National Archives and Records Administration

NARA 108
February 28, 2003

SUBJECT: Information Collection

TO: Office Heads, Staff Directors, ISOO, NHPRC, OIG

Purpose of this transmittal memo. This transmits a revised policy directive, NARA 108, Information Collection, incorporating NARA policy and procedures for gathering information from all our customers.

Objective for issuing this directive. We want to ensure that information is collected from our customers in a manner that

- minimizes, for them, the amount of time and cost to respond and
- maximizes, for us, the usefulness of the collected information.

This directive

- consolidates and updates our policy for all types of information collections, including surveys and forms,
- describes information collection requirements, and
- provides, in a series of supplements, detailed procedures for securing approval of information collections, depending on the target population and method of development and distribution.

Availability of this directive on NARA's Intranet web site. This directive is available on the Staff Only web site at *http://staffonly.nara.gov/directives/directpg.html*. We also plan to publish and expand on portions of the directive in a user-friendly "tool kit for information collection" on the Staff Only web site later this year. A similar "tool kit" for online surveys will be provided once we secure Office of Management and Budget (OMB) approval to use our web sites for survey distribution.

Canceled directives. This directive cancels NARA 108, Information Collected from the Public (September 3, 1999) and GSA Order NAR 1872.1A, NARS reporting system.

Whom can I contact if I have questions about this directive?

For questions concerning:	Contact:
• new information collections directed at non-Federal entities and the public, other Federal agencies, and NARA offices and staff • changes to or renewals of existing information collections • existing forms or surveys within your office that do not include a NARA form number or OMB approval number, as appropriate	Tamee Fechhelm, NHP, room 4400, AII, on 301-837-1694 or by email or by fax on 301-837-3213, early in the planning process.
• clearance of surveys and other customer feedback information collections directed at non-Federal entities and the public, other Federal agencies, and NARA offices and staff	Debra Leahy, NPOL, room 4100, AII, on 301-837-1903 or by email or by fax on 301-837-0319, early in the planning process.
• information collections in regulations and internal directives	Nancy Allard or Pam Lagundo, NPOL, room 4100, AII, on 301-837-1477 and 301-837-1895, respectively, or by email or by fax on 301-837-0319, early in the planning process.
• online forms, design and location within NARA web sites	Early in the planning process, Michelle Dozier (NARA public web site), NPOL, room 3200, AII, on 301-837-1667, and Michael Lingenfelter (NARA Intranet), NPOL, room 3200, AII, on 301-837-0908, or by email or by fax on 301-837-0312.

JOHN W. CARLIN
Archivist of the United States

Attachment

National Archives and Records Administration

NARA 108
February 28, 2003

SUBJECT: Information Collection

108.1 What is the purpose of this directive?
This directive establishes NARA-wide policy for information collections and a framework for complying with the authorities described in par. 108.2. The directive describes the kinds of information collections we use and how to obtain permission to use them. This directive establishes policy for collecting information from our customers in a manner that minimizes, for them, the amount of time and the cost to respond to the information request and maximizes, for us, the usefulness of the collected information.

108.2 Authority for this directive
This policy is established in compliance with the

a. Paperwork Reduction Act of 1980, as amended by the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35), 5 CFR Part 1320 - Controlling Paperwork Burdens on the Public, and Office of Management and Budget (OMB) Circular No. A-130 (revised), which sets Government-wide restraints on the collection of information from the public;

b. Government Paperwork Elimination Act (GPEA) (Title XVII, Pub. L. 105-277), which allows citizens to use electronic technologies when filing information with or retrieving it from the Federal Government;

c. Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d) and the Workforce Investment Act of 1998, which require accessible design of products and services purchased by the Government; the Clinger-Cohen Act (Pub. L. 104-106), which requires agencies to implement a process that maximizes the value and assesses and manages the risks of IT investments;

d. OMB M-00-13, Privacy Policies and Data Collection on Federal Web Sites, June 22, 2000, which requires that Federal agencies not use persistent cookies;

e. Government Performance and Results Act (GPRA), Executive Order 12862, “Setting Customer Service Standards,” and associated Presidential memorandums, which delineate Federal agencies’ responsibilities for customer service; and

f. 40 U.S.C. 486(c) and 41 CFR Section 102-195, on interagency reports management.

108.3 What do these authorities require?

a. The Paperwork Reduction Act requires Federal agencies to collect information from non-Federal entities and the public in a manner that:

(1) Minimizes, for them, the amount of time and the cost to respond to the information request, and

(2) Maximizes, for us, the usefulness of the collected information.

