

**SUPPORTING STATEMENT FOR
APPLICATION TO RESTORE FEDERAL FIREARMS RIGHTS, PAPERWORK
REDUCTION ACT SUBMISSION**

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 Office of the Pardon Attorney (PARDON) has authority to collect this information under the United States Constitution, Second Amendment; 18 U.S.C. § 925(c); 28 U.S.C. §§ 509, 510; Homeland Security Act of 2002, Public Law 107-296, 116 Stat. 2135, title XI, subtitle B, §§ 1111, 1112(f)(6) (2002); and Order of the Attorney General No. 6212-2025, codified in 28 C.F.R. § 107 and 28 C.F.R. § 0.

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 restoration of federal firearms rights is statutorily codified in 18 U.S.C. § 925(c) and protects the Second Amendment right of the people to keep and bear arms. There is, however, currently no workable mechanism for the Attorney General to grant restoration. To determine if such relief should be granted to an individual, the Attorney General, by statute, must determine if “the circumstances regarding the disability, and the applicant’s record and reputation, are such that the applicant will not be likely to act in a manner dangerous to public safety and that the granting of the relief would not be contrary to the public interest.” The principal purpose for collecting this information is to enable PARDON, on behalf of the Attorney General, to make such a determination by processing applicants’ requests for relief from federal firearm disabilities. The information is necessary to verify applicants’ identities, conduct investigation of the applicants’ backgrounds and criminal records, and ensure proper record in the Federal Register and notification to the Federal Bureau of Investigation and other law enforcement entities in the event of the grant of restoration of firearms rights.

This information will primarily be used by Department of Justice employees to investigate the application; employees of the Federal Bureau of Investigation to assist in the investigation and record the results of the request on the applicants’ criminal records; and employees of the Bureau of Alcohol, Tobacco, Firearms & Explosives to assist in adjudicating licensing and other related firearms requests. When a decision is made to restore federal firearm rights, some identifying information including the name of the recipient and reasons for decision will be published in the Federal Register. Also, routine uses which may be made of this information include provision of data to other governmental entities and the public.

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 burden.

The Application to Restore Federal Firearm Rights will be available for completion on our website, at <https://www.justice.gov/pardon>, soon. The electronic application will initially be the primary means for applying for this relief, but PARDON intends to allow email and mailed submissions, soon.

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.

Applications to Restore Federal Firearm Rights are prepared for unique, individual applicants. The information is not similarly reproduced by another government entity. Also, the application requires the submission of unique identifying numbers to ensure no duplication of information among applicants.

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

This information will not have a significant economic impact on a substantial number of small entities. PARDON estimates that this rule will have an impact on at least 20 million adults in the United States and that approximately 1 million individuals will apply in the first year, a small minority of whom will be federal firearm licensees with small businesses. PARDON estimates that no more than 195 federal firearm licensees will apply per year, based on the number of firearms revocations issued by the ATF in prior fiscal years. To minimize any burden, the application was created to take an estimated 60 minutes to complete and is a one-time collection.

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 collected from the Application to Restore Federal Firearms Rights will primarily be used to make decisions on the removal of federal firearm disabilities and ensure proper record in the Federal Register and notification to the Federal Bureau of Investigation and other law enforcement entities in the event of the grant of restoration of firearms rights. The Application to Restore Federal Firearms Rights will only be used once per request.

If the collection is not conducted, PARDON cannot fulfill its directive to receive, investigate, and facilitate the disposition of applications to restore federal firearms rights. This would prevent

PARDON from completing its vital mission to assist the Attorney General in executing her authority under 18 U.S.C. § 925(c) in aid of preserving the Second Amendment of the United States Constitution.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

The Application to Restore Federal Firearms Rights is a one-time collection, but an individual can re-apply if they are denied and wait an appropriate waiting period to re-apply. An individual issued an indeterminate finding can re-apply if and when the person is able to obtain and submit necessary additional information.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Applicants may be required to submit supplementary information to accurately process their application.

- **requiring respondents to submit more than an original and two copies of any document;**

Applicants are not required to submit more than an original or one copy of any document.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Applicants are advised but not required to keep copies of all documents submitted while the application is pending.

- **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;**

PARDON intends to collect statistical data on the personal characteristics of remission applicants to provide to Department leadership and public in yet unspecified studies and fora if needed.

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**

PARDON intends to collect statistical data on the personal characteristics of applicants as captured in the attached form to provide to Department leadership and the public in yet

unspecified studies and fora if needed. PARDON may also use information gathered during the application process, but outside the formal requests of the application form itself, in developing statistical information.

- **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**

The Application to Restore Federal Firearm Rights contains a Privacy Act Statement. Any release of information will conform to the Privacy Act Statement. The language of the Privacy Act Statement is included in the Application to Restore Federal Firearm Rights and provides references to PARDON's System of Record Notice, which outlines that data collected in the form may be included in the "provision of data to the President and his staff, other governmental entities, and the public," as well as other routine uses documented in the System of Records Notice, to be developed.

Only those persons with valid identification, password, and permission created and maintained by PARDON are authorized to have access to applicant file information.

- **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.**

The collection does not require the claimants to submit proprietary trade secrets.

8. If applicable, provide a copy and identify the date 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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 C.F.R. § 1320.8(d), The Department of Justice published notice of proposed rulemaking in the Federal Register, published on July 22, 2025, notifying the public that of both the rule and the proposed information collection requirements under the Paperwork Reduction Act of 1995 and giving interested persons 90 days to submit comments.

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

No government funds will be used as payment or for gifts to applicants.

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

Information requested in this collection is collected in accordance with the Privacy Act. Any release of information will conform to the Privacy Act Statement, which is included in the Application to Restore Federal Firearm Rights. The Statement provides references to PARDON's System of Record Notice, which will be published and will outline the permissible uses of data collected.

