February 28, 2003

Supplement B to NARA 108
Information Collection from Federal Agencies

Specific Procedures

1. What are the steps to get approval for collecting information from Federal agencies?
For an information collection directed at Federal agencies or employees outside of NARA, NARA offices must:

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

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

c. 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.

d. 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.

e. 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.

f. 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.

2. What is contained in the draft information collection package?
The package contains the following items:

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

b. 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.

c. A narrative supporting statement that explains what information will be collected, why the information is needed, who will need to respond to the information collection, the proposed methods for 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 to the respondents and to NARA.

3. 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.

4. What if I wish to use the same information collection to secure information from both Federal agencies and 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 collection information from both public and non-public entities, prepare the package described in Supplement A, par. 2, 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 par. 2 above, with the following changes:

(1) Include, in the brief cover memorandum, a statement that the same information collection will target both public and non-public entities.

(2) Exclude any materials such as the draft information collection instrument and related transmittals that are exactly the same as those proposed for use with the public.

(3) Feel free to limit the contents of the supporting statement to that information which relates solely to the Federal agency portion of the proposed information collection (i.e., a description of who will need to respond to the information collection, the number of Federal respondents anticipated or needed, and the expected cost and burden to the respondents and to NARA).

c. Submit the two packages to NPOL and NHP simultaneously for review and clearance.

5. Who approves the information collection?

The Director, NPOL, approves the format, content, and methodology for information collections that use a form questionnaire. The Web Program Manager, NPOL, approves the use of NARA's web site for administration of information collections. NHP approves new and revised forms.

6. When must I get this approval?

You must complete the steps in pars.1 and 3 before the form, customer survey, or other information collection instrument is finalized for printing or use. Clearance of surveys of Federal customers generally takes two or three months. The time frame for clearance of other information collections depends upon their proposed nature and use.

7. What do I do next?

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

8. How long does an approval last?

Information collections are approved for specific periods of time, depending on the type of information collection. Surveys, for example, generally expire when 3 years old. If information collections are not used in a timely manner following their approval, however, permission to use the collection may be withdrawn by NPOL prior to the scheduled expiration of the approval.

9. How do I renew an 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 information collection 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, in MS Word format, and any related letters or other documents that will be used to transmit the instrument to the intended respondents; and

c. A narrative supporting statement that describes what information was collected under the prior clearance and how it was used, and explains what information you still need or now want to collect, why the information is still needed, who will need to respond to the information collection, the proposed methods for 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.

10. 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.

11. 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 (i.e., 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.

12. 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 decision 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.11 to NPOL.