

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

**Historic Preservation Certifications – 36 CFR Part 67  
OMB Control No. 1024-0009**

**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 Park Service (NPS) administers the Federal Historic Preservation Tax Incentives program with the Internal Revenue Service (IRS) and the State Historic Preservation Offices (SHPOs). The tax incentives promote the rehabilitation of income-producing historic structures of every period, size, style and type. Through this program underutilized or vacant schools, warehouses, factories, retail stores, apartments, hotels, houses, offices, and other buildings throughout the country have been returned to useful life in a manner that maintains their historic character.

Owners of historic buildings use the Historic Preservation Certification Application (Forms 10-168, 10-168a, 10-168b, and 10-168c) to apply for Federal tax incentives. Sections 47 and 170 of the Internal Revenue Code require that the Secretary of the Interior to make certain “certifications” to the Secretary of the Treasury for owners of historic buildings seeking Federal tax incentives for historic rehabilitation. Department of the Interior regulations (36 CFR 67) contain a requirement for completion of an application form for an owner of an historic building to receive these certifications for the Federal tax incentives. These incentives include a 20% Federal income tax credit for the rehabilitation of historic buildings and an income tax deduction for the donation of easements on historic properties. The Internal Revenue Code also provided for a 10% Federal income tax credit for the rehabilitation of non-historic buildings built before 1936, but the 10% credit was repealed in 2017 as part of changes to the Internal Revenue Code.

The SHPOs use the Historic Preservation Certification Application State Historic Preservation Office Review and Recommendation Sheet, Part 1 - Significance (Form 10-168d) and the Historic

Preservation Certification Application State Historic Preservation Office Review and Recommendation Sheet, Part 2/Part 3 - Rehabilitation (Form 10-168e) to review the applications submitted by the owners for these certifications and forward the applications with their recommendations to the NPS, which makes the final certification decisions on behalf of the Secretary of the Interior. The NPS provides copies of certification decisions to the Internal Revenue Service, who administers the tax incentives program on behalf of the Secretary of the Treasury.

To be eligible for the tax incentives for historic buildings, the building must be listed individually on the National Register of Historic Places (NRHP); or located in a registered historic district and certified by the NPS as contributing to the historic significance of that district. A registered historic district is any district listed on the NRHP; or a state or local district, if the district and the enabling statute have also been certified by the NPS. The NRHP is the official list of the Nation's historic places worthy of preservation.

### **Legal Authorities**

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- Qualified Conservation Contributions 26 USC 170
- Rehabilitation Credit - 26 U.S.C. 47.

**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.**

We use the information collected to make the certifications to the Secretary of Treasury required by the Internal Revenue Code. These certifications permit taxpayers to make use of the Federal income tax incentives for the preservation of historic buildings.

A few minor changes to the descriptions of fields have been made to the State Historic Preservation Office Review and Recommendation sheets, for clarity, based on prior users' feedback on the 2016 forms. The field for "Property Name" has been changed to "Historic Property Name" for both the Part 1 - Significance and Part 2/3 - Rehabilitation parts of the review sheets. Updates mandated in 2016, by the now-obsolete Department of the Interior

(DOI) Forms Library have been removed or modified.

**Forms 10-168, 10-168a and 10-168b - Historic Preservation Certification Application**

For all parts of the Historic Preservation Certification Application, the field for “Property Name” is now “Historic Property Name”. We added the description of property types and check boxes for greater clarity. The changes in Project Data section of the Part 2 – Description of Rehabilitation are all for greater clarity. Explanatory text in Question 2 has been added in to instruct the applicant to include data for the entire project, not just individual phases of the project. An additional check box has been added related to Internal Revenue Code requirements and 60-month phased rehabilitation projects. On 10-168b Amendment/Advisory Determination added the address fields for the historic property to match the other parts of the application.

**Form 10-168, “Part 1 - Evaluation of Significance”** is used by owners of structures to request a determination as to:

- Whether an individual building not yet listed in the National Register of Historic Places might meet the National Register Criteria for Evaluation.
- Whether a building in a potential historic district contributes to the significance of the district.
- Whether a building outside the period or area of significance of a registered historic district contributes to the significance of the district.

We collect ...	So that we can...
Historic name and address of the property and information on any current or proposed historic designations	Identify the structure for which the applicant wishes a determination of significance or non-significance.
Nature of the request	Undertake the appropriate analysis of the structure for the type of requested certification.
Name, address, company, email address, and telephone number of the authorized project contact if different from owner	Obtain expeditious answers to questions raised in the review.
Name, applicant entity, address, email address, and telephone number of the owner	Communicate with the applicant.
Social Security or Taxpayer Identification Number and indication of whether number has changed	Provide required notifications to the Internal Revenue Service (IRS), Department of the Treasury.
Indication of whether applicant is fee simple owner	Determine whether applicant is qualified to apply, as well as whether any notifications of fee simple owner, if different than applicant, may be necessary.

We collect ...	So that we can...
Description and physical appearance of the property.	Assess the historic character and physical integrity of the structure.
Statement of significance	Assess the relative historic significance of the resource individually or to the historic district in which it is located.
Photographs and maps	Establish the appearance, condition, and location of the structure.

**Form 10-168a, “Part 2 - Description of Rehabilitation”** is used by owners of certified historic structures to request that their rehabilitation project be preliminarily determined (that is, preliminarily approved) by the Secretary of the Interior as being consistent with the historic character of the structure and, where appropriate, with the district in which the structure is located, thus qualifying as a certified rehabilitation for purposes of the tax incentives for rehabilitation contained in the Internal Revenue Code. This application may be submitted when work is being planned, is in progress, or has been completed, depending on the nature and timing of the historic designation of the property.

