

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

Lower Mississippi Delta Initiative

OMB Control Number 1024-NEW

Terms of Clearance: None

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

The Lower Mississippi Delta Initiative is an assistance program established by Congress in 1995 that is intended to bring about the protection, preservation, and interpretation of significant natural, cultural, and recreational resources with the Lower Mississippi Delta by assisting small, emerging, minority and rural museums with planning grants, preservation of music heritage, stabilization/preservation/ interpretation of Historically Black Colleges and Universities, stabilization of historic structures and archeological sites including on government- and non-government-owned sites. The Lower Mississippi Delta region comprises Mississippi, Louisiana, Arkansas, Kentucky, Tennessee, and Illinois.

The P. L. 103-433, Title XI: Lower Mississippi Delta Region Initiatives authorized the Department of the Interior to establish within the National Park Service (NPS) a program to award grants to qualified tribal, governmental and non-governmental entities to assist the Secretary in carrying out those elements of the program which the Secretary deems appropriate. The Secretary is further authorized to award grants and provide other types of technical and financial assistance to such entities to conserve and protect historic and archeological sites and structures in the Delta Region identified in the program prepared pursuant to this section.

One of LMDI's notable strengths is the program's ability to develop connections between National Park Service units and diverse communities throughout the LMDI region. These relationships enable communities that have had no prior interaction with the National Park Service to become partners with the agency, a success that fosters greater awareness of the agency in areas where the National Park Service has no presence. Each year the LMDI receives an annual appropriation from Congress is distributed by way of grants to each state to fund programs. The funding must support partnerships with state and local governments, federally recognized tribes, non-profit corporations, preservation organizations, or grassroots community groups. The focus of projects must also be a priority identified in the LMDI legislation such as the preservation of cultural resources, natural resources, or cultural heritage, or the development of heritage tourism any specify the section of the law that will be addressed. The following guidelines were established for acceptable projects that meet the legislation:

1. A project that results directly in increased heritage tourism within the Lower Mississippi Delta Region;
 2. A product that enhances a visitor's understanding of the LMDR nationally significant stories;
 3. A project that preserves a natural, cultural, or recreational resource; e.g. preservation of a structure or an object that has public visitation; and
 4. A project that adds to the knowledge base concerning a cultural, natural, or recreational resource or provides useful contextual information for a resource.
- Information needs to be readily available and/or provided to the public.

This request is to collect the information necessary to identify qualified entities and to evaluate proposed projects for grant funding.

Legal Authorities:

- **Lower Mississippi Delta Initiative (LMDI) Public Law (PL) 100-460 (Section 1101).** Established in 1994, the law declared [219 counties across the states of Arkansas, Illinois, Kentucky, Louisiana, Mississippi, Missouri, and Tennessee](#) the Lower Mississippi Delta Region. The goal of the program is to initiate projects to preserve the region's cultural and natural resources and to increase tourism.
- **The National Park Service Act of 1916 ([54 USC 100101](#))** Requires that the National Park Service (NPS) preserve the national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments that are necessary for public use, health, and safety.
- **National Wildlife Refuge System Administration Act ([16 USC 668dd](#) and [668ee](#); as amended)** Requires that the FWS administer the National Wildlife Refuge System for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats for the benefit of present and future generations.

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 will use the application (collection) to determine eligibility of potential grant recipients and eligibility of potential grant-funded projects. Further, the application (collection) asks questions to establish alignment between the LMDI program goals and the potential grant recipients and potential grant-funded projects. The LMDI Program does not plan to disseminate the information collected. The information collected is to be used only for program staff to make grant funding decisions.

Justification for questions

Questions 1-10 Establish the Identify and Eligibility of Applicant. <ul style="list-style-type: none">• Organization Name• Type of Organization• Federal Employer Identification Number• Organization phone number• Year Founded• Street Address• City• State• Zip Code• Website URL
Questions 11 and 12 Evaluate alignment with the program's purpose of assisting qualified small entities. <ul style="list-style-type: none">11. Number of paid full-time equivalent staff12. Which best describes your organization's annual income or budget?
Questions 13 and 14 Establish the primary project point of contact. <ul style="list-style-type: none">13. Primary Contact14. What is your role with this Project?
Questions 15 -15 c Establish project contact for financial purposes. <ul style="list-style-type: none">15. Is there another person managing the finances for this project15b. Financial Contact Person15c. What is this person's role within the project
Questions 16 and 17 Establish eligibility of the project (must be with the congressionally identified Lower Mississippi Delta Area) <ul style="list-style-type: none">16. State(s) where project be physically located17. County (or Counties) where project will be physically located
Questions 18 -20b Establish eligibility of the project. <ul style="list-style-type: none">18. Project Description19. Project Title20. Project Category20b. Is the site on Federal or non-Federal land?
Question 20c: DOI Policy requires Tribal consultation on projects with Tribal implications. This question seeks to establish if grant applicants are working with tribes on projects in the Native American Heritage category. <ul style="list-style-type: none">20c. Tribe Consulted and Date
Questions 20d: DOI Policy requires Tribal consultation on projects with Tribal implications. This question seeks to establish to what degree tribes have been engaged in Native American Heritage projects

Questions 21-30 Establishes eligibility of project.

