

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT
SUBMISSION (OMB 1024-0232)**

**National Underground Railroad Network to Freedom Program
National Park Service
Department of the Interior**

Network to Freedom Application

Terms of Clearance: OMB approved this information collection on February 1, 2007 with the following terms of clearance: None.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

P.L. 105-203, the National Underground Railroad Network to Freedom Act of 1998 authorizes the Secretary of the Interior to establish the Network to Freedom (the Network). The Network is designed to be a collection of sites, facilities, and programs, both governmental and non-governmental, around the United States. All entities should have a verifiable association with the historic Underground Railroad movement. Recognized in the enabling legislation as a crucial element in the evolution of a national civil rights movement, the Underground Railroad was the resistance to enslavement through escape and flight through 1865.

Elements included in the Network are authorized by the National Park Service (NPS) to display the Network logo, which tells the public and interested parties that the NPS recognizes the element's historical association to the Underground Railroad, and that the element is managed in a manner consistent with the preservation, education and commemorative goals established by P.L. 105-203.

The Network Application Form is completed by Federal agencies, State Historic Preservation Offices, other State agencies, local governments, organizations, and individuals. The completed form is forwarded to the NPS which reviews the application to verify the historical associations and management activities. The Network application collects the minimum amount of information necessary to verify historical association and evaluate a minimum level of professional management protocols. For programs and facilities that are included in the Network, managers may be required to certify that nothing has changed. If there have been substantial modifications to the program or facility, the manager is required to re-submit an application. The estimated number of re-submittals is included in the burden hours documented below.



2. Indicate how, by whom, and for what purpose the information is to be used.

NPS uses the information collected in the Network Application to verify a candidate's historical association to the Underground Railroad and to evaluate the candidate's activities (especially for interpretive programs and facilities). The decision to include a candidate in the Network is based on several key factors. The respondent must demonstrate that the candidate has a clear historical association to the Underground Railroad, either in program activities, collections, or site association. The respondent must provide clear, convincing, and well-documented evidence of historical association. Sites or properties applying for inclusion in the Network must submit photographs, and preferably maps, to verify location and current appearance. Facilities and programs applying for inclusion in the Network must describe collection or activity association to the Underground Railroad as well as explain management characteristics and protocol.

After an element is included in the Network, the information collected on the Network Application becomes available to the public for research. Key information is entered into a computerized database included on the Network web site (www.nps.gov/ugrr). The information will be used by NPS and other interested parties for research, education, heritage tourism, and preservation programs. The information can provide a clearer understanding of our common heritage. It can be useful to develop a more thorough analysis of the Underground Railroad movement than available before. Additionally, the information supports efforts to plan for the identification, evaluation, and protection of historic resources that have been largely overlooked.

To apply to the Network the candidate uses an application which includes four sections. All respondents must complete the cover page, or first section, of the application, which requests basic data to identify the candidate type, owner or manager, and the respondent. Respondents must then also complete one of the following three sections, depending on the candidate type identified on the cover page. Respondents applying for inclusion as sites must complete Section A. Respondents identified as facilities complete Section B. Programs apply in Section C. In all cases, the information requested is the minimum needed to evaluate the candidate for inclusion in the Network and hour burden estimates are the same, regardless of candidate type.

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.

Respondents generally submit the attachments to the Network Application—photographs, letters of consent from property owners, program evaluation forms, etc.—in paper form. The application itself is usually submitted as an electronic document attached to an e-mail message. The form is available as a word processing template on the Network web site. We estimate that about 85 per cent of the responses are submitted electronically.



4. Describe efforts to identify duplication.

There is no duplication. Each element that applies for inclusion in the Network is evaluated on its unique activities and historical association. If historic sites have been formally recognized through other evaluated inventories at the State or Federal levels, applicants are encouraged to make substantial use of existing information, especially for the statement of Underground Railroad association.

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

The collection of information is entirely voluntary and is initiated by people, organizations, and agencies that have a strong interest in participating in the Network program. The NPS has taken great care to assure that the collection of information is the minimum necessary to achieve program goals. The NPS also encourages the use of digitized forms and makes these available to respondents to reduce paperwork and copying. Electronic files reduce burden on respondents to provide each reviewer with a copy of the application. To save time and effort, the NPS encourages respondents to contact program staff who can provide technical assistance in the completion of the application forms. Program staff also offer workshops, as requested, on how to document Underground Railroad associations and complete the application form.

