

**Supplement E to NARA 108
How to Prepare a Request for OMB Review**

Supporting Statement for Paperwork Reduction Act Submissions

The Office of Management and Budget (OMB) requires, under the Paperwork Reduction Act, that a Supporting Statement must accompany each request for approval of a collection of information from the public. The Supporting Statement must be prepared in the format identified in OMB's "General Instructions for preparing the Supporting Statement for Paperwork Reduction Act Submissions," dated October 1995. These guidelines tell you how to format the Supporting Statement in accordance with those instructions and what information each section should contain. The "**Points to Consider**" blocks provide additional information, instructions, and examples. An arrow (⇐) in the following instructions indicates required documentation and/or attachments. An example follows:

4	Points to Consider
⇐	OMB requires that a copy of the notice to the public published (or to be published) in the <i>Federal Register</i> accompany each request for approval of a collection of information. Include this notice as Attachment No. 5.

What are the general format requirements and instructions for development of the supporting statement? Follow these general guidelines:

- Write succinctly (no more than 20 pages double-spaced Times New Roman font size 12), using plain language.
- Number pages consecutively for ease of reference.
- Include only the information requested by the OMB outline discussed below and needed to understand the project.
- Use the section headings provided in bold font in the specific instructions below as the section headings for your particular submission.
- Provide a cover page with the title of the information collection, name of project officer or other contact person, sponsoring office, telephone number, facsimile number, and email address.
- Include the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the *Federal Register*.
- If an item in the OMB guidelines is not applicable to your information collection, do not just state "not applicable," but provide a brief explanation why.
- Submit two copies (one hardcopy, one via email attachment) for initial review.

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

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.

4 Points to Consider in Responding to A.1

- Describe why you need to collect the information. Outline the background, need, and circumstances. In general terms, a collection may be justified if needed to achieve a result within our statutory mission. This means, however, that there must be a plan to use the information for policy or program objectives.
- Identify the program(s) under which the information collection request falls. Include program(s) that relate to the concept of the project and any educational efforts involved.
- Describe what evaluation components exist. For an ongoing project, indicate if any data has been used to date.
- Note whether or not the information is necessary; that is, will having it make a difference in the program or policy?
- Have there been past data collections that may be applicable to the study? If information is being collected for multiple offices, explain the need that each office has for the information.
- If the submission is for approval of language in a regulation, section A.1. also should specifically say that approval of wording is requested in addition to any request for approval of information collection forms. Each part of the regulation that contains a collection of information requirement should be separately identified and briefly summarized.
- ← **Reference, mark, and attach** a copy of the authorizing statute or regulation. Whenever possible, the citation should reference the United States Code (USC), e.g., 44 USC 2109. If a collection of information is authorized by more than one statute or section, cite the principal legal authority. ***Include the copy as Attachment No. 1.***

A.2. Purpose and Use of the Information

Indicate how, by whom, and for what purpose the information is to be used. If this is a request for renewal of an existing collection, indicate the actual use that has been made of the information received from the current collection.

4 Points to Consider in A.2

- The information in this section and in Section A.1 will be used in assessing the appropriateness and adequacy of the sample design, data collection plans, and analysis plan. OMB uses this section to evaluate “practical utility” to the Government as defined in 5 CFR 1320.3(l). Avoid broad statements about research, descriptive analyses, or policy.
- **“Practical utility”** means that the usefulness of information (considering its accuracy, adequacy, and reliability to carry out our functions in a timely manner) can be demonstrated.
- Give general categories of information and items to be collected.
- Justify the data collection in terms of positive needs and the negative consequences of not having the information. Provide concrete examples of how the data are being or have been used. There should be some specific planned use.
- Describe who will review and use the collected information.

A.3. Use of Information Technology and Burden Reduction

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 the burden.

4 Points to Consider in A.3

- The use of appropriate information technology should reduce the burden, improve data quality, agency efficiency, and responsiveness to the public.
- Receiving information electronically is an example of a data collection procedure designed to reduce the burden on the respondent. ***If information technology is not being used, provide a brief explanation why.***

- The estimated percentage of responses that will be submitted or collected electronically using magnetic media (i.e., diskette), electronic mail, or electronic data interaction should be reported on the OMB 83-I form, Item 13, b.1.
- **“Burden”** is the time, effort, and financial resources necessary to comply with a collection of information. Burden is divided into two elements: hours of human effort and financial cost and all other aspects of burden. *See Supplement F for instructions on calculation of burden.*

A.4. Efforts to Identify Duplication and Use of Similar Information

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 section A.2.

