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

**Nomination of Properties for Listing in the National Register of Historic Places,**
**36 CFR 60 and 63**

**OMB Control Number 1024-0018**

**Terms of Clearance:** None.

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

The National Historic Preservation Act of 1966 (16 USC 470), as amended, authorizes the Secretary of the Interior to maintain a National Register of Historic Places as a list of the Nation's historic, architectural, and archeological resources worthy of preservation. Nominations to the National Register (NR) are made by Federal agencies (FPO), State Historic Preservation Officers (SHPO), territories, the District of Columbia, and Tribal Historic Preservation Officers (THPO) as required by the law and 36 CFR Part 60. These officials are responsible for documenting the nominated properties to the satisfaction of the Secretary. The 1980 amendments to the Act allow for the nomination of properties by local governments or individuals in cases where there is no approved State program. The National Register of Historic Places Registration Form (NPS Form 10-900), the National Register of Historic Plates Registration Continuation Sheet (NPS Form 10-900-a), and the Multiple Property Submission/Multiple Property Documentation Form (NPS Form 10-900-b), are completed by individuals, SHPOs, FPOs, THPOs, or other nominating organizations. The SHPOs, FPOs, and THPOs then forward these forms to the National Park Service (NPS) for nomination to the National Register. As per 36 CFR 60, NPS does not process nominations received directly from the public. The forms are also completed by Federal agencies seeking a determination of eligibility for listing as required by the law and 36 CFR 63. The forms collect only information that is necessary to conform to the requirements of the National Historic Preservation Act and the Federal regulations that implement that Act.

Legal Authorities:
- The National Historic Preservation Act of 1966, 16 USC 470
- National Register of Historic Places, 36 CFR 60
- Determinations of eligibility for inclusion in the National Register of Historic Places, 36 CFR 63

**2.  Indicate how, by whom, and for what purpose the information is to be used.  Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.  Be specific.  If this collection is a form or a questionnaire, every question needs to be justified.**

The NPS uses the information provided on NPS Forms 10-900, 10-900-a, and 10-900-b to evaluate the eligibility of properties and approve them for inclusion in the National Register.  Registration and multiple property documentation forms are evaluated by the National Register staff before listing and are reviewed after listing during periodic program reviews.  NPS review and approval of forms is based on 1) the sufficiency of information provided in the forms and supporting documentation, such as photographs and maps that accompany the forms, and 2) the eligibility of the property when evaluated according to the National Register criteria.  Much of the information requested on the form corresponds to data fields in the National Register computerized database, the National Register Information System (NRIS).  The NRIS provides a readily accessible, online source of information about the National Register and the properties it contains.  Information on the registration and multiple property forms is routinely used by States, Federal agencies, Indian tribes, and others in applying the Federal protections and rehabilitation incentives afforded properties listed in the National Register.  The information is used for heritage education and interpretation to provide a tangible understanding of our common heritage.  Historic context information in multiple property documentation forms also assists States and others in planning for the identification, evaluation, and protection of historic resources.  We have not made any changes to the forms.  We collect the following information:

**NPS Form 10-900 National Register of Historic Places Registration Form**

A.  *Name of Property:* This block identifies the specific property being registered in the National Register according to the various names by which the property has been known.  Although the historic name is generally considered the official name of the property, the inclusion of other names provides an appropriate means of differentiating one property from other similarly named properties already listed in the National Register. It also assists the public and other users who may know the property by these other names.

B.  *Location:* This block identifies the geographic location of the property by street number, street, city, county, state, and ZIP code.  The "not for publication" item is used primarily for resources, such as archeological sites, which would be adversely affected by amateur excavation or vandalism by the general public if the location were disclosed.  In accordance with the National Historic Preservation Act, the National Register is allowed to withhold information on specific locations of properties which might be adversely affected by the release of such information.  The item "vicinity" is used to help locate properties outside of incorporated political jurisdictions.

C.  *State/Federal Agency or Tribal Certification:* The signature of the State, Federal, or tribal certifying official certifies that the documentation provided on the form meets the National Register documentation standards and that its submission meets the professional and procedural requirements set forth in the regulations.  This statement clarifies the accountability of the State, Federal, or tribal official for the content and submission of the form, in keeping with the intent of the National Historic Preservation Act.  It also provides for clear statements of the opinion of the certifying official and any commenting officials, as outlined in the regulations, on whether or not the property meets the National Register

criteria.  The item for the level at which the certifying official has considered the significance of the property indicates the contextual level at which evaluation of the property has taken place, that is, locally, statewide, or nationally.

D.  _National Park Service Certification:_  NPS completes this to record the nature and dates of actions taken regarding the registration of the property in the National Register.

E.  _Classification:_ This block is used to classify the property by ownership of the property, type of property, and the number and nature of resources comprising it.  Since some resources within a property, such as a district, may have been previously listed, that number is also requested. The name of a related multiple property listing provides a useful cross-reference to the multiple property file, if applicable.  This block provides useful information that quickly provides essential facts that relate the property to specific provisions of the National Register program as outlined in the regulations.

F.  _Function or use:_ This block requests information on the current and historic functions or uses of the property.  The block is completed from a list of categories that correspond to those entered in the NRIS.

G.  _Description:_ The narrative description of the physical appearance and condition of a property requested in this block is important in making an accurate assessment of the significance and integrity of the property being registered.  The items for Architectural Classification and for Materials are completed from lists of categories corresponding to those entered in the NRIS.  They provide quick reference to the physical aspects of the property that relate to its integrity, significance, and need for specific preservation treatments.

H.  _Statement of Significance:_ The narrative statement of significance is based on documentary research of the property and the specific assessment of how the property qualifies for listing in the National Register.  Applicable National Register criteria and criteria considerations (exceptions) quickly link the property to the qualifying National Register criteria as specified in the regulations.  Areas of Significance, Period of Significance, Significant Dates, Cultural Affiliation, Significant Person, and Architect/Builder provide easy reference to the specific facts, dates, and associations that underscore the property's historic importance and relate it to the National Register criteria.  All items directly correspond to data elements and categories included in the NRIS.

I.  _Major Bibliographic References:_ This block lists the sources from which the documentation given on the form was compiled and the assessment of the property's significance was made.  This information is necessary to verify information given in the Description and Significance blocks.  This block also requests indication of 1) any previous documentation on file in the NPS, and 2) the location of additional documentation.  This cross-referencing proves useful to tie documentation sources and administrative processes together regarding how the property has been evaluated and for what purposes previously.

J.  _Geographical Data:_ This block provides information on the acreage, UTM or latitude/longitude references, and boundaries for the property being registered.  Acreage, given to the nearest acre, specifies the size of the property being registered.  Locational references provide for one method for recording the geographical location of the property.  The verbal boundary description specifies exactly what land is included and defines its legal boundaries for purposes of listing in the National Register.  The block also requests a concise explanation or justification of how the boundaries and acreage were selected.  Information in this block is essential for identifying exactly what property is being registered

and for ensuring that the boundaries and acreage selected are appropriate to the property's historic significance.  Many free online mapping programs (Google Earth, Bing maps, ArcGIS Explorer) now provide users with the ability to produce property maps that are accurate and cost-effective for use with National Register nominations.

K. *Form Prepared by:* This block identifies the name, organization, address, and phone number of the person(s) directly responsible for compiling the information. This information enables the National Register staff to contact the person directly, if necessary, after consultation with the SHPO, FPO, or THPO.

**NPS Form 10-900-a National Register of Historic Places Continuation Sheet**

This form is used to complete items from forms 10-900 and 10-900-b for which additional space is needed: it is a blank page with a National Register of Historic Places header.  The continuation sheet is used when additional space is needed for historic photographs, drawings, and documents that supplement the historical information requested.

**NPS Form 10-900-b Multiple Property Submission/Multiple Property Documentation Form" (MPDF).**

This form is also used to document properties for inclusion in the National Register.  This form is used in conjunction with NPS Forms 10-900 and 10-900-a.  The MPDF cover form efficiently provides, in a single document, the contextual information necessary for the evaluation of many historic resources related through geography and/or theme.  Because the registration forms for related individual properties do not restate this information—it is required to relate the individual property to the historic context information recorded in the multiple property documentation cover form—their recordation is substantially facilitated and the time to accomplish it significantly expedited.  Furthermore, the evaluation of newly surveyed or discovered resources also will be expedited when they can be related to existing historic context documentation contained in extant MPDF cover forms.  All historic contexts approved for MPDF nominations to the National Register nationwide are available online to further facilitate and expedite the identification, evaluation and registration of additional similar properties.

A. *Name of Multiple Property Listing:* This block identifies the multiple property submission and provides an easy reference by which to link individual properties related to the form.  The name is based on common physical characteristics, on historical events or persons to which the group relates, or architectural or archeological types which describe the properties.

B. *Associated Historic Contexts:* This block lists the historic contexts or an organizational format that groups the information about the related properties.  The titles of the historic contexts include the unifying theme, period of significance, and geographical area.  The block is used to list the themes with which the properties included in the MPDF submission are associated.

C. *Form Prepared By:*  This block identifies the name, organization, address, and phone number of the person(s) directly responsible for compiling the documentation.  This information enables the National Register staff to contact that person directly, if necessary, after consultation with the SHPO, FPO, or THPO.

D. *Certification:* The signature of the State, Federal, or tribal certifying official certifies that the documentation provided on the form meets the National Register documentation standards and that its submission meets the professional and procedural requirements set forth in the

regulations.  The statement clarifies the accountability of the State, Federal, or tribal official for the content and submission of the form, in keeping with the intent of the 1980 amendments to the National Historic Preservation Act.

E.  *Statement of Historic Contexts:* This block includes a discussion of the themes on which contexts listed in block B are based.  Each context is related to significant patterns of American history, architecture, archeology, engineering, and culture.  It is discussed in terms of the historic development of the locality, state, or nation, and in terms of the general areas of significance for which properties related to the group may be listed.

F.  *Associated Property Types:* In this block, the variety of property types representing the contexts discussed in block E are listed.  Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate the underlying themes.  For each property type given, this section will include: a description of the physical characteristics or common associations with events or persons that define the property type; a statement of how the property  type is significant to the areas outlined in the historic context; and the registration requirements, (what  features or characteristics individual properties must retain in order to convey the significance of the property  type and thus be eligible for inclusion in the National Register) based on an analysis of the data collected on the property type.  This section will be a tool in identifying and evaluating resources for nomination to the National Register.

