Section 101(b)(3)(A)]. None of the information collections that this supporting statement discusses involve statistical surveys, data classifications, pledges of confidentiality, or proprietary trade secrets.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The NPS published a 60-Day Notice to solicit public comments in the Federal Register on August 1, 2007 (Volume 72, FR 42106). The comment period ended on October 1, 2007. No public comments were received.

Over the last three years, NPS has not received any comments from the State, Tribal, and local governments actually involved in these information collections. This is not surprising because the substance of these information collections is unchanged since OMB's last approval.

NPS consulted States in the development of all of the State-related information collections covered in this support statement. NPS consults all States several times annually either directly at regularly-scheduled meetings of SHPOs or through officials of the National Conference of State Historic Preservation Officers which represents the interests of the States. These consultations serve as opportunities for the States to influence the National Park Service on the availability of data, information items required, and the clarity of instructions, etc. These factors were all considerations during the development of the original and most recent substantive revisions to the information collections. At all times, the NPS welcomes the recommendations of States and, within the limits of maintaining an effective program that safeguards the expenditure of Federal monies, attempts to satisfactorily adapt the process to limit the burden that it imposes. NPS reached consensus with the States in the development of each of the information collections that this supporting statement discusses. Similar consultations have taken place with Tribes and local governments both individually and through their national organizations (the National Association of THPOs and National Alliance of Preservation Commissions). CLGs also have the ability to communicate with NPS through their SHPOs. Over the years, our State, Tribal, and Local Government partners have shown no reluctance in

making suggestions (solicited or not) regarding potential improvements to these information collections or any other aspects of any programs that relate to the national historic preservation partnership. Consequently, the absence of comments on the issues that this question raises has indicated to NPS that our partners have no significant problems in these areas.

NPS did consult with a small sample (fewer than 10 for each information collection) of States, THPOs, and CLGs to determine what the current burden is in terms of time and dollars. We have attached a list of the names, titles, addresses, and telephone numbers of the people consulted for estimates of current burden imposed by the information collections. The responses that we received from our sample are consistent both with each other and with our professional estimate of what the size of the burden should be. We used an average of the responses to generate our estimates. Note that because no State Program Reviews have occurred in the last three years, we did not make new inquiries about the burdens associated with that information collection. Instead, we used the time burden estimates from the most recent OMB clearance supporting statement and updated the dollar cost burdens based on inflation.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

By statute, States and Tribes participating in the program receive annual HPF grants that NPS administers. Most CLGs receive HPF subgrants from the States. NPS is not involved in the selection of subgrants. Other than grants, NPS makes no payment or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

NPS makes no assurance of confidentiality to any respondent. The only exception is for location information concerning some properties included in the State inventories. Pursuant to Section 304 of the National Historic Preservation Act, as amended, (16 U.S.C. 470w-3) release of information is tightly controlled when such release could have the potential of damaging those qualities that make a property historic.

The information that NPS collects is not personal and does not merit special confidentiality. It is public information concerning the expenditure of appropriated Federal funds and the operations of State programs.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The information collections that this Supporting Statement covers do not include any questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- \* **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- \* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or**

**paying outside parties for information collection activities should not be included here. Instead, this cost should be included.**

The total annual burden figures for all information collections follow below along with a summary explanation. The detailed burden calculations for each information collection follow thereafter.

Annual Reporting Burden -- All Information Collections

Number of respondents (and record keepers)		1,902
Respondents	1,784	
Record Keepers	118	
Total	1,902	
Number of responses/records per respondent/record keeper (Average)		14.78
Respondents	3	
Record Keepers	262	
Total	14.78	
Total annual responses/records		34,342
Responses	3,485	
Records	30,857	
Total	34,342	
Hours per respondent/record keeper – All responses/records (Average)		19.20
Respondents	32.32	
Record Keepers	67.35	
Total	19.20	
Hours per response/record (Average)		4.51
Responses	9.20	
Records	0.44	
Total	4.51	
Total Hours		35,923
Responses	27,976	
Records	7,947	
Total	35,923	

Total Annual Burden – All Information Collections

Hours

Requested		35,923
Respondents	27,976	
Record Keepers	7,947	
Total	35,923	
In Current OMB Inventory		67,291
Respondents	26,939	
Record Keepers	40,352	
Total	67,291	
Difference		-31,368
Respondents	+1,037	
Record Keepers	-32,405	
Total	-31,368	

NPS consulted a small sample of States, THPOs, and CLGs to determine the current burden in terms of time and dollars. The responses that we received from our sample are consistent both with each other and with our professional estimate of what the size of the burden should be. We used an average of the responses to generate our estimates.

We describe our detailed estimates in the appropriate sections below. Where there is a significant difference from earlier approved burden estimates, we provide an explanation based on our program experience and expertise. We also identify where we have taken recent steps to reduce the burden. In several instances, we are reporting an increase in the time and cost burden. These reported increases generally do not represent any real change in the burden because the requirements have not changed in the last few years. Some of the reported increases for individual information collections reflect changes in how we approached the estimation process for the burden on respondents and record keepers. In other instances, we are reporting a decrease in the time and cost burden. These reported decreases (with a few exceptions) generally do not represent any real change in the burden because the requirements have not changed in the last few years.

Part of the changes is due to the fact that in making these estimates NPS consulted different States, CLGs, and THPOs than we did the last time. Each historic preservation office is organized a little bit differently and approaches this document a little differently.

In addition, the changing number of records and responses has a lot to do with the total number of hours and the total cost even when the burden per record or response has not changed significantly. Finally, while the number of States and Territories participating in these information collections is stable at 59, the number of Certified Local Governments and participating Tribes grows each year. Thus, even when the collection itself is unchanged and the time burden per item is unchanged, the total burden will increase because of the increased number of respondents/record-keepers. A parallel analysis applies to the cost burden except that inflation makes the costs go up even when there is no change in the information collection.

Also, the burden estimates for some grant-related collections have now been properly “annualized.” That is, Historic Preservation Fund (HPF) grants to States and to THPOs are two-year grants. Thus, a collection that takes place once during the two-year grant cycle occurs 0.5 times per year.

One area in which changes to the information collections have made a significant impact on the burden of individual collections is that all States have made the change to on-line preparation/submittal (thus reaping reduced burden for them and the Federal government) of most grant-related documents since the last clearance cycle. One information collection has ceased to have any burden because the on-line system creates the document automatically. The “E-Grants” Initiative’s impact on reducing burden for documents requiring original signatures will most likely appear in the next clearance cycle.

With regard to the salary cost estimates, we have used Bureau of Labor Statistics (BLS) data. Historians represent a typical discipline found in every government historic preservation office. We have used the average hourly wage of a historian in a State government setting (\$21.37) as the average combined wage for Clerical/Unskilled, Skilled/Technical, Professional Managers, and Executive categories described below. The source of the wage data is the BLS website, Occupational Employment and Wages, May 2006, State Government (OES designation).

- 1) Local Government Certification Application/Agreement. A CLG goes through the certification process once only. The data below are based upon applications that properly follow NPS and State procedures and that do not go beyond NPS minimum requirements. Although the Federal requirements have not changed, the burden both in terms of time and dollars has changed – but not significantly -- from three years ago. Both the small decrease in the number of newly CLGs and inflation have an impact on the national totals. However, most of the variances can be explained by differences in the States and CLGs surveyed this time around. How comfortable each State feels with the CLG certification process and how many CLGs it has certified lately has a large impact of who gets assigned and how long those people take

to complete their part of the process. Similarly, a local government that has a strong historic preservation program prior to certification will not need as much time to complete its part of the process as a local government with no prior historic preservation experience would need.

