SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION (OMB 1024-0232)

National Underground Railroad Network to Freedom Program
National Park Service
Department of the Interior

Network to Freedom Application

TERMS OF CLEARANCE: The agency is requested to include the names and addresses of respondents that were contacted to determine whether the burden estimates are accurate in the supporting statement accompanying the next request for OMB approval of this collection.

The above terms of clearance which appeared in the Notice of Action (December 2003) from OMB are addressed in Items 8 and 12.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

P.L. 105-203, the National Underground Railroad Network to Freedom Act of 1998 authorizes the Secretary of the Interior to establish the Network to Freedom, or the "Network." (See attached legislation). The Network is designed to be a collection of sites, facilities, and programs, both governmental and non-governmental, around the United States with a verifiable association with the historic Underground Railroad movement. Recognized in the enabling legislation as a crucial element in the evolution of a national civil rights movement, the Underground Railroad was the resistance to enslavement through escape and flight prior to 1865.

Elements included in the Network are authorized by the National Park Service (NPS) to display the Network to Freedom logo, which tells the public and interested parties that NPS recognizes the element's historical association to the Underground Railroad, and that the element is managed in a manner consistent with the preservation, education and commemorative goals established by P.L. 105-203.

The Network to Freedom Application Form is completed by Federal agencies, State Historic Preservation Offices, other State agencies, local governments, organizations, and individuals. The completed form is forwarded to NPS which reviews the application to verify the historical associations and management activities. The Network to Freedom application collects the minimum amount of information necessary to verify historical association and evaluate a minimum level of professional management protocols. For programs and facilities that are included in the Network to Freedom, managers are required to certify every two years that nothing has changed. If there have been substantial modifications to the program or facility, the manager is required to re-submit an application. The estimated number of re-submittals is included in the burden hours documented below.

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 information collected in the Network to Freedom Application is used by NPS to verify a candidate's historical association to the Underground Railroad and to evaluate the candidate's activities (especially for interpretive programs and facilities), in order to approve its inclusion in the Network. The decision to include a candidate in the Network is based on several key factors. The respondent must demonstrate that the candidate has a clear historical association to the Underground Railroad, either in program activities or collections, or site association. The respondent must provide clear, convincing, and well-documented evidence of historical association. Sites or properties applying for inclusion in the Network must also submit photographs to verify location. Facilities and programs applying for inclusion in the Network must also describe collection or activity association to the Underground Railroad as well as explain management characteristics and protocol.

After an element is included in the Network, the information collected on the Network to Freedom Application becomes available to the public for research purposes. Key information is entered into a computerized database included on the Network to Freedom web site (www.cr.nps.gov/ugrr). The information will be used by NPS and other interested parties for research, education, heritage tourism, and preservation programs. The information can be used to provide a clearer understanding of our common heritage and to develop a more thorough analysis of the Underground Railroad movement than has been available before. Additionally, the information supports efforts to plan for the identification, evaluation, and protection of historic resources that have been largely overlooked.

Justification for the items contained on the Network to Freedom Application is as follows:

The application includes four sections. All respondents must complete the cover page, or first section, of the application, which requests basic data to identify the candidate type, owner or manager, and the respondent. Respondents must complete one of the following three sections, depending on the candidate type identified in the cover page. Respondents applying for inclusion as sites must complete Section A. Respondents identified as facilities complete Section B. Programs apply in Section C. In all cases, the information requested is the minimum needed to evaluate the candidate for inclusion in the Network to Freedom and hour burden estimates are the same, regardless of candidate type.

COVER PAGE: GENERAL INFORMATION.

Type: This item asks the respondent to identify the candidate type described in the application. Candidates eligible for the Network are classified into three basic categories: sites, facilities, or programs. This identification will direct the respondent to the appropriate section of the application and will provide NPS with basic evaluation organization.

Name: For identification, respondents are asked to provide the present name of the candidate applying for inclusion in the Network. If the applicant is a site, respondents are asked to supply the historic name.

Address (address, city, State, zip): Respondents are asked to provide the current address of the candidate applying for inclusion in the Network. Respondents should provide the candidate's street number, street, city, State, and zip code. The form has been made more explicit for these pieces of data to minimize incomplete responses. The addresses are used to post the candidates and members on the program web page and in order to mail official letters and the program newsletter.

County: The information is used to sort candidates and listings geographically. It aids in analysis of the operation of the Underground Railroad and facilitates networking among candidates.

Congressional District: Respondents are asked to identify the congressional district that represents the element's location. This information is used by NPS to facilitate the notification of the appropriate congressional delegation if the element is approved for inclusion in the Network.

Physical Location of site/facility (if different): Occasionally candidates, particularly sites, may not readily be identified by standard street addresses. In these cases, respondents may use this item to provide general location data, such as rural highway intersections, distance markers, county boundaries, longitude and latitude etc.

Address not for publication?: Respondents have the opportunity to mark a "Not for Publication" box in this item. This option is available primarily for elements such as archeological sites, which would be affected adversely by treasure hunters and unauthorized excavations if the address were released to the general public. In accordance with the National Historic Preservation Act, the Network to Freedom is allowed to withhold information on the specific locations of properties that might be affected adversely by the release of information.

Date submitted: Respondents are asked to identify the date that they submit the application. This item is used by NPS to track submittal dates.

Summary: Respondents should provide an abstract or summary of the candidate applying for inclusion in the Network. The summary should describe the candidate in 200 words or less, highlighting the candidate's association with the Underground Railroad. The abstract will be posted on the Network to Freedom web page, both before and after the candidate is evaluated for inclusion in the Network. If a candidate is accepted, then the summary, along with the candidate's name, city and state, will become part of the Network to Freedom database, published on the web page. The summary is the basic reference provided to the general public for listings included in the Network to Freedom.

Owner/manager: Respondents are asked to provide the name, street address, city, State, zip code, phone number, fax number, and e-mail address of the owner or manager of the element. Regardless of the candidate type, owner or manager support is mandatory for inclusion in the Network. NPS must have this information in the event a question arises about such support, and so the owner or manager can be contacted for notification and programmatic reasons. Because some candidates have more than one owner, the "block" is repeated three times to facilitate additional entries. Each owner/manager has the opportunity to indicate whether or not he/she agrees to share contact information with others working on projects related to the Underground Railroad.

Application Preparer: If the respondent is not the owner or manager identified in the previous item, then the respondent should identify him- or herself in this item by name, street address, city, State, zip code, phone number, fax number, and e-mail address. This item is used by the NPS to contact the application preparer concerning any questions on the application, need for additional information, or for notification of results.

SECTION A: SITES

Respondents will complete Section A only if they identified the candidate under consideration as a "site" on the cover page of the application.

S1. Site Type: Respondent should identify the type of site applying for inclusion in the Network. Sites are generally classified as buildings, structures, districts (neighborhoods), objects, landscape features, or archeological sites. If none of these apply then the respondent has the opportunity to describe the unique site type in an "Other" listing. This item is used for compilation of general site information.

S2. Is the site listed in the National Register of Historic Places? If the site is on the National Register of Historic Places, under what name is it listed? Sites on the National Register of Historic Places that have an association to the Underground Railroad will be included in the Network, according to the program's establishing legislation. NPS administers the National Register of Historic Places program and the National Register Information System. Information concerning the site's admission into the National Register is readily available to NPS; therefore, the respondent is not requested to provide additional information about the site's admission into the National Register. Nonetheless, elements are identified in the National Register by historic name, which in many cases may be different from the commonly associated name the general public recognizes today. If the element is on the National Register of Historic Places, the respondent must identify the name under which it is listed. Sites not on the National Register may leave this item blank.

S3. Ownership of site: Respondents must identify the type of site ownership. They have the opportunity to identify ownership as private, private not-for-profit (501c3), public-local government, public State government, public-Federal government, or multiple, with an opportunity for description. Ownership types can be used for overall assessment of the program. Site owners must consent to including their properties in the Network. Respondents should identify property owner type and include a letter of support for inclusion from the property owner(s). Sites comprised of multiple property owners must show that a majority of owners support inclusion. This includes all property owners in a historic district if the element is a district as opposed to one site within a historic district.

