

**Supporting Statement A
for Paperwork Reduction Act Submissions**

**Archeology Permits and Reports - 43 CFR Parts 3 & 7
OMB Control Number 1024-0037**

Terms of Clearance: None.

A. Justification

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

Section 4 of the Archaeological Resources Protection Act (ARPA) of 1979 (16 U.S.C. 470cc) and section 3 of the Antiquities Act (AA) of 1906 (54 U.S.C. 320302 and 320303) authorize any individual or institution to apply to Federal land managing agencies to scientifically excavate or remove archeological resources from public or Indian lands. Permits for Archeological Investigations ordinarily are requested either for conducting scientific research; in conjunction with statutorily required environmental clearance activities prior to commencing a Federal undertaking; or issuing a Federal license or permit for third party activities such as energy development on public or Indian lands.

ARPA and AA require that Federal land managers issue Permits to qualified applicants and place terms and conditions on the Permits, including reporting requirements, as set forth in the implementing regulations for the two statutes (43 CFR Part 7 for ARPA; 43 CFR Part 3 for the AA) to ensure that the resources are scientifically excavated or removed and deposited, along with associated records, in a suitable repository for preservation. If the Permit is for work on Indian lands, ARPA requires that the Federal land manager place terms and conditions on the Permit as requested by the Indian landowner and the Indian tribe having jurisdiction over the lands. If the Permit may have an effect on a resource on public lands that has Indian tribal religious or cultural importance, ARPA requires that the Federal land manager notify the pertinent Indian tribe for the purpose of developing terms and conditions to be placed on the Permit.

- 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.**

Application – The National Park Service uses Form DI-1926, “Application for Permit for Archeological Investigations” to collect the following information:

- **Name of Applicant and Contact Information** (mailing address, telephone numbers, and email addresses).
- **Nature of Archeological Work Involved** (survey and recordation; limited testing and/or collection; or excavation or removal).
- **Location of Proposed Work** (description of parklands, including best location data, and identification of archeological or cultural resources involved).
- **Time of Proposed Work** (estimated duration of project and estimated duration of fieldwork).

- **Name and Contact Information for Principal Investigator.**
- **Name and Contact Information for Field Director.**
- **Name and Contact Information for Permit Administrator.**
- **Statement of Work:** A description of the purpose, nature, and extent of the work proposed, including research design, methods, curation, collection strategy, and reporting plan.
- **Statement of Applicant's Capabilities:** Evidence of the ability to carry out the proposed scope of work, including detailed information about logistical support and laboratory facilities, with information about location(s) and description of facilities and equipment; organizational structure and staffing; and equipment and staff to be involved in the proposed work.
- **Statement of Applicant's Past Performance:** Organizational history in completing the kind of work proposed, including similar past projects; government contracts; Federal permits previously held, currently in force with effective dates, and currently pending or planned; reports and/or publications resulting from similar work; and any other pertinent organizational experience.
- **Curriculum vitae for Principal Investigator(s) and Project Director(s):** A curriculum vitae or similar resume or summary of education, training, and experience in the kind of work proposed and in the role proposed.
- **Other Authorization:** Written consent by State or tribal authorities to undertake the activity on State or tribal lands that are managed by the park unit, if required by the State or tribe.
- **Curation Authorization:** Written certification, signed by a properly authorized official of the proposed curatorial facility, attesting to the facility's capability and willingness to accept any material remains and associated records generated under the Permit, and capacity and willingness to assume permanent curatorial responsibility for such materials on behalf of the park unit pursuant to regulations for the curation of federally-owned and administered archeological collections ([36 CFR 79](#)).
- **Detailed Schedule of All Project Activities,** including completion of reports.
- **Additional information:** Land managers may also require applicants to participate in consultations with tribal authorities.

The National Park Service uses this information to ensure that:

- Applicant is appropriately qualified.
- Proposed work is for the purpose of furthering archeological knowledge in the public interest.
- Proposed work is not inconsistent with any management plan or established policy, objectives or requirements applicable to the management of the public lands concerned.
- Where the work proposed is on Indian lands, written consent has been obtained from the Indian landowner and the Indian tribe having jurisdiction over such lands.
- Where the work proposed is on public lands, it is determined whether it may have an effect on resources of Indian tribal religious or cultural importance.
- Museum or other institution proposed as the repository is appropriately qualified to preserve the excavated or recovered resources and the associated records.
- Where the work proposed is on public lands, the applicant has certified that within 90 days after submitting the report to the NPS Regional Director, the resources and associated records will be delivered to the approved repository.
- Where the work proposed is on Indian lands and the Indian owner declines custody of

the resources removed, the applicant has certified that within 90 days after submitting the report to the NPS Regional Director, the resources and associated records will be delivered to the approved repository.