Only those persons with valid identification, password, and permission created and maintained by PARDON authorized to have access to applicant file information. Confidentiality is assured.

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.

All information on the Application to Restore Federal Firearm Rights is necessary to process applicants' requests for removal of disabilities and to evaluate pardon cases under the standards articulated in 18 U.S.C. § 925(c). The information is necessary to verify applicants' identities, conduct investigation of the applicants' backgrounds (utilizing approved methods of investigation owned and operated by the Federal Bureau of Investigation) and criminal records, and ensure proper notice to the Federal Register and notification to the Federal Bureau of Investigation and other law enforcement entities in the event of the grant of restoration of firearms rights.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of**

potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Estimated Annualized Respondent Cost and Hour Burden

b	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)¹	Hourly Rate*	Monetized Value of Respondent Time
Application to Restore Federal Firearms Rights	1 million	1	1 million	1 hr.	1 million hrs.		
<i>Unduplicated Totals</i>	1 million	1	1 million	1 hr.	1 million hrs.		

13. Estimate of Cost Burden

Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing**

¹ This estimate derives from comparison to estimates made in similar information collections, such as PARDON's Application for Certificate of Pardon for Simple Possession of Marijuana, OMB Control No. 1123-0014, and Pardon's Application for Pardon After Completion of Sentence, OMB Control No.1123-0016.

computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

PARDON recognizes that individuals will have to provide fingerprints in order to complete this application. We estimate those fingerprinting costs as follows:

Electronic USPS Fingerprinting: We estimate that 97% of respondents will opt-in to obtaining electronic fingerprints through the USPS. The average cost is \$50 per electronic scan. With 97% of the projected 1 million applicants (970,000 persons) obtaining their fingerprints through the USPS service, we project a total cost of \$48.5 million.

Non-USPS Fingerprinting: The remaining 3% are likely to use commercial electronic services (Livescan) or local police services to obtain their fingerprints on paper. Livescan fingerprinting services typically costs between \$79 and \$87, for an average cost of \$83. Local police services for fingerprinting averages \$58 (based on the average of 5 localities throughout the country: Richmond, Virginia--\$10; Texas State - \$25; Pasco, Washington -- \$11; Huntsville, Alabama -- \$20; Burlington, Vermont -- \$50). Thus, the average for cost for seeking fingerprints from private or local entities is \$70.50. Three percent of 1 million applicants is 30,000 individuals, for a total cost of \$2.115 million. Thus, PARDON estimates the total expenditures to be \$50.615 million dollars.

Type	# of Persons	Average Costs	Total Costs
USPS	970,000	\$50	\$48.5 million
Livescan/Localities	30,000	$\frac{\$83 + \$58}{2} = \$70.5$	\$2.115 million
Total	1 million	---	

Though not part of the formal cost burden assessment required under the Paperwork Reduction Act, PARDON notes that applicants will be required to pay a \$20 fee for this application. The \$20 fee was based on an interim calculation of the estimated first-year costs of this program and

will be re-evaluated for the publication of the final rule, and at regular intervals of no more than four years thereafter. PARDON estimates as follows:

Cost Allocation	FY 2026 Cost
50 FTE personnel at average yearly cost of salary and benefits of \$225,000	\$ 11.25 Million
Technology and Case Management Startup costs	\$6.5 Million
Technology Maintenance and Support	\$.75 Million
Operational Costs including rent and operational support.	\$1.5 Million
Contracting and short-term support	\$1 Million
Total	\$20 Million

With 1 million estimated applicants within the first year and a total cost of \$20 million in the first year, PARDON determined an interim fee of \$20 per application. Indigent persons can request to waive or modify the fee.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

Available information suggests approximately 1 million people will complete the Application to Restore Federal Firearms Rights annually. We estimate an average of one hour for review and data entry of the information in the application. Review and data entry will be performed by PARDON employees and legal instrument examiners (OPM Series 0963) at the GS-7 to GS-9 level. With an average hourly wage of \$49.47 (rounded),² the estimated annual cost to the federal

² The Federal employee average hourly wage rate comes from Office of Personnel Management (OPM) General Schedule (GS) Pay Tables, 2025, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2025/general-schedule/>. Average annual salary was obtained for GS-7 and GS-9 positions in the Washington, D.C. locality by averaging the cost of each step within those grades, \$65,741 and \$78,665 (rounded), respectively. The two cumulative averages were then added together to determine an average annual cost of \$72,203. To include the cost of benefits, the average annual salary of \$72,203 was multiplied

government is \$49,473,407.

15. Explain the reasons for any program changes or adjustments

This new form allows applicants to petition solely for restoration of federal firearm rights. The form aligns with the updated requirements contained in the notice of proposed rulemaking regarding 28 C.F.R. Part 107, and includes a broad population of individuals with prior federal or state felony convictions, those with dishonorable discharges from the military, and those who have been convicted of a misdemeanor domestic violence conviction, among other prohibitors.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no current plans to publish the information collected. Statistical information collected from applicants may be provided to other government entities, the White House, or the public when requested. We do not intend to link the names of the applicants to this statistical data.

A notice of approval with some limited identifying information, including names, and reason for restoration for those are granted restoration of federal firearms rights will be listed in the Federal Register.

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.

PARDON is not seeking an exemption.

18. Exceptions to the Certification Statement

This collection of information does not include any exceptions to the certificate statement.

B. Statistical Methods

This collection does not contain statistical data.

by a federal benefit scaler of 1.43 (computed from PARDON's 2025 budget submission). The resulting sum of \$103,251 was divided by 2,087 annual hours to obtain the adjusted average hourly wage rate of \$49.47 (rounded).