Supporting Statement A
for Paperwork Reduction Act Submission

Nomination of Properties for Listing in the National Register of Historic Places, 36 CFR 60 and 63

OMB Control Number 1024-0018

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.**

   The National Historic Preservation Act of 1966 (16 USC 470), as amended, authorizes the Secretary of the Interior to maintain a National Register of Historic Places as a list of the Nation's historic, architectural, and archeological resources worthy of preservation. Nominations to the National Register (NR) are made by Federal agencies (FPO), State Historic Preservation Officers (SHPO), territories, the District of Columbia, and Tribal Historic Preservation Officers (THPO) as required by the law and 36 CFR Part 60. These officials are responsible for documenting the nominated properties to the satisfaction of the Secretary. The 1980 amendments to the Act allow for the nomination of properties by local governments or individuals in cases where there is no approved State program. The National Register of Historic Places Registration Form (NPS Form 10-900), the National Register of Historic Plates Registration Continuation Sheet (NPS Form 10-900-a), and the National Register of Historic Places Multiple Property Documentation Form (MPS) (NPS Form 10-900-b) are completed by individuals, SHPOs, FPOs, THPOs, or other nominating organizations. The SHPOs, FPOs, and THPOs then forward these forms to the National Park Service (NPS) for nomination to the National Register. As per 36 CFR 60, NPS does not process nominations received directly from the public. The forms are also completed by Federal agencies seeking a determination of eligibility for listing as required by the law and 36 CFR 63. The forms collect only information that is necessary to conform to the requirements of the National Historic Preservation Act and the Federal regulations that implement that Act.

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

   The NPS uses the information provided on NPS Forms 10-900, 10-900-a, and 10-900-b to evaluate the eligibility of properties and approve them for inclusion in the National Register. Registration and multiple property documentation forms are evaluated by the National Register staff before listing and are reviewed after listing during periodic program reviews. NPS review and approval of forms is based on 1) the sufficiency of information provided in the forms and supporting documentation, such as photographs and maps that accompany the forms, and 2) the eligibility of the property when evaluated according to the National Register criteria. Much of the information requested on the form corresponds to data fields in the National Register computerized database, the National Register Information System

(NRIS). The NRIS provides a readily accessible, online source of information about the National Register and the properties it contains. Information on the registration and multiple property forms is routinely used by States, Federal agencies, Indian tribes, and others in applying the Federal protections and rehabilitation incentives afforded properties listed in the National Register. The information is used for heritage education and interpretation to provide a tangible understanding of our common heritage. Historic context information in multiple property documentation forms also assists States and others in planning for the identification, evaluation, and protection of historic resources. We have not made any changes to the forms. We collect the following information:

National Register of Historic Places Registration Form (NPS Form10-900)

A. Name of Property: This block identifies the specific property being registered in the National Register according to the various names by which the property has been known. Although the historic name is generally considered the official name of the property, the inclusion of other names provides an appropriate means of differentiating one property from other similarly named properties already listed in the National Register. It also assists the public and other users who may know the property by these other names.

B. Location: This block identifies the geographic location of the property by street number, street, city, county, state, and ZIP code. The "not for publication" item is used primarily for resources, such as archeological sites, which would be adversely affected by amateur excavation or vandalism by the general public if the location were disclosed. In accordance with the National Historic Preservation Act, the National Register is allowed to withhold information on specific locations of properties which might be adversely affected by the release of such information. The item "vicinity" is used to help locate properties outside of incorporated political jurisdictions.

C. State/Federal Agency or Tribal Certification: The signature of the State, Federal, or tribal certifying official certifies that the documentation provided on the form meets the National Register documentation standards and that its submission meets the professional and procedural requirements set forth in the regulations. This statement clarifies the accountability of the State, Federal, or tribal official for the content and submission of the form, in keeping with the intent of the National Historic Preservation Act. It also provides for clear statements of the opinion of the certifying official and any commenting officials, as outlined in the regulations, on whether or not the property meets the National Register criteria. The item for the level at which the certifying official has considered the significance of the property indicates the contextual level at which evaluation of the property has taken place, that is, locally, statewide, or nationally.