4Points to Consider in A.4

- The term **“unnecessary duplication”** means that information exactly alike or corresponding to information that could serve your purpose and need is already available. An example is administrative record sets or other public and private sources.
- When looking for duplication, include professional-to-professional discussions, database literature searches, and data collection in the private sector, as well as government surveys or pilot studies that may relate directly to your request.
- When developing data collection plans, consult with organizations and individuals to bring to light similar data collection efforts. It is quite appropriate to summarize these types of communications, even if informal.
- In many instances, there is no similar information. It is acceptable to state that this is the case. If there is similar information, but it does not meet the current needs of the proposed study, its existence should be acknowledged and the importance of obtaining the information in the proposed study should be stated so that it is clear why the other data will not suffice.

A.5 Impact on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

4 **Points to Consider in A.5**

--- A "*small entity*" may be:

- a small business, i.e., one that is independently owned and operated and that is not dominant in its field of operation;
- a small organization, which is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or
- a small government jurisdiction, i.e., a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

--- OMB encourages development and use of "short forms" for information collection from small organizations. Most information collections require the full range of information from all selected organizational respondents. If a small organization will skip more of the questions than a larger one, that type of minimization should be cited. At a minimum, it can usually be stated that the information being requested or required has been held to the minimum required for the intended use.

--- Techniques that might be used to simplify requirements for small entities include:

- Asking fewer questions of small entities;
- Taking smaller samples of these entities than of the larger ones; and
- Requiring small entities to provide information less frequently than larger ones.

--- If you will not be collecting data from small business or other small entities, state "*No small businesses or entities will be involved in this study.*"

--- For additional information on burden reduction for small entities, see 5 CFR 1320.9(c).

A.6. Consequences of Collecting the Information Less Frequently

Describe the consequences to your 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.

4 **Points to Consider in A.6**

- This item refers specifically to periodic surveys, reporting (as for grantees), and similar matters. State frequency of response (i.e., quarterly, annually, etc.), and justify why respondents must report at that frequency.
- For a “single time” survey, there may be periodicity (i.e., the information is collected only once, although the respondents may answer more than once during the study). When applicable, provide the rationale for the respondent re-contact interval.

A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

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;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than government contract or grant-in-aid records, for more than 3 years;
- in connection with a statistical survey only, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- 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
- requiring respondents to submit proprietary, trade secret, or other confidential information, unless you can demonstrate that you have instituted procedures to protect the information’s confidentiality to the extent permitted by law.

4 Points to Consider in A.7

- *If all guidelines of 5 CFR 1320.5 are met, there should be a statement that the information collection fully complies.*
- Project sponsors should guard against excessive detail and overly lengthy questionnaires, even where questions are relevant. ***Response time of more than 1 hour generally will not be approved.***
- An explanation for a decision to provide for any payment or gift to respondents should be discussed in Section A.9 of the Supporting Statement.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

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 the actions you have taken 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.

4 **Points to Consider in A.8**

← **Reference** and **attach** a copy of the **Federal Register notice** wherein public and affected agencies' comments were solicited prior to submission to OMB. (*Include as Attachment No. 5.*)

---- Provide a summary of public comments received under 5 CFR 1320.8(d). Include a description of actions you have taken in response to the comments and the date and page of the publication in the **Federal Register** of the notice. Comments about cost and hour burden must be addressed.

---- Give some evidence of having had interactions with those from whom the information is required. For surveys, also show what outside technical expertise has been obtained. Include:

- Current names, titles, affiliations, and telephone numbers of those consulted and the year in which the consultation took place. Include the names of only those individuals who have reviewed the materials or who have been directly consulted. Consultation should occur at least once every 3 years. Indicate the agencies, companies, state or local governments, or other organizations represented by those consulted.
- A summary of major problems that could not be resolved during consultation.

A.9. Explanation of Any Payment or Gift to Respondents

Explain any decision to provide any payment or gift to respondents, except remuneration of contractors or grantees.

4 Points to Consider in A.9

- An explanation for a decision to provide for any payment or gift to respondents, other than remuneration of contractors or grantees, is required by 5 CFR 1320.5(a)(1)(iii)(D).
- OMB's concern in paying respondents is to prevent agencies from inducing respondents to comply with unnecessary paperwork requests or to shift the burden of a collection of information from respondents to the taxpayers at large.
- If applicable, demonstrate that a payment or a gift will significantly improve reliability, to an extent beyond that possible through other means, and the alternatives are not likely to produce the level of reliability necessary for the purpose of and need for the collection.
- Any plan for remuneration of respondents must be fully justified. It is important to provide results of prior information collections showing that remuneration in the amount planned is necessary to achieve adequate response rates. There must be a clear relationship between the level of "work" requested of the respondent and the amount of the payment.