Reports - Each permittee must complete a report at the end of the project. The report must be consistent with information in field notes, photographs, and other materials and include:

- Description of the study area.
- Relevant historical documentation/background research.
- Research design.
- Field studies as actually implemented, including any deviation from the research design and the reason for the changes.
- Field observations, including the number of new sites that are discovered and identified sites that are revisited.
- Analyses and results, illustrated as appropriate with tables, charts, photographs, and graphs. Evaluation of the investigation in terms of the goals and objectives of the investigation. Recommendations for updating interpretive and management materials.
- Recommendations for ongoing or proposed treatment activities, such as structural documentation, stabilization, etc.
- Name and location of facility curating material remains and associated records.
- Accession numbers.

National Park Service archeologists review reports to ensure that the archeological work was conducted in accordance with the Permit's terms and conditions. They use the information in the report for cultural resource management purposes (that is, it is incorporated into existing Federal and State archeological inventories and historic preservation plans for the lands concerned). Reports, or the information in them, generally are available to the public through agency interpretation and programs or through the reports themselves.

- 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.**

Information requested in Form DI-1926 and in reports is unique to the applicant and no other source is available. No centralized national administration of the permitting process currently exists. This is because the authority to issue Permits is delegated to each National Park Service region. The relatively low number of Permits issued in any given year for archeological investigations makes the development of a high security, highly controlled electronic system less cost effective than a paper system. The National Park Service Chief Archeologist is exploring centralization of the Permit application system. The NPS Archeology Program is considering making application for a Permit for Archeological Investigations available online through the NPS Research Permit and Reporting System, which would facilitate the ease of permit application submission.

Applications and reports may be submitted via email. Form DI-1926 is available online on the National Park Service website (www.nps.gov/archeology/npsGuide/permits/index.htm).

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.

No duplication occurs. Permit applications and the resulting reports are project-specific and the information is unique to the project. Applicants are encouraged to bundle multiple small projects to be carried out for the same land manager during the same calendar year into one Permit application.

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

To minimize the burden, we request only the minimum information necessary to assess the qualifications of the investigator and merits of the project. The application form is available online and may be submitted via email.

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.

An application is completed prior to the commencement of an archeological project taking place on park land. It is not possible to collect the data in the application less frequently due to the nature of the statutory requirements under ARPA. Failure to collect information from applicants that are requesting permission to conduct scientific research on archeological resources located on park lands would result in the prohibition of such research. If individuals and institutions conduct research without a valid Permit, they are in violation of ARPA sections 6, 7, and 8 (16 U.S.C. 470ee, ff, gg), AA section 1 (54 U.S.C. 320301) and other statutes concerning Federal property. Furthermore, they are subject to criminal and civil penalties as well as forfeiture of personal property and of the resources removed.

Failure to collect information from applicants that are requesting permission to conduct archeological clearances in conjunction with federally-licensed or permitted third party activities (e.g., drill pads, mining, or pipeline right-of-ways), and subsequent failure to issue Permits, would result in the prohibition of the third party activities. If a park superintendent authorizes a third party activity without considering the effects of that activity on the cultural environment, the superintendent is in violation of the amended National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327) and Section 106 of the amended National Historic Preservation Act of 1966 (54 U.S.C. 300101 et seq.). If the authorized activity might destroy or damage important archeological or historic resources pursuant to the Archeological and Historic Preservation Act of 1974 (54 U.S.C. 321502-321505), the Secretary of the Interior is required to recover, or direct the superintendent to recover, the important information about these resources. Ordinarily, the third party activity is temporarily delayed or halted, if it already has begun, until the archeological work is completed. If the appropriate NPS Regional Director or park superintendent authorizes archeological investigations without reviewing an application and issuing a Permit for Archeological Investigations, the Regional Director or park superintendent is in violation of ARPA and the Antiquities Act, as well.