- a. Total Hours to Procure Each Local Government Certification (Combined State and Local Government Burden) 11.72

Local Government

- i) Clerical/Unskilled 1.88
- ii) Skilled/Technical 0.88
- iii) Professionals/Managers 3.75
- iv) Executives 2.29
- v) Total 8.80

State

- i) Clerical/Unskilled 0.00
- ii) Skilled/Technical 0.80
- iii) Professionals/Managers 2.03
- iv) Executives 0.09
- v) Total 2.92

- b. Number of Certifications per Year all States 54
- c. Number of States with CLG Programs 50
- d. Total number of hours (a \* b) 633
- e. Total Salary Cost to Prepare Each Certification Package (Combined State and Local Government Burden = a \* \$21.37) \$250.46
- f. Annual Cost for all Certifications (b \* e) \$13,525

2) Certified Local Government Monitoring. The data below are based upon that part of CLG monitoring that properly follows NPS and State procedures and that do not go beyond NPS minimum requirements. The estimated burden in terms of both time and money for monitoring an individual CLG will vary somewhat depending upon the States and CLGs surveyed for their burden estimates. The combined State and local burden for monitoring an individual CLG is small. However, there are a lot of CLGs, each of which is monitored each year. This means that although the annual burden per CLG is small, the national total burden is somewhat large. This accounts for most of the increase in the total number of burden hours since the last clearance cycle. Most of the variances in the burden per CLG monitored can be explained by differences in the States and CLGs surveyed this time around. How comfortable each State feels with the CLG monitoring process, the experience of the State CLG program staff, and how many CLGs the State has all have a large impact of who gets assigned and how long those people take to complete their part of the process. Similarly, a CLG that has a strong historic preservation program will not need as much time to be monitored as a CLG that has a weak program or has had considerable staff turnover. Inflation and an ever increasing number of CLGs nationally will tend to drive up the total burden regardless of changes in the burden associated with monitoring individual CLGs.

- a. Total Hours to Monitor Each CLG (Combined State and Local Government Burden) 12.05

Local Government

i) Clerical/Unskilled	2.00
ii) Skilled/Technical	1.67
iii) Professionals/Managers	4.00
iv) Executives	0.33
v) Total	8.00
<u>State</u>	
i) Clerical/Unskilled	0.80
ii) Skilled/Technical	0.15
iii) Professionals/Managers	3.10
iv) Executives	0.00
v) Total	4.05
b. Number of CLGs monitored per Year all States	1,554
c. Number of States with CLG Programs	50
d. Total number of hours (a * b)	18,726
e. Total Salary Cost to Monitor Each CLG (Combined State and Local Government Burden= a * \$21.37)	\$257.51
f. Cost for Monitoring all CLGs (b * e)	\$400,171
3) <u>Certified Local Government Evaluations.</u> The data below are based upon that part of CLG evaluations that properly follows NPS and State procedures and that do not go beyond NPS minimum requirements. The estimated burden in terms of both time and money for evaluating an individual CLG will vary somewhat depending upon the States and CLGs surveyed for their burden estimates. The burden in terms of both time and money for CLG evaluations will vary somewhat depending upon the States and CLGs surveyed for their burden estimates. For example, some States use on-site evaluations while the others do not. On-site evaluations drive up the time and costs. The combined State and local burden for evaluating an individual CLG is small. However, there are a lot of CLGs evaluated each year. This means that although the annual burden per CLG is small, the national total burden is somewhat large. Inflation and an ever increasing number of CLGs nationally will tend to drive up the total burden regardless of changes in the burden associated with evaluating individual CLGs, although the rate of increase will not be as great as with monitoring CLGs because States evaluate their CLGs only once every three or four years.	
a. Total Hours to Evaluate Each CLG (Combined State and Local Government Burden)	12.05
<u>Local Government</u>	
i) Clerical/Unskilled	1.00
ii) Skilled/Technical	1.75
iii) Professionals/Managers	2.25
iv) Executives	0.25
v) Total	5.25
<u>State</u>	
i) Clerical/Unskilled	0.17
ii) Skilled/Technical	2.00
iii) Professionals/Managers	4.63

	32	
iv) Executives	0.00	
v) Total	6.80	
b. Number of CLG Evaluations per Year all States		389
c. Number of States with CLG Programs		50
d. Total number of hours (a * b)		4,687
e. Total Salary Cost to Evaluate Each CLG (Combined State and Local Government Burden = a * \$21.37)		\$257.51
f. Cost for all CLG Evaluations per Year (b * e)		\$100,171
4) <u>Baseline Questionnaire for CLGs.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Baseline Questionnaire does have a form, the form is a template. CLGs may use any method they choose to prepare and submit the information requested. The approach that the CLGs choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The approach that the CLG chooses will have an impact on the burden in time and cost. By the next clearance cycle, an on-line option will be available. The burden of completing an individual Baseline Questionnaire is small but the number of CLGs submitting Baseline Questionnaires is relatively large – though not as large as the number of CLGs preparing Annual Achievement Reports (see below). Participation in this information collection is voluntary and a Baseline Questionnaire needs to be prepared only once unless changes occur in a CLG’s historic preservation program. Over time, inflation and an ever increasing number of participating CLGs will tend to drive up the total burden regardless of changes in the burden associated with completing individual Baseline Questionnaires.		
a. Total Hours to Prepare Each Baseline Questionnaire		0.42
i) Clerical/Unskilled	0.00	
ii) Skilled/Technical	0.00	
iii) Professionals/Managers	0.42	
iv) Executives	0.00	
v) Total	0.42	
b. Number of Baseline Questionnaires Submitted per Year all CLGs		275
c. Total number of hours (a * b)		116
d. Total Salary Cost to Prepare Each Baseline Questionnaire (a * \$21.37)		\$8.98
e. Annual Cost for all Baseline Questionnaires (b * d)		\$2,470
5) <u>Annual Achievements Report for CLGs.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Annual Achievement Report does have a form, the form is a template. CLGs may use any method they choose to prepare and submit the information requested. The approach that the CLGs choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The approach that the CLG chooses will have an impact on the burden in time and cost. By the next clearance cycle, an on-line option will be available. The burden of completing an individual Annual Report is small but the number of CLGs submitting Annual Report is relatively large. Participation in this information collection is voluntary. Over time, inflation and an ever increasing number of participating CLGs will tend to drive up the total burden regardless of changes in the burden associated with completing individual Annual Reports.		



