

**Supporting Statement for Paperwork Reduction Act Submission
3090-0044 - GSA Form 3453, Application/Permit for Use of Space in Public
Buildings and Grounds**

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.

The Public Buildings Cooperative Use Act of 1976 (PL 94-541) encourages the use of auditoriums, meeting rooms, courtyards, rooftops, and lobbies of public buildings by persons, firms, or organizations engaged in cultural, educational, or recreational activities that will not disrupt the operation of the buildings during normal business hours. GSA recognizes that once such areas have been designated by the Congress as public, consideration must be given to the Constitutional guarantees of freedom of speech, free exercise of religion, and the right of peaceable assembly.

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.

GSA may not prohibit persons, firms, or organizations from occasionally using such areas of the space we control solely on the basis of the content of the activity. Any person desiring to use a public area of a public building or its grounds must first obtain a permit from the appropriate GSA Buildings Manager. This permit is GSA Form 3453, "Application/Permit for Use of Space in Public Buildings and Grounds." In order to obtain the permit, a copy, sample, or description of any material or item proposed for distribution or display, with a written statement regarding the activity, must be submitted to the appropriate GSA Buildings Manager.

The Buildings Manager then decides to approve or deny the application/permit. These applications/permits are filed chronologically by some 117 GSA Buildings Managers. They use the information as historic records in their decision to approve or deny the request.

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.

The collection of information does involve the use of automated, electronic submission of responses. The basis for adopting this means of collection is the ease with which a

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person may submit the information. It also allows the GSA buildings manager to retrieve information faster. GSA plans to phase out the use of hard copy submissions once the majority of requestors submit information via automation.

There is no similar information already available that could be used or modified for this purpose.

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

Collection of information does not have a significant impact on small businesses or other small entities.

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.

The consequence to Federal program activities if the collection is not conducted is that GSA building managers will have no record of the numbers and types of persons or entities who request access to public buildings and grounds for educational, recreational, or cultural purposes. Due to the high turnover rate of building managers, these records are important historically. There are no technical or legal obstacles to reducing burden.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to:

- **Prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Submit more than an original and 2 copies of any document;**
- **Retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;**
- **In connection with a statistical survey, that is not designed to produce valid, reliable results that can be generalized to the universe of study;**
- **Require the use of a statistical classification that has not been reviewed and approved by OMB;**
- **Include 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 the sharing of data with other agencies for compatible confidential use; or,**
- **Submit proprietary trade secrets, 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.**

GSA can think of no special circumstances that would cause an information collection to be conducted in the manner noted above.

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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 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 3 years – even if the collection of information activity is the same in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Comments were sought through the Federal Register notice published at 74 FR 19094, April 27, 2009. There were no public comments received.

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

To date, there has not been a decision to provide any payment or gift to respondents.

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

There is no assurance of confidentiality provided to respondents. The facilities under GSA's control are open to the public and the respondents will be using public spaces for events.

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.

There are no questions on GSA Form 3453 that apply to this question.

- ❖ If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

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12. **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**
13. **The 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 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 13.**

Space provided to the general public engaged in cultural, educational, or recreational activities is usually made available gratis; however, when GSA must supply services such as heat, air-conditioning, or guards, a fee is charged to cover costs. The fee is based on the number of hours that a mechanic or guard would be needed. Based on past experience, it is expected that approximately 8,000 requests for space will be made during a given year.

GSA expects the amount of time to complete the GSA Form 3453 is less than one hour. The estimate from an original study was 8,000 requests per year with a burden of less than one hour per requestor.

Total Annual Requests	8,000
Estimates hours/response	<u>.05 hour request</u>
Estimated total burden/hours	400
Average Cost/hour	<u>\$25.47/hr (GS-12 Salary)</u>
Total Cost to Public	\$10,188.00

13. **Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hourly burden shown in Items 12 and 14.)**

- **The cost estimate should be split into two components: (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. 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.**

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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.

See item 12 above.

14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include qualification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Reviewing Time/hr	.05 hr response
Requests/year	<u>8,000</u>
Review Time/year	400
Average Cost/hr	<u>\$25.47</u> (GS-12 Salary)
Total Government Cost	\$10,188.00

15. Explain the reasons for any program changes or adjustments reported.

There are no program changes or adjustments.

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 project, publication dates, and other actions.

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There are no plans to publish the collected information, which is for internal GSA use only.

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.

GSA does not plan to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions”.

There are no exceptions to the certification.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When employing statistical methods, the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The agency estimates 400 total annual hours. GSA has 11 regions. Dividing 400 by 11 equals approximately 36 hours per region per year. Although there may be 8000 requests for use of public buildings and grounds per year, there may not be 8000 approvals per year. One factor may be that respondents are not willing to conduct their activities after hours. Another may be timely submission of a request. Another may be the weather factor (snow, ice, summer storms, and the like). The agency does not want to further burden the GSA buildings manager with the requirement to provide statistical data on specific organizations who use public buildings or grounds, nor at this time do we see the need to collect such statistics.

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**

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- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

There are no procedures in place to employ statistical methods to collect information.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield 'reliable' data that can be generalized to the universe studied.

There are no plans to maximize response rates and to deal with issues of non-response. If an organization chooses not to use public space after having been granted a permit to do so, that is their choice.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

GSA does not plan to undertake any testing to refine the collection of information to minimize burden and improve utility.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect or analyze the information for the agency.

GSA does not plan to use the information for analytical purposes. The only purpose of the Form 3453 is to provide a service to requestors to use space in public buildings in accordance with the Public Buildings Cooperative Use Act of 1976 (PL 94-541).