We collect ...	So that we can...
Historic name and address of the property	Identify the structure that has been or will be rehabilitated.
Name of the National Register historic district in which the structure is located or the date of listing in the National Register of Historic Places	To confirm historic designation (and, therefore, eligibility for the incentive) and to retrieve additional information from the National Register files that may expedite review.
Information that a Part 1 application has or has not been submitted for the property, along with the date the part 1 was submitted and the date it was approved (date of certification)	Prevent inadvertent certification of rehabilitations that have not yet been designated certified historic structures.
Data on the building and the rehabilitation project	Assess the nature of the structure being rehabilitated, and establish the size, duration, and any phasing of the work that has been or will be performed on the structure.
Cost of the total estimated rehabilitation work	Assess the review fee to charge (which is based on the project cost).
Name, company, address, email address, and telephone number of the authorized project contact if different from owner	Communicate with key project personnel in order to expedite reviews.
Owner’s name, applicant entity address, email address, and telephone number	Communicate with the applicant.
Social Security or Taxpayer Identification Number and indication of whether number has	Provide it to the IRS.

We collect ...	So that we can...
changed	
Indication of whether applicant is fee simple owner	Determine whether applicant is qualified to apply, as well as whether any notifications of fee simple owner, if different than applicant, may be necessary.
Detailed description of rehabilitation work	Assess the current condition of each architectural feature of the structure and judge the effect of proposed rehabilitation work on each feature and on the overall historic character of the structure.

**Form 10-168b, “Amendment / Advisory Determination”** is used by applicants who wish to propose changes to a form submitted earlier, to seek approval of a finished phase of a multi-phased project, or to submit work to be undertaken post-project completion/post-certification during the five-year “recapture” period during which any changes to the property continue to be subject to review.

We collect ...	So that we can...
Historic name and address of the property and the NPS project number	Identify the property for which an application was previously submitted.
Name, company, address, email address, and telephone number of the authorized project contact if different from owner	Communicate with key project personnel in order to expedite reviews.
Information on whether this amends Part 1, amends Part 2, Amends Part 3, or requests an advisory determination (check boxes)	Identify the nature of the request.
Cost of the rehabilitation work finished in the phase	Comply with IRS regulations.
Owner’s name, applicant entity, address, email address, and telephone number	Communicate with the applicant.
Social Security or Taxpayer Identification Number and indication of whether number has changed	Provide it to the IRS.
Indication of whether applicant is fee simple owner	Determine whether applicant is qualified to apply, as well as whether any notifications of fee simple owner, if different than applicant, may be necessary.

**Form 10-168c, “Part 3—Request for Certification of Completed Work”** is used by owners of certified historic structures to request that the Secretary of the Interior certify (approve) completed rehabilitations, making the project eligible for the historic tax credit.

We collect ...	So that we can...
Historic name and address of the property	Ensure that the building is a certified historic structure before we declare the completed rehabilitation a certified rehabilitation.
Project data (start and completion dates and costs)	Comply with IRS regulations and determine review fees to charge.
Name, company, address, email address, and telephone number of the authorized project contact if different from owner	Communicate with key project personnel.
Owner's name, applicant entity, address, email address, and telephone number	Communicate with the applicant.
Social Security or Taxpayer Identification Number and indication of whether number has changed	Provide it to the IRS.
Indication of whether applicant is fee simple owner	Determine whether applicant is qualified to apply

**State Review.** State Historic Preservation Offices (SHPOs) are the first point of contact for property owners wishing to use the rehabilitation tax credit. They can be contacted by the applicant to help determine if an historic building is eligible for Federal historic preservation tax incentives, provide guidance on an application before or after the project begins, and advise on appropriate preservation work.

The SHPO reviews the application and forwards one copy to NPS with a recommendation (the SHPO retains one copy of the application). SHPO comments are carefully considered, but by law all certification decisions are made by NPS (on behalf of the Secretary of the Interior). SHPOs may use the following forms in making a recommendation to NPS:

***Form 10-168d, "Historic Preservation Certification Application State Historic Preservation Office Review and Recommendation Sheet - Significance/Part 1"***

In the Part 1 portion of the review sheets, the descriptions for two fields and the order of one of the other fields has been changed for greater clarity. In the Part 2/3 portion of the review sheets a new field was added for applicant signature date to better track amendments when multiple amendments for the same project are submitted, and a field has been reworded and the order of one of the other fields has been changed for greater clarity.

Previous Question	Current Question
10-168e	
Part 3 (Part 2 not previously reviewed)	
Amendment	Amendment (applicant signature date)
Advisory determination that a phase meets the Standards	Request for an advisory determination for a phase
Property visited by State staff (dates):	Property visited by SHPO staff (date/s):
Date application received by SHPO	Application received (date)
Date(s) additional information requested by SHPO	Additional information requested (date/s)
Date complete information received by SHPO	Complete information received (date)
Date of transmittal to NPS	Transmitted to NPS (date)

We collect ...	So that we can...
Historic name and address of the property and the name of the National Register or State or local historic district in which the property is located	Identify the structure that is the subject of the review.
Dates the SHPO received the application, requested additional information, sent the application to the NPS and information on site visits	Judge the timeliness of the information provided by the owner in the application and the status of the SHPO review.
SHPO review summary	Determine quickly whether application presents special issues requiring in-depth NPS review.
Name of SHPO staff reviewing application	Determine that staff meets the Secretary of the Interior's Professional Qualifications Standards and communicate with SHPO regarding the project.
SHPO recommendation and date and signature of State official	Receive and document the official SHPO evaluation of the application.
Issues highlighted by SHPO reviewer	Identify potentially problem areas quickly and review the application more efficiently.
Historic district's period of significance, references to property in the district or National Register documentation, status of the National Register nomination, and consistency of the property with the district nomination	Assess the contribution of the property to the historic district or the likelihood of its nomination to the National Register of Historic Places.
Overall SHPO comments on issues or concerns raised by the application	Use the comments to guide our review of the application.
SHPO comments, if applicable	Use the comments in reviewing the application, as appropriate.

