

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

**Archeology Permits and Reports
OMB Control Number 1024-0037**

Terms of Clearance: None.

A. Justification

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

Section 4 of the Archaeological Resources Protection Act (ARPA) of 1979 (16 U.S.C. 470cc) and Section 3 of the Antiquities Act (AA) of 1906 (54 U.S.C. 320302 and 320303) allow any person or organization to apply to Federal land-managing agencies for permission to scientifically dig up or remove archaeological resources from public or Indian lands. These permits are usually requested to carry out scientific research, to support environmental review requirements before a federal project begins, or when a federal agency is issuing a license or permit for activities such as energy development on public or Indian lands.

Both ARPA and the AA require Federal land managers to issue permits to qualified applicants and to include specific terms and conditions—such as reporting requirements—based on the regulations for each law (43 CFR Part 7 for ARPA and 43 CFR Part 3 for the AA). These conditions help ensure that archaeological materials are properly excavated or removed and that all items and records are placed in an appropriate repository for long-term preservation.

If a permit involves work on Indian lands, ARPA requires Federal land managers to include any terms and conditions requested by the Indian landowner and the tribe with jurisdiction over the land. If work on public lands could affect a resource that has religious or cultural importance to an Indian tribe, ARPA requires the Federal land manager to notify the tribe so they can help develop appropriate terms and conditions for the permit.

Legal Authorities:

- Archaeological Resources Protection Act 16 U.S.C. 470cc and 43 CFR Part 7
- Antiquities Act of 1906 - 54 U.S.C. 320302 and 320303 and 43 CFR Part 3

- 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.**

NPS uses this information to confirm that the applicant is qualified, the work serves the public interest, complies with management plans and legal requirements, has the necessary tribal or landowner consent, and has appropriate curatorial arrangements for materials and records.

Application (Form DI-1926): NPS uses Form DI-1926 to collect the basic information needed to evaluate an archeological permit request, including:

- Applicant and key project staff contact information
- Type, location, and timing of the proposed work
- A statement of work describing research goals, methods, collections, curation, and reporting
- Evidence of the applicant's capability and past performance
- CVs for the Principal Investigator and Project Director
- Required written authorizations from tribes, states, or curatorial facilities
- A project schedule, including report completion
- Any additional information needed by the land manager, such as tribal consultations

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Reports: At the end of each project, permittees must submit a report that documents:

- Description of study area and background research
- Research design and how the fieldwork was carried out
- Field observations, including new or revisited sites
- Analysis and results including illustrations (as needed)
- Recommendations for interpretation, management, or treatment
- The repository that holds curated materials and associated records (including accession numbers)

National Park Service archeologists review reports to ensure that the archeological work was conducted in accordance with the Permit's terms and conditions. They use the information in the report for cultural resource management purposes (that is, it is incorporated into existing Federal and State archeological inventories and historic preservation plans for the lands concerned).

Reports, or the information in them, generally are available to the public through agency interpretation and programs or through the reports themselves.

- 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 National Park Service (NPS) does not have a single nationwide system for submitting archaeological permit applications online. Each NPS region is responsible for issuing its own permits, and because the program is decentralized, there is no unified electronic platform that serves all regions. Only a small number of permits are issued each year, and given that limited volume, creating and maintaining a secure, standardized national system has not been cost-effective. At this time, applicants can continue to submit applications and reports electronically by email. Email remains the most efficient and cost-effective option under the decentralized system. Form DI-1926 is available online on the National Park Service website at www.nps.gov/archeology/npsGuide/permits/index.htm.

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 required in Form DI-1926 and in the related reports is specific to each applicant and project. There is no other way to get this information. Because permit applications and reports are tied to individual projects, the details vary from one project to another. To reduce workload, applicants can combine several small projects for the same land manager within the same calendar year into a single permit application.

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

The impact on any small business requesting a permit is considered part of their normal business activities. To reduce the burden, we only ask for the minimum information needed to evaluate the investigator's qualifications and the project itself. The application form is available online and can be submitted by email.

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

If the required information is not collected, the National Park Service would be unable to carry out legally mandated responsibilities under ARPA, the Antiquities Act, NEPA, and the National Historic Preservation Act. The agency would be prohibited from issuing permits, which would halt scientific research and federally licensed activities such as drilling, mining, and pipeline

construction. Failure to collect this information would place the agency in violation of multiple federal statutes, exposing it to legal, regulatory, and compliance risks

Without these submissions, the Secretary of the Interior could not properly evaluate potential impacts to archeological resources, resulting in delays or stoppages of projects until the necessary information is obtained. Finally, failure to collect required reports would prevent the National Park Service from confirming that archeological work was conducted appropriately and would undermine its ability to update inventories and preservation plans—ultimately reducing the agency's capacity to manage and protect cultural resources effectively.

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 would cause this information to be collected in ways 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 May 13, 2026, we published a Federal Register Notice (91 FR 27076) informing the public of our intent to ask OMB to renew approval for this information collection. We solicited comments for a period of 60 days, ending on July 13, 2026. We did not receive any comments in response to this notice.

In addition to the Federal Register Notice, we contacted nine recent applicants by e-mail and asked for comments on the collection of information. Of the nine contacted, we received three responses.. The responses are summarized below.

