

**Supporting Statement for
Application for Use of Public Space by Non-DOL Agencies in the Frances Perkins**

This Information Collection Requests seeks to extend, without change, PRA authority for the Application for Use of Public Space by Non-DOL Agencies in the Frances Perkins Building information collection.

Collection Instrument(s): Form DL1-6062B

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.**

Consistent with 40 U.S.C. § 581(h)(2), Federal Management Regulation (FMR) Part 102, Public Law 102-74, Subpart D, and the GSA Delegation under which the Department of Labor (DOL) operates the Frances Perkins Building (FPB), DOL allows the use of public space within the FPB for non-commercial purposes. As provided by FMR 102-74, Subpart D, (41 CFR 102-74-460) any person or entity that wishes to use public space in a Federal building is required to submit an application for a permit. In order to capture the nature of the request, information such as the requester, description of event, date, time, and approvals are collected in order to review the appropriateness of the request and make a determination of the availability of the requested public space.

DOL experience shows that the agency actually receives fewer than 10 non-DOL Agency requests to use FPB public space in any given year; however, as the information is contained in a rule of general applicability, the information collection is deemed to involve 10 or more persons. *See* 5 CFR 1320.3(c)(4)(ii). DOL, consequently, must maintain PRA authority to conduct this information collection.

- 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.**

The pertinent information is collected on Form DL1-6062B, "Application for use of Public Space by Non-DOL Agencies in the Frances Perkins Building," by staff members in the FPB Conference Center. This form is used by all applicants desiring to use DOL public-use space. Information is collected in-person on hardcopy, via facsimile, or through emailed scanned PDF. The information is necessary to determine whether approval of the requested use is consistent with applicable law and regulations (identified above) and DOL policy, to identify

users and usage, to provide logistical support (where permissible) and maintain user reservations.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burdens.**

In order to comply with the Government Paperwork Elimination Act (GPEA) applicants have the option of submitting the form electronically. Form DL1-6062B may be downloaded from a Web-based database available through DOL's Intranet and Internet Web sites and can be fill-out electronically. A hardcopy with signature is submitted to the scheduling office and the data is transferred to a scheduling database to maintain reservation and contact data.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.**

An agency review of data collections found no duplication. This ICR relates to applications to use public space in the Frances Perkins Building.

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

Only non-profits may apply to use the FPB for events, therefore the questions in the application relate to FMR requirements and/or aspects of the event that will occur in the FPB that are under the non-profit's control. If a small business is a vendor for a nonprofit's event (as is permitted under the FMR in limited situations—e.g. events sponsored by an employee association), the nonprofit is asked to assert that it has seen the valid vendor license of such vendor, a de minimis requirement as any vendor operating in any jurisdiction must have such a license.

- 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 information is only collected when an applicant requests to use public space at the FPB. Failure to collect proper information would result in DOL being unable to evaluate requests from outside requestors.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner: a. requiring respondents to report information to the agency more often than quarterly; b. requiring respondents to prepare**

a written response to a collection of information in fewer than 30 days after receipt of it; c. requiring respondents to submit more than an original and two copies of any document; d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; e. in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB; g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or h. requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

DOL associates no special circumstances with this request.

- 8. If applicable, provide a copy and identify the data and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

As required by the Paperwork Reduction Act of 1995, the Department published a notice in the *Federal Register* soliciting comments on August 21, 2020 (85 FR 51757). No comments were received.

- 9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.**

There is not payment or gift to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. (Note: If the submission will serve as Joint ICR and Privacy Impact Assessment per OMB Memorandum 03-22, Section II.D, the relevant justification shall be included as part of the agency's response to this Item)**

It is the Agency's policy to release financial and personal information only with the applicant's written permission. However, there is no formal assurance of confidentiality provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collected does not contain any questions of a sensitive nature such as sexual behavior, religious beliefs, or other matters commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Based on prior experience, the DOL anticipates receiving about five non-DOL Agency requests to use of the facility each year. Each Form DL-1-6062B takes approximately 5 minutes to complete. As this collection is covered by a rule of General applicability, the PRA implementing regulations deem the collection to have at least 10 respondents

The DOL has estimated the value of respondent time based on the March 2023 average hourly earnings in the Professional and Business Services Industry of \$31.57 and inflating that about by 40 percent to account for fringe benefits and overhead—a total rate of \$44.20. See [The Employment Situation—2023](#) at 33, Table B-3, U.S. Department of Labor, Bureau of Labor Statistics.

Table 1: Estimates of Annual Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Rounded Hours)	Hourly Rate*	Monetized Value of Respondent Time
Form DL-1-6062B Completion (Reporting)	10	1	10	.083 (5 min.)	1	\$44.20	\$44.20
Unduplicated Totals	10		10		1		\$44.20

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

The DOL associates to no capital/start-up costs with this information collection, beyond the value of respondent time. The DOL associates \$0.64 paper and mailing costs with each submission. \$0.55 postage + \$0.10 paper + \$0.05 envelope = \$.7.

\$.7 x 10 responses = \$7.

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

Basic Federal costs for this information collection are based on a 5-minute review by a support staff employee in order to transfer data into the scheduling database and 15 minutes for legal review for requests involving fund raising or commercial activities. For purposes of estimating Federal costs, the DOL has used the [Washington, DC rate](#) for a GS-6, step 4 clerical employee of \$22.51 and GS-14, step 4 of \$62.35 ATTORNEY, as calculated by the U.S. Office of Personnel Management.

10 responses x 5 minutes = 1 hour.
1 hour x \$22.51 per hour = \$22.51.
10 responses x 15 minutes = 3 hours.
3 hours x \$62.35 = \$187.05.

\$22.51
\$160.71
\$183.22 TOTAL

15. Explain the reasons for any program changes or adjustments reported in items 12 or 13.

There are no changes to the OMB inventory for this collection.

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

DOL will not publish this information collection.

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

The agency plans to display the expiration date on the form.

18. Explain each exception to the certification statement in ROCIS.

There are no exceptions requested.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.