1Supporting 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, and to make it easier for them to share expertise and communicate with NPS and other Network participants. Local entities are able to 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 to 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 several key factors.
Candidates, facilities or programs must:

- have a clear historical association to the Underground Railroad, either in program activities, collections, or site association.
- be clear, convincing, and well-documented evidence of historical association.
- submit photographs, and preferably maps, to verify location and current appearance.
- 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 in *NPS Form 10-946* becomes available to the public for research. Key information is publically 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 also use it. Additionally, the information supports future efforts to identify, evaluate and protect of historic resources that are largely over looked.

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 the 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 requirements for becoming a network partner is the person/organization must have some association to 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, and 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 to the Underground Railroad.

Change/Non-Substantive Change

With this submission, we are requesting one change on Page 2 of form 10-946. The change is to clarify the contact information to distinguish between the owner/manager and the person completing the application (if they are different).

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.

We estimate that 99% of responses will be submitted electronically as an email attachment. To accommodate electronic submission, the form is available on the Network website. The majority of submissions have scanned electronic attachments detailing supplementary material; however, respondents are free to submit physical attachments in a paper-based format. To reduce respondent burden, prospective partners are encouraged to submit information electronically

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 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 May 28, 2019, we published in the Federal Register (84 FR 24541) 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 July 29, 2019. We did not receive any comments in response to that Notice.

In addition to the Federal Register Notice, we contacted eight recent applicants for comments. We received substantive comments from only one individual willing to provide feedback on the following:

1. Regarding whether the collection of information was necessary:

   Comment: In my opinion, it is extremely necessary in order to preserve this important slice of American history. In my case, the national designation already has yielded practical utility, as charter bus tours are now calling the Jackson Chamber of Commerce for tours of local sites connected to the Underground Railroad. I'm also coordinating with a local business owner to have a mural depicting the Underground Railroad painted on his building's exterior wall in a heavy traffic area of downtown. National accreditation has led to the kind of credibility that generates interest on many levels! I did not feel any questions on the application were unnecessary.

NPS Response: *No action required.*

2. Regarding the time it takes to complete the form:

   Comment: It took me about 1 year to gather the information, acquire the necessary municipal approvals and letters of support, generate the maps, and complete the form. I did not feel this amount of time or the process was unnecessarily burdensome, since a higher burden of proof contributes to higher standards of credibility that make this designation so commendable.

   NPS Response: *We have taken this information into consideration when calculating our estimated burden on the public.*

3. Suggestions for improving the information collection:

   Comment: I don't have any suggestions for minimizing the burden on applicants – especially since there are no fees involved. State historical markers cost around $4,000 and it is incumbent on the applicant to generate the funds. The Network to Freedom designation is free! Regarding minimizing the burden of proof, I hope the process is not downgraded to make it "easier" since a higher burden also yields a higher level of confidence, which, in turn, leads to higher credibility.

   NPS Response: *No action required.*

4. Additional feedback:

   Comment: It would be helpful if applicants didn't have to wait so long for their official letters of approval. I'm still waiting on mine (but I do have the 4-29-19 email from my regional manager confirming my application was accepted). I would only add that I found Midwest Regional Manager Deanda Johnson extremely helpful, responsive, and knowledgeable. She is a credit to your Network.

   NPS Response: *The Network to Freedom has had 2 vacant positions for more than 3 years. The national program manager has been covering the vacant areas as well as administrative tasks in addition to managing the program. This had led to a backlog and a delay in timely responses. The program has recently undergone a strategic planning process. We are now working on* *position management to re-align and fill vacant positions in order to work more effectively.*

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.

We 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 the case of historic resources that are 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.

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, applicants and owners will specify which of these items they do not want to share, with the intent that NPS will share as much information to facilitate networking as allowed. Putting people in contact with others who are researching related topics and historic events is a Network goal. Connecting individuals who may have technical expertise or resources to assist with projects is likewise one of the most effective means of advancing Underground Railroad commemoration and preservation.

In 2016, the NPS Privacy Officer determined this collection of information would not require a SORN as the agency's purpose in requesting the name of a technical contact was essentially administrative, rather than investigatory, and was not necessary for conducting of the program's operations. Nor was there evidence that the program used 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 27 annual responses totaling 1,001 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. In 2016, we raised the average completion time from 25 hours per response to 40 hours based on feedback received as part of our outreach to recent applicants. We believe the estimated 40 hours continues to accurately reflect 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 $39,044 (rounded). We used the rates listed below in accordance with Bureau of Labor Statistics news release USDL-19-1649, September 17, 2019, Employer Costs for Employee Compensation—June 2019, (http://www.bls.gov/news.release/pdf/ecec.pdf) to calculate the total annual burden.

- Individuals. Table 2 lists the hourly rate for all workers $36.61, including benefits.
- Private Sector. Table 4 lists the hourly rate for all workers as $34.44, including benefits.
- State and Local Government. Table 3 lists the hourly rate for all workers as $50.78, including benefits.

Table 12.1. Total Estimated Annualized Burden

Activity	Number of Respondents	Number of Annual Responses	Completion Time per Response (Hours)	Total Annual Hours	Hourly Rate with Benefits	$ Value of Annual Burden Hours*
Applications						
Individuals	15	15	40	600	$36.61	$21,966
Private Sector	5	5	40	200	$34.44	$6,888
Government	5	5	40	200	$50.78	$10,156
Partner Request*	2	2	.5	1	$34.44	$34
Totals	**27**	**27**		**1,001**		**$ 39,044**

* 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.**
* **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 $96,130 (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 2019-DCB (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx) to determine hourly wage rates. To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with BLS News Release USDL-19-1649, September 17, 2019, Employer Costs for Employee Compensation—June 2019, ((http://www.bls.gov/news.release/pdf/ecec.pdf)).

Table 14.1 Federal Salaries

Personnel	GS Level	Number of staff	Hourly Rate	Hourly Rate incl. benefits *(1.6 x hourly pay rate)*	Total estimated staff time (hours)	Annual Cost*
Regional Program Manager	12/5	2	$45.29	$72.46	832	$60,287
National Program Manager	13/5	1	$53.85	$86.16	416	$35,843
						46361

**Rounded*

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

We are reporting 400 fewer burden hours, due to a decrease in responses. The burden hour per response remains the same. Due to staffing shortages and decreased activity in the program, the resulting annualized cost for administering the program are lower than the last reporting period. When vacant positions are filled, the number of responses and costs are expected to rise to previous levels.

	Previously Approved		Current Request		Net change	
Activity	Responses	Burden (hours)	Responses	Burden (Hours)	Response	Burden (Hours)
Applications						
Individuals	12	480	15	600	+3	+120
Private Sector	15	600	5	200	-10	-400
Government	8	320	5	200	-3	-120
Partner Request*	2	1	2	1	0	0
Totals	**37**	**1,401**	**27**	**1,001**	**-10**	**-400**

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, are presented on the website and are 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.