

# 1 Supporting Statement A for Paperwork Reduction Act Submission

## Procedures for State, Tribal, and Local Government Historic Preservation Programs 36 CFR 61

**OMB Control Number 1024-0038**

**Terms of Clearance. None.**

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

The National Historic Preservation Act (16 U.S.C. 470 et seq.), as amended, established the programs and 36 CFR 61 further defined the programs for which NPS created the information collections in this Supporting Statement. 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.

The Act does not require State, tribal, or local governments to participate in these programs. Those that do participate 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 must 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 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 application 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 \$46 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 State Historic Preservation Offices (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 decisionmakers, States (for example) have the parallel need to describe the grant program and its accomplishments to State government decisionmakers. 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 2-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 governmentwide 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, Project Notifications, Final Project Reports, and the Annual Achievements Report for States. For THPOs, the forms are a "Grants Product Summary Table," an unexpended funds carryover statement, and a "THPO Annual Report" (a narrative summary of important accomplishments). For CLGs, the forms are the Baseline Questionnaire for CLGs and the Annual Achievements 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 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 governmentwide 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 Non-Federal 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 DOI 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 an Annual Achievements Report for States that estimates the number of historic properties designated/protected under State law regardless of the funding source. Also, on a voluntary basis, States that have not participated in the annual report process for a while or that have identified errors in recent annual reports complete a Baseline Questionnaire. However, fewer than 10 States do this each year. As such this does not meet the definition of information collection, so burden estimates are not provided below for the Baseline Questionnaire for States. 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 Baseline Questionnaire for CLGs that identifies the historic preservation programs that the CLG has created under local law along with an estimate of the cumulative 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 an Annual Achievements 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.

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

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.

Also, NPS may use the information in part (in accordance with an apportionment formula) to determine the amount that each State and territory is 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.

Although NPS establishes the minimum requirements for documentation, NPS generally does not require the use of specific forms or recordkeeping formats. Grantees may copy and use the model forms. States may use the NPS-designed, online 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.

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 decisionmakers 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 ongoing 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 governmentwide 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 decisionmakers 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 every 4 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 decisionmakers 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 cumulative 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 decisionmakers 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 identifies the historic preservation programs that the CLG has created under local law and estimates the number of historic properties designated/protected under local law during the reporting year 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. States/CLGs are not required to use the form that NPS provides as a template. 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 DOI strategic plan documents. The information that is a part of the Annual Report is also useful for decisionmakers 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. Recordkeeping 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 prehistoric 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 decisionmakers 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 online to their constituents (although reserving locational data for some fragile/sensitive properties such as archeological sites that might be subject to looting).

g. Recordkeeping 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 (generally no later 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 decisionmakers 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 decisionmakers 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 2k below). Finally, if a proposed summary number (especially for a nondiscretionary 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 strategic plan documents, as well as (potentially) a partial basis for apportioning Historic Preservation Fund grants among the States.

States submit the Cumulative Products Table online 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 SHPO’s 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 decisionmaking relating to the identification, evaluation, and treatment of historic and prehistoric resources. This adds credibility to the State Office’s historic preservation-related decisionmaking. 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 downloading 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 Plan’s 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 NPS-approved 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 decisionmakers. 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-party 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 online.

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 some years ago 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.

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 online via the Internet through the "HPF On-Line" system. Because the online 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. 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. All States now use HPF On-Line for their applications and End-of-Year Reports

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, nonprofit 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 online via the Internet through the "HPF On-Line" system. Because the online 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. 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 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 online via the Internet through the "HPF On-Line" system. The States have taken advantage of this opportunity. Because the online 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. 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 1) identifies whether or not the State offers standard historic preservation programs under State law and that 2) 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 DOI’s strategic plan documents. The information that is a part of the Annual Report is also useful for decisionmakers 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, THPOs use the Grants Product Summary Page as a means to help report in a summary fashion to their decisionmakers 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 2u below). Finally, NPS uses the actual figures in reports on the grant program's accomplishments, budget documents, NPS and DOI 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 appropriated funds is of interest to both Federal and tribal decisionmakers.