G.  *Geographical Data:* This block describes the geographic limitations of the area where properties included within the multiple property submission exist.  The information is essentially a list of towns, cities, counties, parts of counties, multiple counties, areas of states, regions, or multiple states where the resources are located.

H.  *Summary of Identification and Evaluation Methods:* This block explains the methods used to identify and analyze property types and determine the requirements for listing.  The summary of methods assists the NPS in evaluating and verifying the information given in blocks E and F.

I.  *Major Bibliographic References:* This block lists major bibliographic references, surveys, and study units used to document the property types and historic contexts.  This information is necessary to verify the statements made in blocks E and F.

➢  **NEW Collection**
*Notarized letters to the SHPO.***:** Any private property owner who objects to a nomination is required to submit a notarized statement to the SHPO certifying that the party is the sole or partial owner of the private property and objects to the listing. This is not a new requirement. Notarized letters from property owners were previously omitted as a respondent burden for this collection.

**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.**

At present, nominating authorities upload their nominations as .pdf documents to a secure, NPS File Transfer Protocol (FTP) site dedicated to this purpose.  This platform was created because NPS staff are teleworking in response to the COVID-19 pandemic.  Any party without internet

access is permitted to submit their material using the former process (i.e., either hardcopy or electronically, with the required accompanying maps and photographs) In either case, forms are completed using a Word template (found online at [http://www.nps.gov/subjects/nationalregister/nation-register-forms.htm](http://www.nps.gov/subjects/nationalregister/nation-register-forms.htm)). Photographs are also submitted electronically via the FTP site, or as digital prints on cd-ROMs, at the nominating authority's discretion.

**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 similar information is collected by the agency.  No other agency collects this type of information.  Each property is unique and must be assessed individually to determine if it meets the National Register criteria.

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

The collection of information does not significantly affect small entities.  We have carefully analyzed the collection requirements to ensure that the information requested is the minimum necessary to access properties for inclusion in the national register.  To assist users in creating an NR nomination, we provide sample approved nominations and guidance on how to complete a NR nomination.  Further, all historic contexts approved for MPDF nominations to the National Register nationwide are available online via the NR web page to further facilitate the identification, evaluation, and registration of similar properties.

**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 information were not collected, it would not be possible to maintain the National Register list and to administer the related Federal programs, such as the required Advisory Council for Historic Preservation review and comment, Federal historic preservation tax incentives, Federal project planning, and preservation grant programs.  We cannot collect the information less frequently.  We only collect the information on occasion when someone nominates a property for inclusion in the National Register.

**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;**
* **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that require us to collect 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 June 8, 2021, we published the 60-day FRN in the Federal Register (86 FR 30478) to request OMB to approve the renewal of the information collection associated with nominations of properties for inclusion in the National Register of Historic properties.  We solicited public comments for 60 days, ending August 9, 2021.  We did not receive any comments from the public.

National Register staff entrusted with the task of form renewal hosted a kickoff video chat with representatives of the seven (7) State Historic Preservation Offices identified in the box below.  The purpose of the kickoff meeting was to explain the intent and process by which the National Register program wished to solicit their candid feedback on four key questions.  This kickoff was held on 4/23/21.

The kickoff meeting was followed up with electronic distribution of the 508-compliant form and questions to which the NPS sought candid responses on 4/26/21.  As agreed at the kickoff meeting, respondents were asked to reply within 45 days.

As respondents submitted their replies, National Register staff acknowledged their receipt and assembled the comments (see below).  Any comments or observations warranting feedback

from the National Register program received a detailed reply below.

In addition to soliciting response from colleagues at the State Historic Preservation Offices, National Register staff checked our incoming mail at the Main Interior Building to ensure that any public comments received via the mail could be included in this outreach effort.  We will continue to monitor the mail for any responses or public feedback received.

All respondents—including any members of the public who submit written feedback—will receive an acknowledgment and thank you from the National Register program.

| Position | Affiliation |
|---|---|
| Architectural Historian | Division of Historic Preservation & Archaeology (Indiana SHPO) |
| Federal Programs Coordinator | Texas Historical Commission (Texas SHPO) |
| National Register Coordinator | Kansas Historical Society – Preserve SHPO (Kansas SHPO) |
| National Register Coordinator | Wisconsin Historical Society – SHPO (Wisconsin SHPO) |
| National Register of Historic Places Coordinator | Michigan State Historic Preservation Office (Michigan SHPO) |
| State Historian II | Office of Historic Preservation (California SHPO) |
| Survey and National Register Coordinator | New York State Parks, Recreation and Historic Preservation – State Historic Preservation Office (New York SHPO) |

> **Question 1 - "Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary."**

Respondents' comments:
Comment 1.1
"Yes, the National Register forms are necessary. They provide a standard format for the documentation and recording of historic properties for listing in the National Register. The information included in the forms is used by property owners, federal/state/local officials and agencies, including the State Historic Preservation Offices, and the public to preserve historic properties and raise awareness of their significance."

Comment 1.2
"The information collected is absolutely necessary as it is actively used in consultant projects, city planning, and rehabilitation of structures on a regular basis. Having completed [sic] and accurate information within the nomination form aids the public and private sector [with] the ability to adequately plan and account for properties deemed important based on research and historical evidence. The forms are critical to aiding communities and developers in planning projects and areas of improvement or growth in their towns. The practical applicability of information in the forms helps numerous projects and also records local histories.  One area that could be better explained or removed (maybe) is the 'additional data' section."

