## Supporting Statement GENERIC CLEARANCE FOR NARA PUBLIC AND EDUCATION PROGRAM REGISTRATION

(OMB Control No. 3095-0074)

- 1. <u>Circumstances making the collection of information necessary.</u> Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. The National Archives and Records Administration (NARA) offers a variety of tours, training, and events throughout the country. Advance registration allows NARA offices to schedule the tours, training, and events to maximize the participants' time and to accommodate the participants in the space. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with our programs, in compliance with E.O. 12862. Without the ability to collect this information NARA would not be able to effectively organize events, resulting in possibly turning away members of the public from events that might be overbooked.
- 2. **Purpose and use of the information.** The information collected will be used to register participants for various NARA education and training programs throughout the agency's locations, and to collect and process credit card payments. The NARA registrar will use the non-financial information to prepare education and training-related forms (certificates, name badges, etc.). Financial information will be used to process credit card payments. The information is also used to develop mailing lists for distribution of education-related information and special NARA training events, but only upon the request or expressed interest of the person registering. A registration catalog of questions (or choices) has been developed that allows each office to select the questions they would need to ask of the registrants.

The types of collections that this generic clearance covers include, but are not limited to:

- Registration for teacher workshops
- Registration for education programs
- Registration for public programs
- Registration for group tours of museums
- Registration for training programs
- Registration for transportation ("school bus") scholarships
- Registration to rent traveling trunk programs
- Registration for online training
- Registration for professional development training
- Registration for field trips
- Registration to receive newsletters and marketing information

Types of information we would collect for the programs above include:

- Name, address and contact information for registrants
- Affiliated organization information (e.g. schools, organizations, corporations)
- Name or type of program of interest to the registrant
- Checklists for types of services required, e.g. transportation, menu options
- Number and types of participants (such as adult, child, chaperone, participant) within a group, when registering at a group level

- If a registrant is requesting financial support for school bus transportation, a statement of need
- Credit card and billing information
- The registrant's teaching specialization or research interest (e.g. U.S. History, Civics, the Civil War)
- Agreement to terms of pre-visit preparation
- Preferred dates for attending/visiting
- Parent approval for student participation

We will submit a specific information collection for approval by the agency PRA clearance officer under this generic clearance only if it meets the following conditions:

- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- Personally identifiable information (PII) is collected only to the extent necessary;
- Information gathered will be used only internally to support registration for training and programs and is not intended for release outside of the agency;
- Information gathered will not be used to substantially inform influential policy decisions;
   and
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study.

If these conditions are not met, we will submit an information collection request to OMB for approval through the normal PRA process.

As a general matter, information collections under this generic collection request will not result in any new system of records containing privacy information and will not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

To obtain approval for a collection that meets the conditions of this generic clearance, we will submit a standardized form to OMB along with supporting documentation (e.g., a copy of the comment card). The submission will have automatic approval, unless OMB identifies issues within five business days.

NARA currently uses these six (6) forms:

- NA Form 2027 K-12 Student Distance Learning Program Registration
- NA Form 2029 Learning Lab Registration
- NA Form 2030 Professional Development Distance Learning Registration

- NA Form 2032 Registration for Situation Room Experience
- NA Forms 11009 and 11009C, Sleepover at the National Archives Consent and Release and Sleepover at the National Archives Consent and Release Chaperone Only
- 3. <u>Consideration given to information technology.</u> NARA currently uses multiple methods to gather registrant information, including manually filling out information and sending it via email, phone, or fax, and using Foundation-partner automated registration processes. NARA will make registration forms available electronically on our website for interested individuals to download, fill out, and submit to NARA via e-mail, mail, or fax. We use EventBrite for some registrations and are seeking agency approval to use another, more robust online system. As part of the online system, the forms will be completed online by the registrant and submitted electronically.
- 4. **Efforts to identify duplication and use of similar information.** There is no duplication of this information.
- 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. Establishing a standardized process and catalog of questions for registering for education programs across NARA ensures that appropriate and complete registration information is collected in as consistent and streamlined a manner possible. It is necessary to collect each time a group or individual wishes to participate in the programs because the groups do not always contain the same participants from event to event, we need to know the number of attendees to properly prepare the space and program materials, some of the programs require payments and thus payment information, and similar needs. We also do not retain peoples' personal information for later re-use should they attend another program as a privacy practice. If we could not collect the information for each program and registrant, we would be unable to offer many of our educational and outreach programs, and would be restricted in the number of participants, in some cases having to turn people away.
- 7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This is a voluntary information collection and will be conducted in a manner consistent with the general information collection guidelines in 5 CFR 1320.5.
- 8. <u>Comments in response to the Federal Register notice and efforts to consult outside agency.</u> We published a notice request for comments for the proposed information collection in the *Federal Register* on April 15, 2021 (86 FR 19908). We received no comment.
- 9. **Explanation of any payment or gift to respondents.** We provide no payment or gift to respondents for this information, other than funding for the bus transportation scholarship program. Those scholarships are not payments or gifts for providing the information, but the information is necessary for awarding the scholarship.
- 10. **Assurance of confidentiality provided to respondents.** An assurance of confidentiality and security is provided to applicants. We include a Privacy Act statement on each form. It clearly

states that NARA staff and designees use the provided information to manage attendance, registration, and communication for and about the named education program. An existing Privacy Act system, NARA 5, Conference, Workshop, and Training Course Files, covers these forms. In addition, only individuals who need to use the information for the stated purpose have access to it, and we destroy it promptly once the program is over.

- 11. <u>Justification for sensitive questions.</u> Credit card information, including name and address of cardholder, credit card number, and expiration date will be collected when appropriate in order to process payments without the person having to come to the facility to pay. No other sensitive information or questions are included.
- 12. **Estimates of hour burden including annualized hourly costs.** We estimate the total hour burden is 1,300, each form taking only 10 minutes to complete. We estimate the number of respondents to be 7,921 across NARA. We are basing the reporting burden estimate on the number of registrations for NARA programs during the past year. The frequency of response is once per request to attend a NARA program.
- 13. **Estimate of other total annual cost burden to respondents or recordkeepers.** There are no annual cost burdens to respondents. Respondents are not required to keep records.
- 14. **Annualized cost to the Federal Government.** There is no annualized cost to the Federal Government.
- 15. **Explanation for program changes or adjustments.** There is an increase in number of respondents due in part to the pandemic, but it is also a result of a general program growth and our efforts to expand distance learning opportunities to teachers and students.
- 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 for OMB approval of this information collection will be displayed on the forms.
- 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."