Supporting Statement
NA Form 14003, Researcher Application
(OMB Control No. 3095-0016)

1.   **Circumstances making the collection of information necessary.** People who wish to use original records at the National Archives in Washington, DC, in our archival field facilities around the country, and at Presidential libraries, must complete the researcher application form. After we process the form, we provide the researcher with a researcher identification card, valid for one year. The researcher must show this identification card when entering the facility and research room and when receiving records in the research room.

You also need a researcher identification card if you wish to use microfilm copies of documents at NARA's Washington, DC, area facilities and in any other NARA facility where the microfilm research room is not separate from the textual research room. No card is required at most archival field facilities when a researcher will be using only microfilm copies of holdings or Public Access Computers in a research room that is separate from the research room where original records are serviced.

Collecting the application information is necessary as a security measure to protect the national holdings and to facilitate providing effective reference service to the researcher. To enhance security further, the renewal cycle for researcher identification cards is one year. Use of the application form is prescribed in 36 CFR 1254.8.

2.   **Purpose and use of the information.** We use the application as a security measure to screen individuals who will have access to original records, to identify which types of records the individual should use, and to allow further contact with the person if we find additional records of interest to the researcher or if we discover problems with the records. We also enter some of the information in the application into a database to serve as a finding aid to the applications file, to compile internal reports concerning researcher use of the records, and to facilitate preparation of mailing lists to send information about NARA programs and events to researchers.

If the information collection were not conducted, the following consequence would result: security screening of researchers would take longer, would need to occur each time the researcher visited the facility, and reference service to researchers would be less efficient.

3.   **Use of information technology and burden reduction.** NARA developed the capability to allow individuals in the Washington, DC, area (more than half of the respondents) to complete the application electronically (screen shot attached). In other facilities, where there are far fewer respondents each, the form is manually processed. There are fewer than 50,000 researchers per year, and since we have automated registration for the majority of researchers, it is not cost beneficial to further pursue

automation under GPEA at each of the additional facilities.

4. **Efforts to identify duplication and use of similar information.** The only duplication is that a small percentage of researchers who do research at a regional archives or Presidential library and at the NARA facilities in the DC area will have to complete two applications. NARA estimates that no more than 0.3 percent of the respondents must complete a second form during a year.

5. **Impact on small businesses or other small entities.** The collection of information does not involve small businesses or small entities.

6. **Consequences of collecting the information less frequently.** The current 1-year renewal cycle allows NARA to keep address information current. Ninety percent of the respondents complete the application on a one-time basis for a specific research project; therefore, the frequency of reporting has little impact on the overall respondent burden.

7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** The information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. **Comments in response to the Federal Register Notice and efforts to consult outside agency.** The information collection is contained in NARA regulations. Also, a *Federal Register* Notice was published on December 22, 2020 (85 FR 83624), inviting the public to comment. No comments were received.

9. **Explanation of any payment or gift to respondents.** We provide no payment or gift to respondents for this information.

10. **Assurance of confidentiality provided to respondents.** The researcher application is contained in a Privacy Act system, NARA-1. When requested under the Freedom of Information Act, NARA's policy is to deny the release of the information under exemptions (b)(4) and (b)(6).

11. **Justification for sensitive questions.** We ask no questions of a sensitive nature.

12. **Estimates of hour burden including annualized hourly costs.** We estimate an average of 17,500 respondents per year during the next three years. We estimated about 3,000 applications to Presidential libraries and about 14,500 applications to research facilities during 2018 and 2019. The numbers for 2020 went down due to COVID-19, so we are estimating based upon numbers from the previous two years. However, we also don't expect the application numbers to rebound fully, so are estimating about 2,000 fewer applications in future than during the previous three years. As noted in response to item 6, more than 90 percent of the respondents complete the form only one time.

The NA Form 14003, Researcher Application, requires about 8 minutes per response. The burden was determined by observing respondents completing the form. The total

annual burden hours are 2,333 (17,500 x 8 minutes).

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** We estimate that the annual cost to respondents is $46,660. The cost to an individual respondent was estimated at 8 minutes based on a salary rate of $20 per hour. Because a number of respondents are performing personal research or are unsalaried students, the estimated respondent cost may be generous.

14. **Annualized cost to the Federal Government.** We estimate that the annual cost to the Government for this information collection is $23,000. This cost includes $1,000 for printing forms and $22,000 for staff time to provide the form to the researcher, review the completed form, issue a researcher identification card, and analyze the statistical information for program evaluation purposes. A GS-12 archivist provides the form to the respondent and issues the researcher identification card as part of the initial consultation with the researcher to determine what records will be useful for the researcher's topic. A GS-13 or GS-14 analyzes the statistics and evaluates the program (DC area).

15. **Explanation for program changes or adjustments.** There was a slight decrease in number of respondents and annual burden hours/costs due to COVID-19 and resulting closure of NARA's research rooms.

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.** We display the expiration date for OMB approval of this information collection on the forms.

18. **Exceptions to certification for Paperwork Reduction Act submissions.** We request no exceptions to the certification statement identified in Item 19 of OMB Form 83-I, "Certification for Paperwork Reduction Submissions."