

41Supporting Statement Part A

Nomination of Properties for Designation as National Historic Landmarks 36 CFR 65

OMB Control Number 1024-0276

Terms of Clearance: None.

Justification

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

The National Historic Landmarks program is authorized by the *National Preservation Programs (54 USC 300101)* which directs the Secretary of the Interior, through the National Park Service (NPS, we), to survey historic and archeological sites, buildings, and objects to determine those that possess exceptional value in commemorating or illustrating the history of the United States. In accordance with the law and 36 CFR Part 65, private citizens, businesses, Federal agencies (FPO), State and local public agencies, State Historic Preservation Officers (SHPOs), territories, and Tribal Historic Preservation Officers (THPOs) may submit nominations for National Historic Landmark (NHL) designation. An NHL is an historic building, site, structure, object, or district that represents an outstanding aspect of American history and culture. There are approximately 2,650 properties designated as NHLs.

Designation as an NHL:

- ensures that stories of nationally important historic events, places, or persons are recognized and preserved for the benefit of all citizens
- may provide the property's historic character with a measure of protection against any project initiated by the Federal Government
- may ensure eligibility for grants, tax credits, and other opportunities to maintain a property's historic character

Legal Authorities:

- *Historic Sites Act of 1935 (16 USC 461-467 et seq.)* - Declaration of national policy. It is declared that it is a national policy to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States.
- *National Historic Landmarks Program (36 CFR Part 65)* - The purpose of the National Historic Landmarks Program is to identify and administer the designation process for National Historic Landmarks and encourage the long-range preservation of nationally significant properties that illustrate or commemorate the history and prehistory of the United States.

- 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.**

Instructions for submitting a letter of inquiry and completing NPS Form 10-934 are available on the NHL Web site at <https://www.nps.gov/subjects/nationalhistoriclandmarks/apply.htm>. We collect the following information:

Letter of inquiry

Prior to nominating a property for NHL designation, respondents must send a letter of inquiry to the NPS. The letter introduces the property to the NHL Program staff and serves as a formal, written record of initiating the NHL designation process. It provides an overview of the property, its historic significance, and its historic integrity, including, but not limited to:

- Historic importance of the property. What nationally significant story does the property tell?
- Current condition and integrity of the property. Has the property undergone major alterations since the historic period? If so, how extensive are these alterations?
- Support of the property owner. Is the property already listed in the National Register of Historic Places?
- Supporting documents, such as photographs or brochures.

Nomination

We use NPS Form 10-934 (National Historic Landmarks Nomination) to collect information on properties nominated for designation as an NHL. We review the forms to evaluate the eligibility of the property being nominated and submit them to the Secretary of the Interior's National Park System Advisory Board (NPSAB). The NPSAB recommends those properties that meet the criteria for NHL designation to the Secretary of the Interior. The Secretary decides whether or not to designate a property as an NHL.

The Secretary of the Interior's decision 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 NHL criteria.

States, Federal agencies, Indian tribes, and others use the information in applying the Federal

protections and rehabilitation incentives afforded properties designated as NHLs. The information is used for heritage education and interpretation to provide a tangible understanding of our common heritage. Historic context information in the forms also assists States and others in planning for the identification, evaluation, and protection of other related historic resources.

We collect the following information on NPS Form 10-934:

Name and Location of Property: Identifies the specific property being designated as an NHL 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 designated as NHLs. It also assists the public and other users who may know the property by these other names. This section also identifies the geographic location of the property by street number, street, city, county, and state.

Significance Data: Applicable NHL criteria and criteria exceptions quickly link the property to the qualifying NHL criteria as specified in the regulations. NHL Themes, Period(s) of Significance, Significant Person(s), Cultural Affiliation, Designer/Creator/Architect/Builder, and Historic Contexts provide easy reference to the specific facts, dates, and associations that underscore the property's historic importance and relate it to the NHL criteria.