(3) Ensures that the information collection is not used for unauthorized purposes.

b. GPEA, the Rehabilitation Act, and Workforce Investment Act require Federal agencies to provide opportunities for electronic exchange of information with our customers, regardless of their disabilities.

c. The Clinger-Cohen Act and OMB Memorandum 00-13 require agencies to use information technology in a responsible and cost-effective manner that is not does not invade users' privacy.

d. GPRA requires Federal agencies to set performance goals and measures with an emphasis on outcomes. Measures linked to the outcome of customer satisfaction provide critically valuable information about organizational performance and confirmation that our strategic goals are equally valued by those customers.

e. The Executive order and memorandums require Federal agencies to:

(1) Survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services;

(2) Survey frontline employees on barriers to and ideas for matching the best in business; and

(3) Create activities and programs, continuing throughout the year, that will engage customers in a discussion about how to improve Government service.

f. 44 U.S.C. 3501-3502 requires that all interagency reporting requirements are necessary, cost-effective, and compliant with applicable laws and regulations.

108.4 Definitions of terms used in this directive

a. **Accessibility –** the degree of a web site's ease of use as experienced by persons with disabilities.

b. **Customer** - anyone who uses (or might use) NARA information, services, and products or who works (or might work) with us to produce and deliver these materials.

c. **Customer survey** - any request for information about customer satisfaction with NARA services and products that is posed in identical form or format to 10 or more persons.

d. **Focus group** - a group of customers or stakeholders who come together at our invitation to discuss a service-related topic.

e. **Form –** a textual or electronic document with a fixed arrangement of captioned spaces or fields designed for entering and extracting prescribed information. Categories of forms include internal, interagency, public use, standard, and optional.

f. **Information collection** - any request for information that is:

(1) Posed in identical form or format to 10 or more persons;

(2) Contained in a regulation, whether or not we expect 10 persons to respond;

(3) Voluntary, mandatory (required in statute), or needed to obtain or retain a benefit;

(4) Written, electronic, or oral;

(5) Prepared or distributed by a NARA unit or other Federal agencies and non-Federal entities (such as a Presidential library foundation or other private organization) on behalf of a NARA unit; or

(6) Prepared or distributed by NARA on behalf of a professional organization or other non-Federal entity.

g. **Information collection package** - the written proposal for a new or revised information collection, consisting of:

(1) The draft information collection instrument (the proposed form or questionnaire) and any related transmittals to its intended recipients;

(2) A detailed justification for the information collection and description of the proposed methods for collecting and using the information;

(3) A description of the reporting and recordkeeping costs to the customer and NARA associated with the information collection; and

(4) A copy of the directive, regulation, or strategic goal prescribing or supporting the information collection.

h. **Instrument** - the form or format used to collect information.

i. **Interagency reporting requirements –** repetitive reports that NARA requires or requests from other Federal agencies.

j. **NARA customers** - a broad spectrum of American society, as well as researchers worldwide, including:

(1) Genealogists and family historians;

(2) Veterans, current and former Federal employees, their families and authorized representatives;

(3) Academic, business, occupational, and historical researchers;

(4) Publication and broadcast journalists;

(5) Congress, the White House, the Courts, and other public officials;

(6) Federal Government agencies, employees, and the individuals they serve;

(7) State and local government personnel;

(8) Professional organizations and their members;

(9) Supporters' groups, foundations, donors of historical materials;

(10) Students and teachers (K-12);

(11) General public, including museum visitors; and

(12) Our fellow employees.

k. **Person** - an individual, contractor, organization, or non-Federal government entity.

l. **Public information collection** - reports, recordkeeping requirements, surveys, or questionnaires that NARA requires or requests from any State or local government, business, institution, or group of 10 or more individuals on a recurring or ad hoc basis. Also may be called a public-use report.

m. **Section 508 –** that portion of the Rehabilitation Act of 1973 (29 U.S.C. 794(d)), as amended by the Workforce Investment Act of 1998 (Pub. L. 105-220), that requires Federal agencies give disabled employees and members of the public access to information that is comparable to the access available to others. Section 508 applies to all Federal web sites.

n. **Usability –** the degree of ease by which any person navigates a web site, reads and comprehends information on a web site, or obtains services through a web site.

108.5 What kinds of information collections do we use?

Our information collections are voluntary or needed to obtain or retain a benefit (e.g., obtaining access to our holdings for research purposes or reproduction of records).