A.10. Assurance of Confidentiality Provided to Respondents

Describe any assurance of confidentiality provided to respondents and the basis for the assurance

in statute, regulation, or agency policy.

4 **Points to Consider in A.10**

- ← If you plan to collect identifiable information, explain what methods will be used to maintain the privacy and/or confidentiality of the respondent. Discuss the arrangements for handling, storage, and disposition of the information. Where a contractor is collecting the information, rather than NARA staff, the contractor's procedures for confidentiality should be referenced and appended.
- Note: Care should be taken about use of the word "confidential" in the absence of a legal basis for its use. Inclusion in a system of records under the **Privacy Act** does not of itself provide sufficient protection to warrant assurance of full confidentiality to respondents. There should be no promise of total and absolute confidentiality for individually identifiable information unless there is a firm legal basis for withholding information in the face of a subpoena, or court order, or other Federal, state, or local legislation.
- When there is no legal basis for a promise of confidentiality other than that offered by the **Privacy Act**, the introductory statement must be drafted in a way that fairly advises the respondent of the data disclosure possibilities and is effective in soliciting the respondent's cooperation. Do not label the statement "assurance" or "guarantee" of confidentiality. An example of an explicit statement of limits is "*The information you provide will be kept confidential and will not be disclosed to anyone but the researchers conducting this survey, except as otherwise required by law.*"
- ← When a data collection constitutes a system of records under the **Privacy Act** (records under control of an agency from which information is retrieved by the name of the individual or some other personal identifier such as a social security number), cite the name of the **Privacy Act System**, the date of publication in the **Federal Register**, and the number of the system. When the **Privacy Act** applies, individuals must be told: a) the statutory authority for collecting the information; b) whether or not response is voluntary; c) the consequence, if any, of not providing the information; and d) the extent to which confidentiality of the information is protected. Attach documentation.
- All offices are encouraged to seek guidance from the NARA Privacy Act Officer (NGC) in determining whether or not the information collection constitutes a system of records under the Privacy Act.
- Where the NARA FOIA and Privacy Officer has determined that the data collection is not subject to the **Privacy Act**, provide a statement to this effect in A.10, including the reason that the **Privacy Act** does not apply.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, i.e., matters that are commonly considered private, such as social security numbers. This justification should include the reasons why you consider 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.

4 **Points to Consider in A.11**

- Questions touching on these sensitive areas must be strongly justified in terms of their importance to the data collection and the consequences of not including them.
- If it is necessary to obtain Social Security numbers, there are specific requirements that are mandated by the **Privacy Act** and should be explained here: special statements must appear on the questionnaire, i.e., the respondent must be told the legislation that authorizes the request; the uses that will be made of the number; whether its provision is voluntary or not; and the consequences (if any) of not providing the number.
- The steps to be taken to safeguard the documents or files containing potentially sensitive information should be described. These may include collecting the information in a totally private setting; removing personal identifiers from completed questionnaires; securing the materials in locked files and rooms for storage of documents; and other special steps.
- ← A signed consent form may not always be required, but you must describe all steps taken to fully and fairly inform respondents in writing about the nature of the information collection, any voluntary aspects of their participation, any known benefits to them or to others from participation, any known consequences or side effects of participation, and the extent to which confidentiality of identifiable information can be assured. If this information is contained in a formal consent statement or explanation to respondents, it should be summarized in the Supporting Statement and included as an attachment.

A.12. Estimates of Hour Burden Including Annualized Hourly Costs

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 by NPOL, you 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, however, is acceptable. The most desirable consultation will

take the form of a monitored administration of the proposed information collection, in which you and the test respondents are given the opportunity to question and discuss the meaning and effectiveness of the content and format of the survey or form. If actual public respondents are unavailable to test the instrument, you may administer the proposed information collection to NARA staff who have not been involved in its development.

- 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 burdens, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If the request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in Item 13 of OMB Form 83-I.
- 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.

4 **Points to Consider in A.12**

- In calculating the hour burden, be sure to include the time that the respondent needs to gather and compile the data, as well as the clerical time needed to complete the form.
- Cost to respondents must be accounted for. Indicate respondent Wage Rate. See Supplement F for instructions on how to calculate these costs.

A.13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers

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.*)

- NARA information collections do not normally require the burden described in this section. In most cases, your response for section A.13. should be: “*NARA anticipates no additional cost burden to respondents or recordkeepers beyond that which results from their customary or usual business or private practices.*”
- If other cost burdens are anticipated, however, your 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 services 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 may include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, and testing equipment; and record storage facilities.

- Generally, estimates should not include purchase 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.
- 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), use 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.