a.	Total Hours to Procure Each CLG Annual Achievement Report	0.29
	i) Clerical/Unskilled	0.00
	ii) Skilled/Technical	0.06
	iii) Professionals/Managers	0.23
	iv) Executives	0.00
	v) Total	0.29
b.	Number of Annual Reports Submitted per Year all CLGs	625
c.	Total number of hours (a * b)	181
d.	Total Salary Cost to Prepare Each Annual Report (a * \$21.37)	\$6.20
e.	Annual Cost for all Certifications (b * d)	\$3,875
6)	<p><u>State Inventory Maintenance.</u> The estimates below are based upon the costs of meeting Federal requirements only. The costs of maintaining additional inventory information that the Respondent keeps for its own purposes are not included in the figures below. Many Respondents have completed or are in the process of completing the automation of their inventories. Although maintaining its inventory is a statutory requirement and a required use for part of each Respondent's annual grant award, NPS does not dictate the method that is used for automation. Data entry is the major burden related to inventory maintenance. NPS' burden analysis is focused on processing new records into the inventory. The changes (as compared to three years ago) in the burden of processing a single inventory record mostly have to do with asking different States for their estimates. NPS does not dictate how each State carries out this responsibility. Office organization and staff experience will often have an impact on the blending of staff who up-date the inventory. The fact that some staff categories show increases while others show decreases indicates that no cross-the-board changes are taking place. Although the burden of processing a single inventory record is small, there are many inventory records processed each year so that the national total burden for this collection is large. Nevertheless, although Federal requirements have not changed in the last three years and what Respondents do has not changed, the estimated burden is significantly different from the estimate of three years ago. This is due primarily to a reduction in the number of properties newly added to respondent inventories which is in turn related in part to a grant-funding reduction. When Historic Preservation Fund grants to respondents decrease significantly when adjusted for inflation, respondents tend to reduce the discretionary portion of their inventory programs. This kind of variability should be expected in future clearance cycles.</p>	
a.	Total Hours to Process Each New Inventory Record	0.70
	i) Clerical/Unskilled	0.07
	ii) Skilled/Technical	0.21
	iii) Professionals/Managers	0.42
	iv) Executives	0.00
	v) Total	0.70
b.	Number of New Inventory Records per Respondent per Year	78
c.	Number of Respondents	59
d.	Total number of hours (a * b * c)	3,221
e.	Total Salary Cost to Process Each Inventory Record (a * \$21.37)	\$14.96
f.	Cost to all Respondents (b * c * e)	\$68,846

- 7) State Review and Compliance Task Tracking. The estimates below are based upon the costs of meeting Federal requirements only. NPS does not mandate how each respondent should track the requests. The decrease in the burden in this information collection accounts for the majority of the total decreases in estimated burden in this supporting statement. Some of decreases in burden estimates have to do with asking a different set of States than three years ago. Each State assigns its staff a little bit differently depending upon office organization, staff experience, etc. Although the burden of tracking a response to a single Federal request for review and comments is small, there are many Federal agency requests to track each year so that the national total burden for this collection is large. Nevertheless, although Federal requirements have not changed in the last three years and what Respondents do has not changed, the estimated burden is significantly different from the estimate of three years ago. This is due primarily to a change in the number of Federal undertakings that States have been asked to evaluate which in turn related to external factors having nothing to do with this information collection. This kind of variability should be expected in future clearance cycles.

a. Total Hours to Track Each Federal Agency Request	0.18
i) Clerical/Unskilled	0.05
ii) Skilled/Technical	0.05
iii) Professionals/Managers	0.08
iv) Executives	0.00
v) Total	0.18
b. Number of Federal Requests per Respondent per Year	445
c. Number of Respondents	59
d. Total number of hours (a * b * c)	4,726
e. Total Salary Cost to Process Each Federal Request (a * \$21.37)	\$3.85
f. Cost to all Respondents (b * c * e)	\$101,082

- 8) State Program Review. NPS derived the estimates below in part from experiences in the most recent round of State Program Reviews, test reviews, and discussions with State personnel. The estimates were also based upon the time required for a review of a SHPO that substantially meets all Federal requirements. NPS has adjusted the data to reflect inflation. Inflation accounts for the increased burden in cost.

a. Total Hours to Prepare for, Participate in, and Follow-up on Each State Program Review	90
i) Clerical/Unskilled	8
ii) Skilled/Technical	24
iii) Professionals/Managers	48
iv) Executives	10
v) Total	90
b. Number of State Program Reviews per State per Year	1
c. Number of State Programs Reviewed Each Year	14
d. Total number of hours (a * b * c)	1,260
e. Total Salary Cost to Complete Each State Program Review (a * \$21.37)	\$1,923.30
f. Cost to all States (c * e)	\$26,926

- 9) State Cumulative Products Table. The figures below treat each year's cycle (two Cumulative Products Tables) as a single response. Thus, each respondent makes one response per year. Each respondent has the option of taking two years to expend its HPF grant award. The estimated burden is essentially the same as it was in the last clearance. States now use the HPF On-line system. The increased use of the Internet option since then accounts for part of the reduced time burden but the reported change is mostly due to consulting different States for this clearance cycle. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the States surveyed for their burden estimates.

a.	Total Hours to Prepare Each Cumulative Products Table (Application and End-of-Year Report combined)	5.56
i)	Clerical/Unskilled	0.00
ii)	Skilled/Technical	0.50
iii)	Professionals/Managers	5.06
iv)	Executives	0.00
v)	Total	5.56
b.	Number of Combined Tables per State Grantee per Year	1
c.	Number of State Grantees	59
d.	Total number of hours (a * b * c)	328
e.	Total Cost to Prepare Each Table (Combined)(a * \$21.37))	\$118.82
f.	Cost to all State Grantees (c * e)	\$7,010

- 10) State Organization Chart and Staffing Summary. The data below are based upon a chart and summary statement that do not go beyond NPS minimum requirements. This is one of the information collections for which the burden estimates have been "annualized" (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In this burden estimate and in the future, the estimated burden in terms of both time and money for an individual Organization Chart and Summary will continue to vary somewhat depending upon the States surveyed for their burden estimates.

a.	Total Hours to Prepare Each Organization Chart & Staffing Summary	1.38
i)	Clerical/Unskilled	0.21
ii)	Skilled/Technical	0.50
iii)	Professionals/Managers	0.67
iv)	Executives	0.00
v)	Total	1.38
b.	Number of Organization Charts per State Grantee per Year per Grant	0.5
c.	Number of State Grantees	59
d.	Total number of hours (a * b * c)	41
e.	Total Cost to Prepare Each Organization Chart, etc. (a * \$21.37)	\$29.49
f.	Cost to each State Grantee per Year (b * e)	\$14.75

g. Cost to all State Grantees (c \* f) \$870

11) State Anticipated Activities List. The data below are based upon a list that does not go beyond NPS minimum requirements. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, the estimated burden in terms of both time and money for an individual Anticipated Activities List will vary somewhat depending upon the States surveyed for their burden estimates.

a. Total Hours to Prepare Each Anticipated Activities List	7.63
i) Clerical/Unskilled	0.00
ii) Skilled/Technical	2.17
iii) Professionals/Managers	5.46
iv) Executives	0.00
v) Total	7.63
b. Number of Anticipated Activities Lists per State Grantee per Year per Grant	0.5
c. Number of State Grantees	59
d. Total number of hours (a * b * c)	225
e. Total Cost to Prepare Each Anticipated Activities List (a * \$21.37)	\$163.05
f. Cost to each State Grantee (b * e)	\$81.53
g. Cost to all State Grantees (c * f)	\$4,810

12) State Project Notification. For most States, NPS requires a single Project Notification for subgrant involving a National Historic Landmark or that has a Federal share exceeding \$25,000. There is a marginal increase in the estimated burden per Project Notification. The change in the estimated burden per Project Notification is mostly due to asking different States this time than we did three years ago. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the States surveyed for their burden estimates.

a. Total Hours to Prepare Each Project Notification	1.11
i) Clerical/Unskilled	0.00
ii) Skilled/Technical	0.00
iii) Professionals/Managers	1.11
iv) Executives	0.00
v) Total	1.11
b. Number of Project Notifications per State Grantee per Year per Grant	0.5
c. Number of State Grantees	59
d. Total number of hours (a * b * c)	33
e. Total Salary Cost to Prepare and Submit Each Project Notification (a * \$21.37)	\$23.72

f. Total Cost to each State Grantee (b * e)	\$11.86
g. Cost to all State Grantees (c * f)	\$700

- 13) State Final Project Report. Because every project that requires a Project Notification also requires a Final Project Report, the burden estimates for Final Project Reports always parallel the burden estimates for Project Notifications. There is a marginal change in the estimated burden per Final Project Report. The change in the estimated burden per Final Project Report is mostly due to asking different States this time than we did three years ago. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the States surveyed for their burden estimates.

a. Total Hours to Prepare and Submit Each Final Project Report	0.81
i) Clerical/Unskilled	0.00
ii) Skilled/Technical	0.50
iii) Professionals/Managers	0.31
iv) Executives	0.00
v) Total	0.81
b. Number of Final Project Reports per State Grantee per Year per Grant	0.5
c. Number of State Grantees	59
d. Total number of hours (a * b * c)	24
e. Total Cost to Prepare and Submit Each Final Project Report (a * \$21.37)	\$17.31
f. Cost to each State Grantee (b * e)	\$8.66
g. Cost to all State Grantees (c * f)	\$511

- 14) State Project/Activity Database Report. NPS requires each State to submit a single Project/Activity Database Report each year. Each State includes at least ten records in its report. There is a marginal change in the estimated burden in this area. The change in the estimated burden per Project/Activity Database Report is mostly due to asking different States this time than we did three years ago. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the States surveyed for their burden estimates.

a. Total Hours to Prepare Each Project/Activity Database Report	8.97
i) Clerical/Unskilled	0.00
ii) Skilled/Technical	4.10
iii) Professionals/Managers	4.87
iv) Executives	0.00
v) Total	8.97
b. Number of Project/Activity Database Reports per State Grantee per Year	1
c. Number of State Grantees	59
d. Total number of hours (a * b * c)	529
e. Total Cost to Prepare Each Project/Activity Database Report (a * \$21.37)	\$191.69

- f. Cost to all State Grantees (c \* e) \$11,310
- 15) State Sources of Non-federal Matching Share Report. Each State submits a single Matching Share Report per year. Seven “States” are statutorily exempted from requirements to match Federal grants (48 U.S.C. 1469a). There is a marginal change in estimated burden in this area. The change in the estimated burden per Report is mostly due to asking different States this time than we did three years ago. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the States surveyed for their burden estimates.
- |      |  |         |
|------|--|---------|
| a.   | Total Hours to Prepare Each Sources of Non-federal Matching Share Report | 4.25    |
| i)   | Clerical/Unskilled   | 0.00    |
| ii)  | Skilled/Technical  | 2.00    |
| iii) | Professionals/Managers   | 2.25    |
| iv)  | Executives   | 0.00    |
| v)   | Total  | 4.25    |
| b.   | Number of Sources Reports per State Grantee per Year                     | 1       |
| c.   | Number of State Grantees Required to Provide Match                       | 52      |
| d.   | Total number of hours (a * b * c)  | 221     |
| e.   | Total Cost to Prepare Each Sources Report (a * \$21.37)                  | \$90.82 |
| f.   | Cost to all State Grantees (c *e)  | \$4,723 |
- 16) State Unexpended Funds Carryover Table and Statement. This information collection no longer has any burden because all States use the HPF On-line system to prepare their End-of-Year Reports and the HPF On-line system prepares this report automatically from other data in the system.
- |      |  |        |
|------|--|--------|
| a.   | Total Hours to Prepare Each Unexpended Funds Carryover Table and Statement | 0.00   |
| i)   | Clerical/Unskilled   | 0.00   |
| ii)  | Skilled/Technical  | 0.00   |
| iii) | Professionals/Managers   | 0.00   |
| iv)  | Executives   | 0.00   |
| v)   | Total  | 0.00   |
| b.   | Number of Carryover Tables per Respondent per Year                         | 1      |
| c.   | Number of State Grantees   | 59     |
| d.   | Total number of hours (a * b * c)  | 0      |
| e.   | Total Cost to Prepare Each Carryover Table (a * \$21.37)                   | \$0.00 |
| f.   | Cost to all State Grantees (c * e)   | \$0    |
- 17) State Significant Preservation Accomplishments Summary. The data below are based upon a summary that does not go beyond NPS minimum requirements. There is a marginal change in estimated burden in this area. The change in the estimated burden per Summary is mostly due to asking different States this time than we did three years ago. In the future, the estimated burden in terms of both time and money for an individual Significant Preservation Accomplishments Summary will vary somewhat depending upon the States surveyed for their burden estimates.

a.	Total Hours to Prepare Each Unexpended Funds Carryover Table and Statement	2.31
	i) Clerical/Unskilled	0.00
	ii) Skilled/Technical	0.00
	iii) Professionals/Managers	2.31
	iv) Executives	0.00
	v) Total	2.31
b.	Number of Carryover Tables per Respondent per Year	1
c.	Number of State Grantees	59
d.	Total number of hours (a * b * c)	136
e.	Total Cost to Prepare Each Carryover Table (a * \$21.37)	\$49.36
f.	Cost to all State Grantees (c * e)	\$2,912
18)	<u>Annual Achievements Report for States.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Annual Achievement Report does have a form, the form is a template. States may use any method they choose to prepare and submit the information requested. The approach that the States choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The approach that the State chooses will have an impact on the burden in time and cost. Participation in this information collection is voluntary. In the future, the estimated burden in terms of both time and money for an individual Annual Achievement Report will vary somewhat depending upon the States surveyed for their burden estimates.	
a.	Total Hours to Prepare Each Annual Achievements Report	2.22
	i) Clerical/Unskilled	0.38
	ii) Skilled/Technical	0.00
	iii) Professionals/Managers	1.21
	iv) Executives	0.63
	v) Total	2.22
b.	Number of Annual Achievement Reports per State per Year	1
c.	Number of State responses per Year	25
d.	Total number of hours (a * b * c)	56
e.	Total Cost to Prepare Each Annual Achievement Report (a * \$21.37)	\$47.44
f.	Cost to all States (c * e)	\$1,186
19)	<u>THPO Grants Product Summary Page.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the THPOs surveyed for their burden estimates. More importantly, the number of THPOs continues to grow. Regardless of any changes that might be made to burden associated with completing an individual Grants Product Summary Page, we can expect the total burden hours and cost to increase due to the multiplier effect.	
a.	Total Hours to Prepare Each Grants Product Summary Page	6.04