D. National Park Service Certification: NPS completes this to record the nature and dates of actions taken regarding the registration of the property in the National Register.

E. Classification: This block is used to classify the property by ownership of the property, type of property, and the number and nature of resources comprising it. Since some resources within a property, such as a district, may have been previously listed, that number is also requested. The name of a related multiple property listing provides a useful cross-reference to the multiple property file, if applicable. This block provides useful information that quickly provides essential facts that relate the property to specific provisions of the National Register program as outlined in the regulations.

F. *Function or use:* This block requests information on the current and historic functions or uses of the property. The block is completed from a list of categories that correspond to those entered in the NRIS.

G. *Description:* The narrative description of the physical appearance and condition of a property requested in this block is important in making an accurate assessment of the significance and integrity of the property being registered. The items for Architectural Classification and for Materials are completed from lists of categories corresponding to those entered in the NRIS. They provide quick reference to the physical aspects of the property that relate to its integrity, significance, and need for specific preservation treatments.

H. *Statement of Significance:* The narrative statement of significance is based on documentary research of the property and the specific assessment of how the property qualifies for listing in the National Register. Applicable National Register criteria and criteria considerations (exceptions) quickly link the property to the qualifying National Register criteria as specified in the regulations. Areas of Significance, Period of Significance, Significant Dates, Cultural Affiliation, Significant Person, and Architect/Builder provide easy reference to the specific facts, dates, and associations that underscore the property's historic importance and relate it to the National Register criteria. All items directly correspond to data elements and categories included in the NRIS.

I. *Major Bibliographic References:* This block lists the sources from which the documentation given on the form was compiled and the assessment of the property's significance was made. This information is necessary to verify information given in the Description and Significance blocks. This block also requests indication of 1) any previous documentation on file in the NPS, and 2) the location of additional documentation. This cross-referencing proves useful to tie documentation sources and administrative processes together regarding how the property has been evaluated and for what purposes previously.

J. *Geographical Data:* This block provides information on the acreage, UTM or latitude/longitude references, and boundaries for the property being registered. Acreage, given to the nearest acre, specifies the size of the property being registered. Locational references provide for one method for recording the geographical location of the property. The verbal boundary description specifies exactly what land is included and defines its legal boundaries for purposes of listing in the National Register. The block also requests a concise explanation or justification of how the boundaries and acreage were selected. Information in this block is essential for identifying exactly what property is being registered and for ensuring that the boundaries and acreage selected are appropriate to the property's historic significance. Many free online mapping programs (Google Earth, Bing maps, ArcGIS Explorer) now provide users with the ability to produce property maps that are accurate and cost-effective for use with National Register nominations.

K. *Form Prepared by:* This block identifies the name, organization, address, and phone number of the person(s) directly responsible for compiling the information. This information enables the National Register staff to contact the person directly, if necessary, after consultation with the SHPO, FPO, or THPO.

National Register of Historic Places Continuation Sheet (NPS Form 10-900-a). This form is used to complete items from forms 10-900 and 10-900-b for which additional space is needed: it is actually just a blank page with a National Register of Historic Places header. The continuation sheet is used when additional space is needed for historic photographs, drawings, and documents that supplement the historical information requested.

National Register of Historic Places Multiple Property Documentation Form (MPS) (Form 10-900-b). This form is also used to document properties for inclusion in the National Register. This form is used in conjunction with NPS Forms 10-900 and 10-900-a. The MPS cover form efficiently provides, in a single document, the contextual information necessary for the evaluation of many historic resources related through geography and/or theme. Because the registration forms for related individual properties do not restate this information—it is required to relate the individual property to the historic context information recorded in the multiple property documentation cover form—their recordation is substantially facilitated and the time to accomplish it significantly expedited. Furthermore, the evaluation of newly surveyed or discovered resources also will be expedited when they can be related to existing historic context documentation contained in extant MPS cover forms. All historic contexts approved for MPS nominations to the National Register nationwide are available online to further facilitate and expedite the identification, evaluation and registration of additional similar properties.

A. *<u>Name of Multiple Property Listing</u>:* This block identifies the multiple property submission and provides an easy reference by which to link individual properties related to the form. The name is based on common physical characteristics, on historical events or persons to which the group relates, or architectural or archeological types which describe the properties.

B. *<u>Associated Historic Contexts</u>:* This block lists the historic contexts or an organizational format that groups the information about the related properties. The titles of the historic contexts include the unifying theme, period of significance, and geographical area. The block is used to list the themes with which the properties included in the MPS submission are associated.

C. *<u>Form Prepared By</u>:* This block identifies the name, organization, address, and phone number of the person(s) directly responsible for compiling the documentation. This information enables the National Register staff to contact that person directly, if necessary, after consultation with the SHPO, FPO, or THPO.

D. *<u>Certification</u>:* The signature of the State, Federal, or tribal certifying official certifies that the documentation provided on the form meets the National Register documentation standards and that its submission meets the professional and procedural requirements set forth in the regulations. The statement clarifies the accountability of the State, Federal, or tribal official for the content and submission of the form, in keeping with the intent of the 1980 amendments to the National Historic Preservation Act.

E. *<u>Statement of Historic Contexts</u>:* This block includes a discussion of the themes on which contexts listed in block B are based. Each context is related to significant patterns of American history, architecture, archeology, engineering, and culture. It is discussed in terms of the historic development of the locality, state, or nation, and in terms of the general areas of significance for which properties related to the group may be listed.

F. Associated Property Types: In this block, all of the variety of property types representing the contexts discussed in block E are listed. Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate the underlying themes. For each property type given, this section will include: a description of the physical characteristics or common associations with events or persons that define the property type; a statement of how the property type is significant to the areas outlined in the historic context; and the registration requirements, (what features or characteristics individual properties must retain in order to convey the significance of the property type and thus be eligible for inclusion in the National Register) based on an analysis of the data collected on the property type. This section will be a tool in identifying and evaluating resources for nomination to the National Register.

G. Geographical Data: This block describes the geographic limitations of the area where properties included within the multiple property submission exist. The information is essentially a list of towns, cities, counties, parts of counties, multiple counties, areas of states, regions, or multiple states where the resources are located.

H. Summary of Identification and Evaluation Methods: This block explains the methods used to identify and analyze property types and determine the requirements for listing. The summary of methods assists the NPS in evaluating and verifying the information given in blocks E and F.

I. Major Bibliographic References: This block lists major bibliographic references, surveys, and study units used to document the property types and historic contexts. This information is necessary to verify the statements made in blocks E and F.

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.

Currently, the forms are submitted either on paper or electronically on disk, with the required accompanying maps and photographs. Forms are completed using a Word template (found online at http://www.nps.gov/history/nr/publications/forms.htm). Photographs are also submitted as digital prints and on disk. We are working with staff in the Department of the Interior to include the forms in the Department's Enterprise Forms System. Once included the forms will be completed online and electronically submitted.

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. No similar information is collected by the agency. No other agency collects this type of information. Each property is unique and must be assessed individually to determine if it meets the National Register criteria.

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

The collection of information will not significantly affect small entities. We have carefully analyzed the collection requirements to ensure that the information requested is the minimum necessary. To assist users in creating an NR nomination, we provide sample approved nominations and guidance on how to complete a NR nomination. Further, all historic contexts approved for MPS nominations to the National Register nationwide are available online via the NR web page to further facilitate the identification, evaluation, and registration of similar properties.

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.**

   If information were not collected, it would not be possible to maintain the National Register list and to administer the related Federal programs, such as the required Advisory Council for Historic Preservation review and comment, Federal historic preservation tax incentives, Federal project planning, and preservation grant programs. We cannot collect the information less frequently. We only collect the information on occasion when someone nominates a property for inclusion in the National Register.

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 the information in a manner that is inconsistence 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 January 28, 2015, we published in the Federal Register (80 FR 4589) a notice of our intent to request that OMB approve the collection of information associated with nominations of properties for inclusion in the National Register of Historic properties. We did not receive any comments in response to that notice.

We published an amended notice on June 26, 2015 (80 FR 36845). The amended notice extended the comment date and provided the public with more detailed information about the five types of package submissions that we receive from the SHPOs, FPOs, and/or THPOs, along with additional information relative to the respective burden estimates broken down by State. We solicited comments for 60 days ending on August 25, 2015. We received eight comments:

Comment: Four States provided clarifications on the State burden estimates published in the amended notice, but did not provide any additional comments regarding the collection of information.

Response: We have considered and included, as appropriate, the information provided in our burden estimates.

Comment: One State responded that the collection of information was essential to meet the mandates of the National Historic Preservation Act. The State acknowledged the burden estimates for their State were accurate and added that there is a wide variation between response times from an individual compared to an experienced consultant. It was suggested the NPS redesign the NR form so that it takes up fewer pages and to fix the “quirks” of the existing form. Finally, the State felt the burden could not be reduced unless additional funding is provided to the SHPOs to hire additional staff.

Response: The forms are provided as Word templates, which allows for rolling text from one page to the next. Some respondents choose not fill out the NPS Form 10-900 completely and simply place most documentation on NPS Form 10-900-a. This is their choice. They are free to delete blank spaces and submit fewer pages. The current forms allow for this flexibility. The current and projected out-year funding levels do not support the possibility of hiring additional staff or increasing the operating budget for the program. However, hiring additional staff would not reduce the burden, only spread it out among a larger staff.

Comment: One State commented that a category for SHPOs that prepare NR nominations should have been included in the burden estimates published in the amended notice.

Response: We agree and have included the burden for the SHPOs to prepare NR nominations (see item 12).

Comment: One State commented that the information collected is adequate and useful and would not recommend any changes to what is requested. The State believes that providing workshops and further guidance would help the SHPOs to more fully understand the requirements. The State also commented that it would be difficult to reduce the burden because most States are concerned with local administration of the Federal tax program and incentives are tied to being listed on the National Register.

Response: We agree. The NR Program provides easily accessibly guidance online via the National Register Bulletins and webinars that are posted on the NR website, as well as offering yearly workshops to assist with this documentation process. If the State has limited travel, these are some guidance options.

Comment: One State commented that the collection of information was neither necessary nor useful and had no practical utility in the nomination of properties.

Response: We disagree. The information we collect is necessary to properly identify, evaluate, and protect properties nominated to the National Register of Historic Places.

We are in constant contact with respondents in the State, Federal, and tribal historic preservation offices and in the public, concerning the National Register program, including the forms. Contact occurs through a variety of venues, including professional meetings, workshops, webinars, and phone and email consultations. We post NR Bulletins online, periodically publish draft White Papers, and offer public webinars that provide guidance on evaluating and documenting different types of historic resources. This policy guidance is broadly distributed for comment before it is finalized. The NPS routinely makes a special effort to solicit input about the program and the information collection requirements.

In addition to the Federal Register notice, we contacted nine SHPO National Register Coordinators to solicit comments on the burden estimates provided therein. We asked for comments on:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

No written comments were provided; however, several individuals stated verbally that the National Register nomination preparation process varies widely and is influenced by many contributing factors. Our burden estimates are based on comments received from the individuals identified below. The following persons representing State Historic Preservation Offices have extensive experience in completing the subject forms as part of their job responsibilities:

Kathleen LaFrank NY SHPO 518-237-8643 Kathleen.lafrank@parks.ny.gov	Paul Diebold Indiana SHPO 317-232-3493 pdiebold@dnr.in.gov	Ian Johnson Oregon SHPO 503-986-0678 ian.johnson@state.or.us
Peggy Veregin Wisconsin SHPO 608-264-6501 Peggy.Veregin@wisconsinhistory.org	John Boughton Montana SHPO 406-444-3647 Jboughton@mt.gov	Claudette Stager TN SHPO 615-532-1550 claudette.stager@tn.gov
Ralph Wilcox Arkansas SHPO 501-324-9787 ralph@arkansasheritage.org	Barb Powers Ohio SHPO 614-298-2000 bpowers@ohiohistory.org	Greg Smith Texas SHPO 512-463-6013 greg.smith@thc.state.tx.us

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.

