Section A: Justification

- 1. The Peace Corps National Agency Check (NAC) Questionnaire for Peace Corps Volunteer Background Investigation Form is used to conduct a formal background check. The data gathered is used to conduct a National Agency Check through the Office of Personnel Management who has pertinent records pertaining to applicants' legal activities and suitability. This NAC form was revised and approved in September 2005. The Peace Corps Act (22 USC 2519 et seq.) requires the Director of the Peace Corps to ensure that the assignment of volunteers is consistent with the national interest in accordance with the standards and procedures established by the President of the United States. 22 CFR 305.4 outlines the eligibility and selection standards used to determine best qualified candidates for Peace Corps volunteer service.
- 2. The NAC Form is used to screen Peace Corps applicants for legal and/or criminal history. The information obtained on the form is provided to the Office of Personnel Management to obtain the necessary information as to an applicant's legal suitability for service. All applicants who complete the initial Peace Corps Application Form are then sent a "legal kit" to complete, which includes this form among others related to the applicants' suitability and a postage-paid return envelope. This form is only requested to be filled once and is only available in carbon-hard copy format.
- 3. The NAC form is available in carbon-hard copy format only. The reason for this is to reduce the number of times an applicant must fill out the form, and because the receiving OPM office requires an original signature. One carbon copy is sent to OPM office, the other copies are kept for internal Peace Corps use.
- 4. Some of the information requested on the NAC form is also requested in the Peace Corps Volunteer Application Form. Although the information requested on the NAC form does exist in the Application Form, the Application Form does not carry any power or authority to conduct a background check and does not contain an original signature from the applicants; therefore, the NAC form is a separate and additional requirement.
- 5. The collection of information from the National Agency Check (NAC)

 Questionnaire for Peace Corps Volunteer Background Investigation Form does
 not impact small businesses or other small entities in any capacity.

- 6. Failure to collect this information would hinder the mission of the Peace Corps by removing a vehicle which the agency uses to screen applicants for illegal or undesirable behaviors. If Peace Corps were unable to collect the information on this form, the agency would then run the risk of sending poor or dangerous representatives into foreign countries. The actions of volunteers are highly observed, and can at times, be a part of a political statement on the behalf of the United States. The impact of a volunteer with poor performance, bad judgment, social inadequateness, or undesirable/illegal personal behavior could have a very large negative impact. By sending a poorly screened volunteer not only would it run the risk of the volunteer creating conflict in a country, attracting unnecessary and negative attention as a representative of Peace Corps and the United States, but it could also run the risk of attracting negative media and political coverage from/for the United States, foreign press, and political affiliations.
- 7. No special circumstances exist that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR Subsection 1320.6.
- 8. The agency's 60-day Federal notice, required by CFR section 132.8(d) was published in the federal register on May 25, 2007, Volume 72, No. 101 and appeared on page 29356. No public comments were received during the 60-day period. The agency's 30-day Federal notice, required by CFR section 132.8(d) was published in the federal register on July 16, 2007, Volume 72, No. 135 and appeared on page 38847. No public comments were received during the 30-day period. To date, no negative feedback has been received from applicants regarding the pertinence, difficulty, or quality of the questions contained within the form.
- 9. No payment or gift is provided to respondents.
- 10. The Peace Corps Privacy Act Statement is printed clearly and boldly on the front of the NAC form. It explains for what purpose the information is being collected, and to whom the information will be sent. The Privacy Act Statement clearly outlines and describes to whom and for what reason the information on the form may be routinely disclosed and also indicates, "Disclosure of the requested information, including your social security number, is voluntary. Failure to provide sufficient information on which to conduct an investigation may result in the rejection of your application for Peace Corps service."
- 11. The form requests the applicant to provide their Social Security number, this number is required to conduct a National Agency Background check through the

Office of Personnel Management (OPM) for criminal/legal history. This requirement is supported by The Peace Corps Act (22 USC 2519 et seq.) which requires the Director of the Peace Corps to insure that the assignment of volunteers is consistent with the national interest in accordance with the standards and procedures established by the President of the United States.

