

SUPPORTING STATEMENT
Request to Digitize Records
OMB Control No. 3095-0017

1. **Circumstances making the collection of information necessary.** Companies and other organizations that wish to microfilm archival holdings in the National Archives of the United States and Presidential libraries with privately-owned equipment must request permission from NARA. The contents of the request are specified in 36 CFR 1254.92 (which is currently also being revised to reflect the change from microfilming to digitizing records). The regulation cannot be revised until we clear this information collection. The purpose of the information collection is to allow NARA to determine whether the proposed digitization project meets the criteria in 36 CFR 1254.94 (also under revision from microfilming to digitizing), to ensure the project will not cause damage to the records being digitized, and to schedule the use of the limited space available for private digitization projects. Public access to the archival holdings in the National Archives and Presidential libraries is enhanced by the availability of privately digitized series of significant documents. Without this information collection, NARA would not be able to allow private digitizing of the records.
2. **Purpose and use of the information.** The information collection is used by NARA to evaluate the reference use and condition of the records proposed for digitizing, the equipment to be used, and digitizing procedures to ensure that records are appropriate for digitizing (e.g., records are not classified or otherwise restricted and that they have not been digitized previously) and that the records will not be damaged during digitizing.
3. **Use of information technology and burden reduction.** The requests are submitted electronically. 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.** NARA has attempted to minimize the burden on small businesses by requiring the minimum information necessary to evaluate the request.
6. **Consequences of collecting the information less frequently.** The information collection cannot be conducted less frequently than once per new digitization project. Without the information specified in the information collection requirement, NARA could not permit private digitization of archival records.
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 Part 1320.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** NARA published a *Federal Register* notice announcing the agency's intent to request extension of OMB approval of the information collection on July 27, 2018 (83 FR 35681). 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.** No assurance of confidentiality is provided; however, NARA would not release the information outside the agency except as required by the Freedom of Information Act.
11. **Justification for sensitive questions.** No questions of a sensitive nature are asked.
12. **Estimates of hour burden including annualized hourly costs.** We estimate 10 respondents per year. Each response is estimated to take an average of 5 hours. A respondent submitting a request for the first time would need to gather detailed information on the equipment to be used and to draft a description of the digitizing procedures to be followed. Respondents submitting requests to digitize similar series of records, such as State Department diplomatic posts, would need less time to prepare requests because the equipment and digitizing procedures would change very little from one project to the next. The frequency of response depends on the number of digitization projects proposed by the respondent.
13. **Estimate of other total annual cost burden to respondents or recordkeepers.** The annualized cost to respondents is estimated at \$150 per respondent per year to assemble data concerning the equipment and digitization procedures, to estimate production time, and to draft the request to digitize records. An average salary rate of \$30 per hour was used for five hours per response. For 10 respondents, we estimate the total is \$1,500 per year. There are no capital costs or other start-up costs.
14. **Annualized cost to the Federal government.** The annualized cost to the Government is \$3,000 based on 10 requests per year. The Government cost is 12 hours of staff time for GS-11 archivists and conservators, estimated at \$25 per hour, to log requests, review the records requested for digitization, evaluate equipment and digitizing procedures, and evaluate conservation needs for the documents before digitizing.
15. **Explanation for program changes or adjustments.** The amount of time for a respondent to draft and submit a request has gone down by 50% from an average of 10 hours to an average of 5 hours, due to changes in the request process and forms. However, the number of requests per year has increased from two to ten because more people are able to digitize records than microfilm them. Each respondent now spends half the time and half the cost but the total burden for all respondents has gone up because of the increase in total number of respondents.
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.
18. **Exceptions to certification for Paperwork Reduction Act submissions.** There are no

exceptions to the certification statement.