*Section 9 of the form has three components—a bibliography of books, articles, and other sources consulted in the preparation of the nomination; the location of previous documentation on file; and the location of additional data. The National Register program is in the process of updating National Register Bulletin 16A and will be sure that the updated guidance makes this point in multiple places and staff will ensure that webinars, workshops, and informal training sessions reiterate these instructions to avoid any confusion.*

Comment 1.3
"What exactly is the Historic Resources Survey Number (if assigned) under Section 9? I feel like each SHPO treats this differently. What is the 'additional data' that is stored in a primary location? I've always interpreted this as the location of the information submitted for nomination not necessarily the research repositories."

NPS Response/Action Taken
*The NPS Heritage Documentation Programs (e.g., Historic American Buildings Survey, Historic American Engineering Record, and Historic American Landscape Survey) assign survey numbers to the resources they document. This is not done by the State Historic Preservation Offices (SHPOs). Additional data is anything that is not listed as one of the items identified in the preceding column on the form (i.e., a bibliography of books, articles, and other sources consulted in the preparation of the nomination). The revised version of the National Register Bulletin 16A, will be updated to provide examples of "additional data."*

Comment 1.4
"The collection of documented 'evidence' is essential to a National Register nomination. In my opinion, there are no unnecessary questions."

Comment 1.5
"The collection of this information is necessary and has practical utility. No questions or prompts on the form are unnecessary."

Comment 1.6
"The information collected is critically important and has very practical utility to the National Register of Historic Places program."

Comment 1.7
"The National Register of Historic Places form constitutes a significant body of information which guides the implementation of the National Historic Preservation Act and related regulations. The forms are essential to the task of conducting a national preservation program and are essential to the efforts of the state historic preservation offices. Having forms allows preservation planners to form precedents for predicting the location and number of unknown resources, and which ones might qualify for listing. The forms are consulted on a daily basis by [identity withheld], its constituents, consultants, and governmental agencies, locally, statewide, and at the federal level. [identity withheld] believes at this point in time that no questions the form requests should be removed."

Comment 1.8
"Certainly, the collection of information on the form is pertinent not only for current use, but also as a permanent record as most surely will lose buildings and sites to time."

Comment 1.9
"As someone working in [identity withheld] I appreciate that there is a standard that includes a historic context. In many instances, a completed NR form is the best (or only) written history for a local area or theme important to the state."

Comment 1.10
"The collection of data and the current form by which that is accomplished is central to maintaining a database of properties listed in the National Register as well as maintaining a consistent standard and integrity of the data collected."

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**Question 2 - "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?"**

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Respondents' comments:

Comment 2.1
"NPS 10-900 NRHP Registration Form= 30-90 minutes; NPS 10-900a NRHP Continuation Sheets= 30-60 minutes; NPS 10-900b NRHP Multiple Property Documentation Form= 45-90 minutes to complete the forms (filling in the blanks and cutting and pasting in text)."

Comment 2.2
"The hours it takes to insert information into the form varies widely. A best guess would be between 10-30 hours (or more) depending on the complexity and variety of the resources used and information going into the nomination. For instance, creating embedded photos for each nomination can take several hours even for 20 photos because the information, logs, photo sizes, and formatting must be corrected for each. If working on a district nomination, or including a large number of photos and figures, the time increases exponentially."

> NPS Response/Action Taken
> *The NPS agrees that the amount of time can vary, depending on the size of the property being nominated.  The issue related to embedding photos is outlined in the photo guidance that requests should not embed photos.  The revisions to National Register Bulletin 16A will reiterate this point.*

Comment 2.3
"A couple hours? Filling out the form is the least burdensome part of the application, timewise. The full time to research, write, and prepare a nomination averages 40 hours or more. The current estimated burden statement provided in the nomination form states 100 hours 'for reviewing instructions, gathering and maintaining data, and completing and reviewing the form;' this seems appropriate for an initial draft. However, as with everything, the variety of information in Sections 7 & 8 vary per SHPO. Some SHPOs require thesis-level nominations, which increases the time burden, especially if subsequent drafts are required before approved to go to a state board."

> NPS Response/Action Taken
> *The respondent notes that "Some SHPOs require thesis-level nominations . . ." which certainly would increase the burden of nomination preparation.  This is not a NPS requirement, so is beyond the purview of the National Register Program.  We can certainly*

*reiterate this point in our upcoming revision of National Register Bulletin 16A: How to Complete the National Register Form.*

Comment 2.4
"The amount of time to research, document in the field, write, and edit a National Register nomination has continued to increase.  Complex or undocumented properties and districts are particularly time-consuming.  The 100 hours estimate to complete the form is a minimum for most nominations and 100-200 hours is more common."

> NPS Response/Action Taken
> This response appears to be a statistical outlier but is nonetheless informative.  Given that the respondent is one of our newer (i.e., less experienced) state coordinators—and we included them in this comment process precisely to identify ways to improve their experience with this part of the nomination process—we will ensure that our staff member who reviews submissions from this state provides additional technical assistance to assist them in identifying efficiencies so as to shorten the time spent in completing this part of the nomination process.