Sensitive Information: Identifies resources, such as archeological sites, that would be adversely affected by amateur excavation or vandalism by the general public, if the location were disclosed. In accordance with Section 304 of the National Historic Preservation Act, the NHL Program is allowed to withhold information on specific locations of properties that might risk harm to the historic resources, impede the use of a traditional religious site by practitioners, or cause a significant invasion of privacy by the release of such information.

Geographical Data: Provides information on the acreage, Universal Transverse Mercator (UTM) grid references or latitude/longitude coordinates, and boundaries for the property. Acreage, given to the nearest acre, specifies the size of the property. UTM or latitude/longitude references provide for one method of mapping and 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 designation as an NHL. We also request a concise explanation or justification of how the boundaries and acreage were selected and discerned. Information in this block is essential for identifying exactly what property is being designated and for ensuring that the boundaries and acreage selected are appropriate to the property's historic significance.

Significance Statement and Discussion: Narrative statement based on documentary research of the property and the specific assessment of how the property qualifies for designation as an NHL relative to one or more NHL criteria and themes.

Property Description and Statement of Integrity: Classifies the property by Ownership of Property (Private, Public Local, Public State, Public Federal, Tribal), Type of Property (Building(s), District, Site, Structure, Object) and the number and nature of resources comprising the property (contributing or noncontributing to the historic character). This section quickly provides essential facts that relate the property to specific provisions of the NHL Program as outlined in the regulations. The narrative description of the historic and current physical appearance and condition of a property is important in making an accurate assessment of the high level of integrity needed for a property to be designated.

Major Bibliographic References: 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 Significance and Description blocks. We also request information on 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 previously.

Form Prepared by: Identifies the name, organization, address, phone number, and email of the person(s) directly responsible for compiling the information. This information enables NHL program staff to contact the person directly, if necessary. This block also contains the name, address, and telephone number of the NHL program staff member(s) responsible for reviewing and editing the nomination.

- 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.**

After the program receives the letter inquiry an evaluation of the property's ability to meet NHL criteria is conducted and a letter of inquiry response is sent to the proponent with a recommendation of no, needs more information, or yes. Properties that do not appear to meet NHL criteria or that need to submit additional information are not recommended to prepare a nomination. Properties that do appear to meet NHL criteria are recommended for NHL nomination.

Forms are submitted in electronic format using a Word template that is provided by the NHL Program to proponents who receive recommendation of yes in their letter of inquiry response. The forms are not available online to ensure that potential nomination preparers do not expend the effort and time for a nomination until they have consulted with the NHL Program; the NHL Program staff also frequently edit the submitted content of the electronic form. Photographs are submitted as digital files and embedded in the Word template. Figures such as illustrations, floor plans, site plans and maps are submitted electronically. The submission of original, hard-copy United States Geological Survey (USGS) map marked with the Universal Trans Mercator points for the property under consideration is no longer a requirement. The electronic submission of these maps and other materials have proved more cost-effective, increased information accuracy, and reduced the burden of obtaining hard-copy maps.

- 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.**

No similar information is collected by other NPS offices or other Federal agencies. Each property is unique, and the NHL criteria are unique, and each property must be assessed individually to determine if it meets NHL criteria.

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

We have carefully analyzed the collection requirements to ensure that the information requested is the minimum necessary. Nominations for successfully designated properties are available online to aid users in completing an NHL nomination. NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations was updated and posted online as a full accessible PDF in 2023. Further, NHL Theme Studies are also available online to facilitate the identification, evaluation, and designation of similar properties. In addition, NHL program staff advise preparers at all steps of the process by request. We also allow the submission of digital images and maps as supporting documentation for nominations.

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 information is collected when a property is nominated for NHL designation. Without these submissions, we could not identify properties eligible for NHL designation or administer associated Federal programs, including Advisory Council on Historic Preservation review, historic preservation tax incentives, Federal project planning, and preservation grant programs. The information would also be unavailable to Federal agencies, States, local governments, Indian tribes, and others who rely on it to apply Federal protections and rehabilitation incentives for NHLs. In addition, it supports heritage education, interpretation, and our ability to advise Congress on potential National Park System units and other federally recognized or owned properties.

