1Supporting 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.**

The National Underground Railroad Network to Freedom Act of 1998 (54 U.S.C. § 308301, et seq.) 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.

NPS Form 10-946, "National Underground Railroad 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. The 2016 version of NPS Form 10-946 was reformatted to meet new DOI and NPS forms standards and to make it a fillable MS Word document. 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 January 15, 2016, we published in the Federal Register (81 FR 2232) 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 March 15, 2016. We did not receive any comments in response to that Notice.

In addition to the Federal Register notice, we contacted nine recent applicants for comments. We received the following comments from six of the individuals contacted. Despite multiple attempts to contact the remaining three individuals via email (twice) and phone calls (twice), we did not receive any responses from them.

Comment:

Diane,
I thought the form was fine, and all the questions seemed appropriate to me. Just filling out the form probably only took about ten hours, including revisions. But doing the research probably took 100 hours or more. It's hard to say since we did it over a long period of time.

I've filled out a number of federal forms and this one seemed very reasonable to me.

NPS Response/Action Taken: *The NTF has increased the average completion time from 25 hours per response to 40 hours based on feedback received as part of our outreach to recent applicants. We believe our updated estimate of 40 hours more accurately reflects the average amount of time required to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.*

Comment:

Hello Diane,

I have submitted five applications for sites in the Putnam Historic District in Zanesville. I find the application and the process very useful. I learned a lot each time.

- In my opinion the information collected was necessary and practical. I did not feel any of the questions were unnecessary.
- I did not keep track of the time spent preparing the application. Each application was less time-consuming than the previous one. Dr. Johnson was very helpful throughout the application process.
- I don't have any suggestions about enhancing the collection of information or minimizing the burden. For me completing the application was a positive, worthwhile, and educational activity.

Hope these comments are useful. I apologize for not responding sooner. We've had non-stop school visits for the last two weeks.

NPS Response/Action Taken: *None required*

Comment:

Sounds like I want to reinvent the wheel but not really. Just sending a random list of whatever comes to mind.

Preparation time- For me over 60 hours, and I have a fair knowledge of Underground RR in Sandusky, local resource folks, in addition to Dee's invaluable assistance.
I have only listed sites. I believe S8 is very close to a repetition of S7.

The dilemma. Does the NTF desire listings or listings that serve a resource vehicle for future researchers?
Is it possible to offer 2 separate classifications of listings?
Is also possible to develop minimum criteria for submissions?
It is very important that 'local legend' cannot sneak in.
Perhaps a minimum of two primary sources independent of each other could be one criterion. For example, Rush Sloane's Firelands Pioneer speech from 1888 is almost identical to the account published in the Sandusky Commercial Register in 1852. If only two primary sources would be required I would consider these two really only one, although other articles in the 1888 from other authors would pass the test.

A minimal amount of research is important as it does allow for develop of local authorities on the subject and can serve as a means of creating a young generation of historians.

This program has been very beneficial to Sandusky and I look forward to submitting a site a year myself and hope to encourage others to do so.

Sorry I rambled on but wanted to get you something before deadline. I'm happy to offer other feedback if the occasion arises.

NPS Response/Action Taken: *NTF strives for listings that become the basis for future researchers as well as for interpretation of the documented sites. There are minimum criteria for submissions to ensure that sites recognized meet the threshold for documentation. Primary sources are required—typically at least two, but sometimes more, depending on the quality of the sources.*

Comment:

• Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions you felt were unnecessary.

The collection and organization of information is absolutely necessary to ensure that the nominated site/program/facility is in fact what it is claimed to be. Documentation of UGRR sites with primary sources is crucial to maintaining the historical integrity of each site, as well as the integrity of the NTF program. It is vitally important that the public receives accurate information so they can be assured of the authenticity of the claims for sites, and that programs and facilities meet the standards set by the National Park Service. The information has practical utility – communities learn more about this great history and find out where they can do research on their own. Approved sites can inspire not only pride of place, but also spur tourism efforts, creating economic impacts within and beyond the community.

No questions are unnecessary.

• What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?

The applications I have worked (20+) have varied in the amount of time it has taken to verify information, organize it, write up a narrative, create map/photos/other images, gather supporting letters, and create a bibliography. They have ranged from 20 hours to 60 hours. This seems reasonable to me. Historic Register application takes at least this amount of time, depending upon the property. Documenting and verifying an Underground Railroad site, facility, or program should require as much time and effort. I feel that the process to apply for NTF status also send the message that this is a serious endeavor, that the gathering of the necessary information makes the program legitimate, and its bestowing of NTF status an truly important goal and achievement. Our history is not to be taken lightly, and documentation of this history has important, positive repercussions beyond the paperwork. The people, places, and events documented through this process deserve the respect of doing the ground work to document the histories, and nothing less.

 • Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?

I wish all of the approved applications were available in downloadable format. Not only would this make the history more widely available, but make the documentation and process more visible and accessible for people looking to learn this history, or who are looking to document their own site/facility/program.

• Do you have any ideas to suggest which would minimize the burden of the collection of information on respondents?

I do not think you should be demanding less of applicants who seek to document sites. I do feel that it might be helpful to ask people who have completed successful applications to be willing and able to mentor and help others seeking to do so. Perhaps you can create a list of names of people who are willing to act in this role and make it available.

I wish that the NTF program had a quarterly newsletter of some sort, too!

We also invite any additional feedback on the application form and process that you wish to share.

I think each question/section in the application should be accompanied with a description of what is exactly expected to be input into the section of the application. For example, under which section would you like to see maps, or historic photos/images, contemporary photos/images? Should they be inserted in the historic narrative for the site, or at the end as part of an addendum or appendix, with references within the narrative to refer to the appropriate appendix?

NPS Response/Action Taken: *The NTF has begun compiling supplementary guidance materials addressing common questions and good examples for different questions in the applications.*

The NTF has increased the average completion time from 25 hours per response to 40 hours based on feedback received as part of our outreach to recent applicants. We believe our updated estimate of 40 hours more accurately reflects the average amount of time required to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.

Most applications are available electronically on request. The NTF is working toward making these available through the program's website.

The NTF used to produce a semi-annual newsletter, but with fewer staff, no longer has the capacity to do so. The NTF is working on developing a social media presence in order to share information more quickly. The NTF website does have a section for news items.

Comment:

Hi Diane (and Jenny, now a civilian):

Thanks again for overseeing this wonderful, important program. We'll be celebrating our successful nomination of Mt. Pleasant Plains Cemetery at Walter Pierce Park on July 16, when we do our annual "Saying Their Names" event. (Our nomination of John Little's Farmhouse at Kalorama Park (2008) formed the basis of Kalorama Park's recent nomination to the National Register of Historic Places.)

Let me know if you need anything else from me,

• Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions you felt were unnecessary:

As a former professional journalist, I found the two UGRR nominations I successfully submitted among the most difficult writing assignments I've ever had to do. It's not the elements of the form that make it difficult—it's the nature of documenting an incident or person or site which has never been formally documented by mainstream historians. In both the nominations I submitted (including one which required extensive re-writing and re-submission), the stories were discovered through primary research by me—they weren't just my riffs on known stories or facts. The first nomination had 31 footnoted references; the second had 63. Therefore, the OMB statement that the form takes 25 hours to complete is laughable and probably irrelevant to what is really required to prepare an UGRR nomination.

Without a journalistic background, I probably couldn't have submitted the nomination. Even then, it felt like I was writing an advanced-degree thesis instead of a nomination. I don't think the nomination exercise is do-able for most people: the task is daunting. Because most stories of the UGRR have been ignored by traditional historians, and most UGRR operations were purposely covert, the National Network to Freedom might embrace a more liberal vision of what constitutes "irrefutable" historical proof. Having said that, I appreciate rigor when it comes to reporting facts. I just think the demands of the UGRR nomination lean toward this being an exercise fashioned by and for academics.

   Specific elements of the form that seem unnecessary:
   Question S4 stating **_"Supplemental chronologies are encouraged."_** What does a timeline add if the narrative is complete?

Question S5, requiring a ***"history of the site since its time of significance to the Underground Railroad."*** This again seems like a lot of research and reporting for little return in terms of enlightening the public about an UGRR site. A more general question might be more helpful, such as "describe major changes to the site since its time of significance to the Underground Railroad."

Question S7 stating ***"Identify historical sources of information. Include a bibliography."*** A bibliography seems redundant if the footnoted references are complete.

• What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information;

As stated above, the difficulty of documenting an event, person or site that has never been recognized in mainstream historical documents requires intensive research that can takes weeks or months. Writing the narrative takes several weeks—my second nomination (which I had to re-write and re-submit) was 61 pages long. It is irrelevant for OMB to try to try to measure in hours the time it takes to fill out the Network to Freedom UGRR form, due to the research that is required and the covert nature of the Underground Railroad.

• Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected;

It would be good if the nomination form could acknowledge that oral traditions are an important element of Underground Railroad stories. This might require broadening the traditional view of what constitutes "historical" facts. Perhaps oral traditions related to UGRR events could constitute their own kind of nomination. More important stories could arise.

• Do you have any ideas to suggest which would minimize the burden of the collection of information on respondents.

None beyond what I've already mentioned. I appreciate the necessity of proving with source materials what a nomination asserts.

NPS Response/Action Taken:
- *Some sites are more complex and require more research than others to document and nominate. The Mount Pleasant Plains Cemetery was one such nomination. The NTF does acknowledge and support using oral traditions. However, as with other types of evidence, we require collaborating sources and information.*
- *While the research required to support a nomination can be extensive, this rigor is necessary to ensure that the properties recognized in the NTF are verifiable. The strength of the NTF as a program and its reputation as the "go to" source for authenticating UGRR associations is based on these standards. The NTF has been recognized by the Organization of American Historians with the Stanton-Horton Award for Excellence in National Park Service History. From the award letter:*

     The panel of judges felt the Network to Freedom distinguished itself in three ways. First, the criteria for Network to Freedom significance, based on primary documents, were established through a long collaborative process. This criterion legitimates the Underground Railroad beyond its so-called mythic status as a secret network and establishes its existence with documented proof. The accumulation of rigorous demonstrable evidence from members has substantially enlarged a significant and crucial area of American historical scholarship. Second, the Network to Freedom

engages people in a nationwide network of collaboration and scholarship. It has stimulated and coordinated an array of nonprofit organizations and government agencies to share resources and cooperate in education, preservation, and commemoration related to the Underground Railroad. Third, this modern-day network, mimicking the historic Underground Railroad, crosses boundaries of race, ethnicity, religion, geography, and approaches to history. The Network to Freedom brings together a spectrum from grassroots activists to professional scholars to work in the common cause of furthering preservation, education, and commemoration of Underground Railroad activities and sites at local, regional, and national levels.

- *The research supporting NTF nominations is often the basis for further efforts to preserve or interpret the sites, such as with the National Register of Historic Nomination submitted for Kalorama Park.*
- *Chronologies are encouraged in S4 (though not required) because some UGRR events and stories can be complicated and they assist the reader in following the narrative. While some narratives are written clearly, the nominations are completed by a wide range of people, with varying levels of writing experience. The chronologies are also a useful tool for many applicants in sorting out the historical events while writing the narrative.*
- *In S5, the intent is to identify major changes in use or ownership, in order to understand the current appearance, condition, and use of the property. It is not necessary to have a detailed account of every ownership and slight change. The supplemental guidance materials will clarify this point.*
- *While some applicants feel that they are writing an advanced degree thesis, a couple of dozen successful applications have been researched and written by high school students, under the guidance of their teachers.*

Comment:

Diane, I apologize, I've given a thought and reflection to my comments. It was harder than I expected because I want to be fair. I'm addressing most of the questions but not as they are asked.

The size of the whole application package can be overwhelming to small organizations. 60 pages of directions makes one wonder whether it could be worth it and it says it's a paper reduction project! Maybe the NPS didn't mail it, but most people had to download it to understand all the expectations. It was very helpful that the state of MD sponsored a workshop on how to work through the package. Learning from the questions others had as they worked on their application helped everyone and was a good use of staff time. The Network to Freedom management staff was also very helpful, always accessible, sometimes blunt regarding what was not clear and always encouraging. As we know when we work within a story we forget others don't know what we know and forget some of those details. They and friends were helpful in that process.

 I've written many RFP's in my career, responded to many, even a SAMSHA and a HUD grant, this was more complicated for less benefit. My bottom line, is that the layout of the application form needs revision. It is helpful with almost too much information, it is complicated, and too long. It's the standard format for the government to use, it seems the goal is to sort people out before they can get started unless they have passionate people. It does do that. Maybe that is good, there are sites/facilities and programs that don't deserve recognition but you lose more of

appropriate sites. I know one today who will not apply because the level of documentation is so burdensome on an overworked staff of one.

 I believe that the collection of information is important to capture the story, yet how much is enough?   Some are better at telling their story than others. We did not learn anything new from gathering the information but I can see situations where that might happen and should. It did help focus the story to what visitors/researchers might want to know about the site/program/facility. I did not work a site or facility application, I heard that some found collecting enough documentation burdensome, yet the NTF must maintain a level of standards.