**Form 10-168e, "Historic Preservation Certification Application State Historic Preservation Office Review and Recommendation Sheet – Rehabilitation Part 2/Part 3"**

We collect ...	So that we can...
Historic name and address of the property, its certified historic structure status, and the type of request	Identify the structure that is the subject of the review and determine the nature of the application to be reviewed.
Dates the SHPO received the application, requested additional information, sent the application to the NPS, and information on site visits	Judge the timeliness of the information provided by the owner in the application and the status of the SHPO review.
SHPO review summary	Determine quickly whether application presents special issues requiring in-depth NPS review.
Name of SHPO staff reviewing application	Determine that staff meets the Secretary of the Interior's Professional Qualifications Standards and communicate with SHPO regarding the project.
SHPO recommendation and date and signature of State official	Receive and document the official SHPO evaluation of the application.
Issues highlighted by SHPO reviewer	Identify potentially problem areas quickly and review the application more efficiently.
Overall SHPO evaluation of project and comments on concerns raised by the application, including SHPO identification of innovations or other noteworthy elements of the application or project	Use the comments to guide our review of the application, including looking for new approaches to troublesome issues or projects worthy of highlighting by the program.
SHPO comments and/or recommended conditions of approval, if applicable	Use the comments and conditions in reviewing the project, as appropriate.

**Appeals.** The owner or a duly authorized representative may appeal any of the certifications or denials of certification made under 36 CFR 67 or any decisions made under § 67.6(f). The appeal must be in writing and contain all of the information the owner wishes the appeals officer to consider.

**Certification of State and Local Statutes (36 CFR 67.8).** As part of the incentives program, a State or local jurisdiction may apply for the certification of State or local statutes authorizing the designation of historic districts. The districts designated under these statutes can then apply to be certified as "registered historic districts" and properties in such districts can qualify for tax incentives. Applicants for such certifications must submit a letter requesting review and a copy of the statute. State Historic Preservation Office staff review these



requests and provide comments to the NPS.

**Certifications of State or Local Historic Districts (36 CFR 67.9)**. As part of the incentives program, a State or local jurisdiction may also apply for certification of State or local historic districts. Historic properties in such districts can then qualify for the tax incentives authorized by the Internal Revenue Code. State Historic Preservation Office staff review these requests and provide comments to the NPS. We collect:

- Description of the general physical or historical qualities that make this a district; an explanation for the choice of boundaries for the district; and descriptions of typical architectural styles and types of buildings in the district.
- Statement of why the district has historic significance, including an explanation of the areas and periods of significance, and why it meets National Register criteria for listing (see 36 CFR part 60.
- Definition of what types of properties contribute and do not contribute to the significance of the district as well as an estimate of the percentage of properties within the district that do not contribute to its significance.
- Map showing all district properties with, if possible, identification of contributing and noncontributing properties; the map should clearly show the district's boundaries.
- Photographs of typical areas in the district as well as major types of contributing and noncontributing properties; all photographs should be keyed to the map.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

The application available in a fillable PDF format (or a fillable MS Word document, in the case of the SHPO review sheets). There are a number of logistical, technological and practical factors make submission of the application via electronic means presently unworkable.

1. Applicants often submit large-format architectural drawings and maps, a large number of photographs, copies of historic prints and other images, original technical specifications and other product literature, and physical material and product samples—submittals that can be difficult (due to file sizes) or impossible (in the case of a material or product sample) to transmit electronically.
2. All 53 SHPOs, as well as applicants (consultants, design professionals, other frequent program users, and one-time users, such as individuals with small projects who do not have their submittal materials in electronic form), would have to have the technology,

hardware, capacity, and access to such a system.

3. Program regulations require copies of original signatures, although presumably this could be changed to accept electronic signatures.

We continue to explore, however, future opportunities concerning electronic submissions of all or portions of the forms by applicants and the SHPOs. The supporting program material is available online about the incentives, application process, and sample applications for common building types.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication. No other NPS office collects similar information. No other Federal agency is authorized to issue the certifications required by the Internal Revenue Code or to collect the information requested in the information collection.

Each application is unique and the information is specific to each project. Separate parts of the application require an applicant to supply identical information, such as name and contact information of owner, name and contact information of project contact, etc. Owners may submit individual parts of the application up to several years apart, and such information often changes during that period. Ownership itself often changes over the course of the project, as the tax incentives can be syndicated through limited partnerships to bring investors into rehabilitation projects, or the tax incentives transferred to a new owner if the property is sold prior to the in-service date and the credits were not already claimed. The information is verified in this way to ensure that the information on who is applying for the incentive and their contact information on file is current. Moreover, not all applicants need to submit all three parts of the application; owners of buildings listed individually in the National Register of Historic Places, for example, do not need to submit part 1 of the application.

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

This collection impacts small businesses or other small entities to the extent they elect to apply for the tax incentives. We have produced information, including sample applications, to help first-time applicants and others who own small buildings (such as small wood-frame houses, small “Main Street” commercial buildings, and barns). We collect only the information needed to determine: (1) whether a building is a certified historic structure and (2) whether the rehabilitation proposed by the applicant is in keeping with the historic character of the building. We need this information to make certifications to the Internal Revenue Service concerning the eligibility of the applicant for Federal tax incentives. Smaller rehabilitation projects would typically require less information, given the smaller scopes of the projects, and proportionately less time for the application to be prepared.

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

If the information collection were not conducted, the Federal policy goal of promoting historic rehabilitation and community revitalization through the rehabilitation of historic buildings, in a manner consistent with their historic character, would not be met, and owners of historic buildings would not be able to prove to the Internal Revenue Service that they qualified for a Federal tax incentive authorized by law.

We use the information to make the certifications for applicants to receive the applied-for benefit—a Federal income tax credit for the rehabilitation of historic structures or a tax deduction for the donation of easements on historic buildings. The Secretary of the Interior is required by sections 47 and 170 of the Internal Revenue Code to make certifications to the Secretary of Treasury. The information cannot be collected less frequently.

**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.**

If a submitted application is incomplete, applicants may be requested to submit the required additional information within 30 days or the file will be closed. However, the applicant may ask for an extension of time, and the file can be reopened if the information is submitted after 30 days (the review may take longer to complete, depending on application activity).