Failure to collect information in a report prevents the appropriate NPS Regional Director from reviewing the adequacy of the work conducted and prevents the park superintendent and the State Historic Preservation Officer from incorporating information about the resources into

existing archeological inventories and historic preservation plans for the lands concerned, affecting stewardship capabilities. It also means that, when the park superintendent needs information about the resources for program planning and management purposes, the manager must conduct duplicative archeological survey and excavation work.

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 circumstances that would cause this information to be collected in ways inconsistent with OMB guidelines.

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 December 19, 2016, we published a Federal Register Notice (81 FR 243) informing the public of our intent to ask OMB to renew approval for this information collection. We

solicited comments for a period of 60 days, ending on February 17, 2017. We did not receive any comments in response to this notice.

In addition to the Federal Register Notice, we attempted to contact nine individuals by e-mail and asked for comments on the collection of information. Of those nine individuals, we received information and comments from eight individuals: three private, two government, and three Federal employees who administer the Permit. Despite multiple attempts via e-mail and phone to contact the remaining individual, we were unable to solicit feedback from that person. The government representative had no prior experience in completing a PAI application form, but the representative's comments were considered.

Position	Affiliation
Department Manager, Impact Assessment & Permitting, DC Metro Environment	AECOM
Cultural Resources Team Leader	Maryland Department of Transportation State Highway Administration
V.P. Media and External Affairs	Bering Strait Native Corporation
Executive Director	Florida Public Archaeology Network University of West Florida
Professor	Cornell University
Archeology and Museum Program Manager	NPS Pacific West Region
Cultural Resources Program Manager	NPS National Capital Region
Regional Archeologist	NPS Alaska Region

Specifically, 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.”

Comments:

- 1.) The information collected is, in my opinion, necessary on which to base approval of an application. The information collected is pertinent, and does not represent an undue burden given the importance of the Permit for the protection of our National cultural heritage.
- 2.) Yes, the information is necessary. It ensures that the work being conducted in the parks meets NPS and industry wide standards. Yes, it does have practical utility not only for the aforementioned reason but also for documenting and noting contact information of investigators. I do not think there are any unnecessary questions. I do not see a need to have a more complicated permit process (i.e., having additional questions).
- 3.) I agree that the collection of the information on the Permit for Archeological Investigations forms are necessary to properly evaluate the qualifications of the applicant. It has practical utility to the extent it allows us to determine the nature of the project, how extensive and potentially damaging it could be, who will all be involved and if we need to reach out to tribes for further consultation.

3.) I think in many cases, it does not create any value or utility. Too often we are completing the Permits for the same agency that we are under contract with and are simply repurposing our approved Scope of Work. It does seem redundant to rework the same scope in a different document to only check a box- especially when the agency has control of the scope and access to the property. I completely agree with process when not working directly for the agency/landowner and then don't have any issues with the questions.

4.) When SHA ((Maryland) State Highway Administration) received a Permit for Archeological Investigations, the collection of information appears excessive. SHA had no need to conduct archaeological investigations on NPS land except in the event of an unanticipated discovery during construction. SHA finds that NPS requiring an ARPA Permit [PAI] for unlikely/unanticipated archaeological sites for construction of our projects is unnecessary. SHA recommends that NPS develop guidelines and expedited process to manage unanticipated archaeological discoveries and avoid construction delays in lieu of requiring an ARPA Permit in advance.

NPS response/Action Taken:

- 1.) No action required.
- 2.) No action required.
- 3.) No action required. Respondents representing cultural resource mitigation companies question the need for a Permit when the firm is contracted by a park unit to conduct the same archeological research. Per ARPA (16 U.S.C. 470cc(a) the park superintendent has the discretion to ask the contractor to obtain the permit independently of details covered within a contract. This is essential for the superintendent to ensure full compliance with ARPA when unique circumstances exist that could place sensitive resources at risk.
- 4.) No action taken. The respondent argues that a Permit should not be required in anticipation of an unanticipated discovery. 43 CFR 7.5 (b) **Permit Requirements and Exceptions** specifies that a Permit is not required for earthmoving excavation for purposes other than archeological until such time that an archeological resource is discovered and archeological excavation is planned. Clarification of guidance and training for archeologists who administer the Permit would identify circumstances when a Permit is needed.

“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?”

Respondents estimated average time to prepare an application was 90 minutes. The range was 30-180 minutes. An average of 45 minutes is spent on phone calls and other communications. The range was 10-90 minutes. The average time to complete and submit the application is 2.5 hours.

