

1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Procedures for State, Tribal, and Local Government Historic Preservation Programs, 36 CFR 61 OMB Control Number 1024-0038

Terms of Clearance: None.

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

The National Historic Preservation Act (54 U.S.C. 300101 et. seq.) established the programs and 36 CFR 61 further defined the programs for which NPS created the information collections in this Supporting Statement. The programs relating to these information collections have been in operation for at least 20 years.

The Act does not require State, tribal, or local governments to participate in these programs. Those that do participate must meet certain requirements to maintain their eligibility for the programs and the associated funding.

- Section 2 of the Act (54 U.S.C. 300101) provides the declaration of policy of the Federal government with regard to historic preservation.
- Section 101(b)(2) of the Act (54 U.S.C. 302302) requires the Secretary of the Interior to periodically evaluate each State's historic preservation program to make a determination as to whether or not it is in compliance with the requirements of the Act.
- Section 101(b) of the Act (54 U.S.C. 302301 et seq.) outlines the specific standards that the States must meet in order to obtain such approval.
- Section 101(c)(1) (54 U.S.C. 302502) requires that each approved State program must provide for a mechanism for the certification of local governments.
- Pursuant to Section 101(d) (54 U.S.C. 302701 et seq.) of the Act, federally recognized Indian tribes, after agreement with the NPS, may assume responsibilities specified in Section 101(b)(3) (54 U.S.C. 302303) and therefore use related information collections.
- Section 101(a)(7)(C) (54 U.S.C. 302107(3)) and Section 101(b)(1) (54 U.S.C. 302301) of the Act authorize the Secretary to revise or promulgate regulations implementing these approval and certification processes.
- Section 101(c)(1)(E) (54 U.S.C. 302503(A)(5)) requires that each certified local government (CLG) satisfactorily perform the responsibilities delegated to it under the Act.
- Section 101(b)(3)(A) of the Act (54 U.S.C. 302303 (b)(1)) requires each State to survey for historic resources and maintain an inventory of such properties.
- Sections 101(b)(3)(E), (F), and (I) of the Act (54 U.S.C. 302303(b)(5)-(7)) require participating States to cooperate with, consult, and advise Federal agencies in meeting Federal agency responsibilities under the Act. The short-hand terminology for this process is "Review and Compliance" because States assist Federal agencies in part by reviewing Federal work, undertakings, etc., for compliance with Federal responsibilities under the Act. NPS carries out the authorities that these sections of the Act assign to the Secretary of the Interior.
- Section 108 of the Act (54 U.S.C. 303101 et seq.) created the Historic Preservation Fund (HPF) to support activities that carry out the purposes of the Act.
- Section 101(e)(1) of the Act (54 U.S.C. 302902(a)) requires the Secretary of the Interior to administer a program of matching grants to the States.

- Sections 101(d) (54 U.S.C. 302701 et seq.) and 101(e) of the Act (54 U.S.C. 302902(a), 302903(a), 302904-302908) direct a program of grants to Tribal Historic Preservation Offices (THPOs) for carrying out their responsibilities under the Act. Each year, Congress directs NPS to use part of the annual appropriation from the HPF for the State grant program and the tribal grant program. The purpose of both the HPF State grants program and the HPF THPO grants program is to assist States and tribes in carrying out their statutory role in the national historic preservation program.
- Section 103(c) (54 U.S.C. 302902(c)(4)) requires that States pass at least 10 percent of their annual grant award through to CLGs.
- Section 102(a)(4) of the Act (54 U.S.C. 302902(b)(1)(B)) gives the Secretary the authority to require reports from grantees.
- Section 101(b) (54 U.S.C. 302301 et seq.) mandates that State staff include qualified historic preservation professionals and describes the responsibilities of each State Historic Preservation Officer.
- Section 102(a) (54 U.S.C. 302902(b)(1)(A)) mandates that no grants to States may be awarded unless the application is in accordance with the State-wide historic preservation plan. These program-specific statutory mandates (in combination with government-wide grant requirements and restrictions) form the basis for determining which activities are eligible for HPF grant support.

