Supporting Statement A for
Paperwork Reduction Act Submission

National Underground Railroad Network to Freedom Program
OMB Control Number 1024-0232

Terms of Clearance: None.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Public Law 105-203 (National Underground Railroad Network to Freedom Act of 1998) authorizes the Secretary of the Interior to establish the Network to Freedom (Network). The Network is a collection of sites, facilities, and programs, both governmental and nongovernmental, around the United States. All entities must have a verifiable association with the historic Underground Railroad movement. The National Park Service (we, NPS) administers the Network for the Secretary. Through the Network, we coordinate preservation and education efforts nationwide, and are working to integrate local historical sites, museums, and interpretive programs associated with the Underground Railroad into a mosaic of community, regional, and national stories.

Federal agencies, State Historic Preservation Offices, other State agencies, local governments, organizations, and individuals who wish to become members of the Network complete the Network application form. We review the completed form to verify the historical associations and management activities.

One of the principal components of the Network to Freedom Program is to validate the efforts of local and regional organizations, and to make it easier for them to share expertise and communicate with the National Park Service and each other. The vehicle through which this can happen is for these local entities to become Network Partners. Partners of the Network to Freedom Program work alongside and often in cooperation with the National Park Service to fulfill the program's mission. They are closely involved in the entire process of preserving resources, commemorating and educating the public about the Underground Railroad. Many partners have worked cooperatively with the National Park Service either in formal or informal roles to accomplish these activities. Most importantly, it is often through the dedicated efforts of Network Partners that elements are added to the Network to Freedom.

The Network to Freedom and Network Partners are two closely interrelated parts of the Network to Freedom Program. Network Partners form part of a database that exists alongside that of the Network to Freedom, and often can be cross-referenced with the Network elements. In fact, in certain cases, Network Partners could even be elements of the Network to Freedom, if they have met the Network's established criteria. More commonly, Network Partners are the entities that work to get elements in the Network to Freedom. Network Partners are NOT authorized to use the Network to Freedom logo. That use is a characteristic of elements included in the Network to Freedom.

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

Network to Freedom Application

We use 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 Website (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. It can be used by members to provide written, social media, or audiovisual products for public information.

With this submission, we have made several clarifications to the wording on the form and instructions as a result of questions and comments received over the course of the past few years. To apply to the Network, the candidate uses an application which includes four sections. All respondents must complete the cover page (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:

- Sites, if applying for inclusion as a site.
- Facilities, if applying as a facility.
- Educational and Interpretive Programs, if applying as a program.

Managers of programs and facilities in the Network may be required to certify that nothing has changed since joining. If there have been substantial modifications to the program or facility, the manager must resubmit an application. We have included the burden for resubmittals in item 12.

Network Partner

The only requirements for becoming a partner are that the person/organization have some association to preserving, commemorating or educating the public about the Underground Railroad, and that the prospective partner's actions are consistent with the spirit of the missions and practices of the Network and the National Park Service. Prospective partners must submit a letter with the following information:

- Name and address of the agency, company or organization;
- Name, address, and phone, fax, and email information of principal contact;
- Abstract not to exceed 200 words describing the partner's activity, or mission statement; and
- Brief description of the entity's association to the Underground Railroad.

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 application is usually submitted as an electronic document attached to an email message. The form is available as a word processing template on the Network Website. We estimate that about 85 per cent of the responses are submitted electronically. Most have scanned attachments. Respondents sometimes submit the attachments to the Network application--photographs, letters of consent from property owners, program evaluation forms, etc.—in paper form. We encourage prospective partners to submit the information electronically.

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

There is no duplication. Each element proposed 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, we encourage applicants to make substantial use of existing information, especially for the statement of Underground Railroad association. The information pertaining to prospective partners is unique and not collected by any other office.

5. If the collection of information impacts small businesses or other small entities,

describe any methods used to minimize burden.

The information we collect is the minimum needed to evaluate the candidate for inclusion in the Network and as a partner. We also encourage the use of digitized forms and make 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, we encourage 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 consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

We would not be able to maintain the Network, as mandated by the program's establishing legislation, if we did not collect this minimum amount of information about Underground Railroad-related resources. Respondents complete an application at the time they propose a site, facility, or program for inclusion in the Network. Without this information, we 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 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.

There are no special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

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

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

On November 16, 2012, we published in the Federal Register (77 FR 68817) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on January 15, 2013. We did not receive any comments in response to that notice.