6. Describe the consequences 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 NPS would not be able to maintain the Network, as mandated by the program's establishing legislation, if it did not collect this minimum amount of information about Underground Railroad-related resources. Without this information, the NPS would be unable to comply fully with the objectives of the program. These objectives are to provide the public with a better understanding of the significance of the Underground Railroad in American history, and provide assistance to State and Federal agencies, tribal nations, municipalities, and organizations in the identification, preservation, and protection of Underground Railroad-related properties.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring reporting more often than quarterly; preparation of a written response in fewer than 30 days of receipt of request; submittal of more than an original and two copies of documentation; retaining certain legal records for more than three years; collection of statistics that can be generalized to the universe of study; the use of statistical data classification not approved by OMB; a pledge of confidentiality not stated in regulation; or submittal of proprietary trade secret information.



None of these conditions apply to this information collection.

8. 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 submittal to the OMB. Summarize public comments received on the notice, describe efforts to consult with persons outside the agency, and consultation with representatives of those from whom information is to be obtained.

The request for comments and extension of the collection was published in the "Federal Register" for public comment on November 4, 2009. Volume 74 No. 212, Page 57189-57190. No public comments were received.

The creation of minimum criteria for inclusion in the Network and the application form came about through extensive consultation between the NPS and interested parties in Federal agencies, State Historic Preservation Offices, municipalities, organizations, and interested parties throughout the United States. In developing the form initially, NPS held several charettes and meetings with subject matter experts and community partners to solicit input.

Since the form was adopted nine years ago, the NPS has reviewed 18 rounds of applications, provided technical assistance to applicants on an ongoing basis, and conducted workshops on how to complete the application. With this submission, several clarifications to the wording on the form have been made as a result of questions and comments received over the course of the past few years. The acceptance rate for applications has improved from 50 per cent in the first year of operation to 75 per cent in 2009.

In 2009 for this re-approval of the application we requested comments from nine potential applicants. To date we received comments from:

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Frances Pollard
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Stephen Marc Smith
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Estimates for time varied from 15 to 30 hours. Commentators all agreed on the importance and necessity of the application as is. They concurred that applicants need to demonstrate relevance, appropriateness, and verifiable association with the Underground Railroad. Information collected stimulates scholarship, encourages public interest, supports educational objectives and professionalism, and preserves Underground Railroad resources. Time needed is not a burden, but useful to show: applicants are serious enough to collect and collate needed documentation; they have an understanding of the Underground Railroad; and they can demonstrate professionalism. Successful applications provide new and verified history on a topic often mythologized. One commentator noted that more complex applications necessarily require more time and give applicants an opportunity to re-evaluate their own work. Another noted that the application gave him a better understanding of the Network to Freedom.

To minimize burdens on applicants in the future, we will emphasize help available from our website, from application workshops, from relevant samples of successful nominations, and from consultation with our staff. Two commentators were enthusiastic about help received from their regional managers. On the new and better website under development, we will post successful examples of applications, and provide means to monitor regional interest and activity.



One commentator noted that the instructions are detailed, with effective explanations throughout (including the appendices). In the new instructions, we will emphasize the separate sections for each type of entity applying. As we examine our application and instructions, we will limit redundancies and requested length of answers. In explaining applications to applicants, we will be clearer on the degree of documentation needed. With their permission, we are happy to put new applicants in contact with helpful past applicants. Also, as requested, we will add a single page preliminary overview, a final checklist for each application area, and page numbers on the Table of Contents.

9. Explain any decisions to provide any payment or gift to respondents and the basis for the assurance in statute, regulation or agency policy.

No payment or gifts are given to respondents.

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

The application collects little confidential information. In accordance with the Privacy Act of 1974, and 43 CFR subpart D2.46 (j), personal addresses, phone numbers, and e-mail addresses of owners and applicants are not released without consent in letters sent in at the time of application (see sample attached). Therefore, applicants and owners will be asked to specify which of these items they do not want to share, with the intent that NPS will share as much information to facilitate networking as allowed. Putting people in contact with others who are researching related topics and historic events is a Network goal. Connecting individuals who may have technical expertise or resources to assist with projects is likewise one of the most effective means of advancing Underground Railroad commemoration and preservation.