12. Estimates of hour burden of the collection of information:

A.	a.	# of Average Applicants:	12,000
	b.	# of Applicants who submit NAC form:	12,000
	c.	Frequency of response:	One time
	d.	Completion time:	15 minutes
	e.	Annual burden hours:	3,000

B. Cost to respondents based on one-quarter hour of annual salary equivalent to Foreign Pay Scale Grade 5, Step 1:

47,576/year = 22.79/hr = 5.70 for 1/4 hour.

- 13. There is no total annual cost burden to respondents or record keepers.
- 14. Total annual cost to the Federal Government per annum

TOTAL per annum	\$	30,527
Analyzing information and processing (see table below for calculation of labor hours)		6,901
Postage costs for mailing to OPM (\$0.41 (postage cost, smaller envelope) x 5,040 forms (Only 42% of applications that move to this phase)		2,066
Return postage costs (\$0.80 (postage cost) x 10,200 forms (15% applicants return form in person, 85% mail back)	\$	8,160
Mailing out of form to applicants (\$0.80 (postage cost) x 12,000 (#of mailings)	\$	9,600
Printing (per 10,000) (includes cost of paper, ink, printing labor)	\$	3,800

Labor Cost Calculations

Amt of NACs reviewed in by Admin Assistant in Recruitment Office	12,000
Amt of time Admin Assistant in Recruitment Office reviews NACs ((0.5 minutes per form* 12000 forms) / 60 minutes)	100 hrs
Labor cost for review by Admin Assistant in Recruitment Office (100 hrs / 2087 hrs per year = 0.05 of a Admin Assistants' annual salary 0.05 of salary * \$30,386 annual salary of a Admin Assistant =)	\$1,520
Amt of time Recruiter reviews NAC forms ((0.5 minutes per form* 12000 forms) / 60 minutes)	100 hrs
Labor cost for review by Recruiter (100 hrs / 2087 hrs per year = 0.05 of a Recruiters' annual salary 0.05 of salary * \$38,022 annual salary of a Recruiter =)	\$1,901
# of applications that move to Nomination Phase (65% * 12000 applications)	7800
Amt of time Admin Assistants in Placement Office screen NACs (7,800 NACs* 0.5 minutes per form = 3,900 min./ 60 minutes = 65 hrs)	65 hrs
Labor cost for screening by Admin Assistants in Placement Office (65 hrs / 2087 hrs per year = 0.03 of a Assistants' annual salary 0.03 of annual salary * \$30,386 annual salary of a Assistant =)	\$912
Amt of time Placement Assistants screen NACs (7,800 NACs* 0.5 minutes per form = 3,900 min./ 60 minutes = 65 hrs)	65 hrs
Labor cost for screening by Placement Assistants (PA) (65 hrs / 2087 hrs per year = 0.03 of a PAs' annual salary 0.03 of PAs' annual salary * \$38,022 annual salary of a PA =)	\$1,141
Amt of NACs given to Suitability Specialist for further review (5% of 7,800 NACs received)	
Amt of time Suitability Specialist will follow up (if needed) (390 NACs received *10 minutes per form = 3900 minutes 3900 minutes/ 60 minutes per hour = 65 hrs	65 hrs

Labor cost for follow up with references by Suitability Specialist65 hrs / 2087 hrs = 0.03 annual salary of a Suitability Specialist
0.03 of annual salary * 47,576 annual salary of a Suitability Specialist)

**Total Company of Special Special

TOTAL LABOR HOURS

\$6,901

- 15. Due to an increasing number of volunteer applicants; the number of National Agency Check (NAC) forms sent out has increased in-tandem. The annual burden hour has also increased in correlation to the increase in applicants. There are no actual costs to respondents.
- 16. This information will not be published for statistical use.
- 17. The Peace Corps is seeking to display the words "Continuous Use Form" with the OMB approval number in lieu of the expiration date. The is to account for the circumstance when old forms are still out in distribution; Peace Corps does not want to have to disregard the use of an older form because it is outdated. This would force the Peace Corps to have to issue an applicant a new updated form and incur additional costs. The function, design, and content of the form has not changed, and earlier forms are still viable.
- 18. A. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.
 - B. This collection of information does not employ statistical methods.