4 Points to Consider in A.13

- Federal agencies now collect information by having respondents use a wide variety of automated, electronic, mechanical, and other technological means. The definition of burden expressly includes “*acquiring, installing, and utilizing technology and systems.*” The use of these resources should be accounted for in Section A.13.
- For an example of a typical description of other annual cost burden to respondents, see Supplement F.

A.14. Annualized Cost to the Federal Government

Provide estimates of the annualized cost of the information collection to the Federal government. Include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Also, provide a description of the method used to estimate cost.

4 Points to Consider in A.14

- Include costs of information collection, design, development, tests, printing forms, mailing list compilation and maintenance, mailing or enumeration, editing, coding, tabulation, analysis, and publication of results. Costs, such as salaries and travel of agency staff involved in project development and implementation and monitoring, should be included, as well as payments to contractors for development, implementation, tabulation, analysis, and publication of results.
- The cost is to be an *average annual cost*. If the information collection is a multi-year project, indicate the total cost of the project, the number of years covered, and the resulting annualized cost.
- For an example of a typical description of other annualized cost to the Federal Government, see Supplement F.

A.15. Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

4Points to Consider in A.15

- For “*New Projects*” simply state that this is a new collection of information.
- A.15 is applicable mainly to “*Ongoing Information Collections*” (i.e., those already in OMB’s inventory of approved activities). Explain the reason(s) for any increase or decrease in the annual burden.
 - ***Program change*** is the result of deliberate Federal government action. All new collections and any substantive revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program change.
 - ***Adjustment*** is a change that is not the result of a deliberate Federal government action, such as corrections of errors in burden estimates. Changes not controllable are recorded as adjustments.
- Item 13 of the OMB 83-I form involves a difference in the annual hours requested.
- Item 14 of the OMB 83-I form involves a difference in the annualized cost.

A.16. Plans for Tabulation and Publication and Project Time Schedule

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

4	Points to Consider in A.16
---	Some information collections may not entail planned statistical use. If there are no plans for statistical analyses in publications, state this in A.16.
---	Pay careful attention to this section. OMB takes into account evidence of actual timely use of the information in determining whether an information collection has practical utility.
---	Describe the types of analyses envisioned for the data, indicating hypotheses to be tested, titles of planned reports, etc. This analysis plan should be consistent with statements regarding need for and use of these data found in sections A.1 and A.2.
---	Give the time schedule for the entire information collection in terms of elapsed weeks or months following OMB approval. See an example in table A.16 - 1 Project Time Schedule .

A.16 - 1 Project Time Schedule	
Activity	Time Schedule
Letters sent to respondents	1 - 2 months after OMB approval
Field questionnaire	3 - 8 months after OMB approval
Completed field work	8 - 9 months after OMB approval
Validation	10 - 12 months after OMB approval
Analyses	12 - 18 months after OMB approval
Publication	18 months after OMB approval

A.17. Reason(s) Display of OMB Expiration Date is Inappropriate

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

4 Points to Consider in A.17

- According to 5 CFR 1320.8(b)(1), a collection of information must display an expiration date, if appropriate.
- Waivers of the requirement to display expiration dates are not granted for the convenience of the agency. They may be waived if the collection instrument is frequently reproduced and stocked by the public or if the instrument bears a date referencing the information to be provided and that specific instrument must subsequently be used to correct a filing deficiency. An example is Internal Revenue forms used for specific tax years.
- Expiration dates should be printed in the upper right hand corner of a document near the control number.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

4 Points to Consider in A.18

- 5 CFR 1320.9 requires Certification for Paperwork Reduction Act Submissions. Any exception to the certification statement should be identified and explained, e.g., practical utility; unnecessary duplicative information; burden reduction on small entities; use of information technology; and effective/efficient statistical survey methodology.
- Exceptions to 5 CFR 1320.8(b)(3) must be identified and explained, e.g., reason for the collection; request for public comments; whether responses are voluntary; confidentiality; and display of valid OMB control number.
- The text of 5 CFR 1320.9 and related provisions of 5 CFR 1320.8(b)(3) appear at the end of the OMB Instructions for Completing OMB Form 83-I (see *Certification Requirement for Paperwork Reduction Act Submissions*).

February 28, 2003

Item 19, the *Certification for Paperwork Reduction Act Submissions* from the OMB 83-I form follows, for your convenient reference.