Each State and tribe approved and local government certified under these requirements is eligible to receive grant assistance. 36 CFR 61 details the processes for approval of State and tribal programs, the certification of local governments, and the monitoring and evaluation of State and CLG programs in a manner that ensures the propriety of the uses of this Federal assistance. NPS intends the provisions of 36 CFR 61 to meet minimum standards and requirements that the Act established without imposing additional or unwarranted burdens on States, tribes, or CLGs. None of these information collections are unfunded mandates. Congress appropriates monies annually from the HPF for distribution to the States and territories and tribes, and States pass through HPF grant funds to CLGs.

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, other Federal agencies, State, Tribal, and local governments, public and private organizations, and individuals use – to varying degrees – the data from these information collections to evaluate whether or not State, tribal, and local governments meet minimum standards and requirements for participation in the national historic preservation program and to meet requirements for related grant programs. The decision by a State, tribal, or local government to seek approval, certification, or funding is voluntary, but completing the information collections is required to obtain the benefits of participation.

The NPS may use the information in part (in accordance with an apportionment formula) to determine the amount that each State and territory is to receive from the HPF appropriation in the next fiscal year. We also use data from these information collections in reports on the grant program’s accomplishments, budget documents, and other NPS and Department of the Interior’s documents.

State, tribal, and local government partners use the information collections to demonstrate their eligibility for grant support, to document their compliance with statutorily-mandated responsibilities for historic preservation offices, to plan for and report on their historic preservation performance, and to demonstrate their contributions to the Federal-State-tribal-local national historic preservation partnership. Information related to program capability and to program achievements in the identification, evaluation, registration, and protection of irreplaceable historic and prehistoric resources is used by the general public and by

decision makers at all levels of government to assess the success of historic preservation programs everywhere.

Most of the information collection requirements remain unchanged from our previous submission.

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.

For most of the information collections that this supporting statement describes, there is no compulsory, paper-based requirement, but States and Territories are required to submit reports and projections using Historic Preservation Online. However, due to limitations of the online system at this time some information must still be submitted hard copy. The information collections that are not grants-related do not produce data that States, tribes, or local governments send routinely to the NPS. For these information collections, we give each State, THPO, and CLG the latitude to use whatever technological collection techniques make sense in its legal, organizational, and information technology environment. Consequently, Government Paperwork Elimination Act (GPEA) requirements are met for those information collections. Even where we do require a hard-copy document because of a signature requirement, we have attempted to put the spirit of GPEA into effect. Like all Federal grant programs, the Historic Preservation Fund State Grants program and Tribal Grants Program are committed to the government-wide “E-Grants,” “Grants.gov,” and similar initiatives. As soon as the electronic signature issues can be solved, the HPF State and Tribal Grants programs will convert hard copy requirements to electronically accessible solutions.

At their option, an increasing number of States ask/allow their Certified Local Governments (CLGs) to provide their State-required annual reporting via electronic mechanisms or on-line data bases.

For the reporting of CLG achievements to NPS, we allow States/CLGs to report via a range of electronic mechanisms (e.g., Google forms, online data entry). In the last round of reporting we tested a fillable spreadsheet as an option for reporting on CLG achievements.

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.

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

For many years, we have implemented a policy of not asking for information from States (for example) that they have already provided for another purpose. For example, as a part of the annual grant application, we ask States to estimate the number of National Register nominations that they will submit and the number of Federal historic preservation tax incentive applications they will process. In the End-of-Year Report on the actual accomplishments in these areas, we get the data from our fellow NPS programs. We do not ask the States to provide this information.

Since our last collection approval, we determined that there was overlap in the State Application process between the Anticipated Activities List and the In-house Activities portion of the Project Activity Database Report. Consequently, we eliminated the requirement for every State to submit the Anticipated Activities List.

We have similar reductions in burden in the Certified Local Governments (CLGs) program. As we mentioned earlier we give a lot of flexibility to States on how to run their CLG programs. That said,

more and more States include the questions that we ask for the CLG annual achievement reports into the reports that the States require (but we don't) as a part of their CLG monitoring responsibilities. CLGs in those States only have to report on achievements once each year.

