

**OMB Supporting Statement  
Information Collection for Document Delivery Services  
Collection Number 0518-0027**

**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 National Agricultural Library (NAL) accepts requests from libraries and other organizations in accordance with the national and international interlibrary loan code and guidelines. In its national role, NAL collects and supplies copies or loans of agricultural materials not found elsewhere, authority, 7USC3125a and 7CFR505. The National Agricultural Library provides photocopies and loans of materials directly to the United States Department of Agriculture staff, other Federal agencies, libraries and other institutions, and indirectly to the public through their libraries. The library charges for some of these activities through a fee schedule. To fill the request for a reproduction or loan of an item, the library must have the name, mailing address, email address and phone number of the respondent initiating the request. The respondent must also provide a brief statement acknowledging copyright compliance, required by Title 17 of the United States Code. The collected information is used to deliver the material to the respondent, bill for and track payment of applicable fees, monitor the return to NAL of loaned material, identify and locate the requested material in NAL collections, and determine whether the respondent consents to the fees charged by NAL.

\*The “Display and Order Warning of Copyright” as required by this section is available on NAL’s online request forms.

**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.**

This information collection is used by NAL document delivery staff to identify the protocol for processing the request. The information collected is used by staff to process/package the reproduction or loan for delivery and to determine whether the respondent is charged or exempt from any charges. The collected information may also be used for any additional follow-up or clarification in replying to a request. Collected information for copy requests is entered into a delivery system used to automate the delivery of material to the respondent. The copyright compliance statement is used for

assurance of compliance with the copyright laws and is retained in the library for three years as required by the above copyright law. All collected information is confidential and only used by staff that need to process the request. Information stored in databases is maintained on NAL's secure network and may be password protected. Additionally, databases are routinely updated to maintain only needed records/information.

**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.**

One hundred percent of the responses submitted by respondents are transmitted by electronic techniques, including web-based registration and request forms available on NAL servers, the Online Computer Library Center (OCLC) interlibrary loan (ILL) system out of Dublin, Ohio, and DOCLINE, the National Library of Medicine's automated ILL request system. All these electronic submission techniques are standardized, maintain constant patron data, and in the case of the web-based forms are linked to citation databases, thus reducing the amount of information needed to be re-keyed for each submitted request. NAL is constantly monitoring the latest technologies that might assist in making document delivery services easier to use.

NAL is also working towards making more of the materials in its collection freely available in digital form on the Internet. As a result, self-service use of online digital documents is reducing the need for document delivery service and its associated information collection. This trend is expected to continue as more material is made freely available digitally by NAL and other libraries and institutions.

**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.**

NAL's web-based requesting system allows users to initially supply constant data to be stored so that they do not have to provide this information with each request. Similarly, respondents who use the OCLC or DOCLINE systems do not have to repeat constant data with each request. Institutions who participate in the OCLC Interlibrary Fee Management system have billing information automatically tracked by a debit/credit system (Interlibrary Fee Management) and do not have to re-enter this information.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

There is no burden on small businesses or other small entities as described in Item 5 of OMB Form 83-1. All respondents are libraries and none of them are small entities as defined in the instructions for this 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.**

If the patron does not provide requested information NAL has no way to locate and deliver the requested material to the respondent, and thus cannot meet its mandate to supply agricultural material. By law (*Title 17 USC*) the requestor must provide a statement in which they agree to copyright compliance laws. Respondents are not required by NAL to retain any records for themselves.

**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 a 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.**

The library does not require any reports, does not require written responses to requests, does not require multiple copies, does not require respondents to retain information, does not use specific information collected in statistical surveys, does not include unsupported pledges of confidentiality, and does not require respondents to submit confidential information. Respondents only need to submit the required information when they are

seeking to obtain NAL owned library material. This is based solely on the needs of the respondent and thus frequency of submissions is at their discretion.

**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 record keeping, 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 as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

A Federal Register notice dated May 31, 2018, Vol. 83., No. 105, pages 24967-24968 was published by the agency. No comments were received.

The respondents to this information collection are libraries, institutions, and organizations involved in interlibrary loan operations. Interlibrary loan is a cooperative process which relies on clear, standardized communication between the participating institutions. There are established codes, standards, and guidelines in place to facilitate and streamline this process including The National Interlibrary Loan Code for the United States, International Federation of Library Associations and Institutions (IFLA) guidelines for international requests, NISO's NCIP protocol, bibliographic utilities such as OCLC and Docline, and request management systems such as Illiad and Relais. The data elements for interlibrary loan are standardized across libraries to ensure clear communication between both staff and automated systems at different libraries. The information collection summarized in this notice is limited to the standard information required for interlibrary loan requests as recorded in these standards and the widespread practices of the library community. Links to some of these ILL standards and examples of similar data collection at the Library of Congress is given below.