Comment 2.5
"The previously reported 'estimated burden' of 100 hours (on average) is accurate. The time to enter (copy and paste) already-gathered information onto the form is about 2 hours."

Comment 2.6
"It is important to note that the amount of time to complete the form varies according to the complexity and number of properties being recorded.  We completed a series of timed trials for three different scenarios: 1) filing out the form for a single property; 2) filing out the form for a medium-sized district (50 properties); and 3) filing out the form for a large district (300 properties). Here are the results:
- Form for a Single Property: 50 minutes. Completing the form itself took about 15 minutes or so. Adding in the required continuation sheets, maps, images, etc. took another 35 minutes.
- Form for a Medium-sized District:  1 hr. 15 minutes. Copying and pasting the text, especially the footnotes, became much more time consuming than I expected because the formatting would get all weird. Inserting photos also took time. Filling out the checkbox and single line fields were probably about 20 mins of the time.
- Form for a Large District: 2 hrs. Inserting the photos with captions and adding the maps took up the most time.

We estimate that completion of the form averages 1.5 hours for a nomination form, 2 hours for a Multiple Property Documentation Form."

Comment 2.7
"Simple completion of the form ranges from about one hour on the simplest of resources, to three-four hours for districts. This does not include research or actual composition of narratives, but rather the act of inputting information. With research, most single-site nominations range between 30-50 hours from start to completion. Districts obviously relate to their size, but most small districts (50 resources) require between 50-80 hours while large districts (500 resources) require 150-170 hours."

Comment 2.8
"I have usually combined the assembly time with preparing the written material, so I do not have a good estimate for the number of hours."

Comment 2.9
"I would estimate 60-90 minutes to complete/assemble the form an individual property and at least 90 minutes for a district."

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**Question 3 - "Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?"**

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Respondents' comments:

Comment 3.1
"The NRHP forms must be responsive to the documentation of all types of historic resources from all states throughout the U.S.  NPS should ensure NRHP forms meet 508 compliancy requirements."

> NPS Response/Action Taken
> *The NPS and the National Register program are committed to accessibility and 508 compliance and are pleased that our external partners are, too.*

Comment 3.2
"SHPO's [do] a pretty good at providing outlines for drafts that are specific to a property's eligibility, but perhaps this is something that could be better explained in the form/bulletin? Context seems to be the biggest struggle for nomination preparers. Even with our specific outlines regarding a single property and its AOS [Area of Significance], we still struggle to get quality drafts from non-professionals."

> *NPS Response/Action Taken*
> *We appreciate this observation and will take this comment regarding historic contexts under advisement when revising National Register Bulletin 16A: How to Compete the National Register Form to include clearer (or additional) guidance to instruct the non-preservation professional in how to prepare a historic context for a nominated property. The program notes, however, that the historic context relates to researching the property and not to populating the form with the completed research.*

Comment 3.3
"Update Bulletin 16 to correspond with the form."

> NPS Response/Action Taken
> The National Register program is in total agreement with this observation, and it is one of the driving forces behind the planned revision of *National Register Bulletin 16A: How to Compete the National Register Form*.

Comment 3.4
"Clarify the information needed for Section 10's verbal boundary description. Some SHPOs want the full legal boundaries (including metes and bounds); some only want a general description. The former requires a lot more time (and often money to get copies of the legal descriptions from county assessors/registers of deeds)."

> NPS Response/Action Taken
> *The instructions for creating the Section 10 "Verbal Boundary Description" are detailed on pp. 55-58 of National Register Bulletin 16A: How to Complete the National Register Form. We suspect that this preparer may have missed the statements on pages 55 and 58 that cross-reference each other and note that a map may be substituted for the VBD—in other words, it is an either/or situation and both are not required.  We will be sure to see how we*

*might make this clearer in the revised Bulletin and will see that our webinars, workshops, and informal training sessions reiterate this point so as to avoid any confusion.*

<u>Comment 3.5</u>
"Do recognize the necessity of professional services. Most property owners are unable to prepare nominations without considerable SHPO staff support."

<u>NPS Response/Action Taken</u>
*The assistance of historic preservation professionals, or individuals with subject area expertise, is recommended for more complex nominations—such as historic districts comprised of 1,000+ buildings and structures, nominations associated with Historic Tax Credit applications, or high stakes nominations where there are local ordinances or state laws that attach to National Register listing and for which the outreach to local residents and documentation of property owners and solicitation of their support for establishment of a historic district may be complicated and not readily tackled by non-experts.*

<u>Comment 3.6</u>
"While the general nature of the form itself remains sound, we believe that a digital submission process would allow for easier use of the form. Understandably with staffing levels, it has been some time since NPS has updated the various bulletins and guidance for preparing the forms. Having updated bulletins in digital form that encompass all the knowledge and policies from c.1990 to the present would provide a nationally uniform basis for data collecting (via the form). Digital "smart" versions of the form and bulletins would be easily updated. Instructions that could be customized by each state would be useful. For example, if the instructions pulled up examples from each state from the NPS database, it would make the guidance much more useful to each SHPO. Adoption of standard terms for vernacular housing and buildings would be helpful – a bulletin was drafted for this but was never finalized."

<u>NPS Response/Action Taken</u>
*The National Register program is currently exploring options for how to create an electronic form with pull-down menus and "Smart" features such as those described above. To date, we have created an electronic submissions platform that requires additional resources to make the platform sufficiently robust. Providing customized examples for each state would be very nuanced and would require input and a fuller understanding this request. We will plan listening sessions that will provide opportunities to solicit input and feedback on this topic that may be included as a proposed revision to National Register Bulletin 16A: How to Compete the National Register Form.*

<u>Comment 3.7</u>
"NPS should expand its architectural classifications to complete the 20th century. Two pieces I rarely, if ever, use is 'Previous documentation on file' and 'Primary location of additional documentation.' It seems both of these could be either left off the form, or, if they are applicable, then some form of encoding could be done on the form to add this information. The same would be true of UTM references and maps, which perhaps could be generated automatically from an address to populate a page within the document."

<u>NPS Response/Action Taken</u>
*As noted previously, the National Register program is in the process of revising National Register Bulletin 16A: <u>How to Complete the National Register Form</u>. One of the areas highlighted for updating is the Section 7 information on architectural classification. As for deleting "Previous Documentation on File" or "Primary Location of Additional Information," there are many parties that populate those fields to good effect, so the program will not*

*remove those fields.  Our plan to revise the guidance will include a update regarding geospatial data that is consistently flagged for improvement by our NPS colleagues in the CRGIS program of the CRPS Directorate.*

Comment 3.8
"NPS could consider some way of accessing local information to find kmz/kml/shapfiles."

NPS Response/Action Taken
*The National Register program has secured the commitment of the CRGIS program within the CRPS Directorate to assist in capturing and recording more accurate GIS data.  This input will be incorporated in the updated guidance included in a revised National Register Bulletin 16A: How to Complete the National Register Form as well as formal and informal training (e.g., webinars, conference presentations, workshops, etc.).*

Comment 3.9
"I think a transition to all digital forms and digital submissions would lead to the enhanced quality and clarity in the data collected, as well as increase its utility. A digital form would streamline and likely standardize responses, while still allowing for the breadth of information that can be included in the narrative description and statement of significance sections. A born-digital nomination would be easier to collect and would permit the National Park Service, SHPOs, and THPOs to readily analyze quantitative data within the National Register that reveals gaps in research and representation. On the public side of the National Register, it would also be easier for citizens and cultural resource professionals to analyze the collective listings on the National Register and readily reference existing nominations to nominations in-process or related research. The nominations are currently available online, but given the crude database format, it is not the most helpful. All of this would of course also rely on make sure that it is accessible to all who wish to submit nominations."

NPS Response/Action Taken
*The respondent may not be aware that the National Register program transitioned to an electronic submissions process on April 10, 2020 as part of the NPS WASO's aggressive telework stance in response to the COVID-19 global pandemic.  What the respondent refers to as the "crude database format" is not our database.  Instead, it is the NPGallery platform.  We work with users to download of the unrestricted National Register documentation from the National Archives and Records Administration (NARA) website where it resides as part of Record Group 79.*

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**Question 4 - "Any ideas you might suggest which would minimize the burden of the collection of information on respondents?"**

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Respondents' comment(s):
Comment 4.1
"NPS should continue to address accessibility of forms through further digitalization efforts."

NPS Response/Action Taken
*The National Register program is committed to pursuing accessibility to National Register documentation on multiple fronts. As just one example, the National Park Service engaged in a multi-year, multi-million-dollar campaign known as the "Gift to the Nation" project which resulted in the digitization of all National Register documentation spanning the period 1966-2012.  Since 2012, all nominations have been submitted on cd-ROMs and National Register program archivists transfer our digitized copies of National Register records annually to the National Archives and Records Administration (NARA) where they*

*are housed as part of Record Group 79. All unrestricted nominations can be downloaded free of charge by members of the public via NARA's searchable website. In addition, the National Register program is pursuing greater accessibility in the form of 508 compliance.*

Comment 4.2
"Update Bulletin 16 to correspond with the form."

NPS Response/Action Taken
*As noted above in the reply to Response 3.3, the National Register program is in total agreement with this observation, and it is one of the driving forces behind the planned revision of National Register Bulletin 16A: How to Compete the National Register Form.*

Comment 4.3
"There is no way to reduce the burden associated with Sections 7 & 8 if each SHPO has a different threshold of what is acceptable. Even the forms are different from state to state (probably because the current NPS form is not as user-friendly as the previous version)."

NPS Response/Action Taken
*As noted above in the reply to Response 2.3, we can assist State Historic Preservation Officer staff in their understanding of the process and implementation of program guidance, but we cannot enforce lock-step uniformity in a program that is designed to fit a broad number of parameters.  Moreover, as a federal agency we would be wise to choose when to intervene if a state has stylistic or other preferences they wish to enforce because they tier their State Register nomination process off of the National Register process.  In other words, some of what this respondent is reacting to (although unspecified) is likely beyond the purview of the National Register Program.  We can certainly reiterate this point in our upcoming revision of National Register Bulletin 16A: How to Complete the National Register Form.*

Comment 4.4
"Increase financial support for comprehensive historic preservation survey and preparation of historic context statements.  That is necessary for property owners to participate in the preparation of nominations."