S4a. In a narrative form, describe the site's association and significance to the Underground Railroad. Provide citations. Supplemental chronologies are encouraged: This question has been renamed (S4a) instead of (S4). This question has been slightly reworded for clarification. Candidates applying to the Network as sites must demonstrate in narrative form an association to the Underground Railroad using reliable and corroborative sources. This narrative is a basic criterion for inclusion in the Network and is information NPS uses to evaluate the site's association and significance. Respondents should describe the site's association and significance to the Underground Railroad, including citations for supporting evidence. They should identify what type of activity occurred at the site, the period of significance to the Underground Railroad and dates of significant events, and the names of noteworthy people associated with the site. Any evidence submitted should be replicable from the same sources by other researchers. Maps showing the site in relation to surrounding roads, waterways, properties, etc. should be submitted with the application. These maps assist in understanding and evaluating the site in its geographic context.

S4b. Type(s) of Underground Railroad Association: This section has been renamed (S4b), instead of (S4a). The respondent is asked to check all of the types of Underground Railroad associations that apply. This question is a means of categorizing candidates to the Network for purposes of evaluation and research. By categorizing the site's associations, the respondent will focus more clearly on the case being made for inclusion. Reviewers of the application will have a better understanding of what the applicant is claiming for Underground Railroad association.

S5. Provide a history of the site since its time of significance to the Underground Railroad, including physical changes, changes in ownership or use of the building(s) and site: Respondents are asked to provide a history of the site since its time of significance to the Underground Railroad. Information should include other, alternative, or previous names of the site, and the historical name of the site if it is different from the present name. Respondents should describe in general terms what the historic uses of the site were and what the site is used for now. If the site is a building, buildings, or structures, respondents should identify the date of construction and describe how the condition of the site has changed over time to its current appearance. They should also note if the setting, or surrounding area, has changed and what context the site is in today in relation to its surroundings. Other than identifying the site's location, most other aspects of integrity are not required for inclusion in the Network. Nonetheless, this information helps NPS understand what resources still exist from the historic period, and provides NPS with an accurate assessment of the level of threat or adverse impacts to Underground Railroad-related resources. This is a primary objective of the Network to Freedom program, as identified in its establishing legislation. Photographs illustrating the current appearance of the building(s) and site should be submitted with the application. Maps and/or site plans showing the site in relation to surrounding roads, waterways, properties, etc. should be submitted with the application. These materials assist in understanding and evaluating the site in its geographic context. They may also be helpful in explaining changes to the property and its surroundings.

S6. Describe current educational programs, tours, markers, signs, brochures, site bulletins, or plaques at the site. Include text and photographs of markers: An application for a site considered for inclusion in the Network should show how its significance is identified to the general public. In many cases, sites have lost their integrity and ability, based on structural integrity alone, to convey their historical significance, even though the location has been positively identified. In cases where integrity has been lost, sites must be associated with some sort of interpretive program, brochure, or signage providing a contextual reference for the general public in order to be included in the Network and to be authorized to display the Network logo. Not an interpretive marker, the Network logo is not meant to stand alone as the sole identification of an Underground Railroad site. Respondents should include text and photo(s) of markers. Information supplied in this item provides NPS with data upon which to evaluate whether a site meets this criterion for inclusion.

S7. Identify historical sources of information. Include a bibliography: Respondents must provide bibliographic references to all sources consulted in the completion of the application, particularly in the development of the site's association and significance statement (S4a). Respondents are asked to include author's name, publication's title, publication date, and publisher for all bibliographic sources; in the case of an interview, respondents should provide the name of interviewees and date of interview. NPS evaluates this data to determine if the respondent has used corroborative data to prove association and significance, which is a criterion for inclusion in the Network.