108.6 Here are some examples of each type of NARA information collection

a. Customer Feedback	• Customer comment form (NA 14045) • www.archives.gov contact form (NA 14116) • Customer surveys and questionnaires • Workshop, class, and public or museum program evaluation forms (e.g., NA 2019) • Interviews with groups of ten or more persons using a standard set of questions (e.g., focus groups) • Telephone and in-person interviews of 10 or more persons where identical questions are asked
b. Multi- and Interoffice Forms used to Support Decision-making	• Strategic Budget Initiative Preliminary Submission • NA 3039 - Request for Recurring, Scheduled Flexiplace Arrangement • Requests for New Desktop Software • Object Class Worksheet
c. Access to Services	• Applications to become a volunteer, or for researcher cards or identification passes (e.g., NA 4003 and NA 6006) • Forms used to request access to records or for information from records in our custody (e.g., www.archives.gov contact form [NA 14116], and SF 180) • Order forms for reproductions of our records (e.g., NATF 36, NATF 81-86, and NA 14110) • Requests by outside groups to use rooms in our facilities (NA 16008) • Requests to perform statistical research in archival records containing personal information (OMB No. 3095-0002) • NHPRC grant application forms (e.g., OMB No. 3095-0013) • Forms used to request records center services (e.g., SF 135, OF 11, CIPS order form).

108.7 What kinds of information collections are not covered by this directive?

Informal contacts with individual customers or user groups and certain types of collections that have been exempted by OMB are not covered by this directive. Here are some examples:

a. Customer Feedback	• Interviews with groups of nine or fewer persons using a standard set of questions • Telephone and in-person interviews of 9 or fewer persons where identical questions are asked • Town halls and other meetings that do not involve question and answer sessions that use previously-prepared questions directed at the attending public • Solicitations of comments in rulemakings and other Federal Register notice documents, such as proposed records schedule notices
b. Office forms used to support decision-making	• Reporting forms developed and used only within a particular office
c. Access to Services	• Interviews with individual researchers to identify and focus their research interests • Research room or museum visitor registers, where information is limited to name, address, date/time, and an identification number, such as that found on a researcher card • Subscription forms for NARA publications, where the information requested is limited to that needed to secure payment and delivery of the publication • Exams to test aptitude, abilities, or knowledge of individuals • Certifications that a user will abide by Copyright Act provisions

108.8 What do I do if my proposed information collection is not described in par. 108.6 or 108.7?
You must contact NHP who will determine if this directive applies to your request for information.

108.9 Who is responsible for information collections?

a. All office heads and staff directors must:

(1) Minimize reporting costs and burdens when developing public, interagency, and internal reporting requirements.

(2) Integrate information collections into their program planning and management efforts to ensure that:

(a) Information collections can be made when needed to support operational and program requirements;

(b) Information collection resource needs are identified in a manner to support appropriate budget allocations;

(c) With particular regard to customer surveys:

(i) Current and potential customers are identified and made aware of NARA services; and

(ii) Feedback from customers regarding services and products is regularly and frequently obtained and used to identify and eliminate service problems in a timely manner; and

(3) Use information collections only with the approval of the Policy and Communications Staff (NPOL) and Information Resources Policy and Projects Division (NHP), the Office of Management and Budget (OMB), and the General Services Administration (GSA), as appropriate.

b. NARA units must draft and use information collections only with the approval of their office head/staff director and appropriate officials mentioned in subpar. 108.9a(3).

c. NPOL must:

(1) Provide oversight, guidance, and technical assistance to all offices concerning implementing the NARA information collection program, with particular respect to customer service initiatives (including surveys of NARA employees), rulemaking, and use of the web site for information collection;

(2) Coordinate the approval process for information collection within NARA, according to NARA, OMB, GSA, and budget requirements; and

(3) Concur in the use of non-NARA entities to develop or perform information collections.

d. NHP must:

(1) Review all proposed information collections directed at non-Federal customers for compliance with OMB requirements and obtain OMB approval for their use;

(2) Review all proposed information collections directed at Federal customers (including NARA) for compliance with GSA interagency reporting requirements and this directive;

(3) Review the proposed technical processes supporting data collection through online forms and the form itself; and

(4) Keep offices advised of the expiration dates of information collections.

108.10 What are the steps to get approval for information collections?

a. NARA units - The office or staff sponsoring the proposed or existing information collection develops or revises, as necessary, the information collection package that explains what information will be collected and how, why the information is needed, who will need to respond, and how much time it will take the public to get and report the requested information. The process for developing the information collection package varies slightly, depending on the target population.

(1) Information collections from the public - see Supplement A for additional procedures relating to the information collection package specific to this type of information collection.

(2) Information collections from other Federal agencies - see Supplement B for additional procedures relating to the information collection package specific to this type of information collection.

