

Paperwork Reduction Act Submission
Helping America's Youth Community Resource Inventory
Supporting Statement

1. 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.

There are no legal or administrative requirements that necessitate the collection. There is nothing mandating the federal government to collect this information. The President and the First Lady have announced that they will make Web-based resources available to the nation as part of the Helping America's Youth Initiative. The Community Resource Inventory (CRI) fulfills that requirement.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for new collection, indicate the actual use the agency has made of the information received from the current collection.

The CRI is a service to communities that provides structure to local efforts to identify youth-serving resources and allows users to easily cross-reference this information with other publicly available sources of data. The CRI is an online database that is provided by the federal government to local partnerships of community leaders and youth-serving professionals. These local partnerships enter information about local programs, resources, and services so they may be better coordinated to serve local youth. The data entered into the CRI are only for the use of the local community partners who enter the data. Data will not be made publicly available. Once local community resource data are entered, users may expand their information with other publicly available data sets (e.g., geospatial data, census data, and federally funded programs). Based on extensive pilot testing, we believe the CRI will be viewed by community leaders around the nation as a valuable and welcome free resource from the federal government. However, the federal government makes no use of the information that is entered into the database.

3. 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 responses) and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The CRI is an online database. All information is submitted electronically. The CRI technology reduces the burden by allowing users to cross-reference locally entered data with existing publicly available data sets in a user-friendly manner.

4. 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 Item 2 above.

Nine federal agencies that support youth-serving programs identified the CRI as a valuable and nonduplicative resource for communities. Information contributed to the database by those agencies is not available electronically elsewhere.

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

The CRI should have no significant impact on small businesses or other small entities. Any individual entity requesting to use the CRI is only responsible for providing contact information and a basic statement of its services or mission.

6. Describe the consequence to federal 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.

The CRI is not designed to meet any federal requirements or fulfill any federal mission beyond providing a valuable service to community partnerships interested in addressing youth issues. There are no consequences if a community does not use the CRI. However, the CRI is designed to support an Administration initiative that would be less effective should the collection not be conducted.

7. 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 health, medical, government contract, grant-in-aid, or tax records—for more than three years.

- In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of the study.
- Requiring the use of statistical data classification that has not been reviewed and approved by OMB.
- That includes a pledge of confidentiality which is not supported by authority established in statute or regulation, which is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing data with other agencies for compatible confidential use.
- Requiring respondents to submit propriety trade secrets or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances or requirements for participants to provide any information regarding the use of the CRI. There are no periodic reports required at any frequency and no requirements for written responses concerning use of the CRI. Documents are not requested of the participants, and participants are not required to retain records of any kind. Statistical survey or statistical data requirements are not made of participants. Participants are not subject to a pledge of confidentiality. There is no requirement for participants to submit confidential information or trade secrets. Participation in use of the CRI is entirely voluntary without requirement.

8. 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 actions taken by the agency in response to that notice and describe actions taken by the agency 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 once every three years—even if the collection of information activity is the same in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

No public comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration to contractors or grantees.

No payment or gift will be provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No sensitive information is being collected. Users are provided password access to the information that they enter into the CRI. They do not have access to information from accounts generated by other users.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers 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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of 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, agencies should not conduct special surveys to obtain information on which to base hour-burden estimates. Consultation with a sample (fewer than ten) of potential respondents is desirable. 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 burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour-burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collection 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 13.

An hour burden is difficult to estimate because this is a database that is intended to be used as an ongoing tool. Typical usage begins with an initial burst of data collection and data entry followed by ongoing database management and upkeep that may last years. Users can add to or delete data whenever they desire. However, in light of the mandatory estimate, the following figures are provided:

Estimated number of respondents (i.e., unique accounts)	500
Frequency of response (resource inventories per account)	1
Annualized hour burden (data collection, entry)	80

The hour burden will vary widely based on amount of existing data in electronic format, size of community, long-term local interest in maintaining the database, and scope of substantive interest. Time commitment will be larger in the first year due to the initial data collection and diminish in later years as tasks move to database management. The range of hour burden could be anywhere from less than one hour (for those who already have all the data available in electronic format and just want to transpose it and view it once) to many hundreds of hours (for those who engage in extensive ongoing data collection, database management, and analysis).

Annualized costs based on estimates above at a rate of \$20 per hour equal \$1,600 per “respondent.”

13. Provide an estimate for 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).
 - The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Describe methods used to estimate 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 include, among other items, preparations for collecting information (such as purchasing computers and software); monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - 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 ten), utilize 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.

- Generally, estimates should not include purchases 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.

Not applicable.

14. Provide estimates of annualized costs to the federal government. Also, provide a description of the method used to estimate cost, which should 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. Agencies may aggregate cost estimates from Items 12, 13, and 14 in a single table.

It is extremely difficult to disaggregate the costs associated with developing and maintaining the CRI from the costs associated with developing the other components of the Helping America's Youth Community Resource Guide. Most of the costs were up front and have already occurred. These include Web site development, programmatic input and support, development of Web services, and shared costs associated with hardware to maintain the Web site. The content of the CRI was developed long before the Helping America's Youth Initiative was ever conceived, and those costs are not included here. The CRI will require staff support to register new accounts over the three years for which this approval is sought. It is estimated that the federal ongoing cost of maintaining it will be approximately \$100,000 over the next three years. These estimates do not include costs of separate but related components of the Helping America's Youth Community Resource Guide (e.g., mapping).

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

Not applicable.

16. 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.

Not applicable.

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

Not applicable.

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

As stated above, the CRI is not necessary for the proper performance of any agency functions.