S8. Describe any other local, State, or Federal historic designations, records, signage, or plaques the site has: The respondent must identify what other levels of certification or recognition the site has received from local, State, or Federal organizations or agencies. Photographs of markers and transcriptions of the text should be included with the application. The information provides NPS with clarification of level of contextual identification and recognition the site has already received.

S9. Is the site open to the public, and under what conditions? Public access to sites is not a requirement for inclusion in the Network. This is particularly true for such places as the interior of private buildings or sensitive archeological sites. The respondent should identify the level of access to the site, and any restrictions. Accessibility may include hours of operation, entrance fees, parking, restroom facilities, etc. Respondents must identify if there are any provisions for handicapped access and if access is compliant with the Americans with Disabilities Act. This response will provide the public with information for visitation and will provide NPS with data necessary to develop travel itineraries for the public.

<u>S10. Describe the nature and objectives of any partnerships that have contributed to the documentation, preservation, commemoration, or interpretation of the site:</u> Respondents should identify the assistance the site has received from the State Historic Preservation Officer, NPS, or any other Federal, State, or local entity for documentation, preservation, or interpretation. They should also note any assistance received from private foundations any corporate sponsorship, and any contributions to the preservation, upkeep, or staffing of the site from such groups as volunteers, educational facilities, scouts, etc. This response provides NPS with an understanding of the level of institutional and community support for the site. It also indicates the availability of assistance and resources to Underground Railroad-related entities and helps NPS to determine areas of need for technical assistance.

<u>S11. Additional data or comments. (Optional):</u> This is an optional field in which the respondent may provide any additional information that might assist NPS in evaluating the site for inclusion in the Network and may provide the public with additional context or information on the site's significance to the Underground Railroad.

SECTION B: FACILITIES

Respondents will complete Section B only if they identified the candidate under evaluation as a facility on the cover page of the application. A letter of consent from the owner or manager of the facility must be included with the application.

<u>F1. Facility type</u>: Respondent should identify the facility type as an archive, library, museum, or research center. Respondents have the opportunity to identify the facility as "Other" if it doesn't qualify as one of the previously mentioned facilities. This information is used for general classification.

<u>F2. Provide a general description of the facility and its purpose or mission:</u> The respondent should provide a general overview of the facility and a general abstract of any collections that illustrate the basic focus of the facility. This information will provide NPS with context to evaluate the facility's collections and determine mass of collection materials relevant to the Underground Railroad.

<u>F3 Identify and describe the holdings or collections, detailing their significance to the Underground Railroad</u>: This question has been re-worded to reduce confusion, but still asks for the same information as previously. This item provides the basic information necessary to determine the facility's association to the Underground Railroad, which is the basic criterion for inclusion in the Network.

F4. List or catalog the Underground Railroad or slavery-related collections or materials the facility has: This item requires the respondent to list specifically the types of items and materials related to the Underground Railroad or slavery that the collections contain. This provides additional context and specific information necessary for NPS to evaluate the association of the facility's collections to the Underground Railroad.

F5. Identify and describe the types of documents the facility has to identify the provenance of its collections: Provenance refers to the authenticity of an item or a collection. Having documentation on an item's provenance can show the item's origin, where it came from, how it was acquired, and how the facility came to care for it. A facility's ability to show provenance for its collections, whether as deeds of gifts, ownership documentation, or analytical research, is a professional criterion for all collections-oriented facilities. It is a professional standard adhered to by all NPS units and other professional facilities and is a requirement for inclusion in the Network.

F6. Identify and describe the types of guides or indexes that are available for the facility's collections: Similar to provenance documentation, finding aids and indexes or catalogs are standard, minimum professional requirements for any collections facility. They are also a basic criterion for inclusion in the Network to Freedom as a collections facility.

F7. Describe the facility's management and staff, and levels of training or certifications.: A basic level of professionalism is required for facilities to be included in the Network. This information allows NPS to evaluate the level of education and training of the facility manager and staff and provides context for the evaluation. Managers of research centers should indicate their level of education. Archivists and museum operators should describe training in the appropriate field, and any accreditation or certification, such as recognition from the Academy of Certified Archivists, the Association of Archivists and Records Managers, the American Association of Museums, and any regional or local certifications. Respondents should also discuss if the facility has trained curators or archivists on staff or as consultants, or has a trained reference staff.

