

The Supporting Statement for OMB 0596-0207
Outreach/Ethnicity Questionnaires
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.**

Law, Statutes, Regulations, and Policies

- Civil Rights Act of 1964, as amended (42 U.S.C. 1971, 1975a - 1975d, 2000a - 2000h-6)
- 7 CFR Part 15
- Forest Service Manual 1700, Civil Rights
- Forest Service Handbook 1709.11, Civil Rights Handbook

The Forest Service Plan: Toward a Multicultural Organization (TMO), requires outreach and recruitment of diverse candidates as a strategy to create a diverse and multicultural workforce within the Agency (FSH 1709.11, Chapter 10, § 17.05). The Forest Service uses two related questionnaires to preform these important activities. The first questionnaire is entitled, NRS Outreach Opportunity Questionnaire (FS-NRS-1700-1). The questionnaire, developed by the Forest Service's Northern Research Station (NRS), gathers information from students attending local college and university career fairs about the effectiveness of information provided by NRS personnel regarding career opportunities in the Forest Service.

The second questionnaire, