

The Supporting Statement for OMB 0596-0084

YOUTH CONSERVATION CORPS APPLICATION & MEDICAL HISTORY

2010

A. Justification

- 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.**

Statutes and Regulations: 16 USC 1701-1706, Chapter 37 - Youth Conservation Corps and Public Lands Corps, Subchapter I - Youth Conservation Corps (Youth Conservation Corps Act of 1970 (P. L. 91-378; 84 Stat. 794) as amended in 1972 (P. L. 92-597) and in 1974 (P. L. 93-408), hereafter referred to as "the Act.")

This information collection request is submitted on behalf of the USDA Forest Service (FS) and the Department of the Interior (Fish and Wildlife Service, National Park Service, and Bureau of Land Management) to collect applications and medical history forms to evaluate the eligibility of youths for employment with the Youth Conservation Corps (YCC). Under the Youth Conservation Corps Act of August 13, 1970, as amended (U.S. 18701-2706), the Forest Service and the Department of Interior cooperate to provide seasonal employment for youths between 15 to 18 years old.

The purpose of the Youth Conservation Corps (YCC) is to further the development and maintenance of the natural resources of the United States by American youth, and in doing so, prepare the young adults of this country for the ultimate responsibility of maintaining and managing these resources for the American people. Three equally important objectives, as reflected in the Youth Conservation Corps Act, are:

- Accomplish conservation work on the land
- Provide gainful employment for 15 through 18 year old males and females from all social, economic, ethnic, and racial classifications
- Develop an understanding and appreciation in participating youth for the Nation's natural environment and heritage.

Youths seeking training and employment with YCC must complete the application (FS-1800-18 YCC Application) and medical history form (FS-1800-3 YCC Medical History) to be eligible for employment with YCC. The applications and medical history forms are collected from applicants and are evaluated by participating agencies to select candidates to the program.

Forms in this collection: FS-1800-18 - YCC Application & FS-1800-3 - YCC Medical History

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**
 - a. What information will be collected - reported or recorded? (If there**

are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Those seeking seasonal employment through this program complete form FS-1800-18 (YCC Application). Selected applicants must complete form FS-1800-3 (Medical History).

Form FS-1800-18 collects the following information from applicants:

- Name
- Date of Birth
- Social Security Number
- Address
- Telephone Number
- Emergency Contact information, and
- Parent or guardian's signature

Form FS-1800-3 collects the following information from applicants:

- Name
- Address
- Medical Insurance information, and
- Medical history, including vaccination history, previous and current illnesses or conditions that may affect ability to perform certain tasks

The information collected is stored and accessed as set forth in Privacy Act Systems of Records USDA/FS-27 - YCC Medical Records; USDA/FS-29 - YCC Enrollee Records; and USDA/FS-30 - YCC Recruitment System.

- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Young people ages 15-18 are eligible to participate in the YCC program. Those seeking seasonal employment through this program complete form FS-1800-18 (YCC Application). Selected applicants must complete form FS-1800-3 (Medical History).

- c. What will this information be used for - provide ALL uses?**

Form FS-1800-18 (YCC Application) is an application form used by participating agencies to evaluate each applicant's eligibility for employment.

Form FS-1800-3 (Medical History) provides information needed to determine the physical suitability and special medical needs of selected applicants. This provides a record for both the participant and the agency.

Information collected is stored and accessed as set forth in Privacy Act Systems of Records USDA/FS-27 - YCC Medical Records; USDA/FS-29 - YCC Enrollee Records; and USDA/FS-30 - YCC Recruitment System. In addition, each agency participating in the program has made provision for the retention of the information collected as per the agency's record system approved by the National Archives and Records Administration.

- d. How will the information be collected (e.g., forms, non-forms,**

electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

Beginning in the first quarter of the calendar year, participating agency offices contact local high schools, churches, and other local organizations that work with youth and share notices and other information regarding the YCC employment program.

Form FS-1800-18 (YCC Application) collects information on all eligible individuals wishing to participate in the program for the current season. Once selected for the program, an applicant is required to complete form FS-1800-3 (Medical History).

These forms are available in paper form and can be found in electronic form on the internet. The forms may be electronically completed, printed, and then signed. Participating agencies require submittal of a paper copy with original signatures.

e. How frequently will the information be collected?

The program is seasonal and information is collected annually. Individuals wishing to participate must reapply each year.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

Only participating agencies within the USDA Forest Service and the Department of the Interior will have access to the information. The participating agencies are USDA Forest Service (FS) and the Department of the Interior (Fish and Wildlife Service, National Park Service, and Bureau of Land Management).

g. If this is an ongoing collection, how have the collection requirements changed over time?

This is an ongoing collection and the collection requirements have not changed over time.

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 of 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 forms are available to potential participants via participating Agencies website.¹ The forms may be electronically completed, printed, and then signed. Participating agencies require submittal of a paper copy with original signatures.

¹ USDA Forest Service - Youth Conservation Application Link:
http://www.fs.fed.us/recreation/programs/ycc/ycc_appl.pdf

DOI National Parks - Youth Conservation Application Link:
http://www.nps.gov/gettinginvolved/youthprograms/upload/ycc_application.pdf

Due to the legal requirement of a parent or guardian's signature, electronic applications are not accepted.

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.

The use of the same forms by the Forest Service and participating Department of Interior agencies avoids duplication in the application process. There are no other existing application forms suitable for YCC purposes.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection has no impact on small businesses or other small entities.

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.

This information collection is necessary to carryout this legally mandated program. The use of the FS-1800-3 (YCC Application Form) ensures uniform collection of information from potential program participants. The information collected provides participating agencies with data needed to select program participants.

The Medical History form (FS-1800-18) ensures that adequate medical information is available, ensuring that participants have the ability to perform the work assigned. Failure to collect this information would create an unacceptable liability risk.

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 study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by au-**

thority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- **Requiring respondents to submit proprietary trade secret, 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. The collection of information is conducted in a manner consistent with the guidelines in Title 5 CFR 1320.6.

- 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 these comments. Specifically address comments received on cost and hour burden.**

The Federal Register 60-day notice was published on November 19, 2009, Vol. 74, No. 222, page 59958. The Forest Service received no comments in response to this notice.

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 record keeping, 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 at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Multiple parties and individuals were asked to comment on this information collection. Participants found the collection of both the application and medical form reasonable requirements for the Forest Service to admit youths to the YCC.

Jef Jalof
YTP Specialist
Lowell School District
(541) 937-2124 ext. 303
jjalof@lowell.k12.or.us

Comment: I have assisted a lot of students in completing the application packet. It is easy to navigate and appropriate in length and information requested. My only suggestion would be to have a youth friendly disclaimer stating that the information asked for is confidential and used only for the purposes of the YCC selection process. (I realize that it is stated on FS-1800 but it is sort of fine print

and harder for youth to understand). Other than this observation it's a good document.

Susie Short
Oakridge School District
76499 Rose Street
Oakridge, OR 97463
(541) 782-2813

Comment: The only changes that I could see on the application is to add cell phone #'s and under Project Work add bridge building, litter patrol, and working with Botanist.

Wendy Herman
Hood River Valley High School
1200 Indian Creek Road
Hood River, OR 97031-8632
(541) 386-4500

Comment: The paperwork seems totally appropriate and easy to fill out.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

Payments or gifts will not be made to respondents of this information collection. Information provided by applicants is on a voluntary basis.

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

The information collected is stored and accessed as set forth in Privacy Act Systems of Records USDA/FS-27 - YCC Medical Records; USDA/FS-29 - YCC Enrollee Records; and USDA/FS-30 - YCC Recruitment System.

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

Applications for employment and submission of medical history are required for participation in the program. The information requested (including Social Security number) on the application form (FS-1800-18) is consistent with standard application processes for employment. Medical information collected (FS-1800-3) is necessary to protect both participants and the Federal government. The medical information applicants provide establishes fitness for participation in the program and special medical needs that employers should know about.

Explanations for the collection and use of the information are included on both forms. In addition, the parent or guardian of each participant must sign the forms. Forms without parent or guardian signatures are not accepted.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- a) **Description of the collection activity**
- b) **Corresponding form number (if applicable)**
- c) **Number of respondents**
- d) **Number of responses annually per respondent,**
- e) **Total annual responses (columns c x d)**
- f) **Estimated hours per response**
- g) **Total annual burden hours (columns e x f)**

Table - 1

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responden ts	(d) Number of responses annually per Responde nt	(e) Total annual response s (c x d)	(f) Estimate of Burden Hours per respons e	(g) Total Annual Burden Hours (e x f)
Application	FS-1800-18	20,000	1	20,000	6 minutes (.10 hour)	2,000
Medical History	FS-1800-3	3,000	1	3,000	14 minutes (.23333 hour)	700
Totals	---	23,000	---	23,000	---	2,700

- **Record keeping burden should be addressed separately and should include columns for:**
 - a) **Description of record keeping activity:** None
 - b) **Number of record keepers:** None
 - c) **Annual hours per record keeper:** None
 - d) **Total annual record keeping hours (columns b x c):** Zero
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table - 2

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Responden ts
Application	2,000	\$7.25*	\$14,500

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Medical History	700	\$7.25*	\$5,075
Totals	2,700	---	\$19,575

*Federal minimum wage is chosen for average income per hour. National minimum wage is reported by the Department of Labor which can be found at <http://www.dol.gov/whd/minwage/america.htm>. Specific wage for youth in recreation jobs can be found at <http://www.dol.gov/whd/regs/compliance/whdfs18.pdf>.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

Employee labor and materials for developing, printing, storing forms

Employee labor and materials for developing computer systems, screens, or reports to support the collection

Employee travel costs

Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information

Employee labor and materials for collecting the information

Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

Table - 3

Form	Printing	Staff Salary	Totals
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	and Storing		
FS-1800-18	\$1,250	550 hours @ \$16.08/hour = \$8,844	\$10,09 4
FS-1800-3	\$1,250	550 hours @ \$16.08/hour = \$8,844	\$10,09 4
Totals	\$2,500	1100 hours @ \$16.08/hour = \$17,688	\$ 20,188

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

There is a slight annual increase in the hour burden. This is due to a projected increase in the number of youths applying to the YCC.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Results of this information collection will not be published.

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.

The expiration date of the OMB approval of this information collection will be displayed on all forms associated with this collection.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.