

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

**National Underground Railroad Network to Freedom Program
OMB Control Number 1024-0232**

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 Underground Railroad Network to Freedom Act of 1998 (54 U.S.C. § 308301, et seq.) authorizes the Secretary of the Interior (Secretary) to establish the Network to Freedom (Network). The Network is a collection of sites, facilities, and programs, both governmental and nongovernmental, around the United States. All entities must have a verifiable association with the historic Underground Railroad movement. The National Park Service (we, NPS) administers the Network for the Secretary. Through the Network, we coordinate preservation and education efforts nationwide and are working to integrate local historical sites, museums, and interpretive programs associated with the Underground Railroad into a mosaic of community, regional, and national stories.

Federal agencies, State Historic Preservation Offices, other State agencies, local governments, organizations, and individuals who wish to become members of the Network must complete Form 10-946, *National Underground Railroad Network to Freedom Application*. We review the completed form to verify the historical associations and management activities.

One of the principal components of the Network to Freedom Program is to validate the efforts of local and regional organizations to make it easier for them to share expertise and communicate with NPS and other Network participants. Local entities participate and contribute to this effort by becoming Network Partners. Partners of the Network to Freedom Program work alongside and often in cooperation with the NPS to fulfill the program's mission. They are closely involved in the entire process of preserving resources, commemorating, and educating the public about the Underground Railroad. Many partners have worked cooperatively with the NPS in either formal or informal roles to accomplish these activities. Most importantly, it is often through the dedicated efforts of Network Partners that new elements are added to the Network to Freedom.

The Network to Freedom and Network Partners are two closely interrelated parts of the Network to Freedom Program. In some circumstances, Network Partners can qualify as elements of the Network to Freedom if they have met the Network's established criteria. More commonly, Network Partners are the entities that work to add new elements to the Network to Freedom. Network Partners are not authorized to use the Network to Freedom logo. That use is a characteristic of elements included in the Network to Freedom.

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

We will continue using NPS Form 10-946, *National Underground Railroad Network to Freedom Application* to verify a candidate's historical association with the Underground Railroad and to evaluate the candidate's activities (especially for interpretive programs and facilities). The decision to include sites or properties applying for inclusion in the Network is based on the following key factors:

- have a clear historical association to the Underground Railroad, either in program activities, collections, or site association.
- be clear, convincing, and have well-documented evidence of historical association.
- submit photographs, preferably maps, to verify location and current appearance.
- describe collection or activity associated to the Underground Railroad as well as explain management characteristics and protocol.

After an element is included in the Network, the information collected in *NPS Form 10-946* becomes available to the public for research. Key information is publicly available on the Network website (www.nps.gov/ugrr). NPS and other interested parties use the information for research, education, heritage tourism, and preservation programs. The information provides a better understanding of our common heritage that contributes to a more thorough analysis of the Underground Railroad movement than previously available. Members use the information to provide written, social media, or audiovisual products for public information. Additionally, the information supports future efforts to identify, evaluate and protect historic resources that are largely overlooked.

To apply to the Network, all candidates must complete the first section (cover page) of the application, which requests basic data to identify the candidate type, owner or manager, and respondent. Respondents must then also complete one of the following three sections depending on the type of request:

- Sites, if applying for inclusion as a site.
- Facilities, if applying as a facility.
- Educational and Interpretive Programs, if applying as a program.

Managers of programs and facilities in the Network may be required to certify that nothing has changed since joining. If there have been substantial modifications to the program or facility, the manager will be required to resubmit an application.

The only requirement for becoming a network partner is the person/organization must have some association with preserving, commemorating, or educating the public about the Underground Railroad. Secondly, the prospective partner's actions must be consistent with the spirit of the missions and practices of the Network and the NPS. Prospective partners must

submit a letter with the following information:

- Name and address of the agency, company, or organization
- Name, address, phone, fax, and email information of principal contact
- Abstract not to exceed 200 words describing the partner's activity, or mission statement and
- Brief description of the entity's association with the Underground Railroad

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.

