

Supporting Statement
Requests to use NARA facilities for events
OMB Control No. 3095-0043

1. **Circumstances making the collection of information necessary.** The primary use for NARA property and facilities, including areas open to the public, is conducting official NARA business. However, we may permit occasional, non-official use of some public areas for private group activities and events that relate to or further our archival, records, or other interests. In the Washington, DC, area, and at Presidential libraries throughout the country, we have public areas that are attractive venues for organizations wishing to hold events. Pursuant to law¹ and regulation², any event held in a NARA facility must relate to NARA's mission or interests, organizations may not use facilities for profit-making or to promote commercial enterprises or products, and they cannot use them for partisan political, sectarian, or similar purposes. Organizations must therefore request permission from NARA to use our facilities, and we collect information through the request process to determine whether the proposed use of the space by the group meets the criteria specified in 36 CFR 1280. To request use of space at Presidential library spaces that are considered NARA property, private organizations provide information on NA Form 16011, Application and Permit for Use of Space in Presidential Libraries and Grounds and submit the form to the relevant Presidential library. If approved, the requester receives a copy of the form (part II serves as the permit to use the space), conditions of use, and the regulations. To request use of space at other NARA facilities and property in the Washington, DC, area, requesters call or email the special events office listed for the building in 36 CFR § 1280.64 and submit a written request providing the required information.

2. **Purpose and use of the information.** We use the collected information to determine whether to approve a request to hold an event in a NARA public area. The collected information allows us to assess a proposed event to determine if it complies with regulations and relates to our mission or interests. It also allows us to schedule use of the public areas, determine whether the requested date can be accommodated, adjust staffing and related budget requirements for the event, and protect property and fragile archival holdings in the requested location. We would not be able to make the space available to outside groups if we did not conduct the information collection. 36 CFR 1280, Subparts C and D, inform respondents of the request requirement, processes, and the uses to which we put the collected information.

3. **Use of information technology and burden reduction.** We collect this information through NA Form 16011 at Presidential libraries, which can be submitted by email. We collect the information at other facilities by email and telephone. Respondents electronically submit requests and copies of printed materials they wish to display or distribute at the event for our review and may add additional details by telephone. Due to the nature of the information, no additional technology options would reduce the burden. We have attempted to simplify the information collection to minimize the burden on respondents by allowing email submission and using a standardized form at all Presidential libraries across the country.

4. **Efforts to identify duplication and use of similar information.** There is no similar information already available, and the information is not duplicated elsewhere.

¹ Presidential libraries are administered by the National Archives and Records Administration (NARA) in accordance with 44 U.S.C. § 2112. Authorities for occasional, non-official use of specified public areas for private group activities and events are 44 U.S.C. § 2112 for Presidential libraries and 44 U.S.C. § 2903(b) for other NARA facilities and property.

² Request processes, criteria, rules of use, fees, and available space information are at 36 CFR 1280, Subparts C and D.

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 because the affected public is primarily not-for-profit institutions. We do not require applications in instances where the library or agency co-sponsors the activity with the private organization.

6. **Consequences of collecting the information less frequently.** We cannot collect the information less frequently than once per new request to use a NARA public area because we must evaluate each request. Requests for recurring events are rare, but we require separate applications for each use to facilitate review and approval. We have found that submitting one application for multiple events over a long period of time is not practical because required information about activities to be held in the distant future, such as the responsible person and catering or other special services, typically has not been planned at the time of the initial application or is subject to change. If we did not collect this information, we would be unable to allow outside groups and other Federal agencies to use our public areas for events.

7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** We collect this information in a manner consistent with the guidelines in 5 CFR 1320.

8. **Comments in response to the *Federal Register* notice and efforts to consult outside agency.** We have not consulted with people outside the agency on this information collection in the past; however, we published a notice in the *Federal Register* on November 1, 2024 (89 FR 87427) inviting public comment on this information collection. We received no comments.

9. **Explanation of any payment or gift to respondents.** We do not provide payment or gifts to respondents for this information.

10. **Assurance of confidentiality provided to respondents.** We do not collect information that requires confidentiality and we do not provide assurance of confidentiality. The information we collect from requestors to use Presidential library spaces is in a system of records protected by the Privacy Act and covered by the SORN for NARA 41. The information we collect from requestors to use other NARA spaces is not maintained in a system of records.

11. **Justification for sensitive questions.** We do not ask questions of a sensitive nature.

12. **Estimates of hour burden including annualized hourly costs.** We receive an estimated 500 requests for use of Presidential library spaces per year, based on the volume of requests during past years with a corresponding annual burden hour of 167 ($500 * 20 = 10,000 / 60 = 167$). For use of other NARA spaces, we receive an estimated 300 requests per year, based on previous years with a corresponding burden hour of 150 ($300 * 30 = 9,000 / 60 = 150$). The frequency of response for both types of requests is occasionally, whenever a group requests use of the space. Most respondents submit requests less than once each year. The total number of respondents for both is 800.

The estimated individual respondent hour burden for Presidential library requests is 20 minutes per application to review the conditions of use and regulations and to complete the form. The estimated individual respondent hour burden for other facility requests is 30 minutes per application to provide information about the proposed event, including the date and location desired, plans and scheduled

activities for the event, and samples of printed materials they wish to use or display at the event. The total annual hour burden for both is 317.

We estimate the cost per hour to respondents requesting use of Presidential library space at \$17.68 per hour. Respondents for these requests include a variety of organizations, ranging from small volunteer or personal interest groups in the community where the library is located to national professional organizations. We estimated the value of the respondent's time at \$17.68 per hour to accommodate respondents who used a professional planner or administrative staff member to complete the form. We estimate the cost per hour to respondents requesting use of other facility spaces in the Washington, DC, area based on a moderate hourly office wage for the area of \$35.33 per hour. Wage estimates can be found here: <https://www.bls.gov/ooh/management/administrative-services-managers.htm#tab-5>.

Type of request	Average requests per respondent (a)	Estimated total requests per year (b)	Estimated time per request (c)	Estimated rate for time per request (d)	Estimated total annual hours (e) = (b)x(c)	Estimated total annual hour cost (f) = (e)x(d)
Presidential library requests	1	500	20 minutes (.33 of an hour)	\$17.68 per hour	167	\$2,900
Other facility requests	1	300	30 minutes (.5 of an hour)	\$35.33 per hour	150	\$5,300
Total for this collection	--	800	--	--	317	\$8,200

13. Estimate of other total annual cost burden to respondents or recordkeepers. Respondents do not incur an annual cost apart from that enumerated in Item 12.

14. Annualized cost to the Federal Government. The estimated annual cost to the Federal Government of requests to use Presidential library space is \$13,550, including printing costs of \$300 and staff costs of \$13,250 (based upon form review and coordination by a GS-13). The estimated annual cost to the Federal Government of requests to use other facility space is \$12,400 for staff costs (based upon request review and coordination by a GS-12). The total annual cost to the Government of these requests is therefore approximately \$25,950, based on an average of 800 requests per year.

15. Explanation for program changes or adjustments. There is a decrease in the number of respondents (previously number of respondents 900) and a corresponding decrease in annual hour burden (previous annual hour burden 350).

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 information collection in a regulation so do not display the date there (although the OMB expiration date that was

current at the time the regulation was recently updated was included in the preamble). We do display the expiration date for OMB approval on the NA Form 16011.

18. Exceptions to certification for Paperwork Reduction Act submissions. There are no exceptions to the certification statement.