i)	Clerical/Unskilled	0.00
ii)	Skilled/Technical	2.50
iii)	Professionals/Managers	3.46
iv)	Executives	0.08
v)	Total	6.04
b.	Number of Grants Product Summary Pages per Year	1
c.	Number of Tribal Grantees	57
d.	Total number of hours (a * b * c)	344
e.	Total Cost to Prepare Each Grants Product Summary Page (a * \$21.37)	\$129.07
f.	Cost to all Tribal Grantees (c * e)	\$7,357
20)	<u>THPO Unexpended Funds Carryover Statement.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the THPOs surveyed for their burden estimates. More importantly, the number of THPOs continues to grow. Regardless of any changes that might be made to burden associated with completing an individual Carryover Statement, we can expect the total burden hours and cost to increase due to the multiplier effect.	
a.	Total Hours to Prepare Each Unexpended Funds Carryover Statement	0.73
i)	Clerical/Unskilled	0.00
ii)	Skilled/Technical	0.17
iii)	Professionals/Managers	0.56
iv)	Executives	0.00
v)	Total	0.73
b.	Number of Unexpended Funds Carryover Statements per Tribal Grantee per Year	0.5
c.	Number of Tribal Grantees	57
d.	Total number of hours (a * b * c)	21
e.	Total Cost to Prepare Each Unexpended Funds Carryover Statement (a * \$21.37)	\$16.03
f.	Cost to each Tribal Grantee (b * e)	\$8.02
g.	Cost to all Tribal Grantees (c * f)	\$457
21)	<u>THPO Annual Report.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. In the future, the estimated burden in terms of both time and money will vary somewhat depending upon the THPOs surveyed for their burden estimates. More importantly, the number of THPOs continues to grow. Regardless of any changes that might be made to burden associated with completing an individual THPO Annual Report, we can expect the total burden hours and cost to increase due to the multiplier effect.	
a.	Total Hours to Prepare Each THPO Annual Report	7.28



i)	Clerical/Unskilled	0.06
ii)	Skilled/Technical	1.88
iii)	Professionals/Managers	5.28
iv)	Executives	0.06
v)	Total	7.28
b.	Number of Annual Reports per THPO per Year	1
c.	Number of THPOs	57
d.	Total number of hours (a * b * c)	415
e.	Total Cost to Prepare Each THPO Annual Report (a * \$21.37)	\$155.57
f.	Cost to all THPOs (c * e)	\$8,867

**13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The non-salary costs for these information collections are insignificant. Users report non-salary costs for only nine out of the twenty-one information collections. For the nine information collections with reported non-salary costs, the total cost per response/record for all nine information collections equals \$69.65 (for photocopying, mailing, office supplies, etc.) or an average of \$7.74 per response/record.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The total hour burden to the Federal Government is 3,191 hours. The total cost to the Federal Government for all twenty-one information collections combined is \$180,443. See below for the detailed figures for each information collection.

We consulted NPS staff to derive the figures below. The figures are estimates assuming a correctly filled out document. For this clearance cycle, we used Federal Employee Retirement System (FERS) salary and benefit figures as follows.

Federal Salary Figures (including 30% benefits):

"Clerical/Unskilled" = GS 7/1 (Washington Locality -- FERS) = \$23.45 per hour

"Skilled/Technical" = GS 9/1(Washington Locality -- FERS) = \$28.68 per hour

"Professionals/Managers" = GS 11/1 (Washington Locality -- FERS) = \$34.70 per hour

"Executives" = GS 14/1 (Washington Locality -- FERS) = \$58.45 per hour

Changes in cost burden for individual reviews are due to varying combinations of inflation, new staff members, use of FERS figures, newly-reported information collections, increased use of on-line reporting for some State grant-related collections, and improvements in burden estimation approaches. All of these factors in combination have resulted in estimates of Federal burden that have remained relatively constant since the last approval cycle.

We interviewed different staff than we did in the past and there has been some staff turnover in the last three years. For this clearance cycle, we used FERS salary and benefit figures instead of Civil Service Retirement System (CSRS) figures. This Supporting Statement includes six information collections that had not been recognized as such for the last clearance cycle. States now take advantage of NPS' on-line preparation/submittal of grants documents that do not require original signatures. Finally, the burden estimates for some grant-related collections have now been properly "annualized." That is, HPF grants to States and to THPOs are two-year grants. Thus, a collection that takes place once during the two-year grant cycle occurs 0.5 times per year.

Changes in the total burden hours and costs are due mostly to increases in the number of CLGs and THPOs and associated increases in the number of reviews.

One technical challenge to further burden reduction is that States have made the change to on-line preparation/submittal (and thus reaping reduced burden for them and the Federal government). The only broad area of potential improvement has to do with finding a suitable electronic substitute for the original signature requirement for certain grant-related documents. When this problem is solved on a governmentwide basis through the "E-Grants" Initiative, NPS will make parallel changes to its program-specific information collections. The "E-Grants" Initiative's impact on reducing burden will most likely appear in the next clearance cycle. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, increasing numbers of CLGs and THPOs, and inflation.

1) Local Government Certification. There have been no changes in NPS requirements for this information collection since the last clearance cycle. The following cost estimates are based on review of certification applications that are properly completed in accordance with Federal and State procedures. We interviewed different staff than we did in the past and there has been some staff turnover in the last three years. Nevertheless, the Federal burden has remained relatively constant for each of these information collections. Changes in the total burden hours and costs are due mostly to changes in the annual number of local government becoming certified.

a.	Total Hours to Review and Process Each Certification Application	0.75
i)	Clerical/Unskilled	0.00
ii)	Skilled/Technical	0.00
iii)	Professionals/Managers	0.50
iv)	Executives	0.25
v)	Total	0.75

b.	Number of Certifications per Year	54
c.	Total number of review hours (a * b)	41
d.	Total Salary Cost to Review and Process Each Certification Application	\$31.96
	i) Clerical/Unskilled	\$0.00
	ii) Skilled/Technical	\$0.00
	iii) Professionals/Managers	\$17.35
	iv) Executives	\$14.61
	v) Total	\$31.96
e.	Total Cost to Review and Process Each Certification	\$31.96
f.	Cost to Federal Government (b * e)	\$1,726
2)	<u>CLG Monitoring.</u> NPS uses the State Program Review process to perform quality control reviews of how States use Federal funds to monitor CLG compliance with Federal and State requirements. The costs are included in the estimates for 14.8 below.	
3)	<u>CLG Evaluations.</u> NPS uses the State Program Review process to perform quality control reviews of how States use Federal funds to formally evaluate CLG compliance with Federal and State requirements. The costs are included in the estimates for 14.8 below.	
4)	<u>Baseline Questionnaire for CLGs.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Baseline Questionnaire does have a form, the form is a template. CLGs may use any method they choose to prepare and submit the information requested. The approach that the CLGs choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The Federal burden is largely unaffected by the format that the CLG chooses. However, by the next clearance cycle, an on-line option will be available. This will significantly reduce the Federal burden related to control and data entry. The burden of reviewing and process an individual Baseline Questionnaire is small but the number of CLGs submitting Baseline Questionnaires is relatively large – though not as large as the number of CLGs preparing Annual Achievement Reports (see below). Participation in this information collection is voluntary and a Baseline Questionnaire needs to be prepared only once unless changes occur in a CLGs historic preservation program. Over time, inflation and an ever increasing number of participating CLGs will tend to drive up the total burden regardless of changes in the burden associated with reviewing and process individual Baseline Questionnaires.	
a.	Total Hours to Review and Process Each Baseline Questionnaire	0.23
	i) Clerical/Unskilled	0.03
	ii) Skilled/Technical	0.17
	iii) Professionals/Managers	0.03
	iv) Executives	0.00
	v) Total	0.23
b.	Number of Baseline Questionnaires Processed per Year	275
c.	Total number of review hours (a * b)	63
d.	Total Salary Cost to Review and Process Each Baseline Questionnaire	\$6.72
	i) Clerical/Unskilled	\$0.78
	ii) Skilled/Technical	\$4.78