NPS has no requirements for how long respondents must retain records; however, because we submit the certifications for tax incentives to the IRS, and this information is needed for the applicant to file with the IRS in claiming the historic tax credit, the application instructions advise applicants to retain their records in accordance with time periods established by the IRS. There are no other special circumstances that would cause us to collect the information in a manner that is inconsistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those**

**who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On July 3, 2019, we published in the Federal Register (84 FR 31909) a Notice soliciting comments from the public on this information collection for a period of 60 days. The comment period ended on September 3, 2019. We received three (3) comments in response to that notice.

Organization	Title
Ogee, LLC	Partner
Historic Tax Credit Coalition (HTTC)	Chair
Artifacts-Inc.	Principal

**Ogee, LLC** suggested the use of a standardized list or more detailed organization of the description of work section in the Part 2 section of the application and that no portions of the scope of work for the project were unintentionally omitted.

***NPS Response:** We are considering the creation of additional guidance and application examples that would provide more direction on how to organize and structure the required description of work information.*

**Historic Tax Credit Coalition (HTTC)** suggested that more information be collected regarding the rehabilitation of affordable housing units as part of the tax incentives program. Specifically, 1) number of rental housing units that are being created, 2) units created for “special needs” (i.e., members of a specified group under a federal or state housing program, or person engaged in artistic or literary activities), and 3) how are units that are “considered affordable and/or accessible,” being measured

***NPS Response:** We contacted the commenter to discuss possible new field(s) and how existing and new fields could be labeled or defined. The application form already requests some of this information. While the wording of the field names could be changed or further defined in the*

*instructions, we did not update the forms because there is limited space available for new fields without having to add an additional page to the application. The commenter was unable to make any specific suggestions, and, as consequently, we are not proposing any changes at this time in response to this comment.*

**Ogee, LLC and Historic Tax Credit Coalition (HTTC)** both suggested that the NPS should provide or further explore the use of electronic submissions.

**NPS Response:** We will continue to explore the options of electronic submissions for the future.

**Artifacts-Inc.**, suggested that the program should work more closely with State Historic Preservation Offices (SHPOs) to administer the review process.

**NPS Response:** *By law the National Park Service must make all final certification decisions. However, NPS partners with SHPOs to administer the certification program. The SHPOs are often the first point of contact meeting with applicants to answer questions, make site visits, and forward applications to the NPS after reviewing and making recommendations.*

We also consulted with nine persons representing State Historic Preservation Offices, developers, consultants, and other applicants. We asked for comments on our burden estimates, availability of data, frequency of collection, clarity of instructions and data elements to be recorded, disclosed or reported. We received comments from all nine persons contacted. Contact information is available upon request.

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**Organization**

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| 1. Rosin Preservation             | 6. Maine Historic Preservation Commission                       |
| 2. Spencer Preservation           | 7. Washington Department of Archaeology & Historic Preservation |
| 3. Historic Preservation Services | 8. Private Individual   |
| 4. The Alexander Company          | 9. City of Chicago Department of Planning and Development       |
| 5. Wisconsin Historical Society   |   |
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**A. 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,**

**Rosin Preservation.** The type, amount and level of information requested is reasonable and pertinent.

**Spencer Preservation.** All questions seems appropriate and necessary.

**Historic Preservation Services.** The form preparation is not difficult and the required information is germane to the process. Either that or I'm so used to it that a better way would never occur to me.

**The Alexander Company.** While the collection of specific information required on NSP forms may not be necessary for the completion of the project by the owner/developer [separate from the tax credit program requirements], most of this information will be available or will be discovered through the normal design/construction drawing/construction process. In many ways, going through the part 1 and part 2 process helps us in the overall design. The NPS requirements (slightly) slows down the relentless push from outside sources to get to construction and completion. It forces us as designers and developers to more carefully consider the entirety of the project. We understand the building better, and we make better design choices.

**Wisconsin Historical Society.** Generally, I think the information requested all makes sense. I don't think the second page of the Part 1 is needed. If the building is contributing to a district we already know why it's significant. If it's not yet listed then a draft nomination is submitted at the same time. Also the one bit of information that owners do not know is their property name. They usually insert the new name for a building. We tend to cross this off and insert the historic name.

**Maine Historic Preservation Commission.** I think the collection of information is one of the most important things we can do to ensure the continued viability of the HTC program. Our office collects slightly more information than is required on the federal application forms. The information collected provides a means for legislators and all interested parties to examine the program results and gauge its success. In my opinion, a lack of good reporting would jeopardize the HTC programs at both the state and federal levels.

**Washington Department of Archaeology & Historic Preservation.** The collection of this information is critical and necessary for providing an initial evaluation and screening of all tax credit application actions. It provides consistency in conveying information and comments to the National Park Service, which reduces overall review time, and makes it easy for NPS reviewers to be able to look at projects in any state regardless of whether or not they normally cover a particular state. There are no superfluous questions in the form, and all of the information collected is necessary for data tracking as well as quickly conveying state recommendations.

**Private Individual.** I feel all documents required for the Part I are necessary and are not burdensome to the applicant. (Ownership deed, tax map and tax card, evidence of present condition, historical documents, photos, etc. supporting historical and architectural events in life of building). Very straightforward application form.

**City of Chicago Department of Planning and Development.** I believe this information is necessary for NPS to allow property owners to take advantage of tax incentives. Very straightforward application form. NPS online instruction forms are very helpful in application process. Part 2 form is clear and easy to use in its digital format. I would suggest that the Part 2 submittal documents may even need more detail, not less, so as to minimize the need for an amendment at a later date.

***NPS Response.** Respondents indicated that the requested information was necessary and reasonable for processing applications. Therefore, no changes have been made to the forms in response to the above comments.*

**B. 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?**

**Rosin Preservation.** For projects located in a historic district, the average completion time is 2.5 hours. The new mapping requirements have made this a little longer than in the past. For projects not in a historic district a Part 1 requires preparation of a document that is roughly equivalent to a draft National Register nomination. For those projects our average completion time is 32 hours. The time to complete a Part 2 varies considerably, from 20 hours to 80 hours. The average would be about 50 hours. This includes prepping the “before” photos, which would add an average of 12 hours, again with considerable variation depending on the size of the building. The time to complete an amendment averages around 4 hours. Some are quite small (1 hour) simply to provide additional information (window drawings or finish details). They can take much longer if a significant revision of the original scope of work is required. The time to prepare a Part 3 with “after” photographs is 12 hours. The average time to prepare an Appeal report (not including presentation) is 40 hours. In general, the amount of information and level of detail being requested as part of the application process has increased over the last several years.