21. Project Abstract
22. Optional – Upload a photograph or video
23. Optional – Upload two additional photographs or videos
24. Optional – include any additional websites or videos about your project
25. Description of Project
26. Project Start Date
27. Project End Date
28. When is grand funding required to be in hand (month/year)
29. Is your timeline flexible
30. Please list any additional active non-federal partners with a substantial role in this project

Questions 31-34 Determine alignment with LMDI goals.

31. Who are the participants and/or target audience for this project
32. What are the anticipated tangible outcomes of the project?
33. Will this project generate any revenue? If yes, please explain.
34. What will happen if this project does not receive funding from this program?

Questions 35-41 Needed for reviewers to understand funding request.

35. Project Budget and Funding Spreadsheet (see required spreadsheet)
36. Optional – upload a scanned PDF of any cost estimates for contracted work included in the budget, if applicable
37. Please list the source(s) of any professional estimates you have received for contract work.
38. What is the Total Project Budget (from spreadsheet)?
39. What is the Total Funding Share from Applicant Organization?
40. Will the project receive financial support from other non-federal sources?
- 40b. Name of other non-Federal Source #2
- 40c. Contributions from non-Federal Source #2
- 40d. Name of other non-Federal Source #3
- 40e. Contributions from non-Federal Source #3
- 40f. Names of all other non-Federal Sources not listed above.
- 40g. Contributions from all other non-Federal Sources
- 40h. Total Non-Federal Match
41. LMDI Grant Request

Questions 22-30 Needed for reviewers to decide how to best allocate available funding.

42. If the grant offered to your organization was 25-50% smaller than requested, how might you modify the project so that it could still move forward?
43. If the grant offered to your organization was 25-50% greater than requested, how might you modify the project so that it could have greater impact?

Questions 44 Needed to ensure that the program does not repeatedly fund the same project.

44. Please list any previous Lower Mississippi Delta Initiative Local Heritage Grants that your organization has received in the last five years.

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 proposed information collection will be 100% electronic. An online portal supported by the SmarterSelect Application Management Software provides an easy-to-use interface to create and manage applications. The information collected is not made available to the public, rather it is used by the LMDI program to award grants.

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 known duplication of effort. Each grant applicant is unique and must meet the requirements of the LMDI program's criteria. This information is not collected by another entity.

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

The collection of information is not intended to cause an undue burden on small business. The collection of information is considered to be a normal business practice for non-profit organizations seeking grant funds.

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.

The Lower Mississippi Delta Initiative (LMDI) Public Law (PL) 103-433 declared 219 counties across the states of Arkansas, Illinois, Kentucky, Louisiana, Mississippi, Missouri, and Tennessee the Lower Mississippi Delta Region. The goal of the program is to initiate projects to preserve the region's cultural and natural resources and to increase tourism.

Each year Congress allocates grant funds for the LMDI Grants. The LMDI grant program must actively seek grant applicants/projects each year that the program receives funding.

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 circumstances that require us to collect the information in a manner 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.

On June 28, 2024, we published a 60-Day Federal Register notice (89 FR 54036). We did not receive any comments in response to that notice.

In addition to the *Federal Register* notice, we consulted with the five (5) individuals identified in Table 8.1 who are familiar with this collection of information to validate our time burden estimates and asked for comments on the questions below.

Table 8.1

Organization	Title
Klipsch Heritage Museum Association	Administrator
Mt. Zion Memorial Fund for Blues, Music, and Justice	Executive Director
But God Ministries	Director of Development
National Women's Relief Corps, Auxiliary to the Grand Army of the Republic	National Senior Vice President
Mardi Gras Museum of Imperial Calcasieu	Museum Director

1. Do you feel that the information collected on the application was necessary and will have practical utility?

Comments: All respondents responded yes, one responded add that “the purpose of the grant was clearly communicated.”

Agency Response/Action Taken: No action taken.

2. Were there any questions you felt were unnecessary?

Comments: All respondents responded no; additional comments included:

- Actually it helped me understand the process better,”
- All questions were necessary to see the full ‘purpose picture’ for LMDI funding.”
- “The application was designed much better than the MS Delta National Heritage Area portal, which was very redundant and excessive. So much so, in fact, that I’m sure it prevented some orgs from applying.
- “The LMDI portal is perhaps the best I have ever used in my experience.”

Agency Response/Action Taken: No action taken.

3. 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?

Comments: Responses included:

- 1 hour (2 responses)
- “a matter of hours”
- “half a day or less”

Agency Response/Action Taken: the program maintains that there are instances where the process may take more than 5 hours to complete the initial application and an average of 2 hours to complete the follow-up reports (Interim and Final)

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

Comments: Three respondents indicated they had no suggestions. Two additional responses included:

- “we had no space for a workplan, but we often revise those anyway during the project.”
- Having someone who can be contacted with questions would be nice. This may be an option that I was unaware of.”

Agency Response/Action Taken: Made additional efforts to highlight on the website contact information of staff that can be contacted if applicants have questions.

5. Are there any ideas you might suggest which would minimize the burden of the collection of information on respondents?

Comments: Three respondents said they had no suggestions. Specific feedback included:

- “Maybe having suggestions up front ahead of the grant opening with organizations that have been on your site before as to how to keep track of in-kind donations and labor for potential projects so that this info is gathered by the time the application opens up.”
- “you need a spell-checker.”

Agency Response/Action Taken: The agency hosts a webinar in advance of the application to prepare applicants for the required information.

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

We did 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.

We do not make any assurance of confidentiality..

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 the dollar value of the burden hours is **\$25,259** (rounded). We used the hourly rates (including benefits) listed in Table 1 of the Bureau of Labor Statistics news release USDL-24-1863¹ (September 10, 2024, Employer Costs for Employee Compensation—June 2024) to calculate the total annual burden for this collection. The rates for each category of respondents including benefits are:

- *Private entity:* \$43.94
- State or local Government: \$61.37

We estimate that we will receive 100 applications (Private Sector n=80 and Local Government 20). Of those, we anticipate awarding 8 grants (Private Sector n=6 and Local Government n=2) per year. The burden hours for each awardee will vary depending on the type of application and reporting (see Table 12.1). Based on feedback received as part of our outreach to recent

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

applicants, we believe the estimated hours accurately reflect the time required to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing the form, and submitting the subsequent reports.

Lower Mississippi Delta Initiative Local Heritage Grants Application

Table 12.1 Total Estimated Annualized Burden

Respondent	Activity	Annual No. of Respondents	Avg. Time per Response (hours)	Total Annual Burden Hours*	Hourly Labor Costs Incl. Benefits	Dollar Value of Annual Burden Hours
LMDI Grant Application						
Private Sector	Application	80	5	400	\$43.94	\$17,576
Government	Application	20	5	100	\$61.37	\$6,137
Mid-Point Report						
Private Sector	Mid-Point Report	6	2	12	\$43.94	\$527
Government	Mid-Point Report	2	2	4	\$61.37	\$246
Final Report						
Private Sector	Final Report	6	2	12	\$43.94	\$527
Government	Final Report	2	2	4	\$61.37	\$246
Totals:		116		532		\$25,259

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.)

We have not identified any non-hour cost burden associated with this collection.

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 \$16,091(rounded). To determine average hourly rates, we used Office of Personnel Management Salary Table [2024-RUS²](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf) as an average nationwide rate. A rate of 1.6% was used to calculate benefits based on the *Bureau of Labor Statistics News Release mentioned about*.

² https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf

Table 14.1 Federal Salaries

Activity	Grade/ Step	Hourly Rate	Hourly Rate w/ Benefits (x 1.6)	Total Responses	Time per Response (hours)	Total Annual Hours	Annual Cost
Review Applications to determine eligibility	13/05	\$ 56.16	\$89.86	100	20 min	33	\$2,965
Review and Rank Applications (reviewer 1)	13/05	\$ 56.16	\$89.86	100	20 min	33	\$2,965
Review and Rank Applications (reviewer 2)	13/05	\$ 56.16	\$89.86	100	20 min	33	\$2,965
Review and Rank Applications (reviewer 3)	13/05	\$ 56.16	\$89.86	100	20 min	33	\$2,965
Compliance with cultural and natural resource laws	12/05	\$47.22	\$75.55	8	5 hrs.	40	\$3,022
Recordkeeping (per grant)	12/05	\$47.22	\$75.55	8	2 hrs.	16	\$1,209
Total							\$16,091

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

This is a new collection.

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

There are no plans for publication of the results of these information collections.

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

We will display the OMB Control Number and expiration date on 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.