Documented Standards and Practices for Interlibrary Loan Transactions:

- Interlibrary Loan Code for the United States (produced by the American Library Association): <http://www.ala.org/rusa/resources/guidelines/interlibraryloancode>

and sample request form:

[http://www.ala.org/rusa/sites/ala.org/rusa/files/content/sections/stars/resources/ALA\\_ILL\\_Request\\_Form.pdf](http://www.ala.org/rusa/sites/ala.org/rusa/files/content/sections/stars/resources/ALA_ILL_Request_Form.pdf)

- IFLA Guidelines for Best Practice in Interlibrary Loan: <https://www.ifla.org/files/assets/docdel/documents/guidelines-best-practice-ill-dd-en.pdf> and sample request form: <https://www.ifla.org/node/5402>
- NISO Circulation Interchange Protocol (NCIP) <http://www.ncip.info/the-standard.html> (see sections 5.1 and 6.3 for definitions of standard data elements.
- Library of Congress Interlibrary Loan registration information: <http://www.loc.gov/rr/loan/LendingFirstTime.html> (example of similar data collection)

Document delivery service users were contacted for feedback about this form. Their names, the questions, and their answers are listed below:

Library Name	Contact Name	Phone #	Date Contacted
Library, U.S. Pharmacopeia	Eli Begoun	301-881-0666 x8464	8/7/2018
Canadian Agricultural Library	Carmen Cayen	613-773-1433	8/16/2018
Hunton & Williams Library	Jon Hartnett	202-955-1825	8/16/2018

Are the forms useful for placing document delivery requests?

Were there any problems when using the forms?

Are the forms easy to use?

Was there enough time to submit a request?

Was there enough time to type the information?

All three reported that the forms worked well and are easy to use, takes a reasonable amount of time to fill out, and that the amount and type of information asked for is appropriate for the service being provided.

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

There is no payment or gift to respondents.

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

NAL follows standard policy that is used by all public libraries nationwide and also adheres to USDA agency policy regarding disclosure of information. NAL respects state confidentiality laws and considers privacy guidelines established by national organizations

such as the American Library Association. As part of NAL policy, respondent information is confidential. Only NAL staff handling the requests have access to this information. It is not published anywhere nor is it distributed in any other form and is discarded when no longer needed. Information stored in a database is on NAL's secure network and password protected.

**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.**

The library does not collect any information 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, who 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 83-1.**

**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 14.**

It is estimated that 590 respondents will submit forms request via web-based request forms, or a network system such as OCLC or DOCLINE. The total annual responses are 4,130. The estimated time to complete the forms is 1 minute. This includes time for reviewing instructions and filling in the information. See copy of spreadsheet.

The estimated annualized average cost per respondent is \$1,424.86 (\$20.65 average hourly wage x 69 hours). (The average hourly wage was based on the rate NAL pays its contract

staff who submit document delivery requests to other libraries on behalf of NAL.) This cost included fringe benefits.

**13. Provide an estimate of the total annual cost burden to respondents or record-keeper 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 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. Capital and start-up costs include, among other items, preparations for collection 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 no associated with the information collection, (3) for reasons other than to provide information to keep records for the government, or (4) as part of customary and usual business or private practices.**

No additional costs would be added to that cost estimated in item 12 above.

**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, operations 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.**

Cost to Federal government is \$894. This estimate is based on annualized estimated cost of system hardware, software, maintenance, and staff costs as follows:

Total annual hardware/software costs: \$13,900  
Staff Costs: \$76,398  
Total Costs: \$90,298

$\$90,298 \times 0.03$  (proportion of work related to patron registration) = \$2,709

$\$2,709 \times 0.33$  (proportion of requests subject to PRA to total requests) = \$894

Staff cost cited include fringe benefits.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.**

The number of respondents decreased from 700 to 590, and the number of responses decreased from 5,600 to 4,130. The burden hours decreased from 93 to 69. The decrease is due to the availability of digital documents on the Internet.

**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.**

No specific information on individual respondents will be published.

**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.**

NAL is not seeking approval to not display the expiration date for OMB approval of the information.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.**

There are no exceptions to the certification statement identified in Item 19.