

Supporting Statement (as amended 03/2018)
Request to use NARA's Official Seals and/or Logos
OMB Control No. 3095-0052

1. **Circumstances making the collection of information necessary.** NARA uses its official seals to authenticate various copies of official records in its custody and for other official NARA business. NARA uses its logos for official NARA business, which includes but is not limited to:
 - Exhibits;
 - Publicity and other materials associated with a one-time or recurring NARA event or activity;
 - NARA web sites (Intranet and Internet);
 - Officially approved internal and external publications; and
 - Presentations.

Occasionally, if criteria are met, NARA will permit the public and other Federal agencies to use its official seal(s) and/or logo(s). The first criterion for approval is that NARA must be participating in the event or activity by providing speakers, space, or other similar services (example: NARA co-sponsoring a symposium or conference). The second criterion is that the seal(s) and/or logo(s) must not be used on any article or in any manner that reflects unfavorably on NARA or endorses, either directly or by implication, commercial products or services, or a requestor's policies or activities. Individuals and organizations wishing to use NARA's official seal(s) and/or logo(s) must request, in writing, permission from NARA. The purpose of this information collection is to allow NARA to approve only those requests that comply with NARA regulations and to ensure appropriate use of the official NARA seal(s) and logo(s).

The contents of the request are specified in the published final rule 36 CFR 1200.8.

2. **Purpose and use of the information.** NARA uses the information to determine whether or not to approve a request to use the official seal(s) and/or logo(s). When making a decision on a request, NARA must consider whether or not the intended use is connected to work with NARA and if the seal(s) and/or logo(s) are going to be used appropriately. NARA also uses the information to designate a time period for each approved use of the seal(s) and/or logo(s).
3. **Use of information technology and burden reduction.** No use of improved information technology is planned given the small number of respondents and the nature of the information requested.
4. **Efforts to identify duplication and use of similar information.** No duplication exists. No similar information is already available.

5. **Impact on small businesses or other small entities.** The information does not impact small businesses and other entities.
6. **Consequences of collecting the information less frequently.** If the information specified in the information collection is not conducted, NARA could not permit the use of its official seals and logos. This information collection is designed to ensure that only requests that meet NARA's criteria are approved.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** The collection will be conducted in a manner consistent with the guidelines in 5 CFR 1320.
8. **Comments in response to the Federal Register Notice and efforts to consult outside agency.** NARA provided the public an opportunity to comment on the information collection in a *Federal Register* Notice published on March 21, 2018 (83 FR 12413). No comments were received.
9. **Explanation of any payment or gift to respondents.** No payment or gift is provided to respondents.
10. **Assurance of confidentiality provided to respondents.** The collection of information, which would require privacy or confidentiality, is not planned.
11. **Justification for sensitive questions.** No questions of a sensitive nature are asked.
12. **Estimates of hour burden including annualized hourly costs.** We estimate 175 respondents per year. Each response is estimated to take an average of 15 minutes per request. Respondents submitting requests would have to provide information on the intended use of the official seal(s) and/or logo(s), including:
 - How the intended use of the official seal(s) and/or logo(s) is connected to their work with NARA;
 - Details on how and where the seal(s) and/or logo(s) is going to be displayed and provide samples of the document or other material on which the seal will appear; and
 - The dates of the event or activity for which they intend to display the seal(s) and/or logo(s).

The estimated cost per request is \$7.50 with a total annual burden to the public of \$1,312.50. Excluding the hour burden, there are no significant capital/start-up or operation costs attributable to this information collection. The cost consists of 15 minutes to complete the information collection by an events coordinator (estimated hourly wage of \$30/hr x 15 min./request = \$7.50).

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** There is no annual cost to respondents apart from that enumerated in Item 12.

14. **Annualized cost to the Federal government.** The estimated cost to the Federal government is \$ 43.46 per request; the total annual cost is \$7,605.50. The cost is based on an estimate of the time of a GS-13/4 NARA staff member for review and recommendation for approval or denial (average wage and benefits of \$43.46/hr x 1 hr/request = \$43.46).
15. **Explanation for program changes or adjustments.** There is a change to the number of respondents and annual burden hours because of an increase in requests due to the Controlled Unclassified Information (CUI) program ramping up, and a decrease in the time due to a change from written/mailed requests to emailed ones.
16. **Plans for tabulation and publication and project time schedule.** The information collection is not used for statistical publications.
17. **Reason(s) display of OMB expiration date is inappropriate.** The OMB approval number is displayed in the regulation. If we had to display the expiration date of the OMB approval, we would have to amend the rule. Given the very small number of requests received, we do not believe that the requirement is justified in this instance.
18. **Exceptions to certification for Paperwork Reduction Act submissions.** There are no exceptions to the certification statement.