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

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

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

We must collect this information in order to ensure that State, tribal, and local governments meet the specific requirements and standards that the Act established and to ensure the proper conduct of Federal assistance activities. For grant-related information collections, we follow the frequency requirements that OMB issues

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- * **requiring respondents to report information to the agency more often than quarterly;**
 - * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - * **requiring respondents to submit more than an original and two copies of any document;**
 - * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - * **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - * **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The only special circumstance that is inconsistent with OMB guidelines is the timeframe for the retention of each State's inventory on its historic resources, which by its nature requires retention longer than 3 years. Maintenance of the State inventory is a requirement of the Act [54 U.S.C. 302303(b)(1)].

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 July 26, 2017, we published in the *Federal Register* (82 FR 34688) a Notice of our intent to request that OMB approve this information collection. In that Notice, we solicited comments for sixty (60) days, ending on September 25, 2017. We did not receive any public comments in response to that Notice.

The NPS consults with all States several times annually either directly at regularly scheduled meetings of SHPOs or through officials of the National Conference of State Historic Preservation Officers, which represents the interests of the States. These consultations serve as opportunities for the States to provide suggestions and comments on the availability of data, information items required, the clarity of instructions, etc. Similar consultations have taken place with tribes and local governments both individually and through their national organizations (the National Association of THPOs and National Alliance of Preservation Commissions). CLGs also have the ability to communicate with us through their SHPOs.

For this renewal, we consulted with a small sample of States, THPOs, and CLGs to determine the current burden in terms of time. No more than nine individuals were consulted for each unique reporting role. We used an average of the responses to generate our burden estimates in item 12. Note that because no State Program Reviews have occurred in the last 3 years, we did not make new inquiries about the burdens associated with that information collection requirement. Because there have been no significant changes in most of these information collections since the last OMB approval, if we received no responses or if responses indicated a lack of understanding of the survey questions, we used the time burden estimates from the previous submission and updated the dollar cost burdens.

State Historic Preservation Officer (SHPO) Contacted	
Name	Affiliation
SHPO	Oklahoma
SHPO	Kansas
SHPO	Alabama
SHPO	South Carolina
SHPO	District of Columbia
SHPO	Oregon
SHPO	Missouri
SHPO	Colorado
SHPO	Maryland

Tribal Historic Preservation Officers (THPO) Contacted	
Name	Affiliation
THPO	Blackfeet Tribe
THPO	Blue Lake Rancheria
THPO	Confederate Tribes of Colville
THPO	Forest County Potawatomi
THPO	Lower Sioux
THPO	Menominee
THPO	Red Cliff
THPO	Suquamish
THPO	Swinomish

Certified Local Government (CLG) Staff Contacted	
Name	Affiliation
CLG Staff	Georgetown, TX
CLG Staff	Nashville, TN
CLG Staff	Houston, TX
CLG Staff	Dallas, TX
CLG Staff	Annapolis, MD
CLG Staff	San Francisco, CA
CLG Staff	Montgomery County, MD
CLG Staff	Florence, CO
CLG Staff	Spokane, WA

State Coordinator for Certified Local Government (CLG) Staff Contacted	
Name	Affiliation
State Coordinator (CLG)	Oklahoma
State Coordinator (CLG)	Kansas
State Coordinator (CLG)	Indiana
State Coordinator (CLG)	South Carolina
State Coordinator (CLG)	Colorado
State Coordinator (CLG)	Oregon
State Coordinator (CLG)	Missouri
State Coordinator (CLG)	Maryland
State Coordinator (CLG)	Alabama

Specifically, in addition to burden estimates, we asked for comments on:

1. 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?