In addition to the Federal Register notice, we received outreach comments from:

Jeanne Schultz Angel Executive Director Lombard Historical Society 23 West Maple Street Lombard, Illinois 60148 lombardhistory@att.net	Erica Fugger Center for Oral History, Columbia University 801 Butler Library, Box 20 535 West 114th Street, MC 1129 New York, New York 10027 Erica.fugger@gmail.com
Alison Gibson Library Director Union Township Public Library 27 Main Street Ripley, Ohio 45167 gibsonal@oplin.org	Shawn Halifax 151 Bernard Fort Monroe, Virginia 23651 shalifax@fmauthority.com

J. Camille Owens-Lalude J. Camille Cultural Academy 9800 Springbark Dr. Louisville, KY 40241 jcamille@insightbb.com	Carol Mull 1111 Fair Oaks Ann Arbor, MI 48104 caramul@comcast.net
Sandra Schmidt Congressional Cemetery 1801 E Street, SE Washington, DC 20003 ssschmidt@bytesofhistory.com	

Burden estimates for the application varied from 10 to 50 hours, depending on the type of application, materials previously collected, and how much was known about site history before beginning. We did not change our burden estimate based on these comments. We believe 25 hours represents an average time to complete the application.

A concern was expressed about burdens for those who are not professional historic preservationists. To minimize burdens on future applicants, we will emphasize help available from our Website, application workshops, sample successful nominations, application instructions, and consultation with our staff.

Commenters all agreed on the importance and necessity of the collection of information for documentation, planning, production of exhibits, and historic preservation. One comment was that the requirements are necessary so that the program does not lose credibility. Urgency was expressed by another that the application is necessary so that historic sites can be documented before disappearing from the landscape.

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

We do not provide payment or gifts to respondents.

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

We maintain the confidentiality of certain specific locations to protect certain 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 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.

In accordance with the Privacy Act of 1974 and 43 CFR subpart D2.46 (j), personal addresses, phone numbers, and email addresses of owners and applicants are not released without consent. Therefore, applicants and owners will 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, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

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

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

We estimate that we will receive 37 annual responses totaling 876 annual burden hours. The burden hours for each respondent vary somewhat depending on the type of application, materials previously collected, and how much was known about the history before beginning the application. We believe our estimate of 25 hours to complete an application reflects the average time to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.

We estimate the dollar value of the burden hours is $ 27,836 (rounded). We used Bureau of Labor Statistics USDL 13-0421, Employer Costs for Employee Compensation—December 2012, to calculate hourly rates and benefits.

- Individuals. Table 1 lists the hourly rate for all workers as $21.35. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of $29.89.
- Private Sector. Table 5 lists the hourly rate for all workers as $20.32. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of $28.45.
- Government. Table 3 lists the hourly rate for all workers as $27.24. To calculate benefits, we multiplied the hourly rate by 1.5, resulting in an hourly cost factor of $40.86.

ACTIVITY	NO. OF RESPONDENTS	NO. OF ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE (HRS)	TOTAL ANNUAL HOURS	HOURLY RATE W/BENEFITS	$ VALUE OF ANNUAL BURDEN HOURS
Applications						
Individuals	12	12	25	300	$29.89	$ 8,967.00
Private Sector	15	15	25	375	28.45	10,668.75
Government	8	8	25	200	40.86	8,172.00
Partner Request*	2	2	.5	1	28.45	28.45
Totals	**37**	**37**		**876**		**27,836.20**

*While anyone can submit a request to become a partner, we are using the private sector rate for this collection.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

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

compliance with requirements not associated with the information collection, (3) for

reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no nonhour burden costs.

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

The annual cost to the Federal Government to administer this information collection is approximately $133,200. This amount represents 20 percent of the current salary and benefits ($666,000) for Network to Freedom staff and includes time to: (1) consult with partners, (2) process and evaluate applications, and (3) review partner requests. It also includes such activities as designing the application and web page, updating member listings, publication of notices on the Website, and meetings to evaluate application forms.

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

We are reporting 37 annual responses totaling 876 annual burden hours, which is a net decrease of 23 responses and 624 burden hours from our previous submission.

- We are reporting as an adjustment, a decrease of 25 responses and 625 burden hours. This is a result of a decrease in the number of responses based on our experience in administering this collection over the last several years.
- We are reporting as a program change, an increase of 2 responses and 1 annual burden hour. This increase is associated with requests to become a partner, not reported in our previous submission.

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

We do not publish the results of this collection. However, applications under review are listed on our Website with an invitation for public comment. Information about approved candidates, including summary abstracts, is presented on the Website and is 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.

We will display the OMB control number and expiration date on the form and other appropriate material.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.