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.

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 September 4, 2025, we published in the *Federal Register* (90 FR 42777) a notice requesting public comment on this information collection. The comment period ended on November 3, 2025. We did not receive any comments.

In addition to the Federal Register Notice, we contacted four cultural resource specialists and one Deputy State Historic Preservation Officers (Table 8.1) familiar with the NHL nomination process. We asked them to give their best estimates on the time required to prepare a National Historic Landmark nomination. An email reminder was sent to all non-respondents if we did not receive a response within the designated time frame.

Table 8.1: Persons Contacted Outside the Agency

	Title	Affiliation
1	Independent Consultant	Independent Consultant
2	Owner/Principal	Clerestory Preservation

	Title	Affiliation
3	Interim Director	University of Delaware Center for Historic Architecture and Design
4	Consultant	NEW Solutions
5	Deputy State Historic Preservation Officer and State Archaeologist	History Colorado

Specifically, we asked:

“Based on your experience with the NHL Program, is the collection of information on the NHL form necessary and what practical utility does the information have?”

Comment 1: *The information on the form is necessary to identify the specific national significance of a resource, while the comparative analysis aids in understanding its level of significance and integrity relative to other similar resources. That understanding is enhanced by the description of its current appearance relative to its historic appearance. Location and mapping are useful tools for mitigation issues.*

Comment 2: *Yes, the information requested in the NHL form is necessary to establish a nominated property's location, the boundary of the nominated property, its historic significance, its construction/development history, the extant resources and whether they contribute to an understanding of its significance, and the property's historic integrity related to its significance.*

Comment 3: *Yes, I think the information collected on the form is necessary. I believe that the NHL forms (especially the NHL not the NR program) should be a definitive (as best as possible at the time of nomination) history, as well as present a scholarly argument about the importance of the building. Besides those two things, NHLs also serve as models for historic preservation best practices, and models for architectural history scholarship, and should be upheld in the preservation field as examples of "what to do." Additionally, the great strides the NHL program has made to recognize new and diverse historic resources through its contexts and attendant nominations, also provides helpful contexts to those writing National Register nominations for similar historic places (albeit not nationally historic).*

Comment 4: *Yes, the information is necessary and practical.*

Comment 5: *The information collected on the form is necessary and does provide practical utility. The form allows for a full argument of eligibility in a way that historic NHL designation forms do not, so that only truly remarkable properties are being designated as NHLs.*

NPS response/Action Taken:

The respondents each said the information collected on the form is necessary and practical. No action required.

Are there any questions on the form which you feel are unnecessary?

Comment 1: *No.*

Comment 2: *No, all questions are relevant.*

Comment 3: *No.*

Comment 4: *No.*

Comment 5: *There are not.*

NPS response/Action Taken:

The respondents each agreed there are no unnecessary questions on the form. No action required.

“What is your estimate of the amount of time (hours) it takes to complete each form? You may provide estimates for both a straightforward nomination and more complex one.”

Comment 1: *At least 1,000 hours, but I am very detail-oriented, more-so than is really needed for an NHL.*

Comment 2: *An average estimate of 588 hours appears to be accurate, accounting for the collection and analysis of all necessary information related to historic background and contextual analysis, onsite conditions, and actual completion (i.e., writing, formatting, etc.) of the form.*

Comment 3: *CHAD has recently (past 5 years) completed two successful NHL nominations. One probably took around 4-6 months (640-960 hours) of time to complete. I would estimate the other one took closer to 1 year of time to complete (1920 hours). This was due to at least three rounds of edits (note: none from subject matter experts) that really were overly critical about personal preferences. And I would say ultimately did not impact the nomination in a net-positive way.*

Comment 4: *600 hours average.*

Comment 5: *A more simple form may take as few as 350 hours, while 588 hours would be on the complex side.*

NPS response/Action Taken:

Based on the comments in this section and previous submissions we estimate the average response burden to be 588-600 hours, with nominations for more complex properties and with multiple stakeholders taking additional time. NPS does not control property complexity or requests for stakeholder input received by nomination preparers.