F8. Describe the types of publications, reports, or services the facility performs or produces: NPS uses this information to identify if the facility meets one of the basic criteria for inclusion in the Network. To be included in the Network, research centers must show a record of ongoing commitment to researching or providing information about the Underground Railroad. This may include such things as publication of a journal that includes Underground Railroad or slavery-related articles, or various types of reports on these related themes. Facilities that are not applying for inclusion as research centers can answer this question with either a negative response or with a description of relevant activities, including any interpretive programs the facility offers.

F9. Identify and describe the conditions of public access to the facility, including handicapped access.: NPS uses this information to determine if the facility meets one of the basic criteria for inclusion in the Network. Facilities in the Network must be accessible to the public. They should be open on a scheduled basis or accessible by appointment. This question addresses not only public access but also the capacity of a facility to serve researchers. Respondents must identify how many hours a week the facility is open to the public, if access is by appointment only, how many appointments the facility can handle in a month, and any special conditions on access that the nature or characteristics of the collections might dictate. Respondents should also identify if the facility is handicapped-accessible and in compliance with the Americans with Disabilities Act.

F10. Describe visitation workload at the facility. Respondents should describe workload by describing number of actual visits to the facility, inquiries via phone, fax, or e-mail, copying requests, or research requests during a determined time period. This information provides NPS with the context necessary to determine the level of use and visitation.

F11. Describe the facility's traveling exhibit, interlibrary loan, and photocopying or duplication policies and capability. Respondents should describe policies and capabilities for making their materials accessible to others. This includes practices such as traveling exhibits, interlibrary loan, and photocopying. This item should address capabilities at the facility as well as prices and availability of services. NPS uses this information to provide context for evaluation of the facility's professional services and provides the public with standard information on facility services.

F12. Describe the nature and objectives of any partnerships that have contributed to the operation of the facility.: Respondents should identify the assistance the facility has received from the State Historic Preservation Officer, NPS, or any other Federal, State, or local entity relevant to operation of the facility. They should also note any assistance received from private foundations, any corporate sponsorship, and any contributions from such groups as volunteers, educational facilities, scouts, etc. This provides NPS with an understanding of the level of institutional and community support for the facility. It also indicates the availability of assistance and resources to Underground Railroad-related entities and helps NPS to determine areas of needs for technical assistance. This information can also be used by the public to find additional resources from Underground Railroad-related facilities.

F13. Additional data or comments (Optional): This is an optional field in which the respondent may provide any additional information that might assist NPS in evaluating the facility for inclusion in the Network and may provide the public with additional context or information on the facility's significance to the Underground Railroad.

SECTION C: EDUCATIONAL AND INTERPRETIVE PROGRAMS

Respondents will complete Section C only if they identified the candidate under evaluation as a program on the cover page of the application. A letter of consent from the owner or manager of the program must be included with the application.

P1. Program type: Respondents should identify if the program is an interpretive program, tour, education program, dramatic performance/theatre, living history, or commemorative or cultural center. Respondents have the opportunity to identify and describe the program as “Other.” This information is used for general classification.

P2. Describe the Underground Railroad theme or message of the program, and how it is conveyed to the audience: This item identifies the program’s association to the Underground Railroad and how the program conveys the theme of the Underground Railroad. Both of these features are basic criteria for inclusion in the Network as a program and are needed by NPS for evaluation. Respondents are required to identify the Underground Railroad theme and describe what methods, objects, or sites are used to convey them.

P3. Describe the consultation and planning process through which the program’s themes were identified. Include subject matter experts: This question has been amplified for clarity. A basic requirement for a program to be included in the Network is to show that consultation occurred with interested individuals, organizations, and schools in the development of the themes. The program must identify subject matter experts consulted and those consulted about the level of professional program development. Respondents must identify partners or local grass-roots organizations consulted, the consultation process, and the outcomes of consultation. As part of the application process, and to validate that consultation occurred, respondents must include documentation such as letters of support from people consulted, etc. NPS uses this information to evaluate the consultation that has occurred in the course of the program’s development.