Comments:

- HPF Online Application: I don't have any major issues in this area. The Cumulative Products Table (CPT) information can be a little tedious to gather, I have to contact other units in the office to gather the information and that can be time consuming. All of the requested information is gathered and tracked by our office so providing the information is not an issue. Other Application Documents: No issues in this area, pretty straight forward. HPF Online Closeout/EOY: I have been administering the HPF grant for 5 years

now and always have problems with the Non-Federal Matching Share Report. I think clearer instructions/examples might be helpful. No issues with the PADB, carry over, and success stories

- NPS Response: The End-of-Year Report for FY 2016 should be easier with regard to sources of nonfederal matching share. Within the last year, we have changed how we ask States to report on matching share. Instead of asking States to report in a single form to matching sharing contributed during the year to both active grants, we only ask States to report on the single grant whose second year of authority just ended.
- One of the hardest numbers for us to determine each year for the Cumulative Products Table is the area surveyed (hectares). For archeological survey projects that information is usually handy, but for individual homes, commercial properties, farms, etc. that are added to the inventory that information is not easily gathered. There may be hundreds or thousands of new properties added to our online database each year. We tend to make a sweeping generalization for those that is likely way off base. For HPF-funded grants for survey we do ask for acreage of the survey area, but there are usually many more inventory records entered by private citizens, state or federal agencies, or even staff where the acreage of the surveyed property is not necessarily recorded. Even if the area was recorded, the information wouldn't be accessible through simple report.
 - NPS Response: Most States use a unit of measure that is convenient for them and then convert to hectares to report to NPS. NPS provides the conversion ratio. An Executive Order directing the Federal Government to convert to the decimal system is the source of the hectares requirement. That said, few Federal programs seem to follow that E.O., so NPS plans soon to replace the hectares requirement with another unit of area measure.
- I think it is necessary. The requisite information isn't hard to track. We use it to evaluate performance, to compare ourselves with other states (see how we rank nationally), as well as to request funding from our General Assembly
 - NPS Response: No response needed
- Let me eliminate those things that I think are necessary and either do not take up much time for me (probably no more than 1-2 hours per item, aside from monitoring and evaluation which take anywhere from 5-45% of time depending on the staff member) or that we find to be an acceptable use of our time because of the information gathered and have no other questions or comments specific to them. Those things would include the PADB – subgranted activities – update/close; Carryover Statement; State Inventory Maintenance; CLG Monitoring; and CLG Evaluations.
 - **The PADB In-house Activities**

This has always seemed like a redundancy that is unnecessary. The information provided in what we do for the most part if provided in the Cumulative Products Table actual numbers. Also, the information rarely, if ever, changes. There may be the occasional difference, but nothing that is worth re-entering and closing out every single year. Additionally, I have never understood why I close out this portion 9 months before it's even complete. This only takes me about 30 minutes to input and/or close out; however, I think a better alternative for this, since I would assume most inhouse projects are the same, would be to have this a one-time input that stays as-is unless something changes, at which time the state can edit it as necessary. If you are not using this information in any way, then I think it is wholly unnecessary.

 - NPS Response: The major in-house activities should provide context to the numbers that appear in the Cumulative Products Table. For example, a major in-house activity might be to promote surveys in a part of the State which hasn't been surveyed for 40 years and which will be facing

significant development decisions. These surveys will allow decision makers to make informed decisions. “Area Surveyed” and “Properties Added to the State Inventory” figures in the Cumulative Products Table do not convey that sort of useful information. Major activities within the required program areas should change or expand each year. If a State’s reported major activity in Survey and Inventory, for example, is “to conduct its survey and inventory program,” that misses the point of the information collection and should have been noted as such. That said, there was a significant overlap between the Anticipated Activities List and the planned Major In-house Activities. Consequently, NPS eliminated the requirement for an Anticipated Activities List with each application.

o **Cumulative Products Table – Projections & Actuals**

This [projections] is completely unnecessary and is most often made up numbers based on hopes, wants, and the possibility of something happening (such as a subgrant being signed and completed). The actual numbers are far more useful. The two combined are the *most* time consuming item for our staff as a whole. From start to finish, this process can take upwards of 40 hours because it involves numerous staff members and the final coordination of data and then online input. Also, the use of hectares for the survey areas is painful at best. Most of the people providing the numbers have only acres in reports, and they are historians/archaeologists and not mathematicians. In short – no more projections, please – you will get the information when we put in the subgrant details.

