

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**National Heritage Areas Program Annual Reporting Forms
OMB CONTROL NUMBER 1024-NEW**

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.**

National Heritage Areas (NHAs), as authorized by Historic Sites Act of 1935, as amended (54 USC Ch. 320101) are places where natural, cultural, and historic resources combine to form a cohesive, nationally important landscape. Each NHA through their resources, tell nationally important stories that celebrate our nation's diverse heritage. The NHA program includes 55 heritage areas and is administered by NPS coordinators in Washington, DC and six regional offices (Anchorage, San Francisco, Denver, Omaha, Philadelphia and Atlanta), as well as local park unit staff.

This collection is currently in use without OMB approval or a valid control number. This collection includes two new forms:

- Annual Program Report – Part I Funding Report
- Annual Program Report – Part II Progress Report

The NPS will use the forms to track the progress of each heritage area on implementing its management plan and meeting performance goals. We are proposing the implementation of two new forms to collect the information needed to assist us in monitoring the progress of each heritage area. The collection of this information is necessary to allow for national oversight, analysis, coordination, technical and financial assistance, and support to the 55 National Heritage Areas to ensure consistency and accountability across the country.

Legal Authorities

- 54 USC Ch. 320101, Historic Sites Act of 1935, as amended
- 54 USC 100101, Conservation in NPS Systems

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.**

Information will be collected from the National Heritage Areas Coordinating Entities, which include private sector and government entities (not individuals), and any future NHA Coordinating Entities should Congress designate new NHAs. National Heritage Areas Program Office will use the following forms:

1. *Annual Program Report – Part I Funding Report.*

The information gathered on this form documents funding from the Heritage Partnership Program (HPP) fund; required non-federal match sources; organizational sustainability planning; and Heritage Area accomplishments and challenges in using the HPP funds. The information is used to

- allocate funds to heritage area management or coordinating entities
- prepare the annual NPS Budget Justification and responses to directives from Congress.

2. *Annual Program Report – Part II Progress Report.*

The NPS will use the information collected to inform annual program reports and publications and to discern individual heritage area evaluations. This information will track input and outcome measures for management planning and implementation. The measures outlined on this form will capture information about:

- the diverse heritage area activities
- approaches to these activities
- direct products or services offered
- the results of the products or services

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 program will use standardized electronically fillable forms to provide ease-of-use, greater reporting consistency and a simplified submission process to reduce respondent burden. Coordinating Entities will fill out both forms, sign (either with electronic signature or printed, signed, and scanned), then submit electronically via email attachment. Hard copy submission via mail or courier service will be accepted on a case-by-case basis.

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 collected is unique to the National Heritage Area Program and no other sources for this information are available. As each coordinating entity and National Heritage Area is unique, information cannot be submitted by other organizations. No similar information in this format pertaining to National Heritage Area programs, projects, and finances is collected by the NPS or other Federal agencies.

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

This information collection will not impact small business or other small entities. The respondents for this collection only include not-for-profit entities; federal commissions; institutions of higher education; and state and local governments.

6. Describe the consequences 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.

Information is collected in response to the NHAs individual authorizing legislation requiring annual reporting. If we did not collect the information, we would be unable to objectively assess progress to carry out management plans, analyze the federal investment, and identify the critical components for sustainability of the NHAs at the national level, and in turn, report on the program as a whole to NPS and DOI Management, Congress, or the public.

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 regarding this collection of information.

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 May 15, 2020, we published in the Federal Register (85 FR 29481) a notice of our intent to request OMB approval for this information collection. In that notice, we solicited comments for 60 days, ending on July 14, 2020. We did not receive any comments in response to that notice.

In addition to the Federal Register notice, we attempted to contact nine individual National Heritage Area entities familiar with the collection of this information. Despite attempts via email and telephone calls, we received feedback from seven of those contacted.

National Heritage Area	Coordinating Entity	Type of Entity
Champlain Valley National Heritage Partnership	Lake Champlain Basin Program, New England Interstate Water Pollution Control Commission	Regional Government
Essex NHA	Essex National Heritage Commission	Private non-profit
Mississippi Delta National Heritage Area	The Delta Center for Culture and Learning, Delta State University	State Government
Mormon Pioneer NHA	Utah Heritage Highway 89 Alliance	Private non-profit
Motor Cities NHA	The MotorCities National Heritage Area Partnership	Private non-profit
Oil Region NHA	Oil Region Alliance of Business, Industry & Tourism, Inc.	Private non-profit
Silos and Smokestacks NHA	America's Agricultural Heritage Partnership	Private non-profit

Specifically, we asked for comments on:

“Do you think the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions on the Part I or Part II form you feel are unnecessary? Is the collection necessary to the proper functions of the National Park Service's NHA Program?”

Comment #1: “While we understand the need for collecting information to report on the NHA’s, the form as it is configured takes an enormous amount of time and does not align with any other reports that we do for the Heritage Partnership program. Part I gives a good overview of the program, but Part II is needlessly long and repetitive. First, we list how many grants we give out, then we have to break them down and repeat them in each category.”

NPS Response: The *Annual Program Report – Part II Progress Report* is intended to capture the wide variety of possible NHA activities. To limit repetition on the Form, the grants summary should provide a cumulative number, the break down should provide more detail per the individual categories. No action taken.

Comment #2: “as to unnecessary questions” – I don’t believe so since we are able to only answer the ones that apply to us. That eliminates superfluous questions. I don’t think the collection is necessary to the proper functions of the NHA program. It’s good information to have but it is not necessary to do our work. The information can inform our planning, but we would be doing that planning whether this report existed or not.”

NPS Response: Information is collected in response to the NHAs individual authorizing legislation requiring annual reporting. No action taken.

Comment #3: [e]very year, the NHA administrators get a report on their collective amount of volunteer hours, number of volunteers, match generated, and other metrics of success from the NPS. This information is very useful in illustrating the huge return in investment the NHAs receive through matching funds and services. The Part I & Part II reports, however, might be a more useful tool if all the NHA's reports—not just the collective metrics were shared for review. The Part I & Part II questions are fine. I'm unsure if this collection is "necessary," but data does have a way of coming in handy in the future.

NPS Response: Upon request, the Service provides a spreadsheet showing the breakdown of volunteer hours, matching funds, and other metrics for the 55 NHAs via email. No action taken.

Comment #4: One commenter noted that “Yes necessary and helpful as we track and report progress to board members and stakeholders.”

NPS Response: No action taken.

“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? Please provide separate estimates for the two forms.”

Comment #1: “Part I takes 6 hours, and the "source of match" part is almost impossible. While we understand the concept, our match is from over 1,000 different sources. We should only have to identify specific match over a certain amount, perhaps \$5,000. Listing each \$40 meeting match is not feasible. Part II takes a combine 100 or more hours of time on the part of the 7 people who are responsible for the different programs.”

NPS Response: Reporting the specific match sources is important due to the legislated requirement of providing a non-federal match to the federal funds received. While the Service believes this concern is unique to this commenter/organization, the Service will provide more guidance on how to record non-federal match on the Part I form so it is easier for respondents to track match throughout the year to properly account for this legislated requirement.

Comment #2: “Hours spent on Part I = 20 and Part II = 64. I think we spend above the average on time for these since we have a lot of partner sites to gather and collect information from. That takes some extra hours.”

NPS Response: The Service has adjusted the burden estimate for both forms in consideration of the estimates provided.

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

Comment #1: the Service should provide “clear examples of the reporting areas in the Part II form (e.g., Education and Interpretation Programs; Recreation Development Projects).”

NPS Response: The Service will provide a sample of completed Part I and Part II forms to the NHA Coordinating Entities during the annual call for this data collection (typically the beginning of November).

“Do you have any ideas you might suggest which would minimize the burden of the collection of information on respondents (i.e. NHA coordinating entities), including through the use of information technology?”

Comment #1: in order to reduce time by NHA staff in assembling, writing, and submitting the respective reports to the different recipients which are all NPS staff could the tracking systems of this data collection and the data collection be shared at the NPS Regional level associated with each NHA’s cooperative/task agreement?

NPS Response: The two respective reports mentioned above, have separate purposes. One report is submitted to the NPS Agreements Technical Representative and is related to each area’s Cooperative Agreement. The report is submitted to the NPS NHA Program Office this information tracks performance measures and progress on management plan goals. Presently, an online tracking system does not exist; however, the Service is open to exploring this option in the future. No action taken

Comment #2: Three commenters suggested that the use of a fillable PDF or an online form/submission would be more user-friendly and allow organizations to submit information after the end of a project [as opposed to at the end of the year] and view archived forms.

NPS Response: The approved collection will include fillable PDF and Word templates NHA entities will be able to submit forms electronically via e-mail. Presently, an online tracking system does not exist; however, the Service is open to exploring this option in the future.

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.

Coordinating Entities are advised that all forms submitted may be disclosed by the Department of the Interior to any person upon request pursuant to the Freedom of Information Act. If the Coordinating Entity believes that the report(s) contains confidential or financial information exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552), the cover page of the form, as well as each page of the form containing such information is to be labeled. No personal identifiable information is collected. All information from respondents is related to their position within the Coordinating Entity. It was confirmed by the NPS Privacy Officer that these the forms will not be retrieved by the name of the individual on the forms, therefore a separate system of record is not required.

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.

No sensitive questions are asked.

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. Instead, this cost should be included under "Annual Cost to Federal Government."**

We expect to receive 55 responses per form (n=110) totaling **3,025** annual burden hours (see table 12.1 below). The annual burden hours were estimated by consulting nine current Coordinating Entities. The nine Coordinating Entities provided estimates for how long it took to fill out/prepare each form. We received feedback from thirteen of nineteen total entities we reached out to. Completion time per response varied from 5 hours to 45 hours, depending on the form. We used

the average completion time reported to estimate the burden for this collection

Table 12.1. Estimated Annual Burden Hours

Respondent and forms	Annual number of responses	Average completion time per form	Total burden (hours)*
Part I Financial Report (Form 10-320)			
NHA Coordinating Entities - Private	43	10	430
NHA Coordinating Entities - Government	12	15	180
SUBTOTAL	55		610
Part II Progress Report (Form 10-321)			
NHA Coordinating Entities - Private	43	45	1,935
NHA Coordinating Entities - Government	12	40	480
SUBTOTAL	55		2,415
TOTAL	110		3,025

We estimate the total dollar value of the annual burden hours to be \$119,604 (Table 12.2). The estimated dollar value of the burden hours for this collection considers the nature of our respondents: state and local government agencies and private businesses, (this includes university and non-profit employees). To estimate the annual burden cost we used Table 1 in the Bureau of Labor Statistics news release on September 17, 2020, Employer Costs for Employee Compensation—June 2020 (<https://www.bls.gov/news.Release/pdf/ecec.pdf>), to calculate the total annual burden.

- Private Sector - Hourly rate of \$35.96, including benefits.
- State Government - Hourly rate of \$52.36, including benefits.

Table 12.2. Estimated Dollar Value of Annual Burden Hours

Sector	Total Annual Number of Responses	Total Annual Burden Hours	Dollar Value of Burden Hours (Including Benefits)	Total Dollar Value of Annual Burden Hours
Part I Financial Report				0
NHA Coordinating Entities - Private	43	430	\$35.96	\$15,463
NHA Coordinating Entities - Government	12	180	\$52.36	\$9,425
SUBTOTAL	55	610		2488824888
Part II Progress Report				
NHA Coordinating Entities - Private	43	1,935	\$35.96	\$69,583
NHA Coordinating Entities - Government	12	480	\$52.36	\$25,133
SUBTOTAL	55	2,415		\$94,716
TOTAL	110	3,025		\$119,604

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 non-hour cost burdens to respondents.

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.

We estimate that the annual cost to the Federal Government to administer this information collection is \$31,813 (rounded), which includes salary costs for staff time to process and review the completed forms and compile an annual program report based off of these individual forms submitted. To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2020-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf). The wage figures include benefits to calculate the fully burdened rate using Bureau of Labor Statistics news release on September 17, 2020, Employer Costs for Employee Compensation—June 2020 (<https://www.bls.gov/news.Release/pdf/ecec.pdf>).

Table 14.1 Estimated Annual Cost to the Federal Government

Position	Grade/Step	No. of Responses	Estimated Time per Response	Total Hours	Hourly Rate	Hourly Rate w/Benefits (1.6)	Total Annual Cost	
Processing of NPS Form 10-320								
NHA Program Manager	14/5	55	1 hour	55	65.88	105.41	\$5,798	
NHA Assistant Program Coordinator	12/5	55	1 hour	55	46.88	75.01	\$4,126	
Processing of NPS Form 10-321								
NHA Program Manager	14/5	55	2 hours	110	65.88	105.41	\$11,595	
NHA Assistant Program Coordinator	12/5	55	2 hours	110	46.88	75.01	\$8,251	
Compilation of annual program report								
NHA Program Manager	14/5	1	8 hours	8	65.88	105.41	\$843	
NHA Assistant Program Coordinator	12/5	1	16 hours	16	46.88	75.01	\$1,200	
Total								\$31,813*

*rounded

15. Explain the reasons for any program changes or adjustments.

This is a new collection.

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

The NHA Program Office produces a two-page annual summary report that includes data from this information collection. The report is titled "By the Numbers" and does not include statistical analysis or complex calculations. The report is distributed via email to the NHA Coordinating Entities, Program partners, and NPS Budget and Upper Management. The report is also posted on the NHA public website at <https://www.nps.gov/subjects/heritageareas/celebrate-success.htm>.

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 expiration date on forms and other appropriate materials.

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