iii) Professionals/Managers	\$1.16	
iv) Executives	\$0.00	
v) Total	\$6.72	
e. Total Cost to Review and Process Each Baseline Questionnaire		\$6.72
f. Cost to Federal Government (b * e)		\$1,848
5) <u>Annual Achievements Report for CLGs.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Annual Achievements Report does have a form, the form is a template. CLGs may use any method they choose to prepare and submit the information requested. The approach that the CLGs choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The Federal burden is largely unaffected by the format that the CLG chooses. However, by the next clearance cycle, an on-line option will be available. This will significantly reduce the Federal burden related to control and data entry. The burden of reviewing and process an individual Annual Report is small but the number of CLGs submitting Annual Reports is relatively large. Participation in this information collection is voluntary. Over time, inflation and an ever increasing number of participating CLGs will tend to drive up the total burden regardless of changes in the burden associated with reviewing and process individual Annual Reports.		
a. Total Hours to Review and Process Each CLG Annual Report		0.23
i) Clerical/Unskilled	0.03	
ii) Skilled/Technical	0.17	
iii) Professionals/Managers	0.03	
iv) Executives	0.00	
v) Total	0.23	
b. Number of CLG Annual Reports per Year		625
c. Total number of review hours (a * b)		144
d. Total Salary Cost to Review and Process Each CLG Annual Report		\$6.72
i) Clerical/Unskilled	\$0.78	
ii) Skilled/Technical	\$4.78	
iii) Professionals/Managers	\$1.16	
iv) Executives	\$0.00	
v) Total	\$6.72	
e. Total Cost to Review and Process Each CLG Annual Report		\$6.72
f. Cost to Federal Government (b * e)		\$4,200
6) <u>State Inventory Maintenance.</u> NPS uses the State Program Review process to perform quality control reviews of how Respondents use Federal funds to maintain inventories of historic resources. The costs are included in the estimates for 14.8 below.		
7) <u>State Review and Compliance Tracking.</u> NPS uses the State Program Review process to perform quality control reviews of how Respondents use Federal funds to track responses to a Federal agency requests for review and comment. The costs are included in the estimates for 14.8 below.		
8) <u>State Program Review.</u> There have been no changes in NPS requirements for this information collection since the last clearance cycle. NPS derived the estimates below in part from experiences in the most recent round of State Program Reviews. The estimates below are based on the time required to review the program of a State Historic Preservation Office that substantially meets all Federal requirements.		

Inflation and the switch to FERS salary figures account for changes to these estimates.

a.	Total Hours to Prepare for, Participate in, and Follow-up on Each State Program Review		174.00
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	116.00	
	iv) Executives	58.00	
	v) Total	174.00	
b.	Number of State Programs Reviewed per year		14
c.	Total number of hours (a * b)		2,436
d.	Total Salary Cost to Complete Each State Program Review		\$7,415.10
	i) Clerical/Unskilled	\$0.00	
	ii) Skilled/Technical	\$0.00	
	iii) Professionals/Managers	\$4,025.00	
	iv) Executives	\$3,390.10	
	v) Total	\$7,415.10	
e.	Total Non-Salary Cost to Complete Each State Program Review		\$3,300
f.	Total Cost to Complete Each State Program Review (d + e)		\$10,715.10
g.	Total Cost to the Federal Government (b * f)		\$150,011
9)	<u>State Cumulative Products Table</u> . There have been no changes in NPS requirements for this information collection since the last clearance cycle. The figures reflect an entire year's cycle (two Cumulative Products Tables) as a single total review. States have the option of taking two years to expend their HPF grant award. The marginal change in the estimated burden is mostly due to staff turnover from three years ago. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.		
a.	Total Hours to Review and Process Each Cumulative Products Table (Application and End-of-Year Report Combined)		0.92
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	0.50	
	iv) Executives	0.42	
	v) Total	0.92	
b.	Number of Combined Tables per State Grantee per Year		1
c.	Number of State Grantees		59
d.	Total number of review hours (a * b * c)		54
e.	Total Cost to Review and Process Each Table (Combined)		\$41.70
	i) Clerical/Unskilled	\$0.00	
	ii) Skilled/Technical	\$0.00	

iii)	Professionals/Managers	\$17.35	
iv)	Executives	\$24.35	
v)	Total	\$41.70	
f.	Cost per State Grantee to Review and Process (b * e)		\$41.70
g.	Cost to Federal Government (c * f)		\$2,460
10)	<u>State Organization Chart and Staffing Summary.</u> There have been no changes in NPS requirements for this information collection since the last clearance cycle. The changes from the last clearance cycle in burden estimates for this collection are very slight. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.		
a.	Total Hours to Review and Process Each Organization Chart, etc.		0.28
i)	Clerical/Unskilled	0.00	
ii)	Skilled/Technical	0.00	
iii)	Professionals/Managers	0.20	
iv)	Executives	0.08	
v)	Total	0.28	
b.	Number of Organization Charts, etc per State Grantee per Year per Grant		0.5
c.	Number of State Grantees		59
d.	Total number of review hours (a * b * c)		8
e.	Total Cost to Review and Process Organization Chart, etc		\$11.81
i)	Clerical/Unskilled	\$0.00	
ii)	Skilled/Technical	\$0.00	
iii)	Professionals/Managers	\$6.94	
iv)	Executives	\$4.87	
v)	Total	\$11.81	
f.	Cost per State Grantee to Review and Process Organization Chart (b * e)		\$5.91
g.	Cost to Federal Government (c * f)		\$349
11)	<u>State Anticipated Activities List.</u> There have been no changes in NPS requirements for this information collection since the last clearance cycle. The slight changes in burden estimates from those of the last clearance cycle likely are due to a change in staff. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.		
a.	Total Hours to Review and Process Each Anticipated Activities List		1.30
i)	Clerical/Unskilled	0.00	
ii)	Skilled/Technical	0.00	
iii)	Professionals/Managers	0.97	
iv)	Executives	0.33	

v) Total	1.30	
b. Number of Anticipated Activities Lists per State Grantee per Year		0.5
c. Number of State Grantees		59
d. Total number of review hours (a * b * c)		38
e. Total Cost to Review and Process Each List		\$53.02
i) Clerical/Unskilled	\$0.00	
ii) Skilled/Technical	\$0.00	
iii) Professionals/Managers	\$33.54	
iv) Executives	\$19.48	
v) Total	\$53.02	
f. Cost per State Grantee per Grant per year to Review and Process Each List (b * e)		\$26.51
g. Cost to Federal Government (c * f)		\$1,564
12) <u>State Project Notification</u> . There have been no changes in NPS requirements for this information collection since the last clearance cycle. The marginal change in the estimated burden is mostly due to staff turnover from three years ago. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, although the “E-Grants” Initiative will allow for some burden reduction, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.		
a. Total Hours to Review and Process Each Project Notification		0.85
i) Clerical/Unskilled	0.00	
ii) Skilled/Technical	0.00	
iii) Professionals/Managers	0.60	
iv) Executives	0.25	
v) Total	0.85	
b. Number of Project Notifications per State Grantee per Year per Grant		0.5
c. Number of State Grantees		59
d. Total number of review hours (a * b * c)		25
e. Total Cost to Review and Process Each Project Notification		\$35.43
i) Clerical/Unskilled	\$0.00	
ii) Skilled/Technical	\$0.00	
iii) Professionals/Managers	\$20.82	
iv) Executives	\$14.61	
v) Total	\$35.43	
f. Cost per State Grantee to Review and Process Each Project Notification per Year per Grant (b * e)		\$17.72
g. Cost to Federal Government (c * f)		\$1,045
13) <u>State Final Project Report</u> . There have been no changes in NPS requirements for this information		

collection since the last clearance cycle. Because every project that requires a Project Notification also requires a Final Project Report, the burden estimates for Final Project Reports always parallel the burden estimates for Project Notifications. Therefore, the marginal change in the estimated burden is mostly due to staff turnover from three years ago. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, although the “E-Grants” Initiative will allow for some burden reduction, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.