In the last three years, applications have been submitted electronically as email attachments and from July 2023 to July 2024, via a proprietary web portal system. To accommodate electronic submission, a template for the form is available on the Network website. The majority of submissions have scanned electronic attachments detailing supplementary material; however, respondents may also submit physical attachments in a paper-based format. To reduce the respondent burden, prospective partners are encouraged to submit information electronically.

After briefly utilizing a proprietary web portal from July 2023 to July 2024, the Network to Freedom discontinued its use. The custom-built platform lacked refinement and proved to be overly burdensome and difficult for public users and staff members to utilize with any degree of confidence. Most preferred to submit the templated Word version of the form instead, which remained available as a submission option.

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. The information pertaining to prospective partners is unique and not collected by any other office. For sites recognized through other evaluated inventories at the State or Federal levels, we encourage those applicants to use existing information, especially for the statement of the Underground Railroad association.

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

The information we collect is the minimum needed to evaluate the candidate for inclusion in the Network and as a partner. We also encourage the use of digitized forms and make these available to respondents to reduce paperwork and copying. To save time and effort, we encourage respondents to contact program staff who can provide technical assistance in the completion of the application forms. NPS program staff also offer workshops, upon request, on how to document Underground Railroad associations and complete the application form.

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.

We would not be able to maintain the Network, as mandated by the program's establishing legislation if we did not collect this information about Underground Railroad-related resources. Respondents complete an application only at the time they propose a site, facility, or program for inclusion in the Network. Without this information, we would be unable to comply fully with the objectives of the program. These objectives are to (1) provide the public with a better understanding of the significance of the Underground Railroad in American history, and (2) provide assistance to State and Federal agencies, tribal nations, municipalities, and organizations in the identification, preservation, and protection of Underground Railroad-related 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 that require us to collect this 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.

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 October 2, 2025, we published in the Federal Register (90 FR 47816) a Notice of our intent to request that OMB renew approval for this information collection. In that Notice, we solicited comments for 60 days, ending on December 1, 2025. We did not receive any comments in response to that Notice.

In addition to the Federal Register Notice, we contacted nine recent applicants for comments. We received substantive feedback from four individuals. The following table includes the titles and organizations of the individuals providing feedback to our request.

Position	Affiliation
1. Historian	Independent
2. Museum Historian (retired)	Museum of History & Industry
3. Historian	Michigan Freedom Trail Commission
4. Genealogist	Independent

Time estimates average 40 hours. Commentators emphasized the application's importance and necessity, noting that applicants must demonstrate relevance, appropriateness, and a verifiable connection to the Underground Railroad. Collecting information promotes scholarship, public interest, educational goals, and professional standards while preserving resources.

The time required shows applicants' seriousness in gathering necessary documentation, understanding the Underground Railroad, and demonstrating professionalism. Successful applications uncover new, verified history. One commentator mentioned that complex applications require more time and provide a chance to reassess their work. Another found the application process improved his understanding of the Network to Freedom.

To reduce future burdens, we will highlight available help from our website, application workshops, successful nomination samples, and staff consultations. Two commentators praised regional manager's assistance. Our forthcoming improved website will feature successful applications and track regional interest and activity.

One commentator noted the detailed and effective instructions. In the new instructions, we will separate sections for each type of entity applying, reduce redundancies, and shorten answer lengths. We will clarify documentation requirements and connect new applicants with past successful applicants, with permission.

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

We do not provide payment 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, establishes the authority to maintain the confidentiality of certain specific locations to protect certain properties. This is particularly the case with many archeological sites and rural properties that are subject to vandalism.

In accordance with the Privacy Act of 1974 and 43 CFR subpart D2.46 (j), personal addresses, phone numbers, and email addresses of owners and applicants are not released without consent. Therefore, the NPS will only share information needed to connect individuals with technical expertise or resources to assist with projects as an effective means of advancing Underground Railroad commemoration and preservation.