NPS Response/Action Taken
*Financial support for the Historic Preservation Fund (HPF) is beyond the purview of the National Register program and to advocate for same would be a violation of the Hatch Act.*

Comment 4.5
"I feel that the font and font size – Times New Roman 12 point – create a burden for people with poor eyesight trying to fill out the form. I would suggest enlarging the font size and using a sans serif font such as Arial. Another burden to all users of the form is the formatting of the fill in the blank lines that not only move when you type on them, but they are also quite tight in their vertical spacing, so people tend to spend time trying to make the form look better when, due to its formatting, it is very unprofessional looking. The formatting of the form seems to be the biggest headache for the user."

*NPS Response/Action Taken*
*The font and font size has been changed to Arial 12 point.  The National Register program improves its 508-compliance record, it will follow best practices are established for font and point size on future generations of its form.  This will be incorporated into all forms of guidance provided by the program.*
Comment 4.6

"Updating of related National Register bulletins, and creation of remote digital submission system would make handling the forms, submitting the forms to SHPOs, and drafting nominations much easier for applicants. Having a uniform and readily accessible database of accepted forms for listed properties is also an essential tool that would assist applicants. Limiting the number of digital images for individual properties to 20 and for districts to an average of one streetscape image per block might lessen the burden on applicants."

> NPS Response/Action Taken
> *As noted previously, the National Register program is in the process of revising National Register Bulletin 16A: How to Complete the National Register Form. As was the case in our reply to Response 3.11, this respondent may not be aware that as part of the NPS aggressive telework stance in response to the COVID-19 global pandemic, the National Register program transitioned to an electronic submissions process on April 10, 2020. Further, as was noted in reply to Response 3.8, the National Register program is researching the feasibility of a fully electronic form. Finally, a "uniform and readily accessible database of accepted forms for listed properties is available online from the National Archives and Records Administration (NARA) website as part of Record Group 79.*

## Comment 4.7
"I rarely use the 'Previous documentation on file' and 'Primary location of additional data' parts of the form. Perhaps the form could automatically generate responses to these."

> NPS Response/Action Taken
> *As noted above in the reply to Response 3.9, we do not anticipate deleting the "Previous Documentation on File" or "Primary Location of Additional Information" fields. There are many parties who do populate those fields to good effect and researchers use the information contained to revise outdated documentation via the preparation of Additional Documentation (updates).*

## Comment 4.8
"Anything that helps with the location data and addresses would be incredibly helpful. I have limited experience with programs like "Endnote" that create bibliographies, but I could see that being helpful – it would help a writer be sure all cited sources end up in the bibliography. Another idea that might be helpful (especially for large districts) is having a "drop-down" menu of the styles and sub-categories in the form."

> NPS Response/Action Taken
> *We will incorporate this into our research regarding the suitability and feasibility of creating a "Smart" form in a future update of the National Register form.*

## Comment 4.9
"I think a digital-born form that could be electronically submitted would minimize the burden of collecting information for a nomination. This is especially relevant when considering how a site or property location is geographically identified and how photographs could be submitted."

> NPS Response/Action Taken
> *On 4/10/2020 the National Register program initiated a fully electronic submissions process. The program has worked to increase "digital-born" records and is working to devise more sophisticated efficiencies and processes that will meet 508 compliance obligations and other mandates. As previously noted, the National Register program continues to research the suitability and feasibility of adopting an electronic form with pulldown menus and other "Smart" features. In addition, we note that all nominations*

*since 2012 submitted on cd-ROMs are annually transfer by National Register program archivists to digitized copies of National Register records to the National Archives and Records Administration (NARA) as part of Record Group 79. Moreover,*

**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.**

Section 304 of the National Historic Preservation Act, as amended, requires the Secretary of the Interior to withhold from disclosure to the public information about the location, character, or ownership of an historic resource, if such disclosure might cause a significant invasion of privacy, risk, or harm to the historic resources or impede the use of a traditional religious site by practitioners.  The only information collected that could be considered confidential in nature is the location of specific properties, their traditional cultural use, and the informants, such as tribal elders, who may testify in the nomination documentation to their cultural importance.  Although this information is reported on the form, and necessary to establish precisely which property is listed, we maintain the confidentiality of certain specific information to protect properties.  This is particularly the case with many archeological sites and certain properties that are subject to vandalism.  It is also the case with places used in traditional cultural practices.  The information provided is given voluntarily, with the understanding that it will be confidential.

**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.   Sometimes, the information that documents the historic significance of a property may be considered sensitive information.  For example, in the case of historic places that are still used for traditional cultural practices, the location of the property, the identity of its specific users, and the informants, such as tribal elders who may testify to the cultural importance of these properties, are kept confidential so as not to interfere with traditional uses.

**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 2,614 annual responses totaling 226,722 annual burden hours. The annual dollar value for the burden hours is estimated to be $24,682,964 (rounded). The estimated burden for each form is listed in the table below. The amount of research or information necessary to meet minimum federal requirements will vary based upon the length and breadth of each nomination. Because it is difficult to come up with precise burden estimates for completing the forms for every possible nomination preparation scenario, we propose the following averages to provide reasonable estimates of the burdens to complete each form based on the type and complexity of the nomination, and the experience of the preparers listed in item 8 above.

This estimated dollar value included the multiplier for benefits based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-21-1647 for Employer Costs for Employee Compensation—June, 2021 at https://www.bls.gov/news.release/ecec.nr0.htm (Released September 16, 2021). The particular values utilized are:

* Individuals - We used the wage and salary costs for all workers from Table 2, which states an hourly rate of $39.01, including benefits.
* Private Businesses (e.g., non-profit and Private Universities): Average hourly wage is $36.64. To obtain the rate for professionals in the private sector we used data from https://www.bls.gov/news.release/pdf/ecec.pdf -Table 4.
* States and Local Agencies: Average hourly wage is $53.68. To obtain the rate for State and local government, we used data from https://www.bls.gov/news.release/pdf/ecec.pdf- Table 3.

Nominations prepared by consultants - We used an average consultant fee of $120 per hour as the hourly wage cost, including benefits.

**Table 12.1. Total Annual Costs to Federal Government**

| Activity | Annual Number | Estimated Time per Response (hours) | Total Annual Burden Hours | Dollar Value of Burden Hour Including Benefits | Total Dollar Value of Annual Burden Hours* |
|---|---|---|---|---|---|
| Preparation and Submission of Nomination Form 10-900 (individuals) | 90 | 250 | 22,500 | $39.01 | $877,725 |
| Preparation and Submission of Nomination Form 10-900 (private sector) | 5 | 250 | 1,250 | $36.64 | $45,800 |
| Preparation and Submission of Nomination Form 10-900 (govt) | 5 | 250 | 1,250 | $53.68 | $67,100 |
| Review of Nomination Forms and Submission to NPS (govt) | 1,282 | 6 | 7,692 | $53.68 | $412,907 |
| National Register Nominations Prepared by Consultants (individuals) | 635 | 120 | 76,200 | $120 | $9,144,000 |

| Activity | Annual Number | Estimated Time per Response (hours) | Total Annual Burden Hours | Dollar Value of Burden Hour Including Benefits | Total Dollar Value of Annual Burden Hours* |
|---|---|---|---|---|---|
| Existing Multiple Property Submission by Consultants | 75 | 100 | 7,500 | $120 | $900,000 |
| Newly Proposed MPDF Cover Document Prepared by Consultants | 36 | 280 | 10,080 | $120 | $1,209,600 |
| New Nominations Prepared and Submitted by Consultants (individuals) | 1 | 150 | 150 | $120 | $18,000 |
| National Register District Nominations Prepared by Consultants (govt) | 435 | 230 | 100,050 | $120 | $12,006,000 |
| Notarized Statement of Owner Objections (private sector) | 50 | 1 | 50 | $36.64 | $1,832 |
| Total | 0 | | 0 | | 082,964 |

**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 the annual cost to the government for this collection of information to average **$660,477(rounded)**.

We used the Office of Personnel Management Salary Table 2021-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB_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-21-1647 mentioned above). Operational expenses listed in Table 14.1 below.

This figure includes the staff time to process and review nominations as well as to administer the information collection.  It includes the cost of designing National Register publications and for publishing notification of pending nominations in the *Federal Register* (as required by public law).  A weighted average cost per hour of $84.72 is calculated based on the following assumptions:

1. Total burden hours for logging in/data entry, technical review of historic resources: 1,282 (number of nominations & MPDF Covers) x 2 hours = 2,564 hours.
2. Total burden hours for reviewing/evaluating/researching historic resources and nominating properties: 1,282 (number of nominations & MPDF Covers) x 4 hours = 5,128 hours.
3. Total burden hours for publishing notices (pending/weekly/DOEs) in the Federal Register 52 (weekly notices) 2 hours = 104 hours.
4. Total annual, recurring cost 7,796 (hours) x $84.72 (rounded) = $660,477.

**Table 14.1.  Federal staff weighted hourly rate**

| Position | GS Level | Hourly Rate* | Hourly Rate incl. benefits *(1.6)* | Estimated percent of time spent on collection work | Weighted average |
|---|---|---|---|---|---|
| Historian (nomination processing) | **11/5** | $39.51 | $63.22 | 20% | **$12.64** |
| Historian (skilled, technical) | **13/5** | $56.31 | $90.10 | 80% | **$72.08** |
| | | | | | **072** |

 * **https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf**

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

Adding the burden for notarized letters to the SHPO increased the number of potential respondents by 50 and the additional hour to complete the process increased the annual burden by 50 hours.   This is not a new requirement. The collection of notarized letters from property owners was previously omitted as a respondent burden for this 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.**

Historic names and addresses of properties pending consideration for listing in the National Register are included in the Federal Register weekly upon receipt of the applications by the NPS. This notice is necessary to allow for public comment as required by Federal regulations. A list of properties entered in the National Register is available from the NPS and online through the Internet. State, Federal, tribal, and local governments; libraries; historical societies; educators; scholars; and other individuals use the list as a record of properties as listed in the National Register.

**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.**

Nominations prepared using NPS Forms 10-900, 10-900-a, and 10-900-b may be in the preparatory stage (e.g., research, writing and appropriate SHPO/FPO/THPO review) before it is formally submitted to NPS for evaluation. The OMB expiration date causes confusion when the form appears to be expired but the historical documentation related to the nomination remains valid. For this reason, we request not to display the expiration date on the three forms.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.