

Supporting Statement
Requests to use NARA facilities for events
OMB Control No. 3095-0043

1. **Circumstances making the collection of information necessary.** In the Washington, DC, area, NARA has many public areas that are attractive venues for organizations wishing to hold events. However, pursuant to law and regulation, any event held in a NARA facility must relate to NARA's mission or interests, organizations may not use NARA facilities to promote commercial enterprises or products, and they cannot use them for partisan political, sectarian, or similar purposes. Organizations must therefore request permission from NARA to use its facilities, and NARA collects information through that process from which it assesses those requests. Currently, respondents use a letter and contract to request use of space so we are removing two outdated forms previously used NA Form 16008a, Application for Use of Public Space in the National Archives Building and 16008b, Application for Use of Public Space in the National Archives at College Park, MD. Neither of those forms covered information in the new NA Form 11009, Sleepover at the National Archives Consent and Release, which is signed by NARA sleepover participants, consenting to their participation and waiving NARA liability.

2. **Purpose and use of the information.** NARA uses the collected information to determine whether to approve a request to hold an event in a NARA public area. The collected information allows NARA to assess a proposed event to determine if it complies with NARA regulations and relates to NARA's mission or interests. It also allows NARA to schedule use of its public areas, adjust staffing and related budget requirements for the event, and protect property and fragile archival holdings in the requested location.

Title 36 CFR §§ 1280.80 and 1280.82 inform respondents of the request requirement and the use to which NARA puts the collected information.

3. **Use of information technology and burden reduction.** NARA collects this information by email and telephone. Respondents electronically submit requests and copies of printed materials they wish to display or distribute at the event for NARA review, and may add additional details by telephone. Due to the nature of the information, no additional technology options would reduce the burden.

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 collection does not have a significant impact on small businesses or other small entities.

6. **Consequences of collecting the information less frequently.** NARA cannot collect the information less frequently than once per new request to use a NARA public area because we must evaluate each request. If NARA did not collect this information, we would be unable to allow outside groups and other Federal agencies to use NARA public areas for events.

7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** We collect this information 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 the *Federal Register*, July 27, 2018 (83 FR 35681). We did not receive any comments.

9. Explanation of any payment or gift to respondents. NARA provides no payment or gift to respondents.

10. Assurance of confidentiality provided to respondents. We do not collect information that would require privacy or confidentiality.

11. Justification for sensitive questions. We do not ask questions of a sensitive nature.

12. Estimates of hour burden including annualized hourly costs. Respondents submit 300 requests per year to use NARA space. Each response for use of NARA space takes an average of 30 minutes per request, for an annual total time burden of 150 hours. A respondent submitting a request provides information about the proposed event, including the date and location desired, plans and scheduled activities for the event, and samples of printed materials they wish to use or display at the event. Respondents for Sleepover submit 230 requests per year. Each response for Sleepover takes an average of 5 minutes per request, for an annual total time burden of 19 hours.

The estimated respondent cost per application for use of NARA space is \$15.00, based on 30 minutes to complete the information collection (estimated hourly wage of \$30/hour x 30 min./request = \$15). The total annual cost burden to collect this information is therefore approximately \$4,500.00, based on an average of 300 requests per year. Excluding the costs above, there are no significant capital/start-up or operational costs attributable to this information collection. The estimated respondent cost per Sleepover is \$2.50, based on 5 minutes to completed the form (estimated hourly wage of \$30/hour x 5 min./request = \$2.50). With 230 requests per year, approximately \$575.00.

13. Estimate of other total annual cost burden to respondents or recordkeepers. Respondents do not incur an annual cost apart from that enumerated in Item 12.

14. Annualized cost to the Federal Government. The Federal Government spends approximately \$35 per request, based on an estimate of the time it takes a GS-12 staff member to review a request (average wage and benefits of \$35/hour x 1 hour/request = \$35). The total annual cost is therefore approximately \$18,550, based on an average of 530 requests per year.

15. Explanation for program changes or adjustments. The request hour and cost burdens have changed due to a much higher annual number of requests to use NARA space and adding NA Form 11009, Sleepover at the National Archives Consent and Release.

16. Plans for tabulation and publication and project time schedule. We do not use this information collection for statistical publications.

17. Reason(s) display of OMB expiration date is inappropriate. We include the information collection in a regulation and the rule's preamble also states the OMB expiration date.

18. Exceptions to certification for Paperwork Reduction Act submissions. There are no exceptions to the certification statement.