The NPS Privacy Act Officer determined that a System of Records Notice (SORN) is not required for this collection, as the agency's purpose in requesting the name of a technical contact was essentially administrative, rather than investigatory, and there is no evidence that the program uses the names of contact persons to obtain information about those persons.

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 66 annual responses totaling 2,561 annual burden hours. The burden hours for each respondent vary depending on the type of application, materials previously collected, and how much was known about the history before beginning the application. Based on feedback received as part of our outreach to recent applicants, we believe the estimated 40 hours accurately reflects the time required to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing the form.

We estimate the dollar value of the burden hours is **\$127,963** (rounded). We used the Bureau of Labor Statistics News Release¹ - USDL-25-1538 September 12, 2025, Employer Costs for Employee Compensation—June 2025 to calculate the hourly rates. The particular values including benefits are:

- Individuals - \$48.05
- Private Businesses - \$45.65
- States and Local Agencies - \$63.94

Table 12.1. Total Estimated Annualized Burden

Activity	Number of Annual Responses	Completion Time per Response (Hours)	Total Annual Hours	Hourly Rate with Benefits	\$ Value of Annual Burden Hours*
Applications					
Individuals	39	40	1,560	\$48.05	\$74,958
Private Sector	15	40	600	\$45.65	\$27,390
States and Local Agencies	10	40	400	\$63.94	\$25,576
Partner Request*	2	.5	1	\$38.91	\$39
Totals	66		2561		127,963

* Rounded

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.

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

- * 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 burden costs.

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 Federal Government to administer this information collection will be **\$303,582** (rounded). This amount represents Network to Freedom staff support and includes time to: (1) consult with partners, (2) process and evaluate applications, and (3) review partner requests. It also includes such activities as designing the application and web page, updating member listings, publication of notices on the Website, and meetings to evaluate application forms. We used the Office of Personnel Management Salary Table 2025-DCB² to determine hourly wage rates.

To calculate benefits, multiplied the hourly rate by 1.6, in accordance with the previously mentioned BLS News Release USDL-25-1358, September 12, 2025, Employer Costs for Employee Compensation—June 2025.

Table 14.1 Federal Salaries

Personnel	GS Level	Hourly Rate	Hourly Rate incl. benefits <i>(1.6 x hourly pay rate)</i>	Total estimated staff time (hours)	Annual Cost*
Regional Program Manager (x4)	12/5	\$55.62	\$88.99	680	\$242,053
Admin Support Assistant	7/5	\$31.35	\$50.16	1,040	\$54,166
Visual Information Specialist	9/5	\$38.35	\$61.36	120	\$7,363
TOTAL					138839

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

² [DCB.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf)https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf

The net increase of 24 responses and 960 hours is based on two factors. Since the last renewal, the Network to Freedom has experienced a 57.15% increase in responses due to two key factors. Increased staffing has allowed the program to expand outreach and provide technical support for additional applicants to research and nominate their Underground Railroad sites. Additionally, increased funding for the Network to Freedom Grant program has made NTF designation more desirable to potential applicants. The burden hour per response remains the same. Staffing levels and grant funding have risen in the last three years due to increased program funding from Congress. The National Program Manager position has been vacant for two years and a Regional Manager position has been vacant for a year.

Table 15.1 Program Changes

Applications	Current Request		Previously Approved		Net Change	
	Responses	Burden hours	Responses	Burden hours	Responses	Burden hours
Individuals	39	1560	15	600	+24	+960
Private Sector	15	600	15	200	+0	++400
Government	10	400	10	200	+0	+200
Partner Request	2	1	2	1	0	0
Totals	66	2561	42	1001	+24	+960

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.

Applications under review are listed on our website (www.nps.gov/ugrr) with an invitation for public comment. Information about approved candidates, including summary abstracts, is presented on the website and available as an electronic file. Once approved, applications become part of the public record and are distributed upon request.

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 the form and other appropriate material.

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.