a.	Total Hours to Review and Process Each Final Project Report		0.47
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	0.32	
	iv) Executives	0.15	
	v) Total	0.47	
b.	Number of Final Project Reports per State Grantee per Year		0.5
c.	Number of State Grantees		59
d.	Total number of hours (a * b * c)		14
e.	Total Cost to Review and Process Each Final Project Report		\$19.76
	i) Clerical/Unskilled	\$0.00	
	ii) Skilled/Technical	\$0.00	
	iii) Professionals/Managers	\$10.99	
	iv) Executives	\$8.77	
	v) Total	\$19.76	
f.	Cost per State Grantee to Review and Process Each final Project Report per Year per Grant (b * e)		\$9.88
g.	Cost to Federal Government (c * f)		\$583

14) State Project/Activity Database Report. There have been no changes in NPS requirements for this information collection since the last clearance cycle. The marginal change in the estimated burden is mostly due to staff turnover from three years ago. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.

a.	Total Hours to Review and Process Each Project/Activity Database Report		3.40
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	2.23	
	iv) Executives	1.17	
	v) Total	3.40	
b.	Number of Project/Activity Database Reports per State Grantee per Year		1
c.	Number of State Grantees		59
d.	Total number of review hours (a * b * c)		200



e.	Total Cost to Review and Process Each Report		\$145.45
i)	Clerical/Unskilled	\$0.00	
ii)	Skilled/Technical	\$0.00	
iii)	Professionals/Managers	\$77.26	
iv)	Executives	\$68.19	
v)	Total	\$145.45	
f.	Cost per State Grantee to Review and Process per Year (b * e)		\$145.45
g.	Cost to Federal Government (c * f)		\$8,582

15) State Sources of Non-federal Matching Share Report. There have been no changes in NPS requirements for this information collection since the last clearance cycle. Seven “States” are statutorily exempted from requirements to match Federal grants (48 U.S.C. 1469a). The marginal change in the estimated burden is mostly due to staff turnover from three years ago. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.

a.	Total Hours to Review and Process Each Sources of Nonfederal Matching Share Report		0.52
i)	Clerical/Unskilled	0.00	
ii)	Skilled/Technical	0.00	
iii)	Professionals/Managers	0.27	
iv)	Executives	0.25	
v)	Total	0.52	
b.	Number of Sources Reports per State Grantee per Year		1
c.	Number of State Grantees Required to Provide Match		52
d.	Total number of review hours (a * b * c)		27
e.	Total Cost to Review and Process Each Sources Report		\$23.86
i)	Clerical/Unskilled	\$0.00	
ii)	Skilled/Technical	\$0.00	
iii)	Professionals/Managers	\$9.25	
iv)	Executives	\$14.61	
v)	Total	\$23.86	
f.	Cost per State Grantee to Review and Process (b * e)		\$23.86
g.	Cost to Federal Government (c * f)		\$1,241

16) State Unexpended Funds Carryover Table and Statement. There have been no changes in NPS requirements for this information collection since the last clearance cycle. The marginal change in the estimated burden is mostly due to staff turnover from three years ago. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement though they were not in the last clearance cycle. In the future, although the “E-Grants” Initiative will allow for some burden reduction, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections and inflation.

a.	Total Hours to Review and Process Each Unexpended Carryover Funds Table and Statement		0.48
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	0.15	
	iv) Executives	0.33	
	v) Total	0.48	
b.	Number of Carryover Tables per State Grantee per Year per Grant		0.5
c.	Number of State Grantees		59
d.	Total number of review hours (a * b * c)		14
e.	Total Cost to Review and Process Each Carryover Table		\$24.54
	i) Clerical/Unskilled	\$0.00	
	ii) Skilled/Technical	\$0.00	
	iii) Professionals/Managers	\$5.06	
	iv) Executives	\$19.48	
	v) Total	\$24.54	
f.	Cost per State Grantee per Grant per Year to Review and Process Each Carryover Table (b * e)		\$12.27
g.	Cost to Federal Government (c * f)		\$724
17)	<u>State Significant Preservation Accomplishments Summary</u> . There have been no changes in NPS requirements for this information collection since the last clearance cycle. The slight changes in burden estimates from those of the last clearance cycle likely are due to a change in staff. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.		
a.	Total Hours to Review and Process Each Accomplishments Summary		0.39
	i) Clerical/Unskilled	0.00	
	ii) Skilled/Technical	0.00	
	iii) Professionals/Managers	0.22	
	iv) Executives	0.17	
	v) Total	0.39	
b.	Number of Summaries per State Grantee per Year		1
c.	Number of State Grantees		59
d.	Total number of review hours (a * b * c)		23
e.	Total Cost to Review and Process Each Accomplishments Summary		\$17.26
	i) Clerical/Unskilled	\$0.00	
	ii) Skilled/Technical	\$0.00	
	iii) Professionals/Managers	\$7.52	
	iv) Executives	\$9.74	
	v) Total	\$17.26	

f.	Cost per State Grantee to Review and Process (b * e)	\$17.26
g.	Cost to Federal Government (c * f)	\$1,018
18)	<u>Annual Achievements Report for States.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. While the Annual Achievement Report does have a form, the form is a template. States may use any method they choose to prepare and submit the information requested. The approach that the States choose ranges from a .pdf of the form to a faxed form filled out by hand to an e-mail containing the requested information. The approach that the State chooses has little impact on the Federal burden. In the future, changes in estimated Federal burden are likely to be due mostly to changes in Federal staff that process the information collections, changes in the quality and complexity of State-supplied documents, and inflation.	
a.	Total Hours to Review and Process Each Annual Report	0.22
	i) Clerical/Unskilled	0.03
	ii) Skilled/Technical	0.17
	iii) Professionals/Managers	0.02
	iv) Executives	0.00
	v) Total	0.22
b.	Number of Annual Reports per Year	25
c.	Total number of review hours (a * b)	6
d.	Total Salary Cost to Review and Process Each Annual Report	\$6.14
	i) Clerical/Unskilled	\$0.78
	ii) Skilled/Technical	\$4.78
	iii) Professionals/Managers	\$0.58
	iv) Executives	\$0.00
	v) Total	\$6.14
e.	Total Cost to Review and Process Each Annual Report	\$6.14
f.	Cost to Federal Government (b * e)	\$154
19)	<u>THPO Grants Product Summary Page.</u> This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. Regardless of any changes that might be made to burden associated with completing an individual Grants Product Summary Page, we can expect the total burden hours and cost to increase due to the multiplier effect of the growing number of THPOs. In the future, changes in estimated Federal burden are likely to be due mostly to the increasing number of THPOs, changes in Federal staff that process the information collections, changes in the quality and complexity of THPO-supplied documents, and inflation.	
a.	Total Hours to Review and Process Each Grants Product Summary Page	0.52
	i) Clerical/Unskilled	0.00
	ii) Skilled/Technical	0.00
	iii) Professionals/Managers	0.02
	iv) Executives	0.50
	v) Total	0.52
b.	Number of Grants Product Summary Pages per Year per THPO	1
c.	Number of THPOs	57

d.	Total number of review hours (a * b * c)	30
e.	Total Salary Cost to Review and Process Each Product Summary Page	\$29.80
	i) Clerical/Unskilled	\$0.00
	ii) Skilled/Technical	\$0.00
	iii) Professionals/Managers	\$0.58
	iv) Executives	\$29.22
	v) Total	\$29.80
f.	Total Cost to Review and Process Each Grants Product Summary Page	\$29.80
g.	Cost to Federal Government (c * f)	\$1,699

