SUPPORTING STATEMENT NA Forms 14110 and 14110A, Item Approval Request List (OMB Control No. 3095-0025)

1. <u>**Circumstances Making the Collection of Information Necessary.</u>** The National Archives and Records Administration (NARA) is the agency of the Federal Government responsible for identifying, preserving, and making available to the public and to Federal, state, local and tribal Governments all forms of Government records not restricted by law that have been determined to have sufficient historical, informational, or evidential value to warrant continued preservation.</u>

Records of various media are normally used in the several research rooms operated within the National Archives system (36 CFR 1254.1 - 1254.27), including the facility in College Park, Maryland (36 CFR 1275). In order to accommodate those researchers who cannot visit the appropriate NARA research room or who request copies of records as a result of visiting a research room, NARA offers limited provisions to obtain copies of records by mail and requires requests to be made on prescribed forms for certain bodies of records (36 CFR 1254.72).

The Item Approval Request List, NA Form 14110 is used by customers/researchers for ordering reproductions of NARA's motion picture, audio, and video holdings that are housed in the Special Media Archives Services Division (NWCS) in the Office of the National Archives.

The Nixon Presidential Materials Staff (NLNS) is the office of the National Archives and Records Administration (NARA) charged with identifying, processing, preserving, and making available to the public and to Federal, state, local and tribal Governments the papers, tapes, still photographs, motion films and video recordings created or collected by the Executive Office of the President during the administration of Richard M. Nixon from January 20, 1969 to August 9, 1974.

The Item Approval Request List, Nixon Presidential Materials, NA Form 14110A is used by researchers for ordering reproductions of NLNS's motion picture, audio, and video holdings that are housed in the Nixon Presidential Materials at the facility in College Park, Maryland.

2. **Purpose and Use of the Information.** The Special Media Archives Services Division (NWCS) and the Nixon Presidential Materials Staff (NLNS) use the Item Approval Request List form to track reproduction requests and to provide information for customers and vendors. A customer/researcher completes Section A, B1, and B2 of the form, indicating which record items he/she is interested in ordering, and sends the form to NWCS/NLNS. NWCS/NLNS staff annotate the remainder of Section B, (except for box B2, Type of Copy Wanted), indicating whether the record items are in stock and are

approved or restricted for use. NWCS/NLNS staff also note on the form the running time and footage so that vendors can price the reproductions. NWCS/NLNS staff mails or faxes the customer/researcher the annotated form. If the customer/researcher decides to order copies of the record items, he/she completes box B3 for each item he/she wants to order and send the form to prospective vendors to obtain price quotes for the items. Once the customer/researcher selects a vendor to make the reproductions, the vendor faxes or e-mails the Item Approval Request List form to NWCS/NLNS so that copying masters of the record items may be pulled from the stack locations and shipped to the vendor for reproducing.

The information collected by the Item Approval Request List form is the minimum identification of the record necessary to service the request. If this information collection was not conducted, NWCS/NLNS would be unable to fulfill this part of its mandate in a timely, equitable, and efficient manner.

- 3. <u>Use of Information Technology and Burden Reduction.</u> These forms are available on the web for customers to e-mail or download and print, then fax back to NARA. The collected information is the minimum information needed to allow NWCS/NLNS to locate the record and provide the requested copying master to the vendor for reproduction. The same information would have to be collected as part of any information technology system intended to automate the request process. Vendors routinely use e-mail to transmit an Item Approval Request List for customers to NWCS for processing of reproduction orders. Oftentimes, NWCS staff and customers may also use a fax machine for transmitting the Item Approval Request List form.
- 4. <u>Efforts to Identify Duplication and Use of Similar Information.</u> NWCS/NLNS is unaware of any duplication. This information is collected only when a customer places an order for reproductions. Each order is unique.
- 5. **Impact on Small Businesses or Other Small Entities.** The collection of the information has been designed to minimize the burden on customers and on vendors who are small businesses. NWCS has held numerous meetings with researchers and vendors (all of whom are small businesses).
- 6. <u>**Consequences of Collecting the Information Less Frequently.</u>** The information collection cannot be conducted less frequently since it occurs only when copies of audiovisual records are requested from NWCS/NLNS. NWCS/NLNS never initiates this information collection; it only responds to customer demand.</u>
- 7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** The information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.
- 8. <u>Comments in Response to the Federal Register Notice and Efforts to Consult</u> <u>Outside Agency.</u> NARA/NWCS met with interested researchers and vendors in

February, 1994, two months before NARA/NWCS changed its order fulfillment system, which now requires researchers to order reproductions directly from vendors instead of ordering from and paying NARA. Since April 1994, NARA/NWCS has met with researchers quarterly and with vendors annually to assess the order fulfillment system, which includes the use of the Item Approval Request List form. NARA/NLNS met with interested researchers and vendors in February, 1994, twelve months before NARA/NLNS changed its order fulfillment system, which now requires researchers to order reproductions directly from vendors instead of ordering from and paying NARA/NLNS.

Additionally, a *Federal Register* notice announcing NARA's proposal to request extension of this currently approved information collection was published to solicit public comment on May 16, 2007 (72 FR 27592 and 27593). No comments were received.

- 9. **Explanation of Any Payment or Gift to Respondents.** No payment or gift is provided to respondents for this information.
- 10. **Assurance of Confidentiality Provided to Respondents.** No assurance of confidentiality is provided.
- 11. **Justification for Sensitive Questions.** No questions of a sensitive or private nature are asked.
- 12. **Estimates of Hour Burden Including Annualized Hourly Costs.** The total number of respondents for the NA Form 14110 and NA Form 14110A is estimated to be 2,816. The burden per response is estimated to be 15 minutes to read the instructions and fill out the form. (The response time was calculated by talking with several researchers. The total annual reporting burden is .25 hours multiplied by 2,816 (number of forms) which equals 704 hours.)
- 13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers. For the NA Form 14110 and NA Form 14110A, the total estimated respondent cost is \$28,160. The cost to complete an individual form is \$10.00. This is based on an average salary of \$40 per hour for a professional researcher. Many respondents submit multiple orders during the year.
- 14. **Annualized Cost to the Federal Government.** The estimated annualized cost to the Government for the NA Form 14110 and NA Form 14110A is approximately \$35,000 for maintaining an automated order log and printing the forms. No cost was assigned to the staff time required to respond to a request because this is a core function of the National Archives.
- 15. **Explanation for Program Changes or Adjustments.** There is no change in

burden.

- 16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collection is not used for statistical studies or publications.
- 17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** The expiration date for OMB approval of this information collection will be displayed on the forms.
- 18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-1, "Certification for Paperwork Reduction Submissions."