

SUPPORTING STATEMENT
Application and Permit for Use of Space in Presidential Libraries and Grounds,
NA Form 16011
(OMB Control No. 3095-0024)

1. **Circumstances making the collection of information necessary.** Presidential libraries are administered by the National Archives and Records Administration (NARA) in accordance with 44 U.S.C. 2112. Regulations for public use of the libraries are contained in 36 CFR 1280. Private organizations may use the auditorium or other public space in a Presidential library for meetings, lectures, or other activities sponsored by the organization upon application to the Presidential library. The form is required for all requests for events held in Presidential library areas or spaces that are considered NARA property.

NARA has developed NA Form 16011, Application and Permit for Use of Space in Presidential Libraries and Grounds, to serve as the application and record of NARA permission. A copy of the form, conditions of use, and regulations is provided to the applicant. NARA needs the information contained on this form in order to determine whether the proposed use of the space by the organization meets the criteria specified in 36 CFR 1280.94.

2. **Purpose and use of the information.** The information provided on the NA Form 16011 is evaluated by the Presidential library to determine whether the proposed use of the space meets NARA's criteria and whether the requested date(s) can be accommodated. Part II of the form serves as the permit to use the space. NARA would not be able to make the space available to outside groups if the information collection was not conducted.
3. **Use of information technology and burden reduction.** NARA has attempted to simplify the information collection to minimize the burden on the respondents.
4. **Efforts to identify duplication and use of similar information.** There is no similar information already available. There is no duplication.
5. **Impact on small businesses or other small entities.** The information requirements do not have a significant impact on small businesses or other small entities because the affected public is primarily not-for-profit institutions. No application is required in instances where the library co-sponsors the activity with the private organization.
6. **Consequences of collecting the information less frequently.** The information collection cannot be conducted less frequently. Organizations normally request use of the library space for a specific one-time event. Requests for recurring use, such as a quarterly meeting, are rare. In such situations, NARA has required separate applications for each use to facilitate review and approval. NARA has found that submission of one application for multiple events over a long period of time is not practical because required information about activities to be held in the distant future, such as the responsible person and catering or other special services, has not been planned at the time of the initial application or is subject to change.

7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** The collection is conducted in accordance with the guidelines in 5 CFR 1320.5.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** NARA has not consulted with persons outside the agency on this information collection in the past; however, NARA published a notice in the *Federal Register* on February 11, 2020 (85 FR 7785) inviting public comment on the information collection. No comment(s) was/were received.
9. **Explanation of any payment or gift to respondents.** No payment or gift provided to respondents for this information.
10. **Assurance of confidentiality provided to respondents.** There is no assurance of confidentiality provided to respondents. The application is contained in a Privacy Act systems, NARA-41.
11. **Justification for sensitive questions.** No questions of a sensitive nature are asked.
12. **Estimates of hour burden including annualized hourly costs.** The estimated annual burden hours are 200, based on 600 respondents per year. The individual respondent burden was estimated at 20 minutes per application to review the conditions of use and regulations and to complete the form. The number of respondents per year is estimated at 600, based on the volume of past applications. The frequency of response is upon occasion -- whenever a private group requests the use of space in a Presidential library. As noted in response to item 6 of the justification, most respondents submit a form less than once each year. The request for approval is for one form.
13. **Estimate of other total annual cost burden to respondents or recordkeepers.** The estimated annual cost to respondents is \$3,000, based on 600 applications received per year. Respondents include a variety of organizations, ranging from small volunteer or personal interest groups in the community where the library is located to national professional organizations. We estimated the value of the respondent's time at \$15 per hour to accommodate respondents who used a professional planner or administrative staff member to complete the form.
14. **Annualized cost to the Federal government.** The estimated annual burden hours are 200, based on 600 respondents per year. The individual respondent or recordkeeper burden was estimated at 20 minutes per application to review the propriety of the application and to coordinate the initial scheduling of the facility. The estimated annual cost to the Federal government is \$13,750, including printing costs of \$250 and staff costs of \$13,500 (based upon form review and coordination by a GS-13).
15. **Explanation for program changes or adjustments.** Based on the amount of forms actually received from 2016 – 2018, we have lowered the number of respondents this time around.

16. **Plans for tabulation and publication and project time schedule.** The information will not be published for statistical use.
17. **Reason(s) display of OMB expiration date is inappropriate.** The expiration date for OMB approval of this information collection will be displayed on the form.
18. **Exceptions to certification for Paperwork Reduction Act submissions.** There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-1, "Certification for Paperwork Reduction Submissions."