20) THPO Unexpended Funds Carryover Statement. This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. This is one of the information collections for which the burden estimates have been “annualized” (see the explanation above in the introductory language for this question) in this supporting statement. Regardless of any changes that might be made to burden associated with completing an individual THPO Carryover Statement, we can expect the total burden hours and cost to increase due to the multiplier effect of the growing number of THPOs. In the future, changes in estimated Federal burden are likely to be due mostly to the increasing number of THPOs, changes in Federal staff members who process the information collections, changes in the quality and complexity of THPO-supplied documents, and inflation.

a.	Total Hours to Review and Process Each Carryover Statement	0.75
	i) Clerical/Unskilled	0.00
	ii) Skilled/Technical	0.00
	iii) Professionals/Managers	0.50
	iv) Executives	0.25
	v) Total	0.75
b.	Number of Carryover Statements per Year per THPO	0.5
c.	Number of THPOs	57
d.	Total number of review hours (a * b * c)	21
e.	Total Salary Cost to Review and Process Each Certification Application	\$31.96
	i) Clerical/Unskilled	\$0.00
	ii) Skilled/Technical	\$0.00
	iii) Professionals/Managers	\$17.35
	iv) Executives	\$14.61
	v) Total	\$31.96
f.	Total Cost to Review and Process Each Carryover Statement (b * e)	\$15.98
g.	Cost to Federal Government (c * f)	\$911

21) THPO Annual Report. This is a newly-recognized information collection and thus all of the burden estimates represent an increase over the last clearance cycle. Regardless of any changes that might be made to burden associated with completing an individual THPO Annual Report, we can expect the total burden hours and cost to increase due to the multiplier effect of the growing number of THPOs. In the future, changes in estimated Federal burden are likely to be due mostly to the increasing number of THPOs, changes in Federal staff members who process the information collections, changes in the quality and complexity of THPO-supplied documents, and inflation.

a.	Total Hours to Review and Process Each THPO Annual Report	0.83
	i) Clerical/Unskilled	0.00
	ii) Skilled/Technical	0.00
	iii) Professionals/Managers	0.33
	iv) Executives	0.50
	v) Total	0.83
b.	Number of Annual Reports per Year per THPO	1
c.	Number of THPOs	57
d.	Total number of review hours (a * b * c)	47
e.	Total Salary Cost to Review and Process Each THPO Annual Report	\$40.79
	i) Clerical/Unskilled	\$0.00
	ii) Skilled/Technical	\$0.00
	iii) Professionals/Managers	\$11.57
	iv) Executives	\$29.22
	v) Total	\$40.79
f.	Total Cost to Review and Process Each THPO Annual Report	\$40.79
g.	Cost to Federal Government (c * f)	\$2,325

**15. Explain the reasons for any reported program changes or adjustments.**

In comparison with the last approved burden, there has been a significant program change resulting in an overall decrease in the reported estimates of the total annual burden. This Supporting Statement covers twenty-one information collections. It is not surprising therefore, that within the over-all change in burden estimates the total burden for the individual collections has also changed since the last clearance cycle. Four factors account for the majority of change in the total reported burden both overall and for individual information collections. All of these factors in combination have resulted in estimates of per item burden that have remained relatively constant since the last approval cycle.

- 1) The multiplier effect in the number of annual records. Both “State Inventory Maintenance” and “State Review and Compliance Task Tracking” involve a large number of records per record-keeper. Furthermore, the number of records is not affected by the requirements related to the information collections. Even though the burden per record is relatively small, the number of records makes the burden relatively large; much larger than most of the other information collections combined. Consequently, a significant change (in this cycle, a decrease) in the number of records can determine the overall results in this supporting statement and mask what is happening in the burden estimates for other information collections.
- 2) The multiplier effect in the growing number of CLGs and THPOs. For most of the information collections that we now propose this clearance number to cover, the burden per response/record is relatively small, but the number of THPO/CLG respondents/record-keepers grows each year, thus making the total annual burden grow each year. The number of States is constant but the number of local governments (currently at 1,554) participating in the CLG program and the number of tribes (57) participating in the THPP program both grow each year and is likely to continue to grow each year for the foreseeable future. Consequently, even if the burden for a CLG or THPO-related information collection item is reduced the total burden is likely to increase.
- 3) Newly covered information collections. For the first time, we have recognized as information collections

six long-standing activities conducted by our historic preservation partners; i.e., CLG Baseline Questionnaire (a burden for CLGs), CLG voluntary Annual Achievement Report (CLGs), Annual Achievement Report for States (States), THPO Grants Product Summary Page (THPOs), THPO Unexpended Funds Carryover Statement (THPOs), and the THPO Annual Report (THPOs). Three of these activities are voluntary and are not required to receive the Federal benefit of grant assistance. Nevertheless, they are quality control indicators of the success of the national historic preservation partnership. For each of the newly recognized information collections, the burden per response/record is small but there are a lot of them making the total annual burden large. We are reporting 34,344 responses totaling 35,927 annual burden hours for the information collections associated with this Information Collection Request (ICR). This is a decrease of 23,128 responses and 31,364 burden hours from our previous request. This decrease is due mostly to adjustments we made after consulting with the States and using feedback. In addition, we are reporting a program change of 31,402 responses and 1,133 burden hours for six collections within this ICR that were not a part of the previous submission for approval. Although all of these collections have been longstanding, we mistakenly did not include them in the previous request for OMB approval.

- 4) For a few of the information collections, we have reported marginal changes in the time and cost burden for individual responses/records. These reported increases generally do not represent any real change in the burden because the requirements have not changed in the last three years. These small changes in burden per response/record are due to inflation and the fact that in making these estimates NPS consulted different respondents/record-keepers than we did the last time. For example, each State is organized a little bit differently and approaches these information collections a little differently. In the next clearance cycle, similarly small increases or decreases in burden could just as easily be reported.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

With one exception, NPS does not publish data relating to these information collections. Upon certification, NPS adds the name of each CLG to the list of CLGs that appears on its CLG web site. Because the other information collections mostly relate either to program compliance or quality control and involve data that our partners do not submit to NPS, NPS does not arrange for publication of the information collections. However, this is changing. These are Federally-supported information collections and thus are public documents which NPS partners will make available upon request. NPS also makes available upon request the underlying data from any of the information collections. However, NPS is in the planning stages of posting on our web site much of the information that we currently make available upon request. These postings are likely to be compilations of the collected data without any substantive editing, analysis, or commentary; e.g., a State-by-State listing of properties newly added to their State inventory during a given fiscal year.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

This question is not applicable to the information collections that this Supporting Statement covers.

**18. Explain each exception to "Certification for Paperwork Reduction Act Submissions".**

There are no exceptions to the certification statement.