

Supporting Statement
Request to use personal paper-to-paper copiers at the National Archives at the College Park facility
OMB Control No. 3095-0035

- 1 **Circumstances Making the Collection of Information Necessary.** Companies, non-profit organizations, and Federal agencies that want to make paper-to-paper copies of archival holdings in the National Archives of the United States must request permission from NARA. The contents of the request are specified in 36 CFR 1254.86. The purpose of this information collection is to allow NARA to determine whether the proposed equipment will cause damage to the records being copied and to schedule the limited space available for personal copiers. Public access to the archival holdings of NARA is enhanced and expedited by allowing the use of personal copiers in the special situation governed by 36 CFR 1254.86. Without this information NARA would not be able to allow the use of personal paper-to-paper copiers.

We are updating our information collections to address changes in technology, and in the course of that effort, this information collection will be cancelled. However, the regulation that gives rise to this information collection is not yet revised. We are requesting an extension of OMB approval for this information collection for 12 months while we finish revising the regulation so that there is not a gap during which the regulation requires something that isn't OMB-approved.

- 2 **Purpose and Use of the Information.** The information collected is used by NARA to evaluate the equipment to be used and the condition of the records to be copied in order to ensure that the records will not be damaged during copying. The information also is essential to schedule the limited space available.
- 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.** NARA has attempted to minimize the burden on small business and other entities 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 often than once per new personal copying project. Without the information specified in the information collection NARA could not permit personal paper-to-paper copying of archival records.
- 7 **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** The collection will not be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.

- 8 **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** NARA published a notice in the Federal Register on April 8, 2020 (85 FR 19778). 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 will 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 a maximum of five respondents per year. Each response is estimated to take an average of three hours. A respondent submitting a request would have to provide specific information about the equipment they intend to use and a list of the records they want to copy.

The frequency of response depends on the number of projects proposed. NARA's experience since the College Park facility opened is that respondents submit only one request per year. Respondents submitting subsequent requests would require less time as the equipment would change very little from one project to another.
- 13 **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** The annualized cost to all respondents is estimated at \$300 (\$60 per respondent per year, based on an average salary of \$20 per hour for three hours) to assemble data about the equipment, to estimate production time, and to draft the request. There are no capital, other start-up, or operating costs.
- 14 **Annualized Cost to the Federal Government.** The annualized cost to the Federal Government is \$1,900.00 based on five requests per year. The Government costs are evaluation of the request, including review of the records and inspection of the equipment, and verification of compliance with the schedule for the project. The work is performed by GS-14 and GS-13 archivists and a GS-7 archives technician.
15. **Explanation for Program Changes or Adjustments.** There is no change.
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.