

Supporting Statement
Independent Researcher Listing Application - NA 14115
(OMB Control No. 3095-0054)

- 1. Circumstances Making the Collection of Information Necessary.** The National Archives and Records Administration is not authorized or funded to undertake in-depth research in the records in our holdings. Some customers, however, are not able to undertake such research themselves, due to a variety of reasons, including geographic distance from our facilities, lack of time, and financial constraints. In the past, the National Archives has provided to these individuals, on request, information about independent researchers who had advised us, on their own initiative, that they were interested in performing freelance research for hire at our facilities. Following a recent review of this process, however, we concluded that the information was neither collected, maintained, nor disseminated in the most efficient and effective manner. To better serve all our customers, we instituted in 2003 a new information collection, NA Form 14115, Independent Researcher Listing Application. The form has helped us improve our program efficiency and effectiveness, as mandated by the Government Performance and Results Act, and achieve our strategic goal of providing ready access to essential evidence by making it easier for users to access that evidence regardless of where they are.

In December 2011, NARA submitted OMB 83-C, Change Worksheet, to document changes to the NARA facilities box on page 1 (some of the facilities have closed and/or been renamed). Also, since the office has moved, at the bottom of page 1, and in Items 12 and 13 on page 2, the form has been updated to reflect the current contact address and telephone/fax numbers.

- 2. Purpose and Use of the Information.** The information is used by our Customer Services Division (NWCC) to construct a listing of independent researchers who wish to communicate their availability by this means to those members of the public desiring to use such services to facilitate research in our holdings nationwide. The information is published on our web site and provided in hardcopy to any NARA customer who requests it in that format.
- 3. Use of Information Technology and Burden Reduction.** The information collection form is posted on our web site in an ADOBE PDF file that may be downloaded, filled out, and printed locally for submission to NARA by postal mail, fax, or hand. Persons who are unable to use the electronic version are able to request an application in hardcopy by telephone, fax, or mail. Applicants submit the information in hardcopy, because we do not yet possess a mechanism to receive electronically the applicant's signature required under the Privacy Act to permit our subsequent release of the information to customers. The number of transactions in the information collection is substantially below the threshold for GPEA. Because any efforts to make a completely web-based form hinge on the ability to have an electronic signature, this activity cannot become part of the effort to put additional services online.

4. **Efforts to Identify Duplication and Use of Similar Information.** To identify duplication, we sought out listings of independent researchers on the Internet and/or maintained by a variety of archival institutions, professional organizations, schools, and other Federal agencies. We consulted a number of these entities, including the National Archives of Canada and Great Britain and the U.S. Library of Congress, about their management and use of such listings. While the listings we have found serve a similar purpose, none provide information about independent researchers specifically interested in working with our holdings. We have found no comparable clearinghouse of information about such researchers.

Similar listings for similar types of institutions exist:

The State Library of PA: <http://www.statelibrary.state.pa.us/libraries/cwp/view.asp?a=3&Q=37509>

Rhode Island Historical Society: <http://www.rihs.org/indieresearch.htm>

Texas State Library and Archives Commission:
<http://www.tsl.state.tx.us/arc/researchers.html>

Nebraska State Historical Society:
http://www.nebraskahistory.org/lib-arch/services/refrence/la_pubs/researcher11.htm

Again, though, these relate only to that specific institution, not to NARA.

This information collection does not duplicate the previous listings distributed by some individual reference units with NARA, which were created or obtained in an ad hoc and unsystematic manner. To avoid confusion on the part of the researchers, however, these previous listings were withdrawn from use. No listing other than that generated by the information collection approved by OMB is distributed by NARA staff at the specified locations.

5. **Impact on Small Businesses or Other Small Entities.** Many, if not all, of the entities that use the information collection may be described as small businesses or other small entities; however, collecting contact and other key information from these independent researchers and providing such information to the public benefits these entities by increasing their business and income.

In keeping with the lessons learned about the management and use of such listings by the archival institutions, professional organizations, schools, and other Federal agencies with which we consulted, including the National Archives of Canada and Great Britain and the U.S. Library of Congress, the information collection burden of our proposed form has been minimized by limiting the data collection to only those items of information needed to provide a useful listing and by providing the ability to fill out the form in an electronic format.

Use of the form is completely voluntary. Instructions for participating in the information collection are printed on the back of the form and are published online on a user-friendly web page entitled “Independent Researchers for Hire: An Opportunity for Independent Researchers”, and found on the NARA web site at <http://www.archives.gov/research/hire-help/researcher-opportunity.html>.

6. **Consequences of Collecting the Information Less Frequently.** If this information is not collected or collected less frequently, that part of our mission involving ready access to our records regardless of where the researcher is will be impacted negatively, since researchers unable to personally visit our facilities will lack a ready means to identify persons interested in working on their behalf.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** This is a voluntary information collection. We know of no circumstances that would require the data collection to be inconsistent with existing Federal guidelines contained in 5 CFR 1320.5.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** A *Federal Register* Notice was published on May 4, 2009 (74 FR 20504 and 20505). 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. A Privacy Act Notice is included on the form, which clearly states that all information provided will be shared with public. A signature block is also provided. The independent researcher must sign the form before any release of information can occur.
11. **Justification for Sensitive Questions.** No questions of a sensitive nature are asked.
12. **Estimates of Hour Burden Including Annualized Hourly Costs.** We estimate the number of annual respondents will be 433. Most respondents will complete the form only once. Completion of the form requires about nine minutes per response. The annual hour burden is estimated to be 65 hours (9/60 hour x 433 = 65). The annualized hourly cost is estimated to be \$1,299, based on an average salary rate of \$20 hour per hour (9/60 hour x \$20 x 433).
13. **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** NARA anticipates no additional cost burden to respondents or recordkeepers beyond that which results from their customary or usual business or private practices. No fee is required for any independent researcher to be included on the list.
14. **Annualized Cost to the Federal Government.** The annual cost to the Government is estimated to be no more than \$2,200. This figure includes data maintenance, storage, and posting of the collected information on our web site; dissemination of hard copies to the

public and NARA staff; administrative and procedural review; responding to any questions or comments regarding the use of the form and the information collected; and the adding and updating of information attained from future form submissions.

- 15. Explanation for Program Changes or Adjustments.** There is an increase in the number of respondents with a resulting increase in burden hours. During the six years that the list has been available, researchers have seen it as beneficial to make their names available. The success of the list has resulted in an increase of actual respondents, 433, as compared to the 2006 estimate, 269.
- 16. Plans for Tabulation and Publication and Project Time Schedule.** No statistical tabulations and analysis are expected. The collected information is published in hard copies. NARA updates the published information whenever new information is provided.
- 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 form.
- 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 Act Submissions."