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

Section 304 of the National Historic Preservation Act, as amended, requires the Secretary of the Interior to withhold from disclosure to the public information about the location, character, or ownership of an historic resource, if such disclosure might cause a significant invasion of privacy, risk, or harm to the historic resources or impede the use of a traditional religious site by practitioners. The only information collected that could be considered confidential in nature is the location of specific properties, their traditional cultural use, and the informants, such as tribal elders, who may testify in the nomination documentation to their cultural importance. Although this information is reported on the form, and necessary to establish precisely which property is listed, we maintain the confidentiality of certain specific information to protect properties. This is particularly the case with many archeological sites and certain properties that are subject to vandalism. It is also the case with places used in traditional cultural practices. The information provided is given voluntarily, with the understanding that it will be confidential.

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. Sometimes, the information that documents the historic significance of a property may be considered sensitive information. For example, in the case of historic places that are still used for traditional cultural practices, the location of the property, the identity of its specific users, and the informants, such as tribal elders who may testify to the cultural importance of these properties, are kept confidential so as not to interfere with traditional uses.

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.**

Respondents seek the honor and related benefits of National Register listing and prepare nominations voluntarily. The preparation of National Register documentation varies in a myriad of ways influenced by a host of factors: it may vary considerably from case to case, measurably from place to place, and widely from historic resource to historic resource. Nominations document properties as different as a single statue or house to miles-long roadways and historic districts encompassing numerous properties. The length and breadth of nominations vary significantly as does the amount of research or information gathering necessary to meet minimum Federal requirements.

Some nominations are the barest bones versions that just cross the threshold of minimum documentation, while some represent the other end of the continuum, demonstrating original research, field work, and analysis and far exceeding the burden of what is minimally required by the nomination form and the National Register program. Many nominations are produced as one facet of a much larger project in which case it is inappropriate to ascribe all the research for the project overall to the preparation of the nomination form.

Nominations are submitted to the National Register by 56 SHPOs, more than one hundred FPOs, and dozens of THPOs, and they may be prepared by anyone: property owners, preservation organizations, students, cultural resource professionals, etc. It is difficult to come up with precise burden estimates for completing the forms that apply across the board to each and every possible nomination preparation scenario. Weighing all of these complex factors, the following "tiers" are reasonable estimates of average burdens on the public to fulfill minimum Federal program requirements to receive the benefit of National Register listing by completing adequate forms ranging from 60-280 hours per form based on the type and complexity of the nomination, the level of experience of the preparer, and the level of research needed. We have considered comments received during the comment period and out outreach in arriving at these estimates.

Tier 1: 60-100 hours (Generally existing multiple property submissions by paid consultants and by Maine State Historic Preservation staff for in-house, individual nomination preparation)
Tier 2: 120 hours (Generally individual nominations by paid consultants)
Tier 3: 230 hours (Generally new district nominations by paid consultants)

Tier 4: 280 hours (Generally newly proposed MPS cover documents by paid consultants).

ACTIVITY	ESTIMATED ANNUAL RESPONDENTS	ESTIMATED ANNUAL RESPONSES	AVG. TIME PER RESPONSE (HOURS)	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS (INCLUDING BENEFITS)	$ VALUE OF ANNUAL BURDEN HOURS
Preparation and Submission of Nomination Forms						
Individuals	90	90	250	22,500	$ 31.81	$715,725
Private Sector	5	5	250	1,250	30.55	38,188
States	5	5	250	1,250	53.40	66.750
Review of Nomination Forms and Submission to NPS						
State/Tribal HPO`	100	1,282	6	7,692	53.40	$410,753
Individual Nominations	635	635	120	76,200	100.00	7,620,000
District Nominations	435	435	230	100,050	100.00	10,005,000
Nominations Submitted under Existing MPS Covers	75	75	100	7,500	100.00	750,000
New Proposed MPS Cover Documents	36	36	280	10,080	100.00	1,008,000
New Nominations[1]	1	1	150	150	100.00	15,000
Total	**2,564**	**2,564**		**226,672**		**$20,629,416**

1 We have not received any new nominations in over 3 years. We are reporting 1 response as a placeholder.

The total dollar value of the annual burden hours is approximately $20,629,416. We used the Bureau of Labor Statistics news release USDL-15-1756, September 9, 2015, Employer Costs for Employee Compensation—June 2015 (http://www.bls.gov/news.release/archives/ecec_09092015.pdf), to estimate average hourly wages and calculate benefits:

- Individuals - We used the wage and salary costs for all workers from Table 1, which states an hourly rate of $22.72. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of $31.81 (rounded).

