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**Supplement A to NARA 108
Information Collection from the Public
Specific Procedures**

1. What are the steps to get OMB approval for collecting information from the public?

a. For an information collection directed at members of the public, NARA offices must:

(1) Prepare a draft information collection approval package, described in par. 2 below, and submit it to NHP.

(2) At the same time, send a copy of the draft information collection approval package to NPOL, via email, if the information collection relates either to customer service or regulations, or the information collection will be administered electronically (e.g., online).

(3) If the information collection involves a new or revised form, submit a completed NA 2001, Request for Forms Management Service, to NHP with the information collection package.

(4) If the form is a standard or optional Government-wide form prescribed by NARA, also submit a completed SF 152, Request for Clearance or Cancellation of a Standard or Optional Form, to NHP with the information collection package.

(5) If you propose to use non-NARA help to develop and/or administer the information collection, also submit a draft statement of work or interagency agreement conditions of agreement, as appropriate, to NPOL with the information collection package.

(6) Modify and resubmit the package to NPOL and NHP for review and clearance, following resolution of any concerns raised by NPOL, NHP, or other affected offices.

b. Once internal approvals are secured, NHP must publish a Federal Register notice advising readers that a new or revised information collection is under consideration and soliciting comments on the proposal for 60 days following publication of the notice.

c. Once the public comment period ends, NHP must

(1) Coordinate among affected NARA offices reconciliation of any comments that were received.

(2) Submit a final clearance package to OMB for approval in accordance with the requirements of the Paperwork Reduction Act.

(3) Publish a second Federal Register notice advising readers that the proposed information collection has been forwarded to OMB for review and approval and inviting the

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submission to OMB of comments regarding the proposed collection for 30 days following publication of the notice.

(4) Coordinate with the sponsoring office the reconciliation of any issues regarding the information collection that are raised by OMB.

d. After reviewing the submission and any comments received during a second period of public comment, OMB may disapprove, approve, or place conditions that must be met for approving the collection.

2. What is contained in the draft information collection package?

The package contains the following items:

a. A copy of the draft information collection instrument, in MS Word format, and any related letters or other documents that will be used to transmit the instrument to the intended respondents. Even if the information collection is proposed for online distribution, submit a facsimile of the form in MS Word format. This will be forwarded to Web Program for design work and coordination of any technical review by NHP under NARA 801, Review of Information Technology Investments.

b. A completed form OMB 83-I (Paperwork Reduction Act Submission), which is used to transmit the package to OMB for approval; and

c. The OMB supporting statement, which must explain, in response to 23 specific questions:

(1) What information will be collected and how;

(2) Why the information is needed (including a copy of the statute or regulation mandating or authorizing the collection) and how it will be used;

(3) Who will need to respond to the collection;

(4) How much time and expense it will take respondents to get and report the requested information;

(5) Your annualized costs for developing and administering the information collection;

(6) Your plans for publicizing the results; and

(7) Your proposed statistical methods for collecting the information (in the case of surveys).

3. How do I prepare the supporting statement?

For additional guidance on preparation of the supporting statement, see Supplement E, "How to Prepare a Request for OMB Review."

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4. What if we propose to use non-NARA help to develop or administer the information collection?

If an office proposes to use non-NARA help (i.e., contractor, outside organization, or other Federal agency) to develop or administer the information collection, a draft statement of work (SOW) or interagency agreement (IAA) draft conditions of agreement (COA) must be forwarded to NPOL with the information collection package for review and approval. NPOL concurrence is required before NARA commits to or signs a contract or agreement for non-NARA involvement in developing or performing the project. The draft SOW or COA will include the standard elements prescribed in the NARA Procurement Guide, a supplement to NARA 501, NARA Procurement. These elements include:

- a. An introduction and overview, briefly describing the project and its relationship to your program mission;
- b. A narrative paragraph describing the scope of work;
- c. A list of specific objectives for the SOW/COA;
- d. The tasks to be performed;
- e. The deliverables/results to be achieved;
- f. A schedule of key dates or milestones; and
- g. Resource, performance, and reporting requirements.

5. Who approves the information collection?

- a. Within NARA, the Director, NPOL, provides approval of the format, content, and methodology for new and revised information collections that use a form questionnaire and the use of non-NARA entities to develop and administer information collections. The Web Program Manager, NPOL, approves the use of NARA's web site for distribution of information collections. NHP approves new and revised forms.
- b. OMB provides final approval of all new and revised information collections directed at the public.

6. When must I get this approval?

You must complete the steps in par.1 before the form, customer survey, or other information collection instrument is finalized for printing or use. Because of the requirements for two periods of public comment totaling 90 days, and for internal and OMB reviews, the clearance process for new collections or revisions to and renewals of existing collections needs to begin no later than 230 days before the date when approval is needed.