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

NOTE: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3), appear at the end of the instructions. *The certification is to be made with reference to those regulatory provisions as set forth in the instructions.*

The following is a summary of the topics, regarding the proposed **collection** of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (I) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);
- (I) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

Signature of Senior Official or designee	Date
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**OMB 83-I
10/95**

B. Collections of Information Employing Statistical Methods

When Item 17 (“Does this information collection employ statistical methods?”) of the OMB Form 83-I is checked “Yes,” Section B of the Supporting Statement must be completed. If your information collection does not employ statistical methods, section B does not apply and you should indicate that the collection does not employ statistical methods in this part of your Supporting Statement. You should be prepared to justify your decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. OMB reserves the right to require the submission of additional information with respect to any request for approval.

When Item 17 on the OMB Form 83-I is checked “Yes,” the following documentation should be included in your Supporting Statement to the extent that it applies to the methods proposed:

B.1. Respondent Universe and Sampling Methods

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

4	Points to Consider in B.1
---	Supply sufficient information about the sample design and the expected numbers and characteristics of sample persons or units to enable the OMB reviewers to assess the adequacy of sample for the types of analyses planned and uses to be made of the data. Present this information in tabular form.
---	When presenting data on race and ethnicity, refer to OMB’s Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity (December 15, 2000) , found on the OMB web site at http://www.whitehouse.gov/omb/inforeg/r&e_guidance2000update.pdf .
---	Where all respondents of a given type are surveyed, rather than a sample, it is essential to indicate why sampling cannot be used.

- If the survey has been done previously, the prior response rate should be included and discussed.

B.2. Procedures for the Collection of Information

Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection;
- Estimation procedure;
- Degree of accuracy needed for the purpose described in the justification;
- Unusual problems requiring specialized sampling procedures; and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

4 Points to Consider in B.2

- When a probability sample is not used, include a full explanation of the rationale and procedures to be used in the proposed non-probability sample.
- Where stratification is used, sufficient information should be given about the criteria to permit a reviewer to determine the appropriateness of the proposed plan.
- Information should be given about who will collect the information and how it will be done so that a reviewer can fully understand how the sampling plan and data collection instruments will be implemented. For example: Are interviewers trained? Do the respondents have advance notice or appointments?

NOTE: Any advance letters, follow-up letters, envelopes, cards, or other visual aids used with respondents must be included in the submission as attachments.
- Quality control procedures to be implemented as part of the fieldwork or review of data coding and preparation should be described. If respondents are reinterviewed or re-contacted for validation, the data collection instrument or script for that re-contact must also be included as an attachment and the burden included.
- If the specific data collection plans are not yet known and only *concept* clearance is being sought, the Statement of Work and deliverables for the project should be referenced and attached.

- *Preliminary or Concept Clearance.* Preliminary clearance is granted after a plan has been formulated but prior to any actual information collection. It is a Concept Clearance that carries 1 hour of burden. It does not guarantee final clearance, but it permits the project sponsors to develop the details of an information collection with some assurance that OMB considers the project or system an appropriate Federal activity and approves the general approach. Justification for this type of clearance should stress the need for and uses to be made of the data, along with a general description of the data collection plan, approach, methods, and schedule.

B.3. Methods to Maximize Response Rates and Deal With Nonresponse

Describe your methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

4 Points to Consider in B.3

- The method to be used to calculate the response rate should be described.
- The combination of data collection methods, type of respondents, type and amount of information requested, procedures for follow-up with initial nonrespondents and refusals, and planned remuneration to achieve the stated response rate should be described. The key is that the accuracy and reliability of the information obtained must be adequate for the intended uses.
- Address the expected response rate. OMB considers 80-85% the minimum acceptable response rate for a statistical survey. Provide convincing evidence to support your estimated response rate.

B.4. Test of Procedures or Methods to be Undertaken

Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

4 Points to Consider in B.4

- If a pretest involving fewer than 10 respondents has been conducted and is considered adequate for the purposes of the study, it may be so stated. Such a pretest should be conducted with members of the proposed respondent group in order to assure that the pretest was meaningful.
- Requests for OMB approval of pretests that are designed to make significant decisions about the data collection method, content, or timing should generally be made separately from those for the main survey(s).
- Request for OMB approval of pretests that are designed only to fine tune the data collection activity may be combined with the request for approval of the main survey. Once approval has been obtained, OMB is to be informed of any changes resulting from the pretest. The intent to inform OMB of such changes and provide that office with the final data collection instrument(s) should be mentioned.

B.5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for you.

4 Points to Consider in B.5

- Provide the name and telephone number of individuals consulted on statistical aspects of the design.
- List the name of contractor doing the interviewing, if applicable.
- List names, title, and affiliation of those analyzing the data.
- If the name of the contractor is not yet known because the clearance is being sought prior to the award of the contract, a statement may be made to the effect that a competitive contract will be awarded.