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

Comment 1: *I wish the description section was still first before the history section so the reader has an image of the resource and its historic integrity before delving into the history. Comparative analysis should be last so the reader has all of the information needed to understand the comparisons.*

Comment 2: *Since the information collected is unique to each property nominated, the quality of the nomination very much depends on the working relationship between the nomination author(s) and the NPS staff who review it. In my experience, staff's comments and questions have helped hone the most salient points to be made while also helping to avoid extraneous information (and thus unnecessary work). Staff are also very open to disagreements with their suggestions in rare instances when they are "off the mark." The quality of the final nomination therefore cannot be achieved simply through filling in form fields.*

Comment 3: *While I understand the need to coordinate with SHPOs, I think providing them with "courtesy edits," should come with parameters. The NHL nomination process is so long and difficult, and often closely coordinated with NHL staff members, that in my experience, the SHPO offices have provided long and frankly unnecessary comments on these documents, which have slowed down the process tremendously. One of the two recent NHL nominations completed by CHAD was greatly impacted by a SHPO courtesy edit--some of which was requesting conformations with how they do NRs--which an NHL nomination is not. I would potentially rethink SHPO involvement / provide clear roles for the SHPO reviewers, especially if the NHL staff and subject matter experts have already provided detailed guidance / feedback.*

Comment 4: *For UTM's, specify the USGS map date used. Wonders if the zip code should be added again? Seems to remember it helped with identifying places associated with members of congress.*

Comment 5: *It is not always clear how NHLs are different from National Register properties, so maybe a prompt beyond simple eligibility would be helpful for an argument regarding why this property is elevated beyond the NRHP.*

NPS response/Action Taken:

Several comments addressed program guidance, organization of nomination materials, or general review issues that do not affect the information collected. These can be addressed through revised guidance rather than changes to the form. NPS considered suggestions to add the USGS map date and zip code; however, the form already specifies non-WGS84 datum requirements, and zip codes are unnecessary given existing address fields. A comment suggesting clearer differentiation between NHL and National Register eligibility can be addressed within the narrative guidance and does not require form revisions.

“Do you have any suggestions on ways to minimize the burden of the collection of information on respondents”

Comment 1: *The two biggest burdens for me are GIS mapping, which I cannot do, and the 508 captioning. 508 captioning is a skill that only someone that does it all the time can master (in my humble opinion). Perhaps WASO could take over the 508 compliance.*

Comment 2: *None at this time.*

Comment 3: *Again, I would minimize reviews outside of NHL staff and the designated subject experts. I think having too many "general" reviewers negatively impacts the process. As where subject matter experts add to the strength of the nomination. Overly critical general reviewers knit-picking language does not help.*

Comment 4: *I don't believe there is a burden. NHLs are incredibly significant properties and the collection and analysis of information regarding that significance should be rigorous.*

NPS response/Action Taken:

Several of the comments say the burden is appropriate, or reference issues such as external reviews not pertinent to the content of the form. Comment 1 notes the difficulty of providing GIS maps and 508 alt-text (captioning). These issues are not directly related to the form and being addressed by the NHL Program through updated map guidance (currently under review) and how-to sheets and direct assistance for 508 compliance.

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

We do not provide any payments or gifts to respondents. After the Secretary of the Interior designates an NHL, we do provide a bronze plaque, free of charge, bearing the name of the property and its year of designation. This plaque attests to a property's national significance. The plaque is presented to the owners who then display it publicly and appropriately.

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, allows us to withhold from public disclosure 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, it is necessary to establish precisely which property is designated and why, the NPS maintains 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.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

We do not ask questions of a sensitive nature.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that we will receive about 45 responses annually, totaling **13,990** burden hours.