The average time for report submission was 60 minutes; the range was 20-120 minutes.

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

Comments:

- 1.) No. The process is appropriate and intuitive.
- 2.) In general, I think the form is fine with exceptions noted below:
 - 2.a) Question 9 (DI Form 1926): I do not see the need for the Field Director name given the ultimate responsible party is the Principal Investigator. The Field Director question can be a challenge at times given the time it can take to get Permits approved. Sometimes with the delays, the Field Director may need to change (i.e., other work occurs during the period and staff adjustments need to be made). I also do not see the need for a resume for the Field Director as requested in Question 11d.
 - Question 11b/c (DI Form 1926): If working for the same agency as contracted, I do not see the need for a summary of organizational capabilities or history of work. It would have been done in the proposal/scope of work to win the contract.
 - Question 11e (DI Form 1926): In general, I fully agree with this requirement. In some cases, the agency has not made a decision about the curation (can depend on the type of resources ultimately recovered).
 - I'd suggest negating the need if done for the same agency/landowner as the one contracting work. For example, if the scope, schedule, and budget for a NPS project are approved by regional NPS staff, negate the need for a Permit.
 - 2.b) Question 10 (DI Form 1926): I do not see the need for a summary of organizational capabilities or history of work. It would have been done in the proposal/scope of work to win the contract.
 - 2.c) Question 11a (DI Form 1926): I do not see the need for a resume for the Field Director as requested in Question 11d.
- 3.) If we are to continue a paper based review and approval system, develop standard fillable pdf forms if not already. However, in the future, I believe that there should be an online permit system to review and execute Permits and deliver/closeout projects—like our current NPS research permit system. This would greatly cut down on review time, reduce paper, and improve organization/tracking of permit information.

NPS response/Action Taken:

- 1.) No action required.
- 2.a) No action required. The respondent questions the necessity for providing background information about a project field director. This information is required by 43 CFR 7.6(b). **Application for permits and information collection.** This section of the regulation identifies specific information to be solicited by the Permit application and lists the individual responsible for conducting the work (i.e. the field director) separately from the individual responsible for carrying out the terms and conditions of the Permit (i.e. the Principal Investigator).
- 2.b) No action required. The respondent questions the necessity for a contracted firm to provide information in an application for a Permit that would have already been provided in a scope of work. If the park superintendent requires that a contracting firm obtain a Permit prior to conducting archeological investigations, then evidence of the firm's ability to initiate, conduct, and complete the proposed work, as demonstrated in the organizational capacities or listing of successful projects, is required by 43 CFR 7.6(b)
- (4). **Application for permits and information collection.**

2.c) No action required. The respondent questions whether a curation agreement is required. 43 CFR 7.6(b)(5). **Application for permits and information collection** requires evidence of a curation agreement. This is an important part of the application, because many parks do not have curation facilities and must transfer materials and records to regional repositories or even to nonfederal facilities. The curation agreement ensures that appropriate arrangements have been made.

2.d) No action required. The respondent argues that a Permit should not be required when a cultural resource mitigation firm is contracted by a park unit to conduct archeological research. Per ARPA (16 U.S.C. 470cc(a) the park superintendent has the discretion to ask the contractor to obtain the Permit independently of details covered within a contract. This is essential for the superintendent to ensure full compliance with ARPA when unique circumstances exist that could place sensitive resources at risk.

3.) The National Park Service Chief Archeologist is exploring centralization of the Permit application system. The NPS Archeology Program is considering making application for a Permit for Archeological Investigations available online through the NPS Research Permit and Reporting System, which would facilitate the ease of permit application submission.

“Any ideas you might suggest which would minimize the burden of the collection of information on respondents?”

Comments:

- 1.) No—there is really little burden.
- 2.) Yes, develop an online ARPA permit submission and review system.
- 3.) SHA [State Highway Administration] recommends that NPS either develop guidelines, immediately expedite Permits in the event of an inadvertent discovery, or work with SHA on a template or agreement statewide that could be used for Permit compliance should unanticipated discoveries occur in lieu of requiring an archaeological recovery permit for construction that is not expected to affect archaeological sites.
- 4.) Do away with requirement for permit if work done for same agency as approved the contract scope of work.