- NPS Response: It is a government-wide requirement for each grantee to inform the grantor agency what the applicant plans to do with the money awarded and at the end of the year what was actually accomplished with that money. The products that NPS includes in the Cumulative Products Table track the statutory requirements for State Historic Preservation Officers. The planned accomplishments should not be guesses or hopes. They should be based on recent history modified by a professional knowledge of what is going on in the State. See the comment above on the hectares issue.

o **State Organization Chart and Staffing Summary & State Staff and Review Board Certification**

Although these are clearly necessary for NPS purposes, the repetition of doing this every year when there have been no changes seems unnecessary as well. I think it would be most helpful to states to have an option online during the application process to click “No changes to staff” and “No changes to review board.” If there are no changes, no new org chart or certification is necessary. Having the area whereby the person inputting the information must click to continue by stating no changes will eliminate states forgetting staff changes (in most instances) so that if they don’t check it, they must upload new documents.

- NPS Response: NPS will consider this idea but would require additional funding to make online changes.

o **State Sources of Nonfederal Matching Share Report**

From my standpoint as the only person who does this, this is my single-most time-consuming process. If this information is not being used for reports or useful to NPS at all, I wouldn’t do it anymore. We only refer to the match as a total and rarely as a breakdown for our own purposes.

- NPS Response: NPS uses all of the information that we request. This report allows us to track on a national basis, for example, how much

State governments provide to their programs, the level of support that Certified Local Governments provide, which States have been successful in getting/using more rare types of match (useful for technical assistance), etc.

O Success Stories

Are these being used? If not, get rid of this. Our former Deputy SHPO never knew what to write because it was such a broad request. I think a better option would be to decide what information NPS wants to focus on for that year and ask the states to provide success stories specific to that (preservation plans, design guidelines, activities for children, etc.), if applicable. If they didn't do anything related to that, they would not provide a success story. This was very time consuming for the staff member who had to provide this information as it involved coordinating with multiple other staff members as well. Unnecessary when we never saw the information used for anything. Ideally, you would make suggestions for projects you'd like to highlight with the success stories in the annual grant application – not demands but just “This year, NPS would like to focus on activities for children related to historic preservation. In the end of year reports for 2019, our success stories will be all about this. Put your thinking caps on and see what projects you can bring to life!”

- **NPS Response:** NPS does use these success stories to describe the work accomplished by the HPF funding, including in the annual HPF report. NPS also uses these stories as a cross-check on other parts of the End-of-Year Report. For example if a success story was a big survey, numbers reflecting that survey should also appear in the Cumulative Products Table. NPS prefers to find out what each State thinks is important among its accomplishments each year. This gives us a wider pool from which to identify and share innovative activities. We will consider asking especially, but not exclusively, for examples relating to particular topics.

O Statewide Historic Preservation Plan

The information is useful to some extent; however, I don't know that in my fifteen years that I have really seen much of the public really read it or pay much attention to it. The process for public input is long and arduous and results in virtually no response, no matter which medium we use (newspaper, online, in person, etc.). The process for updating the state plan takes over a year, and although it's a nice little book, we've found ourselves printing less and less as we give away fewer and fewer...and our website traffic doesn't indicate they are opting to review it online.

- **NPS Response:** Other States do not have a similar experience. Many States use the process used in developing the Plan to demonstrate how widely the State consulted in identifying the historic preservation needs and developing the goals and objectives for the State. Many States use the Plan to explain what their program is all about to the public/decision makers who don't know much about the program. NPS does not require that States print their Plans.

O Local Government Certification Application

I would think this is necessary? What might be helpful to the states would be the ability to upload all required documentation to a website requesting certification. It would be set up similar to the [grants.gov](https://www.grants.gov) in that it would give you conformation of receipt for documentation purposes, but with minimal staff in multiple locations (SHPOs and NPS), the potential for lost paperwork on a desk seems much greater, and this speeds up the digitization of records

significantly.

- NPS Response: We do not have the funding to create such a system at this time. We do accept applications in electronic format via email.

o **Baseline Questionnaires for CLGs**

The process to obtain this information was painful as we had to coordinate with the CLGs, many of whom are not the most responsive. It would not have been any easier had we allowed NPS to request the information. Many of the CLGs didn't understand why they were providing the information, and from a state standpoint, we weren't certain how the information provided was ever being used.

