

Supporting Statement
Requests to film, photograph, or videotape in a NARA facility for news purposes
OMB Control No. 3095-0040

1. **Circumstances making the collection of information necessary.** NARA is a valuable resource for news organizations wishing to film, photograph, or videotape for stories about historical and current events. Due to the nature and fragility of the documents we hold in trust, NARA carefully controls access to our buildings, with the security of the records being of paramount concern. In addition, organizations may not use NARA facilities to promote commercial enterprises or products, and they cannot use them for partisan political, sectarian, or similar purposes. NARA staff must also accompany all film crews while they are working on NARA property to protect any records located in the area the film crews are working. Often, film crews employ high-intensity artificial light sources, which can be very damaging to archival holdings. NARA must make prior arrangements to protect such documents in the affected areas.

Therefore, news organizations that wish to film, photograph, or videotape on NARA property must ask permission from NARA. NARA collects information through that process from which it assesses those requests. A respondent submitting a request provides information about what they wish to film, photograph, or videotape, for what purposes they will use the film, where they wish to perform their work, and how long they expect it to take. A respondent may schedule several filming or photograph sessions per request. In addition, respondents who use NARA equipment sign a new agreement, NA Form 11010, Waiver of Liability. This agreement is necessary to protect NARA from liability related to the respondent's use of the equipment.

2. **Purpose and use of the information.** NARA uses the collected information to determine whether to approve a request to film, photograph, or videotape, including what resources it would need to comply with the request. NARA staff must accompany each film crew while they are working on NARA property, so we must plan to have staff for this purpose. We must also determine what steps are necessary to protect archival holdings in areas in which film crews will be using artificial high-intensity lighting and other equipment. NARA also uses the information to ensure that the project the requester is working on is for news purposes only, and not for commercial purposes.

Title 36 CFR 1280.48 sets out what information NARA collects as part of the request process.

3. **Use of information technology and burden reduction.** We have attempted to impose a minimum burden on the respondent. To allow maximum flexibility to respondents, we allow them to supply this information via email, telephone, in person, or fax.
4. **Efforts to identify duplication and use of similar information.** No duplication exists. No similar information is already available.

5. **Impact on small businesses or other small entities.** The information collection does not have a significant impact on small businesses or other small entities.
6. **Consequences of collecting the information less frequently.** NARA cannot collect this information less frequently than once per request to film, photograph, or videotape on NARA property because we must evaluate each request. If we did not collect this information, we would be unable to fulfill as many requests as we do, and we would be unable to adequately protect archival documents that might be in an area in which film crews might use high-intensity artificial lighting. A request may include more than one filming date and location.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** We collect this information in a manner consistent with the guidelines in 5 CFR 1320.5.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** NARA provided the public an opportunity to comment on the information collection in the *Federal Register* on July 27, 2018 (83 FR 35681). We did not receive any comments.
9. **Explanation of any payment or gift to respondents.** NARA provides no payment or gift to respondents.
10. **Assurance of confidentiality provided to respondents.** We do not collect information that would require privacy or confidentiality.
11. **Justification for sensitive questions.** We do not ask questions of a sensitive nature.
12. **Estimates of hour burden including annualized hourly costs.** Respondents submit an average of 350 responses per year. Each response takes an average of 10 minutes per request for a total annual time burden of approximately 58 hours.

The respondent cost per application is approximately \$7.00, based on 10 minutes to complete the information collection, or information collection and agreement, by a news producer or producer's assistant (hourly wage of \$42.00/hour x 10 min./request = \$7.00 per request). The total annual cost burden to collect this information is therefore approximately \$2,450, based on an average of 350 requests. Excluding the costs above, there are no capital/start-up or operational costs attributable to this information collection.

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** Respondents do not incur an annual cost apart from that enumerated in Item 12.
14. **Annualized cost to the Federal Government.** The Federal Government spends approximately \$8.75 per request, based on an estimate of the time it takes a GS-12 staff member to review, process, and schedule (average wage and benefits of \$35.00/hour x 15 min./request = \$8.75 per request). The total annual cost of collecting this information is therefore approximately \$765.63, based on an average of 350 requests per year.

15. **Explanation for program changes or adjustments.** The overall request time and cost burdens have changed due to an increase in the number of requests we receive each year and inflation. However, the burden per request has decreased because we streamlined the request process and forms so it takes each respondent less time/money, down from 15-17 minutes per request to ten minutes.
16. **Plans for tabulation and publication and project time schedule.** We do not use this information collection for statistical publications.
17. **Reason(s) display of OMB expiration date is inappropriate.** We include the information collection in a regulation and the rule's preamble also states the OMB expiration date.
18. **Exceptions to certification for Paperwork Reduction Act submissions.** There are no exceptions to the certification statement.