NPS response/Action Taken:

- 1.) No action required.
- 2.) No action required. The Chief Archeologist will explore the possibility of incorporating the Permit for Archeological Investigations application into the NPS Research Permit and Reporting System. Initial conversations indicate, however, that there will be significant costs to doing so, which may not be justifiable, given the relatively low volume of Permit applications annually.
- 3.) Action required. The NPS Archeology Program will review, possibly revise, and disseminate guidelines to appropriate NPS personnel regarding ARPA responsibilities and inadvertent discoveries.

4.) No action required. Per ARPA (16 U.S.C. 470cc(a)) the park superintendent has the discretion to ask the contractor to obtain the permit independent of details covered within a contract. This is essential for the superintendent to ensure full compliance with ARPA when unique circumstances exist that could place sensitive resources at risk.

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.

We do not provide any assurance of confidentiality.

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 100 responses totaling 176 (rounded) annual burden hours. We estimate the dollar value of the burden hours is \$8,937.28.

Based on information received from NPS archeologists, we estimate that 50 applicants will each submit an application and a report annually totaling 100 (50 x 2) annual responses. We estimate that 85 percent of the applications will be private (cultural resource management companies and scholarly research); 13 percent of the applications will be from government

entities (tribal, state, and local); and less than 2 percent will be from independent researchers.

In accordance with the Secretary of the Interior’s Guideline for Archeological Documentation, the principal investigator is an archeologist who customarily has attained a Master’s Degree or higher. We used the Bureau of Labor Statistics, Occupational Employment and Wages, May 2016, [table 19-3091 Anthropologists and Archeologists](#), to obtain the mean hourly wage for an archeologist, which is listed as \$31.94. To calculate benefits, we multiplied this rate by 1.59 in accordance with Bureau of Labor Statistics news release [USD-17-10770](#), June 9, 2017, Employer Costs for Employee Compensation—March 2017, resulting in a cost factor of \$50.78. We used this rate for all non-Federal respondents.

Activity	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden Hours	Total Dollar Value of Annual Burden Hours (\$50.78 per hour)
Form DI-1926, “Application for Permit for Archeological Investigations”				
Private	43	2.5 hours	108*	\$5,484.24
Individual	1	2.5 hours	3*	\$152.34
Government	6	2.5 hours	15	\$761.70
Reports				
Private	43	1.0 hour	43	\$2,183.54
Individual	1	1.0 hour	1	\$50.78
Government	6	1.0 hour	6	\$304.68
Totals	100		176*	\$8,937.28

*Rounded

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 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 National Park Service to administer this information collection is \$10,830. National Park Service staff review applications for feasibility, compliance, and compatibility with the purpose of the park unit. Reports are reviewed to ensure that the archeological work was conducted in accordance with the Permit's terms and conditions. Review times can vary depending on the complexity of the project. We estimate that 2 hours is the average time to review an application and 2 hours is the average time to review a report.

NPS archeologists spend an estimated 175 (50 x 4) annual burden hours reviewing applications and reports. Grades of most archeologists range from GS-11 to GS-14. We used GS-12/step 5 as the average rate for employees Nationwide administering this collection. To determine average hourly rates, we used Office of Personnel Management Salary Table [2017-RUS](#) as an average nationwide rate for a GS-12/5 as \$34.06. We used the Bureau of Labor Statistics news release [USD-17-0770](#), June 9, 2017, Employer Costs for Employee Compensation—March 2017, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.59 to obtain a fully burdened rate of \$54.15.

Activity	Number of Responses	Time Spent on Information Collection	Total Hours	Total Cost (\$54.15/hr)
Application Review	50	2 hours	100	\$5,415.00
Report Review	50	2 hours	100	\$5,415.00
Totals	100	2 hours	200	\$10,830.00

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

Prior to 2017 the National Park Service reported the burden and costs for all agencies using the DI-1926 application form. Starting in the 2017 request, the National Park Service is only reporting the anticipated burden and costs for their bureau. The application form DI-1926 is converted to a defined "Common Form" that other agencies may utilize, but must independently report their own associated burden and costs to OMB.

We are reporting 100 estimated average responses totaling burden hours annually for this information collection for the National Park Service.

The time required to review a report increased from 30 minutes in 2014 to 2 hours in 2017. The reason for this is because the complexity of permitted field work within NPS has trended

upward since 2014 and the associated reports are more elaborate, requiring more time to review.

- 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.**

There are no regular venues for publication of data resulting from investigations carried out under Permits for Archeological investigations.

- 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.

- 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.