- NPS Response: NPS explains the purpose of gathering this information with every request. It is important to be able to explain and give credit to the accomplishments of our local partners outside of HPF-funded activities. It is also an excellent quality control device for the Certified Local Government (CLG) program. If a CLG can't get ready access to (or doesn't know) how many historic properties there are in local historic districts and landmarks, there is a systemic problem with that CLG that the State needs to evaluate and monitor information. This information is posted on the NPS public-facing CLG website. The response is also voluntary.

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

Comments:

- The most confusing issue is the difference between "inventory" and "local register." I'm not sure how we clarify this in more detail, but attempting to explain that inventory is the properties that a Commission learned information about through survey or nomination - both eligible and non-eligible - and that the local register is the designated properties takes time and effort each year
 - o NPS Response: This is a common problem. NPS has improved the guidance on this issue in the guidance to the CLG Annual Accomplishments Report and the Baseline Questionnaire. NPS welcomes suggestions.
- It would be nice if we could submit everything at one place instead of emailing part of it and then entering the remainder in the database.
 - o NPS Response: Currently we do not have permission to use electronic signatures for the grant documents thus those must still be submitted separately. This is a future hope but will require funding that we do not currently have.
- Under the Cumulative Products Table, it would be helpful to have some clarifying definitions or guidance in the Development, Acquisition, and Covenant report on what to include under the sections asking for number of predevelopment projects reviewed. Since federal tax credit projects and federal R&C projects are reported separately, I've always assumed that those should not be included in the DAC report. We do include state tax credit review, state-funded grant reviews, and state law reviews. Other parts of the Cumulative Products Table might be enhanced with some guidance on what projects or numbers to include too.
 - o NPS Response: Good suggestions. We will study and accommodate these ideas so as to be ready for implementation prior to our next ICR renewal.
- It would help if states could access old years in the HPF online (i.e. old success stories, cumulative products tables, etc.). That way we could run trends—like for our 50 year anniversary, we could see how many 106 projects we reviewed over a certain period, etc. It also would help if the system allowed states to run reports and even comparisons

between states on data (once it has been approved). That would increase the functionality and utility. It would also help to clarify how the NR nominations are counted (it looks like we are counting both districts AND all of the individual buildings in a district). Is that right? Isn't that double counting? Why do we use hectares and not acres? We would prefer acres.

- NPS Response: Our planned update to HPF On-Line should solve the old reports issue. See the earlier response on the hectares issue. NPS uses the information on types of National Register listings and the expected number of contributing properties in those listing for different purposes so it is not double-counting.

3. Any ideas you might suggest which would minimize the burden of the collection of information on respondents.

Comments:

- To operate the programs at even a minimal level, I feel these reporting requirements are necessary and not over burdensome
 - NPS Response: No response is needed
- Nothing at this time other than clearer instructions and forms. I work with grants all of the time and I know that collecting requested information can be time consuming.
 - NPS Response: No response is needed
- I know all states do things a bit differently, but having examples are really helpful. Some of the examples that NPS provided in their training webinars are very helpful, especially slides that show which cells in the reports should match (example below). I'm not sure if those kinds of examples can be incorporated into HPF online, but any kind of visual guidance would be helpful
 - NPS Response: This is a useful suggestion. For HPF On-Line and for the HPF Grants Manual there is always a balance needed between having enough helpful examples and making the guidance succinct and uncluttered. A periodic reexamination of this issue is worthwhile.
- More universal electronic systems—like e-106's, e-architectural survey databases, etc. Newer systems contain reporting features that reduce human error and increase the ways we can use the information
 - NPS Response: We do have universal systems for most of the grant related data we collect but each state is allowed to set up their own systems.

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

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

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

We make no assurance of confidentiality. The only exception is for location information concerning some properties included in the State inventories. Pursuant to Section 304 of the National Historic Preservation Act (54 U.S.C. 307103), release of information is tightly controlled when such release could have the potential of damaging those qualities that make a property historic.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. 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.**

There are approximately 2,229 respondents (59 States, territories, and District of Columbia; 170 tribal governments; and 2,000 certified local governments) for these information collection requirements. We estimate that we will receive 43,108 responses totaling 40,761 burden hours (rounded). We based our estimates on our experience in administering this collection and the results of our outreach. Completion times vary greatly depending on complexity. For each requirement, we averaged the completion times provided during our outreach and rounded.