(3) Information collections from other NARA staff - see Supplement C for additional procedures relating to the information collection package specific to this type of information collection.

(4) Information collections addressed to both public and non-public entities – see Supplement A, par. 17, and Supplement B, par. 4, for additional procedures.

b. Policy and Communications Staff (NPOL) reviews draft information collection packages and concurs in the proposed information collections that are related to customer service (including surveys of NARA employees), regulations, directives, and interagency or interoffice data collections, or intended for publication on the NARA web site. NPOL determines if a proposed form is appropriate for the web site, fits the current web site design, and meets current requirements for general usability and accessibility by persons with disabilities. NPOL approves the proposed use of non-NARA entities to develop or administer the information collection. NPOL also processes the related Federal Register notices for information collections, as appropriate.

c. Office of Human Resources and Information Services (NH) - The Assistant Archivist for Human Resources and Information Services, in his capacity as Chief Information Officer for NARA, signs the Federal Register notice and the form OMB 83-I for public information collections.

d. Information Resources Policy and Projects Division (NHP) reviews all proposed information collections for compliance with GPEA, OMB or GSA requirements and obtains OMB or GSA approval for their use, as appropriate, by:

(1) Coordinating necessary internal NARA clearances;

(2) Conducting the technical review required by the Paperwork Reduction Act or GSA's Interagency Reports Management Program;

(3) Performing the forms management review, if the collection instrument is a form;

(4) Performing the technical review of the proposed processes and form supporting online data collection, in accordance with policy directive, NARA 801, Review of Information Technology Investments, and Interim Guidance 801-1, Analyzing the Lifecycle Benefits, Costs, and Risks of Information Technology;

(5) Drafting and coordinating publication of the Federal Register notices;

(6) Coordinating any changes identified during the public or agency comment period or requested by OMB or GSA;

(7) Coordinating submission of the information collection package to OMB or GSA, as appropriate; and

(8) Notifying the sponsoring office when OMB or GSA approval is received or denied.

108.11 When must I get this approval?
You must complete the steps in par. 108.10 before the form, customer survey, or other information collection instrument is finalized for printing or use.

108.12 What is the typical timeline for clearance of an information collection?
It depends on the type of information collection.

a. New or revised information collections directed to the public generally take about seven months. However, clearance of surveys based on previously approved "generic" clearances takes a few weeks. (See Supplement A for further information.)

b. New or revised information collections directed at Federal agencies and employees, including NARA staff, generally take two or three months. (See Supplements B and C for further information.)

108.13 How long does an approval last?
Information collections are approved for specific periods of time, depending on the type of information collection. (See Supplements A, B, and C for further information.)

108.14 How do I renew an information collection?
Nine months before an information collection expires, NHP notifies the responsible office in writing. If the office wishes to continue using the information collection, the office must prepare an information collection package following the steps in par. 108.10 and in accordance with the procedures in Supplements A, B, or C, as appropriate.

108.15 What if I want to revise or terminate an information collection before the current approval period has expired?
Notify NPOL and NHP by memorandum or email that you wish to change or terminate the information collection. In addition to identifying the particular information collection that you wish to modify or abandon, include in the memorandum a brief description of your reasons for changing or terminating use of that particular tool. NPOL and NHP will coordinate any required internal and external reviews of the request and advise you of the additional steps that must be taken, if any, to change or terminate the specified information collection.

108.16 What do I do with the information I collect?
The sponsoring office must:

a. Maintain all records relating to an information collection in accordance with the NARA records schedule (FILES 203). (For example, records relating to customer feedback are covered by Appendix 1.)

b. Forward to NPOL, within 3 months of the conclusion of the approved survey period, a copy of the analysis or report resulting from an information collection that provides customer feedback, along with a cover memorandum that includes the following information:

(1) A brief synopsis of findings (e.g., general trends established from analysis of collected data);

(2) 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);

(3) Description of possible changes to the organization that may result from the survey; and

(4) Points of contact for questions about the survey.

108.17 Must all online information collections be Section 508 compliant?
All online forms must comply with Section 508 accessibility design guidelines, whether the forms are posted on the public or Staffonly web site.

108.18 Who designs the online form and provides the associated information collection software and data reports?
The Web Program staff ensures proper design of the online form. Unless explicitly authorized by NPOL, the online information collection must be undertaken using software tools that the Web Program staff operates. If publication of the online form on a server not hosted by NARA is proposed and approved, the Web Program staff ensures the proper design of the interface with NARA web sites. NPOL provides data reports to the unit responsible for analyzing the information collection.