11. Provide additional justification for any questions of a sensitive nature.

Apart from personal contact information, the only other information collected that could be considered sensitive is the location of specific properties. This information is reported on the form as necessary to establish which property is listed. The NPS, however, maintains the confidentiality of certain specific locations in order to protect these properties. This is particularly the case with many archeological sites and rural properties that are subject to vandalism. In the case of historic resources that are still used for traditional cultural practices, the location of the property is also kept confidential so as not to interfere with these uses. Section 304 of the National Historic Preservation Act, as amended, establishes this authority.

12. Provide estimates of the hour burden of the collection of information.

Number of respondents expected:	60 annually
Frequency of response expected:	1 per respondent (60 annually)
Annual hour burden expected:	1500



Annual Respondents	Annual Burden	Annual Value
60	25	\$44,555

Explanation of how the burden was estimated. Based on recent comments by applicants and more complex candidates, we have adjusted the estimate per response. While the time required for actually completing the form is consistent with initial estimates, the time required for researching the underlying documentation for authenticating Underground Railroad associations was previously underestimated. A combined estimate of 25 hours per application includes research and completing the form. The burden hours for each respondent, regardless of element type, should be consistent and not vary much. The number of annual responses has been lowered as a result of taking an average of the number received in the last three years of the program.

Annualized cost to respondents for the hour burden: Cost figures are based upon volunteer respondents. At current volunteer rates (\$20.25), the estimated current cost for respondents based on receiving 60 applications annually is approximately \$44,555.00. To account for benefits, we multiplied the rate for individuals/households by 1.4, and multiplied the rate for the State/local/tribal governments by 1.5. We calculated the benefits in accordance with BLS news release USDL-09-1501 of December 9, 2009, <http://www.bls.gov/news.release/pdf/ecec.pdf>.

The performance level used to calculate the cost was based on the volunteer rate as most respondents who write applications are volunteers. The volunteer rate is used for both non-profit, government, and individuals as the response to the application is part of non-paid duties apart from their occupations or jobs. We estimate that each of the 3 types of applicants takes the same amount of time to fill out.



Sector	No. of Responses	Burden hours per application	Total Hours by Section	Rate per hour with benefits	Total per Sector
Individual	20	25	500	\$28.35	\$14,175.00
Non-profit	25	25	625	\$30.38	\$18,987.50
Government	15	25	375	\$30.38	\$11,392.50
					Total of All
					\$44,555.00

By “volunteer” we mean unpaid work. Volunteer rate of \$20.25 comes from Independent Sector

www.independentsector.org/programs/research/volunteer_time.html

*To account for benefits, we multiplied the rate for individuals/households by 1.4, and multiplied the rate for the State/local/tribal governments and non-profit by 1.5. We calculated the benefits in accordance with BLS news release USDL-09-1501 of December 9, 2009, <http://www.bls.gov/news.release/pdf/ecec.pdf>.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no estimated capital costs and there are no filing or application fees.

14. Provide estimates of annualized cost to the Federal government.

The annualized cost to the Federal government is calculated by taking the percentage of the program budget allotted to staff time (represented by salary and benefits). It is about \$143,200. This amount accounts for approximately 20 per cent of the current budget of \$716,000 that includes Network program staff time and time to consult with partners; and to process and evaluate applications. It also includes such activities as designing the new web page, updating the application form on the web page, and updating member listings;



the publication of notices in a program Newsletter; and meetings to conduct evaluations of the application forms.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

Based on experience in operating the program, the estimates used for the burden have been adjusted to reflect more accurate actual conditions. Two adjustments have been made: 1) to reduce the annual number of responses to the average of the last 3 years of operation, and 2) to increase the time estimate per response to account for detailed research requirements. These are all adjustments based on experience rather than representing a change in the program.

16. Outline plans for tabulation and publication of results to be published.

Each application is unique and reflects the unique aspects of the element applying for inclusion in the Network. Respondents must provide detailed, textual explanations involving historical associations and management activities. No statistical sampling methods are used to derive any of the information needed to complete the application form. No advanced or complex analytical techniques are used in tabulation.

New applications are reviewed every six months. Applications under review are listed on the web site with an invitation for public comment. Information about approved candidates, including summary abstracts, is presented on the web site and in a national newsletter, and, per request, are available as an electronic file. Once approved, applications become part of the public record and are distributed upon request.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

Not applicable.