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7. What is the typical timeline for clearance of an information collection?

Typical Time Line	Step in Process
30-60 days	Internal, simultaneous clearance by NHP/NPOL of new collections*
14-28 days	Internal, simultaneous clearance by NHP/NPOL of revised existing collections*
60 days	First public comment period (1st <i>Federal Register</i> notice)
7-21 days	Internal resolution of public comments and submission to OMB
30 days	Second public comment period (2nd <i>Federal Register</i> notice)
30-60 days	OMB approval or disapproval of information collection

*Note: First two steps run concurrently. Next four steps run sequentially.

8. How will I know the information collection has been approved by OMB?

NHP will forward a copy of OMB's ruling on the proposed information collection to the sponsoring office.

9. What do I do once OMB approves the information collection?

Once the approval for an information collection has been received, you are free to undertake the information collection in accordance with the approved methodology.

10. How long does an approval last?

Information collections are approved by OMB for specific periods of time and no longer than 3 years.

11. How do I renew an OMB-approved information collection?

Nine months before an information collection expires, NHP will notify the responsible office in writing. If the office wishes to continue using the information collection, the office will prepare an information collection renewal package. The package contains the following items:

a. A brief memorandum requesting renewal of the OMB clearance and describing, in general terms, the purpose of the information collection, the intended audience, and the proposed format and time frame for its use;

b. A copy of the draft information collection instrument and any related letters or other documents that will be used to transmit the instrument to the intended respondents; and

c. An updated form OMB 83-I and OMB supporting statement that describes how you used the information collected under the prior clearance and what information you still need or now want to collect and explains what information will be collected, why the information is still needed, who will need to respond to the information collection, the proposed methods for

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collecting, analyzing, reporting, or otherwise using the information, when and how the information collection will be administered, and what is the expected cost of administration.

12. Why would I want to request a “generic” clearance for customer surveys?

OMB provides an alternate method for securing clearance for information collections that supports a more rapid response to information collection needs. The generic clearance differs from the standard clearance in that it covers a number of related information collections that are not fully documented until right before they are actually used. Typically, the clearance contains a plan for several related information collections, describing the overall methods for data collection that may be used, the total number of instruments to be collected under the clearance, lists of questions that may be used to compile a specific instrument, and sample instrument designs. Individual instruments based on material in the approved generic clearance package are reviewed and cleared for use by OMB on a “fast track” of a few weeks, rather than several months. This approach allows a level of responsiveness to customer issues not possible with the regular clearance process.

13. How do I request a generic clearance?

The initial generic clearance package contains much the same information and follows the same steps for approval as shown in par. 1 and 2 for the standard clearance. For further information and assistance in developing a generic clearance package, contact NPOL.

14. What kinds of records must I maintain regarding specific information collections?

Case files relating to the development, approval, and evaluation of specific information collections are maintained by NHP and NPOL. Completed information collection forms and related analysis are maintained by the office responsible for conducting the information collection. Disposition of these items is covered by the NARA Records Schedule.

15. What reporting requirements apply to information collections?

A copy of the analysis or report resulting from an information collection that provides customer satisfaction feedback must be forwarded to NPOL within 3 months of the conclusion of the approved survey period or terminated use of the information collection, along with a cover memorandum that includes the following information:

- a. A brief synopsis of findings (e.g., general trends established from analysis of collected data);
- b. Lessons learned about the survey’s design and implementation (e.g., response rates, follow-up strategies used, and effectiveness of survey content, format, and delivery medium in securing the expected feedback);
- c. Description of possible changes to the organization that may result from the survey; and
- d. Points of contact for questions about the survey.

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16. What do I do if I wish to modify or stop using an information collection before the approval expires?

a. Notify NPOL and NHP by memorandum of your intention to modify or terminate use of the information collection. In addition to identifying the particular information collection that you intend to change or no longer use, the memorandum should contain a brief description of your reasons for modifying or abandoning that particular tool. Following their review of the proposal, NPOL and NHP will notify you of any additional steps that must be taken to change or terminate the specified information collection.

b. Apply the appropriate records disposition standard to the related files.

c. If the information collection involved customer satisfaction feedback, submit the report described in par. 15 to NPOL.

17. What if I wish to use the same information collection to secure information from public and non-public entities?

When establishing an information collection that will be used with both public and non-public entities outside NARA, it is important to segregate the costs that relate to each sector.

a. If you are seeking approval to collect information from both public and non-public entities, prepare the package described in par. 2 above, but be sure that the numbers cited in the burden and costs sections of the OMB supporting statement reflect only that portion of expenses and hours attributable to the public collection.

b. Prepare a draft information collection approval package for the non-public portion of the information collection in accordance with Supplement B, par. 4, and submit the two packages to NPOL and NHP simultaneously for review and clearance.