**Spencer Preservation.** Part 1 - 40 hours (because we typically prepare full draft nomination for Part 1s); Part 2 - 51 hours (varies so much depending on size of project and quality of plans but 51 is good average); Amendment - 6 hours (our average is much lower, I'd say 6 but we strive to minimize amendments needed); Part 3 - 17 hours (again, varies with size of building and number of photos but 17 is good average); Appeals (we haven't had appeal for years so I can't speak to this).

**Historic Preservation Services.** The “Average Completion Time” hours fall within the time I would expect to spend, depending on the project. In the past three years we have flooded



the system with 160+ Part 1s and 2s from a scattered-site housing project. We try to keep the time invested in each property's Part 1 and 2 to 10 hours or under.

**The Alexander Company.** As previously mentioned, the Alexander Company projects are larger, typically between 20 and 50 million dollars. Comments are provided above relative to the Part 1. For the Part 2, our large projects will require at least 100 hours to provide adequate written descriptions, photo documentation, and plans. As mentioned above, this does not include any on site time, or production of plans. We can provide estimates of actual drawing time if that helps, however this varies depending on what existing plans are available and the condition of the building.

**Wisconsin Historical Society.** Part 1: 30 minutes, Part 2: 1-10 hours and Part 3: 30 minutes. The Part 2 description of work is definitely the most time intensive. Obviously for architects and developers who do these applications enough, they can figure it out. Most of my building owners who are applying are small business owners who don't necessarily understand how to break down a project into scope of work items. One thing that may help owners with the amount of time they spend is to have a generic example of the description of work. Maybe just an example with four or five items that show the owners how to properly describe an existing condition and proposed work.

**Washington Department of Archaeology & Historic Preservation:** The actual time it takes to complete some of the {SHPO review} forms is slightly shorter than the estimated times provided, but is largely dependent upon the complexity of a project and whether or not there are any outstanding issues that need to be conveyed to NPS. Part 1 applications can take less than 2.5 hours on average. In Washington state, the average is closer to 1.5 hours. The time it takes to complete the Part 3 form is also closer to 1.5 hours, but again depends largely on how much complexity a project has, how much interaction the applicant has had with SHPO throughout construction, and whether or not there has been a change in reviewer at NPS between the Part 2 and Part 3. Between checking final versions of all applications for completeness and accuracy, the other averages appear to be relatively accurate.

**Private Individual.** Part 1 – 15 hours, Part 2 – 45 hours, Amendment – 12 hours, Part 3- 4 hours.

**City of Chicago Department of Planning and Development.** I think 3.5 hours is an underestimate for landmark districts. The time it takes varies depending on the size of the district. The last time I certified a district we had to shoot film, and then label all of the photos by hand. I would estimate 7 - 10.5 hours for a district.

***NPS Response.** NPS Technical Preservation Services hosts regular training programs that provide professional and local preservation guidance during the planning stages. Detailed information assists historic building owners, preservation consultants and community officials during the application process for historic preservation projects. NPS is considering on-line*

*webinars and training as a method to reduce the respondent burden to nearly half in 2020-2023.*

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

**Rosin Preservation.** Provide training for consultants in tandem with or parallel to that received by SHPOs. There is a lot of variation in how SHPOs interpret the requirements. It would be helpful as a preparer to have a clear understanding of expectations. Training could be in person or via webinar. At minimum a written manual would be a useful reference.

***NPS Response.** As the commenter noted, the NPS holds regular training for the SHPO application review staff. The NPS is considering holding similar in-person training or online webinars for consultants and, as also noted above, possible additional guidance and application examples that would provide more direction on how to organize and structure the required description of work information on applications.*

**Spencer Preservation.** My only suggestion on the actual information would be to develop [an] online "registry" of project[s] to log in [a] project and get [an] NPS project number assigned. This would allow our digital copies to have the project number rather than NPS staff handwriting it in. In an attempt to move away from storage of hard copies, it would be great to enable all data entered on forms to be digital. Also consider guidelines for accepting digital signatures. With the reduced service of USPO, requiring hard signatures of clients is a challenge because some do not want to incur the cost of express shipping and applications can sit a week waiting on US mail. Acceptance of digital signatures again would allow complete digital record on the applications.

***NPS Response.** As discussed above in Section 3 in more detail, there are a number of logistical, technological, and practical factors that make submission via electronic means presently unworkable, but we continue to explore this as a future option. Regarding the electronic assignment of application numbers, this would have similar technical and practical limitations, and only impacts the first portion of the application to be submitted (after which the applicant has an assigned project number).*

**The Alexander Company.** I believe the forms are fairly simple and straightforward (especially when compared to forms required by other governmental agencies). The requirements for the written descriptions are not so specific as to burden the applicant with providing irrelevant or excessive information.

**Wisconsin Historical Society.** Most of my building owners who are applying are small business owners who don't necessarily understand how to break down a project into scope of work items. One thing that may help owners with the amount of time they spend is to have a generic example of the description of work. Maybe just an example with four or five items that show the owners how to properly describe an existing condition and proposed work. On the Part 3 form where it asks for the estimated QRE, almost every owner asks me

about this. They think this is what they listed on their Part 2 when they estimated the expenses. We think the word estimated should be replaced with actual QRE.

***NPS Response:** We are considering the creation of additional guidance and application examples that would provide more direction on how to organize and structure the required description of work information. We believe that the existing field description for QREs on the Part 3 portion of the application is sufficient as it currently is; adding the word “actual” would likely only cause further confusion, as these QREs are still estimated numbers (the final QREs are filed with the IRS as part of the taxpayer’s tax filing).*

**Maine Historic Preservation Commission.** I think the program runs very well as it is currently set up, and I think the information collected would likely compare favorably to any other similar program.

**Washington Department of Archaeology & Historic Preservation.** Even though the format of the Part 1 [SHPO] review form is different from the Part 2/3/Amendment review form, the number indicating which Part of the application is being review (i.e. 1, 2, 3, or Amendment) could be more visually prominent. The quality, utility, and clarity of the information being collected is consistent and presents no challenges to complete.

***NPS Response:** We may consider in the future changing the format of the review sheet so that the application part number is more visually prominent, but given that there are only two forms for the SHPO review sheets, and there already is a significant difference in the appearance between them due to the different fields and information collected, we are not proposing any changes at this time.*

**City of Chicago Department of Planning and Development.** Maps with photo view keys always don't seem to be practical for dense, urban landmark districts.

***NPS Response.** Photographs of every building are not required for certification of local landmark districts. As noted above as part of the section on information collected, only photographs of typical areas in the district as well as major types of contributing and noncontributing properties need be included. All photographs should be keyed to the map.*

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

**Rosin Preservation.** Specify whether preparation of “before” photos should be counted with Part 1 or Part 2 application. More information is requested today, in general, than in the past. Preparers are often unaware of new requirements until after submitting an application. Often the request for additional/different information comes at the end of a 30-day SHPO review period. This can be burdensome for an applicant whose schedule becomes delayed by unexpected requests and requirements.

**NPS Response.** *A full set of “before” photos is not required for the Part 1 section of the application, although an applicant may submit it as part of the Part 1 submission (in which case it would not need to be submitted again with the Part 2 submission).*

**Spencer Preservation.** I know photo quality continues to be an issue with many people using only phone cameras without adequate flashes for interior photos. I would urge NPS to consider accepting digital photo files thus eliminating time and cost of printing and labeling photographs. Kansas accepts digital plans and photos therefore, we print and label photographs solely for NPS. This is the primary way I see to reduce the burden of existing application process.

**NPS Response.** *As discussed above in Section 3 in more detail, there are a number of logistical, technological, and practical factors that make submission of the application via electronic means and acceptance of electronic signatures presently unworkable, but we continue to explore this as a future option.*

**Historic Preservation Services.** One thing that I believe could be streamlined is the Part 1 requirement of written Description and Significance sections. None of my clients read Part 1s, and I’m not sure reviewers really do either, not to cast aspersions. National Register district nominations have required lists of “contributing” buildings for decades now. If the Part 1 Application required proof that a building was listed as “contributing” to a National Register district, isn’t that enough ? Photos would still be required to address integrity. There is no Part 1 to go with the Part 2 we shipped this morning because the old school is an individual National Register nomination. Isn’t this analogous to a building assessed as “contributing” to a historic district?

**NPS Response.** *Regarding why a Part 1 submission is necessary for a building already identified as contributing to a listed historic district, first, a Part 1 submission is required by the Internal Revenue Code and program regulations for all buildings in historic districts or individually-listed properties with multiple buildings; second, there is a difference in the definitions used for a “contributing” building as defined pursuant to the National Register of Historic Places and a “certified historic structure” as defined by the tax incentive program regulations; and, lastly, older National Register nominations may not identify individual properties as “contributing” or not, may contain old, incorrect, or incomplete information, or the status or integrity of the property may have changed since the historic district was listed on the National Register. For these same reasons the second page of the Part 1 submission is needed to evaluate the significance of the property.*

**The Alexander Company.** I believe the most effective way to reduce the burden on the applicant is to provide adequate meeting time with either the SHPO or the NPS reviewer prior to submitting the Part 2. In many cases this can eliminate the need for multiple amendments or appeals. Amendments can be particularly troublesome as they often occur during construction when time delays are much harder to deal with and can run into considerable expense.

**NPS Response.** *The NPS administers the certification program in partnership with the SHPOs, and the SHPOs are the first point of contact, often meeting preliminarily with applicants, answering questions about the program, and making site visits, depending on the individual SHPO office's capacity to do so. SHPOs also have at their discretion the ability to consult with the NPS staff on a given application as part of a preliminary consultation or meeting process.*

**Maine Historic Preservation Commission.** I have not heard of any concerns from any of our HTC consultants or applicants about the collection of information being a burden. My understanding is that applicants generally have no problem with providing as much information as is necessary if they can get fairly consistent guidance within established time frames.

**Washington Department of Archaeology & Historic Preservation.** If the application process in general is to become digitized at some point in the future, it would be useful to be able to digitally submit comments with the applications. However, if this is too far off into the future, it could be useful to convert the review forms into fillable PDFs to be consistent with the HPCA forms submitted by the applicants.

**NPS Response.** *As discussed above in Section 3 in more detail, there are a number of logistical, technological, and practical factors that make submission of the application via electronic means presently unworkable, but we continue to explore this as a future option. The SHPO review sheet is already provided in an MS Word fillable version, which should not differ significantly in functionality from a fillable PDF, but we will look into this further to verify that there is not a significant difference in functionality.*

**Private Individual.** My experience with the HPCA application process is based on projects in size from \$200,000 to \$5,000,000 and I feel the application process for Part 1,2, and 3 submittals works equally well on large and small projects. The forms need little or no change. I find the application process simple enough for the average property owner to complete the forms without assistance from a hired Preservation Consultant. NPS support materials are easy to find on the website and are very helpful, both for the application and rehabilitation. NPS staff and North Carolina SHPO staff are quick to respond to questions.

**City of Chicago Department of Planning and Development.** Maybe NPS allows digital photography now, if not this would be helpful in terms of the time burden.

**NPS Response:** *As discussed above in Section 3 in more detail, there are a number of logistical, technological, and practical factors that make submission of the application via electronic means presently unworkable, but we continue to explore this as a future option.*

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

We do not make 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 assurances of confidentiality. The NPS Privacy Act Officer determined that a SORN is not required for this collection. The information is not used to identify specific individuals and is only used to search for specific landmarks. The information is provided as a normal course of normal business for documenting historical landmarks. The Information collected is only used to conduct program operations.

