

SUPPORTING STATEMENT
OMB Control No. 3095-0037
NA Form 13022, Returned Request
NA Form 13064, Reply to Request Involving Relief Agencies, and
NA Form 13068, Walk-In Request for OPM Records or Information

1. **Circumstances making the collection of information necessary.** National Archives and Records Administration (NARA) administers Official Personnel Folders (OPF) and Employee Medical Folders (EMF) of former Federal civilian employees. Civilian Conservation Corps (CCC) records and some Federal agency OPF's have been transferred to the legal custody of NARA and are considered archival records. Records still in the legal custody of the creating agency but in the physical custody of NARA are administered in accordance with rules issued by the Office of Personnel Management (OPM). These records are hereafter referred to as "non-archival" records. When former Federal civilian employees and other authorized individuals request information from or copies of documents in OPF's or EMF's, they must provide in forms or in letters certain information about the employee and the nature of the request.

The NA Form 13022, Returned Request, is used to request additional information about the former Federal employee. The NA Form 13064, Reply to Request Involving Relief Agencies, is used to request additional information about the former relief agency employee. The additional information is needed to better identify individuals listed on microfiche holdings since SSN's were not used during the time period covered. The NA Form 13068, Walk-In Request for OPM Records or Information, is used by members of the public to request a copy of a Personnel or Medical record. The authority for this information collection is contained in 36 CFR 1228.164.

2. **Purpose and use of the information.** Non-archival civilian personnel and medical records described above are in NPRC's physical custody, legal custody of the records remains with the Office of Personnel Management, or the creating agency. Handling of requests for information from the records must conform to the legal requirements of the Freedom of Information Act (FOIA), the Privacy Act, and the implementing regulations of OPM and other agencies. Archival records are open to the public. The Privacy Act of 1974 does not apply to archival records. However, in order to protect the privacy of the civilian employee, his/her family, and third parties named in the records, the personal privacy exemption of the Freedom of Information Act (5 U.S.C 552(b)(6)) may still apply and preclude the release of some information.

NPRC uses information submitted on NA Form 13022, NA Form 13064, and NA Form 13068, and various other forms, and in letters in order to locate requested records and to determine the releasability of records. When third parties submit requests using these forms or letters, the form or letter serves as a record of disclosure since non-archival civilian personnel and medical records are covered by the Privacy Act. Without this information collection, NPRC would be unable to provide requested information to requestors since information submitted in the information collection is the minimum NPRC staff need in order to locate and release requested records.

3. **Use of information technology and burden reduction.** The forms are available online through the archives.gov website. Links to the forms are on the NPRC web page within related subject areas

as appropriate. Currently, there is no information technology application available to accept the collected information online. The collected information is the minimum information needed to allow NPRC to locate the record and provide the requested information.

4. **Efforts to identify duplication and use of similar information.** There is no duplication.
5. **Impact on small businesses or other small entities.** The collection of information does not have a significant impact on small businesses.
6. **Consequences of collecting the information less frequently.** The frequency of response is on occasion, such as when individuals, businesses and government desire to acquire information from civilian personnel or medical records. Therefore, the information collection cannot be conducted less frequently because requesters determine when they want to request information. Many requesters submit one request in order to obtain replacements of documents in civilian personnel or medical files or to verify some aspects of an individual's civilian service. Some requesters who conduct genealogical research may submit multiple requests, although NPRC has estimated that such individuals comprise no more than 1% of the total number of requesters.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** The information collection is conducted in a manner consistent with guidelines outlined in 5 CFR 1320.6.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** No formal consultations have taken place. NARA published a notice in the *Federal Register* on November 1, 2018 (83 FR 54945) requesting public comment. No comments were received.
9. **Explanation of any payment or gift to respondents.** This information collection involves no remuneration to respondents.
10. **Assurance of confidentiality provided to respondents.** NPRC staff retains, in civilian personnel and medical records, NA Forms 13022, 13064, and 13068, as Privacy Act-protected records of disclosure. NA Forms 13022, 13064, and 13068, become releasable only in accordance with Privacy Act provisions, contained in 5 U.S.C. 552a, and the routine uses for systems of civilian personnel records, contained in the Privacy Act system notice. These are contained in NARA 35, Case Management and Reporting System (CMRS), published in 78 FR 77281 – 77282.
11. **Justification for sensitive questions.** Respondents are asked no questions of a sensitive nature.
12. **Estimates of hour burden including annualized hourly costs.** The hour burden for all individual respondents is as follows:

<i>Form of Request from Respondents</i>	<i>Number of Respondents</i>	<i>Responses per Respondent</i>	<i>Minutes per Response</i>	<i>Annual Hour Burden</i>
NA Form 13022	20,000	1	5	1667

<i>Form of Request from Respondents</i>	<i>Number of Respondents</i>	<i>Responses per Respondent</i>	<i>Minutes per Response</i>	<i>Annual Hour Burden</i>
NA Form 13064	500	1	5	42
NA Form 13068	300	1	5	25
TOTAL	20,800	----	----	1,733

NPRC developed the respondent data by tracking the number of forms returned to NPRC by requesters. The estimated times for each form of inquiry are based on the expectation that most respondents will be employees who can complete required information from memory. Even next of kin or others acting on authority of employees is usually prepared to complete the essential information just as quickly.

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** The total estimated annualized respondent cost is \$21,927. Because requests are normally made for the personal benefit of requesters, the respondents cost consists of both the labor time involved in completing the form (based on the current minimum wage) and the materials used to submit the request.

<i>Form of Request from Respondents</i>	<i>Annualized Cost for Hour Burden</i>
NA Form 13022	\$21,083
NA Form 13064	\$527
NA Form 13068	\$316
TOTAL	\$21,927

14. **Annualized cost to the Federal government.** The total estimated annualized cost to NARA is \$666.00. This includes costs associated with the desktop printing and mailing of NA Forms 13022, 13064, and 13068, in response to requests received. However, no cost is assigned to the staff time required to perform core functions at NPRC, including: responding to letter and forms requests that contain sufficient information; and reviewing and preparing the responses for mailing.

15. **Explanation for program changes or adjustments.** There is no change in burden.

16. **Plans for tabulation and publication and project time schedule.** The information collection is not used for statistical studies or publications.

17. **Reason(s) display of OMB expiration date is inappropriate.** The expiration date of the OMB approval will be displayed on each form.

18. **Exceptions to Certification for Paperwork Reduction Act submissions.** NARA is not requesting any exceptions to the certification statement identified in Item 19, "Certification for

Paperwork Reduction Submissions”, of OMB Form 83-I.