We estimate that the dollar value of the annual burden hours is \$1,958,973.66 (40,761 hours x \$48.06). We used the below listed rate in accordance with Bureau of Labor Statistics news release [USDL-17-1222](#), September 8, 2017, Employer Costs for Employee Compensation—June 2017, to calculate the total annual burden. We used Table 3 of the Bulletin (State and Local Government Workers) which lists the hourly wage plus benefits for all workers as \$48.06.

Activity	Annual Number of Responses	Completion Time Per Response (Hours)	Total Annual Burden Hours (rounded)
HPF Online (State Project/Activity Database Report - Projections)	59	5.25	310
HPF Online (State Cumulative Products Table - Projections)	59	2.63	155
State Organization Chart and Staffing Summary	59	1.5	89
State Staff and Review Board Certification (mistakenly not reported last cycle).	59	2.5	148
HPF Online Closeout/EOY (State Sources of Non-Federal Matching Share Report)	52	2.25	117
HPF Online Closeout/EOY (State Cumulative Projects Table – Actuals)	59	10.5	620
HPF Online Closeout/EOY (State Project/Activity Database Report – Actuals)	59	2.5	148
HPF Online Closeout/EOY (State	59	5	295

Project/Activity Database Report – subgranted activities			
HPF Online Closeout/EOY (Carry-Over Statement)	53	.5	27
HPF Online Closeout/EOY (State Success Stories – Detailed)	59	5.5	325
State Inventory Maintenance	10,856	.25	2714
State Technical Assistance to Federal Agencies (Review and Compliance)	24,603	.25	6151
Statewide Historic Preservation Plan	14	166 ¹	2324
State Project Notification	59	6	354
State Final Project Report	59	5.5	325
State Significant Preservation Accomplishments Summary	25	2.25	56
Local Government Certification Application/Agreement (State)	30	18.5	555
Local Government Certification Application/Agreement (CLG)	30	15	450
Certified Local Government Monitoring (State)	2000	5	10,000
Certified Local Government Monitoring (CLG)	2000	2	4,000
Certified Local Government Evaluations (State)	500	5	2,500
Certified Local Government Evaluations (CLG)	500	4	2,000
Baseline Questionnaire for Certified Local Governments (State)	250	.75	188
Baseline Questionnaire for Certified Local Governments (CLG)	250	2	500
Annual Achievements Report for Certified Local Governments	1000	2	2000
Reporting and Quality Control Requirement - Tribal Historic Preservation Office (THPO) Grants Product Summary	170	10	1700
Reporting and Quality Control Requirement - Tribal Historic Preservation Office (THPO) Annual Report	170	8	1360
State Program Review	15	90	1350
TOTAL	43,108		40,761

¹ Includes hours for public engagement, data and resource analysis, plan design and writing, and for publishing/posting.

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**

¹ Includes hours for public engagement, data and resource analysis, planning, design, and writing, and publishing and posting.

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 cost burdens to respondents. This results in a decrease of \$90,836 compared to the last reporting cycle.

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 total annual cost to the Federal Government is approximately \$205,542 (rounded). We used the Office of Personnel Management Salary Table [2017-DCB](#) to determine hourly wages. We have used the hourly wage of a GS-11, step 5 (\$36.12) as the average combined wage for all who perform work associated with these requirements (Clerical/Unskilled, Skilled/Technical, Professional Managers, and Executives). To calculate benefits, we multiplied the hourly rate by 1.59 in accordance with Bureau of Labor Statistics news release [USDL-17-1222](#), September 8, 2017, Employer Costs for Employee Compensation—June 2017, resulting in an hourly cost factor of \$57.43 (rounded).