Social Security/Taxpayer Identification Numbers are protected information and disclosed by the NPS only to the Internal Revenue Service (acting on behalf of the Secretary of Treasury), to the Department of Justice in the event of an investigation, or as otherwise required by law, in keeping with the requirements of the Freedom of Information Act, the Privacy Act, and agency policy regarding PII. State Historic Preservation Office handling of the material is governed by applicable State privacy act laws.

**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 11,841 annual responses totaling 150,432 (rounded) burden hours. The frequency of reporting is on occasion. Based on the comments from our outreach in question 8 above, the average completion times and ranges of times are as follows:

- **Form 10-168 (Part 1):** 15 hours (completion time varies from 2.5 hours for a smaller rehabilitation project of a building already listed in the National Register up to an estimated 40 hours for a project involving a building to be listed as part of a proposed district).
- **Form 10-168a (Part 2):** 51 hours (varies from an estimated 27 to 75 hours).
- **Form 10-168b (Amendment):** 6 hours (varies from an estimated 4 to 8 hours).
- **Form 10-168c (Part 3):** 12 hours (varies from estimated 8 to 16 hours).
- **Form 10-168d (State Review Sheets – Part 1):** 3 hours (varies from an estimated 2.25 to 3 hours)
- **Form 10-168e (State Review Sheets – Part 2/3):** 5 hours (varies from an estimated 2.25 to 7 hours)
  - for Part 2 reviews: 5 hours (varies from an estimated 3.5 to 7 hours).
  - for Part 3 reviews: 4 hours (varies from an estimated 3 to 4.5 hours).
  - for Amendments: 3 hours (varies from an estimated 2.5 to 3 hours).
- **Certification of State and local statutes:** 5 hours (estimated 4 hours for municipal staff time; 6 hours for State Historic Preservation Office review).
- **Certification of State or local historic districts:** 20 hours (combines State Historic Preservation Office (estimated 10 hours) and municipal staff time (average 10 hours)).
- **Appeals:** 40 hours (varies from estimated 30 to 50 hours).

We estimate that approximately 5 percent of Part 1s, Part 2s, Amendments, and Part 3s are completed by individuals, with the remainder completed by private sector; a higher percentage of appeals are attributed to individuals. The estimated total annual number of responses is the average of Fiscal Years 2016 to 2018, which represents an increase from the 2016 submission.

We estimate the dollar value of the burden hours is \$5,553,086 (rounded). We used the hourly rates (including benefits) listed in Table 1 of the Bureau of Labor Statistics news release USDL-19-1649, September 17, 2019, Employer Costs for Employee Compensation—June 2019, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the total annual burden for this collection. The rates for each category of respondents including benefits are: (1) Individuals: \$36.61; (2) Private Sector: \$34.44; and (3) State Government: \$50.79.

**Table 12.1 Total Estimated Annualized Burden**

ACTIVITY	ESTIMATED TOTAL ANNUAL RESPONSES	ESTIMATED AVERAGE COMPLETION TIME (Hours)	ESTIMATED TOTAL ANNUAL BURDEN HOURS*	HOURLY WAGE WITH BENEFITS	\$ VALUE OF ANNUAL BURDEN HOURS
<b>Form 10-168 (Part 1)</b>					
Individuals	88	15	1,320	\$36.61	\$ 48,325
Private Sector	1,663	15	24,945	34.44	859,106
<b>Form 10-168a (Part 2)</b>					
Individuals	77	51	3,927	\$36.61	143,767
Private Sector	1,473	51	75,123	34.44	2,587,236
<b>Form 10-168b (Amendment)</b>					
Individuals	77	6	462	\$36.61	16,914
Private Sector	1,472	6	8,832	34.44	304,174
<b>Form 10-168c (Part 3)</b>					
Individuals	53	12	636	\$36.61	23,284
Private Sector	1,000	12	12,000	34.44	413,280
<b>Forms 10-168d and 10-168e (State Review Sheets)</b>					
Form 10-168d	1,751	3	5,253	50.79	266,800
Form 10-168e (Part 2s)	1,550	5	7,750	50.79	393,623
Form 10-168e (Part 3s)	1,053	4	4,212	50.79	213,927
Form 10-168e (for Amds.)	1,549	3	4,647	50.79	236,021
<b>Certification of Statutes</b>	1	5	5	50.79	254
<b>Cert of Historic Districts</b>	2	20	40	50.79	2,032
<b>Appeals</b>					
Individuals	3	40	120	\$36.61	4,393
Private Sector	29	40	1,160	34.44	39,350
<b>Totals</b>	<b>11,841</b>		<b>150,432</b>		<b>\$0</b>

\* Rounded

**13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

\* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

\* If cost estimates are expected to vary widely, agencies should present ranges of cost



burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 2005, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We estimate that the total non-hour cost burden for this information collection is \$4,490,811 based primarily on application fees and other costs (includes printing photographs and architectural drawings) described in Tables 13.1 and 13.2 below.

Under the current fee schedule, one-half of the application fee is payable upon NPS receipt of Part 2 and one-half upon NPS receipt of Part 3. The amount of fees collected from applicants varies from year to year, depending on application activity. The estimated average application review fee of \$3,000 (50% at Part 2 and 50% at Part 3) is based on the current fee schedule, the estimated average project review fee for FY18, and the projected estimated number of applications for FY20 (comparable to FY17-FY19 approved/certified application numbers).