- Private Sector - We used the wage and salary costs for all workers from Table 5, which states an hourly rate of $21.82. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of $30.55 (rounded).

- State Government - We used the wage and salary costs for management/professional workers from Table 3, which states an hourly rate of $35.60. To calculate benefits, we multiplied the hourly rate by 1.5, resulting in an hourly cost factor of $53.40.

For those nominations normally prepared by consultants, we used an average consultant fee of $100 per hour as the hourly wage cost, including benefits.

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden 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, 2005, (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.**

We have not identified any nonhour cost burdens.

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 annualized cost to the Federal Government to administer this collection is approximately $498,944 (rounded). This is based on staff time to process and review nominations and to administer the information collection. It includes the cost of designing National Register publications and for publishing notification of pending nominations in the *Federal Register* (as required by public law). A weighted average cost per hour of $64.00 (rounded) is calculated based on the following assumptions:

POSITION	GRADE	HOURLY PAY RATE ($/HR EST.)*	HOURLY RATE INCLUDING BENEFITS (1.5 X HOURLY RATE)**	PERCENT OF TIME SPENT ON PROCESSING	WEIGHTED AVERAGE ($/HR)
Historian (e.g. nomination processing)	GS-11/ step 5	$31.80	$47.70	20%	$9.54
Historian (Skilled, technical)	GS-13/ step 5	$45.33	$68.00	80%	$54.40
Weighted Average ($/hr)					$63.94

* Salary Table 2015-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/RUS_h.pdf)
** BLS Bulletin USDL 15-1576, September 9, 2015 (http://www.bls.gov/news.release/archives/ecec_09092015.pdf)

1) Total burden hours for logging in/data entry, technical review of historic resources: 1,282 (number of nominations & MPS Covers) x 2 hours): 2,564 hours.

2) Total burden hours for reviewing/evaluating/researching historic resources and nominating properties: 1,282 (number of nominations & MPS Covers) x 4 hours): 5,128 hours.

3) Total burden hours for publishing notices (pending/weekly/DOEs) in the Federal Register (52 weekly notices x 2 hours): 104 hours.

4) Total annual, recurring cost (7,796 hours x $64 (rounded)): $498,944.

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

We are reporting 2,564 responses totaling 226,672 annual burden hours. This is a net increase of 1,682 responses and `115,522 burden hours.

We are reporting as a program change an increase of 1,727 responses and 110,242 annual burden hours. The increase in the number of responses is mainly associated with including the burden associated with States to prepare nominations as well as the burden for States/tribes to review nominations prior to submission to NPS. The remaining adjustments are a result of revising burden estimates based on comments received in response to the Federal Register notice and our outreach, as well as our experience in administering this information collection.

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.

Historic names and addresses of properties pending consideration for listing in the National Register are included in the Federal Register weekly upon receipt of the applications by the NPS. This notice is necessary to allow for public comment as required by Federal regulations. A list of properties entered in the National Register is available from the NPS and online through the Internet. State, Federal, tribal, and local governments; libraries; historical societies; educators; scholars; and other individuals use the list as a record of properties that are listed in the National Register.

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.

Displaying the expiration date is undesirable. NPS Forms 10-930, 10-930-a, and 10-930-b have remained basically the same for several years. A nomination can be in the research and writing stage for several years before being sent to the appropriate SHPO/FPO/THPO for review and processing and then to NPS for evaluation. Posting the expiration date causes confusion when dates have changed yet the historical documentation is still valid and useable. It is better not to display an expiration date.

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

There are no exceptions to the certification statement.