Table 8.1 Consultation with persons outside the agency

Position	Affiliation
1. Assistant Historic Preservation Manager	Missouri Department of Transportation
2. Northeast Regional Manager	Gray & Pape, Inc.
3. Professor and Curator for Archaeology	University of Denver, Department of Anthropology

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”

Respondent Comments: The respondents generally agreed that the information collected in the Permit for Archeological Investigations is essential for evaluating applicant qualifications, understanding project scope, and ensuring compliance with NPS and industry standards. It enables reviewers to assess potential impacts, confirm personnel roles, and determine when tribal consultation may be needed. While the process generally has strong practical utility, and the permitting is vital for preserving our shared past. Many questions are the same as what is required for the park-specific permit. Perhaps they could be linked. Overall, the questions are appropriate and support accountability and clear research design.

NPS Response: *The information required in the Permit for Archeological Investigations is essential for evaluating qualifications, understanding project scope, and ensuring protection of cultural resources in accordance with ARPA. Although some applicants may experience redundancy when working under agency-approved scopes, ARPA (16 U.S.C. 470cc(a)) authorizes park superintendents to require a permit whenever needed to ensure full compliance and adequate oversight, particularly when sensitive resources may be affected.*

“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?”

Respondent Comments: Respondents reported a wide range of completion times for ARPA permit applications, largely driven by project complexity, research needs, and mapping requirements. Overall, respondents indicated that a typical application—including the narrative, attachments, and internal review—generally takes about 5–10 hours, with additional time needed for signature collection and specialized projects

NPS response: *No Action taken. The current burden reflects the average time to complete the process.*

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

Respondent Comments: Respondents suggested standardizing the ARPA permit application across agencies, improving clarity—particularly for mapping requirements and CV submissions—and reducing redundant information requests. Several noted that permit reviews can take 60–90 days and recommended shortening the processing time. Others requested small usability improvements such as an export-to-Excel function and online or fillable forms and access to an ARCGIS system where the project location could be drawn. Overall, respondents found the form acceptable but identified opportunities to streamline and modernize the process.

NPS Response: *The Departmental Consulting Archeologist is actively working with federal agencies to ensure they are using the most current ARPA permit application. At the same time, the National Park Service is continuing to explore options for an online permit application system to modernize the process and improve usability for applicants.*

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.

We do not provide any guarantee of confidentiality for the information collected. All information is subject to the requirements of the Privacy Act and the Freedom of Information Act.

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 expect about **180 responses each year**, which will take a total of **1,306 hours** for respondents to complete, based on this the dollar value of the annual burden is estimated to be **\$75,959**.

Using the Bureau of Labor Statistics (BLS) mean hourly wage data of \$36.35 for Anthropologists and Archeologists (19-3091 May 2025 Occupation Profiles)¹. This rate reflects the Secretary of the Interior's guidance that principal investigators are typically archeologists with a master's degree or higher. After that, we applied the standard 1.6 benefits multiplier from the Bureau of Labor Statistics (BLS) News Release (USD L-26-0827, June 12, 2026, Employer Costs for Employee Compensation – March 2026)², to calculate the total annual dollar value of \$58.16.

Based on this hourly rate, we estimate the total annual cost of the burden hours to be about **\$ 77,519** (rounded), for the full set of responses.

Table 12.1 Annualized Cost to Respondents

Activity	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden Hours	Total Dollar Value of Annual Burden Hours* (\$58.16 per hour)
Application (DI-1926)				
Local Government	4	7	28	\$ 1,629
Individual	7	7	49	\$ 2,850
Private	79	7	553	\$ 32,163
Reports (DI-1926a)				

¹ https://www.bls.gov/oes/2025/may/oes_stru.htm#19-0000

² <https://www.bls.gov/news.release/ecec.nr0.htm>

Activity	Total Annual Responses	Completion Time per Response (Hours)	Total Annual Burden Hours	Total Dollar Value of Annual Burden Hours* (\$58.16 per hour)
Local Government	4	7.5	30	\$ 1,745
Individual	7	7.5	53	\$ 3,083
Private	79	7.5	593	\$ 34,489
Totals	180		1,306	\$ 75,959

(*Rounded to match ROCIS)

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 costs associated with this information 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.

The annual cost to the National Park Service to administer this information collection is **\$63,000** (rounded). National Park Service staff review applications for feasibility, compliance, and compatibility with the purpose of the park unit. Reports are reviewed to ensure that the archeological work was conducted in accordance with the Permit's terms and conditions. Review

times can vary depending on the complexity of the project.

We anticipate that NPS archeologists will spend 810 annual hours reviewing applications and reports. To determine average hourly rates for the activities identified below (Table 14.1), we used the Office of Personnel Management Salary Table 2026-RUS³ to determine the hourly rates for federal employees. We multiplied the hourly rate by 1.6 to account for benefits in accordance with BLS News Release mentioned above.

Table 14.1 Annualized Cost to Federal Government

Position	Grade/ Step	Hourly rate including benefits (1.6 x hourly rate)	Hours spent on each application (N=90)	Total Hours	Total Cost Including Benefits
Application Review	GS 12/5	\$77.78	1.5	135	\$10,500
Preliminary Report Review	GS 12/5	\$77.78	1	90	\$7,000
Communication and re-submission	GS 12/5	\$77.78	2	180	\$14,000
Permit Package Preparation	GS 12/5	\$77.78	3	270	\$21,000
Report Review	GS 12/5	\$77.78	1.5	135	\$10,500
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15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no changes

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 regular venues for publication of data resulting from investigations carried out under Permits for Archeological Investigations.

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.

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.

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/RUS_h.pdf