We estimate the dollar value of the burden hours to be **\$1,745,686** (rounded). We used the Bureau of Labor Statistics news release USDL-25-1358 September 12, 2025, Employer Costs for Employee Compensation—June 2025 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), to determine hourly wages and calculate benefits to prepare initial letters of inquiry.

- **Individuals:** We used the wage and salary costs for all workers from Table 1, which states an hourly rate including benefits as \$48.05.
- **Private Sector:** We used the wage and salary costs for all workers from Table 5, which states an hourly rate including benefits as \$45.65.
- **State Government:** We used the wage and salary costs for all workers from Table 3, which states an hourly rate including benefits as \$63.94.

- **Nominations:** We used the average consultant fee of \$125 per hour. We estimate that each respondent will require an average of 558 hours per nomination.

Table 12.1: Estimated cost based on the hour burden of the collection

Requirement	Annual Number of Responses	Completion Time (hours) Per Response	Total Annual Burden Hours	Hourly Rate Including Benefits	\$ Value of Annual Burden Hours
Letter of Inquiry					
Individuals	3	2	6	\$48.05	\$288
Private Sector	7	2	14	\$45.65	\$369
Government	10	2	20	\$63.94	\$1,279
Nominations					
Individuals	5	558	2,790	\$125	\$348,750
Private Sector	10	558	5,580	\$125	\$697,500
Government	10	558	5,580	\$125	\$697,500
Totals	45		11160		\$ 1,745,686

- 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.

We have not identified any non-hour cost burden.

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 collection will be **\$780,356**. We base this on staff time to process, review, and edit nominations and to administer the information collection. We used the Office of Personnel Management Salary Table 2025-DCB¹ to determine hourly wage rates. To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with BLS News Release USDL-25-1358, mentioned above.

Table 14.1. Annualized cost to the Federal government

Position	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time (hours)	Annual Cost*
Historian	12/5	\$55.07	\$88.11	520	\$45,817
Historian	12/5	\$55.07	\$88.11	1,872	\$164,942
Historian	12/5	\$55.07	\$88.11	1,872	\$164,942
Historian	12/5	\$55.07	\$88.11	1,872	\$164,942
Historian	13/5	\$65.48	\$104.77	416	\$43,584
Historian	13/5	\$65.48	\$104.77	1,872	\$196,129
				Total	\$780,356

*Rounded

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

The change in respondent burden is the result of several adjustments to improve the accuracy of burden estimates. First, non-public-facing activities were removed from ROCIS after determining that these activities do not constitute respondent burden under the Paperwork Reduction Act.

Second, the net increase in respondent burden hours reflects a refined and more accurate estimate based on actual submissions received since the last approval period, as well as stakeholder feedback summarized in Question 8. These updates better align the burden estimates with current reporting practices and respondent experience.

Table 15.1 Program Adjustments

¹ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages?url=2025>

Activities	Anticipated Completed Responses			Anticipated Respondent Burden (hours)		
	Current Request	Previously Approved	Net Change	Current Request	Previously Approved	Net Change
Letter of Inquiry						
Individuals	3	3	0	6	6	0
Private Sector	7	7	0	14	14	0
Government	10	10	0	20	20	0
Nominations						
Individuals	5	5	0	2,790	1,720	1,070
Private Sector	10	10	0	5,580	3,440	2,140
Government	10	15	0	5,580	5,160	420
	45	50	-5	13,990	10,360	+3,630

- 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.**

A list of properties designated as NHLs is available online through the NHL Web site. This list is used by State, Federal, tribal, and local governments; libraries; historical organizations; educators, scholars; and other institutions and individuals as a record of properties designated as NHLs. In addition, a copy of the final approved nomination form for the NHL property is available online through the NHL web site.

- 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 continue to request permission to not display the expiration date on the forms. A nomination process (e.g., research, writing, review, and editing) may take several years to complete before they are submitted to the NPS. Displaying the expiration date may cause confusion when the historical documentation is still valid and useable.

- 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.