P4. Identify historical sources of information and describe in a narrative form how they were used to develop the program. Include a bibliography: This question has been slightly reworded for clarity. Programs applying for inclusion in the Network need to demonstrate a commitment to historical accuracy in their interpretation of Underground Railroad activity by providing a narrative description of the Underground Railroad history conveyed. Respondents must provide a bibliography of sources that were consulted in the development of the program. Sources must be identified in a professional manner, citing the author’s name, the publication title, the date and place of publication, and the page number(s). NPS uses this information to evaluate and validate the program’s commitment to accuracy of presentation.

P5. Describe the educational objectives of the program, tour, or performance: Respondents must describe what the outcomes of the program are, and what the program directors expect the audience to learn. NPS uses this information to develop an overall context of evaluation for the program’s effectiveness and of the translation of the themes into learning experiences.

P6. For whom is the program intended? Respondents should identify the target audience, describing such things as the demographics of the target audience, including age groups, and their level of familiarity with the Underground Railroad themes. NPS uses this information to develop the context for evaluating the program for inclusion in the Network and to tell the general public what the appropriate age-level of the program is.

P7. Describe the geographic area of program presentation or activity. Respondents must identify, as closely as possible, the geographic area where the program occurred in the past or is occurring. Tour organizers should identify where the program begins and ends and general route information. NPS uses this information as general data to provide context to the program's operations.

P8. Describe how the program is evaluated: Interpretive and educational programs must demonstrate the manner in which they determine success and quality of presentation. Respondents must describe the techniques used for audience feedback, and how often evaluation occurs. They should also include with the application an example of the audience feedback mechanism. NPS uses this information to gauge the effectiveness of the program under evaluation for inclusion in the Network and to provide a means for tracking the program's activities over the course of time; programs will be reevaluated every two years.

P9. How long has the program existed and what are the future plans for the program.: Programs included in the Network must be operational and have a track record of interpreting the Underground Railroad. At a minimum, they must have occurred at least once in the past, and have a schedule for future activities. Respondents must describe when the program began operations and the frequency of its operations. Past commitment to interpreting the Underground Railroad may also be demonstrated through the program's products. In this case, respondents should describe any publications, audio-visual presentations, multimedia programs, or special curricula produced by the program and designed specifically for instruction and public presentation on the Underground Railroad. NPS uses this information to evaluate the program's ongoing commitment to interpreting the Underground Railroad, which is a basic criterion for inclusion in the Network.

P10. Describe the program's management and staff, and levels of training or certification: Respondents must identify who runs the program and its profit/non-profit status. Additional information should include if the staff is volunteer and the number of hours of training for staff members. Any professional affiliations and training in interpretation should be identified. The formal education and training of staff should be described. NPS uses this information to evaluate the level of professionalism of the program's staff and to provide context for understanding the program's operations.

P11. Describe the nature and objectives of any partnerships that have contributed to the program: Respondents should identify the assistance the program has received from the State Historic Preservation Officer, NPS, or some other Federal, State, or local entity for the operation of the program. They should also note any assistance received from private foundations, any corporate sponsorship, and any contributions from such groups as volunteers, educational facilities, scouts, etc. This response provides NPS with an understanding of the level of institutional and community support for the program. This response provides NPS with general information on the availability of assistance and resources to Underground Railroad-related programs and helps NPS to determine areas of need for technical assistance. This information can also be used by the public to find additional resources from Underground Railroad-related programs.

P12. Additional data or comments: This is an optional field in which the respondent may provide any additional information that might assist NPS in evaluating the program for inclusion in the Network and may provide the public with additional context or information on the program's significance to the Underground Railroad. Applicants are encouraged to submit a video of at least a portion of the program. Particularly for performances, living history, and tours, video excerpts will help reviewers understand and evaluate the program.