 It took longer than expected, I didn't track the number of hours but I know it was more than 30 for the easier program application, which not all volunteers have to give.

 As I wrote pieces, other committee members worked on others, it became a learning experience about the vision and what is expected. It didn't change the organization, at least not yet, but it changed thinking about how to go forward.

 While writing I found some questions seemed to duplicate, but with good editing, I don't think they were – if you follow standard rules of objectives you could reduce one of the questions.- ie. Evaluation – that's how you measure objectives. The question about where the program could be presented could be integrated into another question such as accessibility.   I found it interesting that there was no request for outcomes – the language used for the past 20 + years.

 Humans as we are, we don't always read directions as well as expected, we don't interpret the question within the NTF thinking and some people don't write well.

The staff was helpful, kind but firm, and it all came together.

 My biggest suggestion is to redesign the directions. There are core questions whether it is a site, facility, or program that fit each proposal. The examples for each kind of application are helpful, they can be highlighted in some way. The staff emphasized bulleting details, yet in the directions it runs together often – some stylistic work would make it flow better. It took until p. 29 to know that we were a program and what to do. Some organizations can see themselves as a site or program, for us the staff helped sort that, but not sure it always happens because people don't know the right questions and don't ask despite the best efforts of the staff.

 The positive experience out of this was working with the NTF staff.   We are honored to have two sites in Cambridge, the Harriet Tubman Museum and the Harriet Tubman Underground Railroad Conference. Until the NPS invests more resources into the NTF, respects it for the treasures it has identified and promotes, it's hard to know feel the benefit. That's another discussion.

NPS Response/Action Taken:
- *Many communities and organizations develop creative, unique ways to commemorate and interpret the UGRR. The NTF embraces this creativity, yet it sometimes makes it difficult to determine whether to nominate an organization or activity as a program or facility. For this reason, we encourage applicants to talk with NTF staff prior to beginning the application to discuss the best way to approach the nomination and the best category to submit under.*

- *Combining questions into one, such as evaluation and objectives, would tend to make the single question more complicated. Further, with multiple part questions, there is a tendency for the response to miss answering part of the question and leaving out information.*
- *The NTF has begun compiling supplementary guidance materials addressing common questions and good examples for different questions in the applications.*
- *The NTF has increased the average completion time from 25 hours per response to 40 hours based on feedback received from several individuals as part of our outreach. We believe our updated estimate of 40 hours more accurately reflects the average amount of time required to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.*

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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.

NOTE: *On June 10, 2016, the NPS Privacy Act Officer determined that this program requires a Systems of Records Notice (SORN). We are currently in the process of developing the SORN.*

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 we will receive 37 annual responses totaling 1,401 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 raised the average completion time from 25 hours per response to 40 hours based on feedback received as part of our outreach to recent applicants. We believe our updated estimate of 40 hours more accurately reflects the average amount of time required 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 $50,033 (rounded). We used the below listed rates in accordance with Bureau of Labor Statistics news release USDL-16-1150, June 9, 2016, Employer Costs for Employee Compensation—March 2016, (http://www.bls.gov/news.release/pdf/ecec.pdf) to calculate the total annual burden.

* Individuals. Table 1 lists the hourly rate for all workers $33.94, including benefits.
* Private Sector. Table 5 lists the hourly rate for all workers as $32.06, including benefits.
* Government. Table 3 lists the hourly rate for all workers as $45.23, including benefits.

Activity	Number of Respondents	Number of Annual Responses	Completion Time per Response (Hours)	Total Annual Hours	Hourly Rate with Benefits	$ Value of Annual Burden Hours
Applications						
Individuals	12	12	40	480	$33.94	$ 16,291.20
Private Sector	15	15	40	600	32.06	19,236.00
Government	8	8	40	320	45.23	14,473.60
Partner Request*	2	2	.5	1	32.06	32.06
Totals	**37**	**37**		**1,401**		**$ 50,032.86**

*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 $139,284. This amount represents 20 percent of the current salary and benefits ($696,422) of 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.

Although the number of responses reported for this renewal has not changed, we are reporting an increase of 525 burden hours. The increased number of burden hours is the result of our outreach to applicants who have recently completed an application. We adjusted our average completion time from 25 hours per response to 40 hours (an increase of 15 hours per response) to more accurately represent the average amount of time needed to complete an application.

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.

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.