

SUPPORTING STATEMENT
OMB Control No. 3095-0037
Requests for Civilian Service Records
NA Form 13022, Returned Request
NA Form 13064, Reply to Request Involving Relief Agencies, and
NA Form 13068, Walk-In Request for OPM Records or Information

1. **Circumstances making the collection of information necessary.** The National Archives and Records Administration (NARA) administers Official Personnel Folders (OPF) and Employee Medical Folders (EMF) of former Federal civilian employees. Civilian Conservation Corps (CCC) records and some Federal agency OPFs have been transferred to NARA's legal custody and are considered archival records. Records still in the legal custody of the creating agency but in NARA's physical custody are administered in accordance with rules issued by the Office of Personnel Management (OPM). These latter records are non-archival records. When former Federal civilian employees and other authorized individuals request information from or copies of documents in OPFs or EMFs, they must provide certain information about the employee and the nature of the request. They may provide that information through a form or through a letter or other methods.

People may use the NA Form 13068, Walk-In Request for OPM Records or Information, to request a copy of a Personnel or Medical record, or they may make a request through letters or other methods. We may then use the NA Form 13022, Returned Request, to ask for additional information about the former Federal employee whose records are being requested, or the NA Form 13064, Reply to Request Involving Relief Agencies, if the request involves a former relief agency employee. We need the additional information to better identify individuals listed on microfiche holdings since SSNs were not used during many of the time periods covered by requests for information. We also need the information to determine whether the requestor is authorized to receive the information. The authority for this information collection is contained in 36 CFR 1228.164.

2. **Purpose and use of the information.** Non-archival civilian personnel and medical records described above (ones that have not been transferred to NARA's legal custody) are in NPRC's physical custody, but legal custody of the records remains with the Office of Personnel Management or the creating agency. Handling requests for information from these records must conform to the legal requirements of the Freedom of Information Act (FOIA), the Privacy Act, and the implementing regulations of OPM and other agencies that own the records.

Archival records (CCC records and some Federal agency OPFs transferred to NARA's legal custody) are open to the public. The Privacy Act of 1974 does not apply to archival records. However, in order to protect the privacy of the civilian employee, their family, and third parties named in the records, the personal privacy exemption of the Freedom of Information Act (5 U.S.C § 552(b)(6)) may still apply and preclude release of some information.

NPRC uses information submitted by requesters on NA Form 13022, NA Form 13064, NA Form 13068, or by other methods, to locate requested records and to determine the releasability of records. When third parties submit requests for these records, the request also serves as a record of disclosure because non-archival civilian personnel and medical records are covered by the Privacy Act. Without this information collection, NPRC would be unable to provide requested information to requestors since information submitted in the information collection is the minimum NPRC staff

need in order to locate and release requested records.

3. **Use of information technology and burden reduction.** The forms are available online through the archives.gov website. Links to the forms are on the NPRC web page within related subject areas, as appropriate. Currently, there is no information technology application available to accept the collected information online. The collected information is the minimum information needed to allow NPRC to locate the record and provide the requested information.
4. **Efforts to identify duplication and use of similar information.** We collect this information only when an individual requests information from these records. Each information collection is unique and the information is not duplicated elsewhere.
5. **Impact on small businesses or other small entities.** The information collection does not have a significant impact on small businesses or other small entities.
6. **Consequences of collecting the information less frequently.** The frequency of response is on occasion, such as when individuals, businesses, and government entities desire to acquire information from civilian personnel or medical records. Therefore, the information collection cannot be conducted less frequently because requesters determine when they want to request information. Many requesters submit one request in order to obtain replacements of documents in civilian personnel or medical files or to verify some aspects of an individual's civilian service. Some requesters who conduct genealogical research may submit multiple requests, although we estimate that such individuals comprise no more than 1% of the total number of requesters.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This is a voluntary information collection. We collect this information 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.** We provided the public an opportunity to comment on the information in the *Federal Register* on March 8, 2022 (87 FR 13011). We received no comments.
9. **Explanation of any payment or gift to respondents.** We do not provide a payment or gift to respondents for this information.
10. **Assurance of confidentiality provided to respondents.** NPRC staff retains, in civilian personnel and medical records, NA Forms 13022, 13064, and 13068, as Privacy Act-protected records of disclosure. NA Forms 13022, 13064, and 13068, become releasable only in accordance with Privacy Act provisions, contained in 5 U.S.C. § 552a, and the routine uses for systems of civilian personnel records, contained in the Privacy Act system of records notice for NARA 35, Case Management and Reporting System (CMRS), last published in full in the *Federal Register* at 78 FR 77255 at page 77281. The most current version is also always available at <https://www.archives.gov/privacy/inventory>.
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 following hour burden for all individual respondents based on an average from pre-COVID three years of requests, and the total hourly cost of all respondents, based on the current Federal minimum wage:

<i>Form of request from respondents</i>	<i>Number of respondents</i>	<i>Responses per respondent</i>	<i>Minutes per response</i>	<i>Annual hour burden for all respondents</i>	<i>Total hourly cost (hour burden x \$15)</i>
NA Form 13022	20,000	1	5 (1/12 of an hour or .0833)	1,667	\$25,005
NA Form 13064	100			8	\$124.95
NA Form 13068	6,500			542	\$8,125.05
Other request methods	31,299			2,607	\$39,108.15
TOTAL	0	----	----	4824	0

NPRC developed the respondent data by tracking the number of forms returned to NPRC by requesters. The estimated times for completing each form are based on the expectation that most respondents will be employees who can complete required information from memory. Even next of kin or others acting on authority of employees are usually prepared to complete the essential information just as quickly.

13. **Estimate of total annual cost burden to respondents or recordkeepers.** The total estimated annualized respondent cost other than hour costs in item 12 is \$30,325.41. Because requests are normally made for the personal benefit of requesters, the respondents' costs consist of materials to respond (e.g., envelope, stamp). We estimate materials costs at about \$0.59 per response. Although respondents can get the form online, we don't currently have an electronic submission mechanism, so they would have to mail or deliver the forms. Requests submitted using NA Form 13068, which requestors pick up at the facility and normally submit in person or by fax, do not incur the materials cost. The estimated annualized cost is based on an average from pre-COVID three years of requests:

<i>Form of request from respondents</i>	<i># of responses x materials cost</i>	<i>Total cost for all responses</i>
NA Form 13022	20,000 x \$0.59 =	\$11,800
NA Form 13064	100 x \$0.59 =	\$59
NA Form 13068	n/a	\$0
Other request methods	31,299 x \$0.59 =	\$18,466.41
TOTAL	---	0

14. **Annualized cost to the Federal Government.** We estimate the total annualized cost to NARA as \$1,303.40. This includes costs associated with printing and mailing NA Forms 13022, 13064, and 13068 in response to incomplete requests we receive. However, this does not include staff time required to perform core functions at NPRC, including: responding to letter and form requests that contain sufficient information and reviewing and preparing the responses for mailing.

15. **Explanation for program changes or adjustments.** The annual burden hours and corresponding

hour cost have increased. This is due to three developments: (1) an increase in the Federal minimum wage from \$7.25 to \$15 per hour; (2) an increase in the number of information requests submitted using NA Form 13068, Walk-In Request for OPM Records or Information, because, prior to this renewal, there was not a research room to accept these requests; and (3) we are adding requests for this same information that we receive by means other than the itemized forms. These forms are not mandatory, and we try to reduce respondent burden by permitting people to submit requests for personnel or medical records by whatever means is easiest for them. The number of requests by other methods has increased significantly over time, and more so during COVID, so we are updating the information collection to include these non-form requests as well. We have also kept our estimates of the number of requests of all types based on pre-COVID levels because the number recorded during COVID has dropped due to staff not being on-site to process them. We anticipate that the numbers will rise to pre-COVID levels during this three-year renewal period, though that might not occur for another year or more. We erred on the side of using the larger estimates so as not to inadvertently underestimate the burden. The materials costs have also increased due to an increase in the cost of stamps since the last renewal and the addition of non-form requests.

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 display the OMB expiration date for this information collection on the form.
18. **Exceptions to Certification for Paperwork Reduction Act submissions.** We are not requesting any exceptions to the certification statement.