Based on past experience, the estimate the following application fees:

**Table 13.1. Non-hour cost burden to respondents**

ACTIVITY	ESTIMATED NO. OF RESPONSES	ESTIMATED AVERAGE FEE PER RESPONSE	ESTIMATED TOTAL FEES
Form 10-168a (Part 2)	1,550	\$1,500	\$2,325,000
Form 10-168c (Part 3)	1,000	\$1,500	\$1,500,000

**Table 13.2. Other non-hour costs reported by respondents (such as costs of printing photographs and architectural drawings)**

ACTIVITY	NUMBER OF RESPONSES	COST PER RESPONSE	TOTAL
Form 10-168 (Part 1)	1,751	\$ 76	\$133,076
Form 10-168a (Part 2)	1,550	234	362,700
Form 10-168b (Amendment)	1,549	10	15,490
Form 10-168c (Part 3)	53	122	6,466
State Review Sheets			
Form 10-168d	1,751	18	31,518
Form 10-168e (for Part 2s)	1,550	28	43,400
Form 10-168e (for Part 3s)	1,053	17	17,901
Form 10-168e (for Amendments)	1,549	15	23,235
Certification of Statutes	1	5	5
Certification of Historic Districts	2	10	20
Appeals	32	1,000	32,000
<b>Total</b>	<b>0</b>		<b>0665,811</b>

**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 \$3,602,631. This includes the cost to the Federal Government for salaries and benefits for administering the certification program and related information collection (\$3,102,631 and non-labor costs (\$500,000). The non-labor costs are approximately \$550,000 annually. This accounts for program overhead (\$250,000), travel (\$40,000), tax act program database management (\$75,000) program guidance and technical preservation information (\$100,000), SHPO training (\$75,000), and supplies and other miscellaneous operational expenses (\$10,000). Table 14.1 below shows Federal staff and grade levels associated with this information collection. We used the Office of Personnel Management Salary Table 2019-RUS ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx)) to determine the hourly rate. We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-19-1002 mentioned above). Operational expenses listed in Table 4 below.

**Table 14.1 Estimated annualized cost to the Federal government**

<b>Federal Staff</b>	<b>Grade/ Step</b>	<b>Hourly Rate</b>	<b>Hourly Rate incl. benefits (1.6 x hourly pay rate)</b>	<b>Estimated time (hours)</b>	<b>Annual Cost</b>	<b>Number of positions</b>	<b>Total Annual Cost</b>
Division Chief	14/5	\$56.92	\$91.07	1,976	\$179,958	1	\$179,958
Supervisory Program Analyst	9/5	\$27.93	\$44.69	1,976	\$88,303	1	\$88,303
Administrative Staff	7/5	\$22.84	\$36.54	2,080	\$76,012	4	\$304,046
Supervisory Architect/Historian (Historic Preservation) Reviewers	13/5	\$48.17	\$77.07	1,976	\$152,294	3	\$456,883
Non-Supervisory Historian (Historic Preservation)	13/5	\$48.17	\$77.07	1,976	\$152,294	1	\$152,294
Architect/Historian (Historic Preservation) Reviewers	12/5	\$40.51	\$64.82	1,976	\$128,076	15	\$1,921,146
<b>Total</b>						25	0

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

The changes due to agency adjustments are a result of the 6% (n=691) net increase of application submission during the three year renewal period. The revised total number of responses is a projection of the number of applications for FY20, based on the number of applications approved/certified in FY16-FY19. The net decrease in the estimated burden per activity (see table 15.2 below) is because we recalculated the respondent burden based upon the comments and reviews received in Question 8 above.

**Table 15.1 Estimated program changes**

<b>Activity</b>	<b>Previously Approved</b>		<b>Requested</b>		<b>Net change</b>	
	<b>Responses</b>	<b>Hours</b>	<b>Responses</b>	<b>Hours</b>	<b>Response</b>	<b>Hours</b>
Historic Preservation Application Process	11,150	169,541	11,841	150,432	+691	-19,019

**Table 15.2 Estimated program change by activity**

ACTIVITY	Responses			Time Burden		
	Previously Approved	Current Request	Net Change	Previously Approved	Current Request	Net Change
<b>Form 10-168</b>						
Individuals	74	88	+14	1998	1,320	--678
Private Sector	1,401	1,663	262	37827	24,945	-12,882
<b>Form 10-168a</b>						
Individuals	65	77	12	3,315	3,927	612
Private Sector	1,242	1,473	231	63,342	75,123	11,781
<b>Form 10-168b</b>						
Individuals	94	77	-17	1,410	462	-948
Private Sector	1795	1,472	-323	26,925	8,832	18,093
<b>Form 10-168c</b>						
Individuals	44	53	9	748	636	-112
Private Sector	841	1,000	159	14,297	12,000	-2,297
<b>Forms 10-168d and 10-168e</b>						
Form 10-168d	1,475	1,751	276	1475	5,253	1,565
Form 10-168e (Part 2s)	1,307	1,550	243	6,535	7,750	1,215
Form 10-168e (Part 3s)	885	1,053	168	3,098	4,212	1,114
Form 10-168e (for Amds.)	1,889	1,549	-340	4,723	4,647	-76
<b>Certification of Statutes</b>	1	1	0	5	5	0
<b>Cert of Historic Districts</b>	3	2	-1	180	40	-140
<b>Appeals</b>						
Individuals	4	3	-1	160	120	-40
Private Sector	30	29	-1	1,200	1,160	-40
<b>Totals</b>	<b>11,150</b>	<b>11,841</b>	<b>+691</b>	<b>169,451</b>	<b>150,432</b>	<b>-19,019</b>

**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.**

An annual report and a statistical report on the Historic Preservation Tax Incentives Program is compiled and distributed to the nationwide network of State Historic Preservation Offices, preservation organizations, and individuals upon request. The reports are posted on the program website. The reports contain summary figures only on the overall Federal tax incentives program (such as the total number of projects received in each State and the dollar

amounts involved in the rehabilitation). No advanced analytical techniques are used. We begin the annual report shortly after the end of the fiscal year and typically complete it in late February or early March. A copy of the database (excluding any PII) is used by Rutgers University for an annual study of the aggregated economic impacts of the program. Quarterly lists of certifications are issued, including the name and address of those who have applied for the tax incentives.

**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.**

As in the previous submissions, we are again requesting approval not to display the expiration date. Normally, the individual parts of the Historic Preservation Certification Application are submitted at different times, often several years apart. Omitting the expiration date is advisable in order to avoid confusion and anxiety on the part of the public, who may fear that a part they previously submitted is no longer valid.

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

There are no exceptions to the certification statement.