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.]

Respondents generally submit the attachments to the Network to Freedom Application—photographs, letters of consent from property owners, program evaluation forms, etc—in paper form. The application itself is often submitted as an electronic document attached to an e-mail message, and this mode is encouraged. The form is available as a word processing template on the Network to Freedom web site, where applicants may also pre-register on-line. Our estimate is that about 33 per cent of the responses are submitted electronically.

Work is in progress on making an electronic form version of the application form using Adobe Acrobat.

4.Describe efforts to identify duplication.

There is no duplication. NPS does not collect similar information for other properties, facilities, or programs. Each element that applies for inclusion in the Network is evaluated on its unique activities and historical association. If historic sites have been formally recognized through other evaluated inventories at the State or Federal levels, applicants are encouraged to make substantial use of existing information, especially for the statement of Underground Railroad association.

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 entirely voluntary and is initiated by people, organizations, and agencies that have a strong interest in participating in the Network to Freedom program. NPS has taken great care to ensure that the collection of information is the minimum necessary to achieve program goals. NPS also encourages the use of digitized forms and makes these available to respondents to reduce paperwork. NPS encourages respondents to contact program staff who can provide technical assistance in the completion of the application forms. Program staff also conduct workshops, as requested, on how to document Underground Railroad associations and complete the application form.

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

NPS would not be able to maintain the Network to Freedom, as mandated by the program's establishing legislation, if it did not collect this minimum amount of information about Underground Railroad-related resources. Without this information, NPS would be unable to comply fully with the objectives of the program -- to provide the public with a better understanding of the significance of the Underground Railroad in American history, and 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.

None of these conditions apply to this information collection.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

The 60-day notice appeared on page 60188, Volume 71, Number 197 of the ***Federal Register*** on October 12, 2006. The 60-day comment period has ended and the national coordinator of the program received no comments on the collection of information.

As requested this year, we collected a small sample of potential respondents from outside the agency who submitted comments on availability of data and clarity of instructions, disclosures, hours of burden, and reporting format. The following responded:

Lynda Jae Breitweiser, 7714 W. Tree Farm Lane, Madison, IN 47250 (812-866-2795) breitweiser@msn.com

Jeannie Regan-Dinius, Special Projects Coordinator, DNR-DHPA, 402 West Washington Street, W274, Indianapolis, IN 46204 (317-234-1268) JRDinius@dnr.IN.gov

Judith Wellman, Historical New York Research Associates, 2 Harris Hill Road, Fulton, NY 13069 (315-598-4387) wellman@twcny.rr.com

To address complaints, we have been e-mailing or mailing forms if necessary, when there are problems downloading the applications forms from the website. For those that have trouble with the interactive part of the website, we will post the application form and instructions on the website for download as PDF files. We are currently working on an agreement with another entity to maintain the website and, if resources permit, will address the technical difficulties with the online application submission. We do not set a limit on any responses to the questions on the form except for the summary; we ask respondents to use the number of words appropriate to supply needed data. In response to one comment, if a respondent finds the instructions or form complicated, the regional manager is available to answer any questions.

The application form is filled out only once for each successful applicant to the Network to Freedom.

The creation of minimum criteria for inclusion in the Network to Freedom and the application form came about through extensive consultation between NPS and interested parties in Federal agencies, State Historic Preservation Offices, municipalities, organizations, and interested parties throughout the United States. In developing the form initially, NPS held several charrettes and meetings with subject matter experts and community partners to solicit input.

Since the form was adopted six years ago, NPS has reviewed 12 rounds of applications, provided technical assistance to applicants on an ongoing basis, and conducted workshops on how to complete the application. With this submission, several clarifications to the wording on the form have been made as a result of questions and comments received over the course of the past two years. The acceptance rate for applications has improved from 50 per cent in the first year of operation to 66 per cent in 2006.

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

No payment or gifts are to be given to respondents.