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 decentralized 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, tribes, 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. Like all Federal grant programs, the Historic Preservation Fund State

Grants program and Tribal Grants Program are committed to the government-wide "E-Grants," "Grants.gov," and similar initiatives. 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.

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 online, 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 online system. The online system allows its users to accumulate information about a particular project or activity over the course of the year and then have the online 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.

Since the last OMB clearance, NPS has created for States the option of entering online information relating to CLG Monitoring, CLG Baseline Questionnaires, and CLG Annual Achievement Reports. The use of these options eliminates one complete set of transcriptions thus reducing the likelihood of transcription errors.

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.

#### **4. Describe efforts to identify duplication.**

The information that we collect is unique and not available from any other source.

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

These information collection requirements do not impact small businesses or other small entities as we only collect information from States, tribes, and local governments. In addition, we collect only the minimum information necessary to establish eligibility and to assess the effect of the programs.

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

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.

- 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.**

The only special circumstance that is inconsistent with OMB guidelines is the timeframe for the retention of each State's inventory on its historic resources, which by its nature requires retention longer than 3 years. Maintenance of the State inventory is a requirement of the Act [Section 101(b)(3)(A)].

- 8. If applicable, provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

**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.**

The NPS published a notice in the Federal Register on March 25, 2011 (76 FR 16813), soliciting public comments for 60 days. The comment period ended on May 24, 2011. No public comments were received.

NPS consulted with States when originally developing these information collection requirements. In addition, we consult 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 provide suggestions and comments on the availability of data, information items required, the clarity of instructions, etc. 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.

For this renewal, we consulted with a small sample of States, THPOs, and CLGs (see attachment 1) to determine the current burden in terms of time and dollars. We used an average of the responses to generate our estimates. Note that because no State Program Reviews have occurred in the last 3 years, we did not make new inquiries about the burdens associated with that information collection requirement. Instead, we used the time burden estimates from the previous submission and updated the dollar cost burdens.

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

We do not provide payments or gifts to respondents other than remuneration of grantees.

**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.

**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.**

We do not ask questions of a sensitive nature.

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

There are approximately 1,924 respondents (59 States, territories, and District of Columbia; 100 tribal governments; and 1,765 certified local governments) for these information collection requirements. We estimate that we will receive 56,382 annual responses totaling 44,390 burden hours as indicated below. We based our estimates on our experience in administering this collection and the results of our outreach.

ACTIVITY	ANNUAL NUMBER OF RESPONSES	COMPLETION TIME PER RESPONSE (hours)	TOTAL ANNUAL BURDEN HOURS
Local Government Certification Application	55	21.40	1,177
Certified Local Government Monitoring	1,765	7.00	12,355
Certified Local Government Evaluations	441	13.33	5,879
Baseline Questionnaire for CLGs	250	.59	148
Annual Achievements Report for CLGs	900	2.20	1,980
State Inventory Maintenance	26,904	.46	12,376
State Review and Compliance Task Tracking	25,370	.17	4,313
State Program Review	14	90.00	1,260
State Cumulative Products Table	59	7.46	440
State Organization Chart and Staffing Summary	30	1.15	35
State Anticipated Activities List	30	7.47	224
State Project Notification	30	1.37	41
State Final Project Report	30	1.03	31
State Project/Activity Database Report	59	7.14	421
State Sources of Non-Federal Matching Share Report	52	4.28	223
State Unexpended Funds Carryover Table and Statement	59	.08	5

State Significant Preservation Accomplishments Summary	59	2.09	123
Annual Achievements Report for States	25	2.22	56
Tribal Historic Preservation Office (THPO) Grants Product Summary Page	100	12.00	1,200
THPO Unexpected Funds Carryover Statement	50	7.08	354
THPO Annual Report	100	17.49	1,749
<b>TOTAL</b>	<b>56,382</b>		<b>44,390</b>

We estimate that the total value of the burden hours is \$1,642,430 (44,390 hours x \$37). 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 (\$24.68) as the average combined wage for all who perform work associated with these requirements (Clerical/Unskilled, Skilled/Technical, Professional Managers, and Executives). The source of the wage data is the Bureau of Labor Statistics Occupational Employment and Wages, May 2010, 19-3093 Historians. In accordance with Bureau of Labor Statistics Bulletin USDL 11-0304 entitled "Employer Costs for Employee Compensation—December 2010" (<http://www.bls.gov/news.release/pdf/ecec.pdf>), we multiplied the hourly wage by 1.5 to account for benefits, resulting in an hourly wage of \$37.00 (rounded).

**13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.**

The total annual nonhour burden cost for this information collection is \$340,474, primarily for photocopying, mailing, office supplies, travel expenses, etc.

**14. Provide estimates of annualized costs to the Federal Government.**

The total annual cost to the Federal Government is approximately \$346,403. We used the Office of Personnel Management Salary Table 2011-DCB to determine hourly wages. Federal salary hourly rates (including 30% benefits):

- Clerical/Unskilled (GS 7/1) = \$26.38
- Skilled/Technical (GS 9/1) = \$32.27
- Professionals/Managers (GS 11/1) = \$39.04
- Executives (GS 14/1) = \$65.76

The Federal salary cost for each requirement is:

**Local Government Certification.**

Hours per Response		1.58
Clerical/Unskilled	0.50	
Skilled/Technical	0.08	
Professionals/Managers	1.00	
Number of Responses		55
Salary Cost per Response		\$54.81
Clerical/Unskilled	\$13.19	
Skilled/Technical	\$ 2.58	
Professionals/Managers	\$39.04	
Cost to Federal Government		\$3,015

**CLG Monitoring** (costs included in State Program Review)

**CLG Evaluations** (costs included in State Program Review)

**Baseline Questionnaire for CLGs.**

Total Hours per Response		2.56
Clerical/Unskilled	0.10	
Skilled/Technical	0.71	
Professionals/Managers	1.50	
Executives	0.25	
Number of Responses		250
Salary Cost per Response		\$100.55
Clerical/Unskilled	\$ 2.64	
Skilled/Technical	\$22.91	
Professionals/Managers	\$58.56	
Executives	\$16.44	
Cost to Federal Government		\$25,138

**Annual Achievements Report for CLGs**

Total Hours per Response		2.56
Clerical/Unskilled	0.10	
Skilled/Technical	0.71	
Professionals/Managers	1.50	
Executives	0.25	
Number of Responses		900
Salary Cost per Response		\$100.55
Clerical/Unskilled	\$ 2.64	
Skilled/Technical	\$22.91	
Professionals/Managers	\$58.56	
Executives	\$16.44	
Cost to Federal Government		\$90,495

**State Inventory Maintenance** (costs included in State Program Review)

**State Review and Compliance Tracking** (costs included in State Program Review)

**State Program Review**

Total Hours per Response		174
Professionals/Managers	116	
Executives	58	
Number of Responses		14
Salary Cost per Response		\$8,342.72
Professionals/Managers	\$4,528.64	
Executives	\$3,814.08	
Nonsalary Cost per Response		\$5,000.00
Cost to Federal Government		\$186,798

**State Cumulative Products Table**

Total Hours per Response		0.87
Professionals/Managers	0.62	
Executives	0.25	
Number of Responses		59
Salary Cost per Response		\$40.64
Professionals/Managers	\$24.20	
Executives	\$16.44	
Cost to Federal Government		\$2,398

**State Organization Chart and Staffing Summary**

Total Hours per Response		0.40
Professionals/Managers	0.23	
Executives	0.17	
Number of Responses		30
Salary Cost per Response		\$20.16
Professionals/Managers	\$ 8.98	
Executives	\$11.18	
Cost to Federal Government		\$605

**State Anticipated Activities List**

Total Hours per Response		1.21
Professionals/Managers	0.88	
Executives	0.33	
Number of Responses		30
Salary Cost per Response		\$56.06
Professionals/Managers	\$34.36	
Executives	\$21.70	
Cost to Federal Government		\$1,682

**State Project Notification**

Total Hours per Response		0.50
Professionals/Managers	0.50	
Number of Responses		30
Salary Cost per Response		\$19.52
Professionals/Managers	\$19.52	
Cost to Federal Government		\$586

**State Final Project Report**

Total Hours per Response		0.35
Professionals/Managers	0.35	
Number of Responses		30
Salary Cost per Response		\$13.66
Professionals/Managers	\$13.66	
Cost to Federal Government		\$410

**State Project/Activity Database Report**

Total Hours per Response		7.99
Professionals/Managers	3.32	
Executives	4.67	
Number of Responses		59
Salary Cost per Response		\$436.71
Professionals/Managers	\$129.61	
Executives	\$307.10	
Cost to Federal Government		\$25,766

**State Sources of Non-Federal Matching Share Report**

Total Hours per Response		0.42
Professionals/Managers	0.25	
Executives	0.17	
Number of Responses		52

Salary Cost per Response		\$20.94
Professionals/Managers	\$ 9.76	
Executives	\$11.18	
Cost to Federal Government		\$1,089

**State Unexpended Funds Carryover Table and Statement**

Total Hours per Response		0.22
Professionals/Managers	0.14	
Executives	0.08	
Number of Responses		59
Salary Cost per Response		\$10.73
Professionals/Managers	\$5.47	
Executives	\$5.26	
Cost to Federal Government		\$633

**State Significant Preservation Accomplishments Summary**

Total Hours per Response		0.45
Professionals/Managers	0.20	
Executives	0.25	
Number of Responses		59
Salary Cost per Response		\$24.25
Professionals/Managers	\$ 7.81	
Executives	\$16.44	
Cost to Federal Government		\$1,431

**Annual Achievements Report for States**

Total Hours per Response		2.56
Clerical/Unskilled	0.10	
Skilled/Technical	0.71	
Professionals/Managers	1.50	
Executives	0.25	
Number of Responses		25
Salary Cost per Response		\$100.55
Clerical/Unskilled	\$ 2.64	
Skilled/Technical	\$22.91	
Professionals/Managers	\$58.56	
Executives	\$16.44	
Cost to Federal Government		\$2,514

**THPO Grants Product Summary Page**

Total Hours per Response		0.34
Professionals/Managers	0.17	
Executives	0.17	
Number of Responses		100
Salary Cost per Response		\$17.82
Professionals/Managers	\$ 6.64	
Executives	\$11.18	
Cost to Federal Government		\$1,782

**THPO Unexpended Funds Carryover Statement**

Total Hours per Response		0.83
Professionals/Managers	0.50	

Executives	0.33	
Number of Responses		50
Salary Cost per Response		\$41.22
Professionals/Managers	\$19.52	
Executives	\$21.70	
Cost to Federal Government		\$2,061

**THPO Annual Report**

Total Hours per Response		0.99
Clerical/Unskilled	0.08	
Skilled/Technical	0.08	
Professionals/Managers	0.33	
Executives	0.50	
Number of Responses		100
Salary Cost per Response		\$50.45
Clerical/Unskilled	\$ 2.11	
Skilled/Technical	\$ 2.58	
Professionals/Managers	\$12.88	
Executives	\$32.88	
Cost to Federal Government		\$5,045

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We are reporting 56,382 annual responses totaling 44,390 burden hours, which is an increase of 22,038 responses and 8,463 burden hours. We made adjustments in our estimates based on our outreach and our experience in administering this collection.

We are reporting as a program change \$340,474 in nonhour burden costs not previously included in our submission.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

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.**

We will display the OMB control number and expiration date on forms and other appropriate documents associated with this information collection.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.