Salary Costs \$205,542 (rounded) + Operational Expenses \$103,200 = \$308,742

Activity	Annual Number of Responses	Total Annual Hours Spent	Total Annual Government Salary Costs (\$57.43/hour)
Historic Preservation Fund Online Application	59	70	\$5,685.57
<ul style="list-style-type: none"> • PADB in-house activities • Cumulative Products Table – projections 	59	29	
State Organization Chart and Staffing Summary	59	14.75	\$847.09
State Staff and Review Board Certification	59	9	\$516.87
Historic Preservation Online Closeout/EOY	52	13	\$9,131.37
<ul style="list-style-type: none"> • State Sources of Non-Federal 			

<ul style="list-style-type: none"> • Matching Share Report • Cumulative Products Table - actuals • PADB – in-house activities – update/close • PADB – subgranted activities - update/close • Carry over statement • Success Stories 	59	14.75	
	59	44.25	
	59	59	
	53	13.25	
	59	14.75	
State Inventory Maintenance	0	0	\$0.00
State Technical Assistance to Federal Agencies (Review and Compliance)	59	59	\$3,388.37
Statewide Historic Preservation Plan	14	126	\$7,236.18
State Project Notification	59	59	\$3,388.37
State Final Project Report	59	59	\$3,388.37
Annual Achievements Report for States (Accomplishments under State Law)	25	4.25	\$244.08
Local Government Certification Application	30	30	\$1,722.90
Certified Local Government (CLG) Monitoring	0	0	\$0.00
Certified Local Government Evaluations	50	50	\$2,871.50
Baseline Questionnaire for CLGs (Accomplishments Under Local Law)	250	38.5	\$2,211.06
Annual Achievements Report for CLGs (Accomplishments Under Local Law)	1000	151	\$8,671.93
Tribal Historic Preservation Office (THPO) Grants Product Summary	170	25.5	\$1,464.47
THPO Annual Report	170	85	\$4,881.55
State Program Review	15	2610	\$149,892.30
TOTAL	2478	3579	\$205,541.97

Operational Expenses: \$103,200

- \$25,000 HPF Online system maintenance
- \$600 Adobe software
- \$77,600 State Program Review (on-site review)

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

We are requesting 43,108 responses totaling 40,761 hours and a decrease of \$90,836 to \$0 non-hour burden costs for respondents for this information collection. The total annual non-hour burden cost for this information collection for respondents, primarily for photocopying, mailing, office supplies, travel expenses, has been eliminated due to online reporting and revised reporting requirements.

Most of our information collections have not changed significantly since the last approval. Consequently, the changes in burden estimates for completing a single item are largely due to surveying different people for this justification. This will be true for every cycle. Similarly, an increasing number of participating CLGs and THPOs will continue to push up the total burden estimates. There is another factor always at work in computing total burden estimates; large multipliers. For example, even a small change in the

burden associated with add a survey record to a State's inventory will always have a big impact on national totals because of the large number of properties added each year to State inventories.

We are reporting as a program change a net decrease of 13,572 responses, a net decrease of 17,488 annual burden hours for respondents as follows:

- Decrease of 30 responses and 5.75 burden hours per respondent associated with the State Anticipated Activities List. This list has been removed as a requirement due to its overlap with data reported and produced in the Project Activity Database (PADB) – in house activities.
- Total burden has decreased due to more availability of new reporting options such as Google forms, web reporting, and an online information system: Historic Preservation Fund Online.
- We have reduced the burden of the project notification and final report collection by only requiring it when National Historic Landmarks (NHLs) are affected by a subgrant. Previously, subgrants over \$25,000 also required a project notification and final report. This means information is only required on the more complex projects that involve NHLs and not on projects of a more simple nature.

We are reporting as an adjustment, a net decrease of 17,488 annual burden hours and a net decrease of \$238,761 (rounded) in burden hour costs. We made these adjustments based on our experience in administering this collection and the burden information provided during our outreach.

We are reporting as an adjustment, a net increase of \$29,731 as cost-to-the-government. This is because we have included the new equipment costs (\$103,200) previously unreported.

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.

Upon certification, we add the name of each Certified Local Government (CLG) to our CLG website. For State Historic Preservation Plans we require States to either publish their approved plan or to post to their web sites. Our website also provides links to all approved State Plans posted by the States. Data from the Cumulative Products Tables is published in the Historic Preservation Fund annual report.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.