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

The application collects little confidential information. In accordance with the Privacy Act of 1974, and 43 CFR subpart D2.46(j), personal addresses, phone numbers, and e-mail addresses of owners and applicants are not released without consent. Owners and applicants will be given the opportunity to request that their personal address, phone, and e-mail address information not be disseminated in accordance with this policy.

The Network to Freedom was established, however, to facilitate sharing of information among those interested in the Underground Railroad. Putting people in contact with others who are researching related topics, historic events, or individuals or who may have technical expertise or resources to assist with projects is one of the most effective means of advancing Underground Railroad commemoration and preservation. Therefore, applicants and owners will be asked to specify which of these items they do not want to share, with the intention that NPS will share as much information to facilitate networking as possible.

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.

Apart from personal contact information, the only information collected that could be considered sensitive in nature is the location of specific properties. Although this information is reported on the form, and necessary to establish which property is listed, NPS maintains the confidentiality of certain specific locations in order to protect properties, This is particularly the case with many archeological sites and rural properties that are subject to vandalism. In the case of historic resources that are still used for traditional cultural practices, the location of the property is also kept confidential so as not to interfere with these uses. Section 304 of the National Historic Preservation Act, as amended, establishes this authority.

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 in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 1.**

Number of respondents expected:	70 annually
Frequency of response expected:	1 per respondent annually
Estimated average burden hours per response:	15 hours

Annual hour burden expected: 1050 hours

Explanation of how the burden was estimated. NPS now has six years of experience with operating the Network. Based on comments by applicants, we have determined the estimate of burden per response. While the time required for actually completing the form is consistent with initial estimates, the time required for researching the underlying documentation for authenticating Underground Railroad associations was initially underestimated. A combined estimate of 15 hours per application includes research and completing the form. The burden hours for each respondent, regardless of element type, should be consistent and not vary much. The number of annual responses has been lowered as a result of taking an average of the number received in the first six years of the program. Now that the Network to Freedom has been operational for six years, we are beginning to review the status of programs and facilities previously admitted. Owners or managers will be required to certify that their program or facility has not changed substantially since listing in the Network. If there have been substantial change, they will be required to re-submit an application. We estimate about five such instances per year, and this has been added to the burden estimates.

The estimate of burden of time provided is 15 hours. As confirmation, in response to the request for information from under ten potential and current applicants, we were told by 3 that the time to fill out an application varied from 5 to 20 hours. Responses came from:

Lynda Jae Breitweiser, 7714 W. Tree Farm Lane, Madison, IN 47250 (812-866-2795) breitweiser@msn.com

Jeannie Regan-Dinius, Special Projects Coordinator, DNR-DHPA, 402 West Washington Street, W274, Indianapolis, IN 46204 (317-234-1268) JRDinius@dnr.IN.gov

Judith Wellman, Historical New York Research Associates, 2 Harris Hill Road, Fulton, NY 13069 (315-598-4387) wellman@twcny.rr.com

Annualized cost to respondents for the hour burden: Cost figures are based upon respondents meeting comparable performance levels of GS-7/9 multi-disciplinary cultural resource or education specialists. At current salary rates ($15.25/18.66), the estimated total cost for respondents applying annually is between $16,012.50 and $19,593.00, or approximately $17,802.75. The performance level used to calculate the cost is related to the sophistication required to conduct research on Underground Railroad history.

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 shown in Items 12 and 14).

- **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]. 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 estimated capital costs and there are no filing fees.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The annualized cost to the Federal government is about $100,000. This amount accounts for approximately 20 per cent of Network to Freedom Program staff time and includes time to consult with partners, and to process and evaluate applications. It also includes such activities as designing the application form on the web page and updating listings, publishing notices in a program Newsletter, and meeting to evaluate application forms.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

Based on experience in operating the program for six years and our outreach, the estimates used for the burden still accurately reflect actual conditions. One adjustment has been made: to reduce the annual number of responses to the average of 6 years of operation. This adjustment is based on experience and does not represent a change in the program.

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 action

Applications are reviewed every six months. Information about approved candidates, including summary abstracts, is presented on the web site. Applications under review are listed on the web site with an invitation for public comment. 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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable.