

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

**National Heritage Areas Program Annual Reporting Forms
OMB CONTROL NUMBER 1024-0287**

Terms of Clearance: None

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

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

The NPS uses Forms 10-320, Annual Program Report—Part I Funding Report, and 10-321, Annual Program Report—Part II Progress Report, to track performance metrics needed to distribute funds and report on heritage area management and budgetary activities as directed by Congress. The collection of this information is necessary to allow for national oversight, analysis, coordination, technical and financial assistance, and support to the 55 National Heritage Areas to ensure consistency and accountability across the country.

Legal Authorities

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

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

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

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

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

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

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

The NPS uses the information collected to inform annual program reports and publications and to discern individual heritage area evaluations. This information will track input and outcome measures for management planning and implementation.

The measures outlined on this form will capture information about:

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

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

The collection is 97% electronic the remaining 3% will be for hard copies received by mail or courier service on a case-by-case basis. The program uses standardized electronically fillable forms to provide ease of use, greater reporting consistency, and a simplified submission process to reduce respondent burden. Coordinating Entities will fill out both forms, sign (either with electronic signature or printed, signed, and scanned), and then submit them electronically via email attachment (or hard copy submissions via mail).

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

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

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

This information collection does not impact small businesses or other small entities.

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

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

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

There are no special circumstances regarding this collection of information.

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

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

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 15, 2023, we published in the Federal Register (88 FR 31005) a notice of our intent to request OMB approval for this information collection. In that notice, we solicited comments for 60 days, ending on July 14, 2023. We did not receive any comments in response to that notice.

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

National Heritage Area	Coordinating Entity	Type of Entity
Champlain Valley National Heritage Partnership	Lake Champlain Basin Program, New England Interstate Water Pollution Control Commission	Regional Government
Mississippi Delta National Heritage Area	The Delta Center for Culture and Learning, Delta State University	State Government
Silos and Smokestacks NHA	America's Agricultural Heritage Partnership	Private non-profit

The most salient responses to the questions are presented below.

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

Comment #1: Part I gives a good overview of the program, but Part II is long and repetitive. First, we list how many grants we give out, then we have to break them down and repeat them in each category.

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

Comment #2: “as to unnecessary questions” this information is good to have but it is not necessary to do our work. The information can inform our planning, but we would be doing that planning whether this report existed or not.”

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

“What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information? Please provide separate estimates for the two forms.”

Comment #2: “Part I takes 6 hours. We should only have to identify specific matches over a certain amount, perhaps \$2,500. Listing each \$40 meeting match is not feasible. Part II takes a combine 100 or more hours of time on the part of the 7 people who are responsible for the different programs.”

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

Comment #3: “Hours spent on Part I = 24 and Part II = 65.

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

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

Comment #2: the Service should provide “clear examples of the reporting areas in the Part II form.

NPS Response: The Service will continue to provide examples of completed forms during the annual data call (typically the beginning of November).

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

Commenter #1: An on-line tracking systems of this data collection should be shared at the NPS Regional level associated with each NHA’s cooperative/task agreement.

NPS Response: The report is submitted to the NPS NHA Program Office this information tracks performance measures and progress on management plan goals. The Service is open to exploring an online tracking system in the future. No action taken.

Commenter #3: the fillable PDF or an online form/submission would be helpful. This will allow organizations to submit information after the end of a project versus at the end of the year.

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

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

We do not provide payments or gifts to respondents.

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

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

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

No sensitive questions are asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**

Generally, estimates should not include burden hours for customary and usual business practices.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”

We estimate that there will be approximately 110 annual responses totaling 3,025 annual burden hours. We estimate the total dollar value of the annual burden hours for this collection to be **\$137,753** (see Table 12.1 and 12.2 below). The annual burden hours were estimated by consulting nine current Coordinating Entities. The nine Coordinating Entities provided estimates for how long it took to fill out/prepare each form. Completion time per response varied from 5 hours to 45 hours, depending on the form. We used the average completion time reported to estimate the burden for this collection.

Table 12.1. Estimated Annual Burden Hours

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

We estimate the total dollar value of the annual burden hours to be \$119,604 (Table 12.2). The estimated dollar value of the burden hours for this collection considers the nature of our respondents: state and local government agencies and private businesses, (this includes university and non-profit employees). To estimate the annual burden cost we used Table 1 in the Bureau of Labor Statistics News Release (USD L 23-2567 December 15, 2023, Employer Costs for Employee Compensation—September 2023)¹ to calculate the total annual burden for the following sectors.

¹ <https://www.bls.gov/news.Release/pdf/ecec.pdf>

- Private Sector – Hourly rate of \$41.53, including benefits.
- State and Local Government – Hourly rate of \$59.90, including benefits.

Table 12.2. Estimated Dollar Value of Annual Burden Hours

Sector	Total Annual Number of Responses	Total Annual Burden Hours	Dollar Value of Burden Hours (Including Benefits)	Total Dollar Value of Annual Burden Hours
Part I Financial Report				
NHA Coordinating Entities – Private	43	430	\$41.53	\$17,858
NHA Coordinating Entities - Government	12	180	\$59.90	\$10,782
SUBTOTAL	55	0		00
Part II Progress Report				
NHA Coordinating Entities – Private	43	1,935	\$41.53	\$80,361
NHA Coordinating Entities - Government	12	480	\$59.90	\$28,752
SUBTOTAL	55	2,415		\$109,113
TOTAL	110	3,025		\$137,753

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

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3)

for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no non-hour cost burdens to respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate that the annual cost to the Federal Government to administer this information collection is \$39,499 (rounded), which includes salary costs for staff time to process and review the completed forms and compile an annual program report based on these individual forms submitted. To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2024-DCB² for the following positions:

Position	Grade/Step	Hourly Rate
Program Manager	14/5	\$75.70
Assistant Program Coordinator	12/5	\$53.87

We multiplied the hourly rate by 1.6 to account for benefits following the BLS News Release mentioned above.

Table 14.1 Estimated Annual Cost to the Federal Government

Position	Grade/Step	Hourly rate including benefits (1.6 x hourly rate)	Number of Responses	Hours spent on each application	Total Hours	Total Cost Including Benefits*
Processing of NPS Form 10-320						
Program Manager	14/5	\$121	55	1	55	\$6,655
Assistant Program Coordinator	12/5	\$86	55	1	55	\$4,730
Processing of NPS Form 10-321						
Program Manager	14/5	\$121	55	2	110	\$13,310
Assistant Program Coordinator	12/5	\$86	55	2	110	\$9,460
Compilation of Annual Program Report						
Program Manager	14/5	\$121	8	1	8	\$968
Assistant Program Coordinator	12/5	\$86	16	1	16	\$1,376
TOTAL						039,499

*Rounded

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

There are no changes to the collection.

² <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages#url=2024>

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

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

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

We will display the expiration date on forms and other appropriate materials.

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

There are no exceptions to the certification statement.