

**Supporting Statement for Information Collection Submission
3090-0044; Application/Permit for Use of Space in Public Buildings and Grounds;
GSA Form 3453**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary.
Identify any legal or administrative requirements that necessitate the collection.
Attach a copy of the appropriate section of each statute and regulation mandating
or authorizing the collection of information.**

The Public Buildings Cooperative Use Act of 1976 (PL 94-541) encourages the use of auditoriums, meeting rooms, courtyards, rooftops, and lobbies of public buildings by persons, firms, or organizations engaged in cultural, educational, or recreational activities that will not disrupt the operation of the buildings during normal business hours. GSA recognizes that once such areas have been designated by the Congress as public, consideration must be given to the Constitutional guarantees of freedom of speech, free exercise of religion, and the right of peaceable assembly.

- 2. Indicate how, by whom, and for what purpose the information is to be used.
Except for a new collection, indicate the actual use the agency has made of the
information received from the current collection.**

GSA may not prohibit persons, firms, or organizations from occasionally using such areas of the space we control solely on the basis of the content of the activity. Any person desiring to use a public area of a public building or its grounds must first obtain a permit from the appropriate GSA Buildings Manager. This permit is GSA Form 3453, "Application/Permit for Use of Space in Public Buildings and Grounds." To obtain the permit, a copy, sample, or description of any material or item proposed for distribution or display, with a written statement regarding the activity, must be submitted to the appropriate GSA Buildings Manager.

The Buildings Manager then decides to approve or deny the application/permit. These applications/permits are filed chronologically by some 117 GSA Buildings Managers. They use the information as historic records in their decision to approve or deny the request.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.**

The collection of information does involve the use of automated, electronic submission of responses. The basis for adopting this means of collection is the ease with which a person may submit the information. It also allows the GSA buildings manager to retrieve information faster. GSA plans to phase out the use of hard copy submissions once the majority of requestors submit information via automation.

**Supporting Statement for Information Collection Submission
3090-0044; Application/Permit for Use of Space in Public Buildings and Grounds;
GSA Form 3453**

There is no similar information already available that could be used or modified for this purpose.

5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

Collection of information does not have a significant impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The consequence to Federal program activities if the collection is not conducted is that GSA building managers will have no record of the numbers and types of persons or entities who request access to public buildings and grounds for educational, recreational, or cultural purposes. Due to the high turnover rate of building managers, these records are important historically. There are no technical or legal obstacles to reducing burden.

7. Explain any special circumstances.

GSA can think of no special circumstances that would cause an information collection to be conducted in the manner noted above.

8. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* at 86 FR 67471 on November 26, 2021. No comments were received. A 30-day notice was published in the *Federal Register* at 87 FR 18797 on March 31, 2022.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

To date, there has not been a decision to provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality provided to respondents. The facilities under GSA's control are open to the public and the respondents will be using public spaces for events.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions on GSA Form 3453 that apply to this question.

**Supporting Statement for Information Collection Submission
3090-0044; Application/Permit for Use of Space in Public Buildings and Grounds;
GSA Form 3453**

12 & 13. Provide estimates of the hour burden of the collection of information.

Space provided to the general public engaged in cultural, educational, or recreational activities is usually made available gratis; however, when GSA must supply services such as heat, air-conditioning, or guards, a fee is charged to cover costs. The fee is based on the number of hours that a mechanic or guard would be needed. It is expected that approximately 8,000 requests for space will be made during a given year.

GSA expects the amount of time to complete the GSA Form 3453 is less than one hour. The estimate from an original study was 8,000 requests per year with a burden of less than one hour per requestor. Annual cost to the respondents is unknown. Collection processes and administrative procedures impacting the cost varies.

Estimated respondents/yr.....	8,000
Number of responses/respondent.....	x 1
Total responses annually.....	8,000
Estimated hours/response.....	x <u>.05</u>
Estimated total burden/hours.....	400

14. Provide estimates of annualized costs to the Federal Government.

The Federal cost has been calculated as follows, based on the wages of GSA's Office of Facilities Management, Facility Operations Division nationwide average employee salary (OPM GS-12 payscale) who take a total of approximately 0.5 burden hours to process each form:

Reviewing Time/hr.....	05
Requests/year.....	x <u>8,000</u>
Review Time/year.....	400
Average Cost/hr.....	x <u>\$46.11</u>
Total Government Cost.....	\$18,444.00

15. Explain the reasons for any program changes or adjustments reported.

There are no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

There are no plans to publish the collected information, which is for internal GSA use only.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

**Supporting Statement for Information Collection Submission
3090-0044; Application/Permit for Use of Space in Public Buildings and Grounds;
GSA Form 3453**

GSA does not plan to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions”.

There are no exceptions to the certification.