

Supporting Statement
Independent Researcher Listing Application - NA Form 14115
(OMB Control No. 3095-0054)

1. **Circumstances making the collection of information necessary.** The National Archives and Records Administration is not authorized or funded to undertake in-depth research within the records in our holdings. Some customers, however, are also not able to undertake such research themselves, due to a variety of reasons, including geographic distance from our facilities, lack of time, and financial constraints. We provide to these individuals, on request, information about independent researchers who inform us, on their own initiative, that they are interested in performing freelance research for hire at our facilities. To better serve all our customers, we instituted a form, NA Form 14115, Independent Researcher Listing Application, by which researchers can submit the relevant information. Maintaining this list of researchers facilitates our strategic goal of providing ready access to essential information or evidence within our archival records, making it easier for users to access that evidence or information regardless of where they are.
2. **Purpose and use of the information.** Archival operations managers within NARA use the information we collect through this process to construct a list of independent researchers who want to inform people they are available for hire to conduct research in our holdings. We publish the information on our web site and provide it in hardcopy to any NARA customer who requests it in that format.
3. **Use of information technology and burden reduction.** We post the NA Form 14115 on our website in a fillable Adobe PDF file that respondents may download, fill out, and print locally and may submit to us by mail, fax, email, or in person. People who are unable to use the electronic version may also request a paper application in person, by telephone, fax, email, or mail.
4. **Efforts to identify duplication and use of similar information.** To identify duplication, we sought out listings of independent researchers on the Internet and/or maintained by a variety of archival institutions, professional organizations, schools, and other Federal agencies. We consulted a number of these entities, including the National Archives of Canada and Great Britain and the U.S. Library of Congress, about their management and use of such listings. While the listings we found serve a similar purpose, none provide information about independent researchers specifically interested in working with our holdings. We have found no comparable clearinghouse of information about such researchers.
5. **Impact on small businesses or other small entities.** Many, if not all, of the entities that use the information collection may be described as small businesses or other small entities; however, collecting contact and other key information from these independent researchers and providing such information to the public benefits these entities by increasing their business and income.

In keeping with the lessons we learned from the archival institutions, professional organizations,

schools, and other federal agencies with which we consulted, we minimized the information collection burden of our form by limiting the data collection to only those items of information necessary to provide a useful listing and making the form electronically fillable.

Respondents submit the information on a completely voluntary basis, and we do not solicit respondents. We have printed instructions for providing the information on the back of the form and published them online on a user-friendly web page entitled “Independent Researchers for Hire: An Opportunity for Independent Researchers,” on the NARA website at <http://www.archives.gov/research/hire-help/researcher-opportunity.html>.

6. **Consequences of collecting the information less frequently.** If we collect this information less frequently or not at all, it will negatively affect the part of our mission involving ready access to our records regardless of where the researcher, because researchers unable to personally visit our facilities will lack a ready means to identify researchers interested in working on their behalf.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This is a voluntary information collection and is consistent with the guidelines in 5 CFR 1320.5.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** We consulted with other archival organizations that maintain similar lists for research in their facilities and made changes to our process based on feedback from customers and researchers. We also published a *Federal Register* Notice on November 23, 2021 (86 FR 66595), providing the public with an opportunity to comment. We received no comments.
9. **Explanation of any payment or gift to respondents.** We do not provide payments or gifts to respondents for this information.
10. **Assurance of confidentiality provided to respondents.** We do not provide respondents with an assurance of confidentiality; the express purpose of collecting this information is to share it with the public. To that end, we include a Privacy Act Notice on the form, which clearly states that we will share all information provided with public. We maintain the information we collect through this process a system of records, NARA 1, Researcher Application Files (last published in 2013 at 78 FR 77256, although it is about to be published again in February 2022). The form also includes a signature requirement; the independent researcher must sign the form before we release any of the collected information.
11. **Justification for sensitive questions.** We do not ask questions of a sensitive nature.
12. **Estimates of hour burden including annualized hourly costs.** We estimate the number of annual respondents is about 300. Most respondents complete the form only once, which requires about ten minutes. We estimate the annual hour burden as 50 hours (10/60 hour x 300 = 50). We estimate the annualized hourly cost to be \$1,000, based on an average salary rate of \$20 hour per hour (10/60 hour x \$20 x 300).
13. **Estimate of other total annual cost burden to respondents or recordkeepers.** Excluding the

costs for time above, respondents incur no costs attributable to this information collection.

- 14. Annualized cost to the federal Government.** We estimate the annual cost to the government as about \$2,500, which includes data maintenance, storage, and posting of the collected information on our website; dissemination of hard copies to the public and NARA staff; administrative and procedural review; responding to any questions or comments regarding the use of the form and the information collected; and adding and updating information obtained from future form submissions.
- 15. Explanation for program changes or adjustments.** With the ongoing COVID-19 pandemic, we anticipate a decline in the number of professional researchers applying over the next three years, but the estimated numbers above remain the same as pre-pandemic until we can determine the change and whether the numbers are likely to resume pre-pandemic levels thereafter.
- 16. Plans for tabulation and publication and project time schedule.** We do not use this information collection for statistical publications.
- 17. Reason(s) display of OMB expiration date is inappropriate.** We include the expiration date for OMB approval of this information collection on the form.
- 18. Exceptions to certification for Paperwork Reduction Act submissions.** There are no exceptions to the certification statement.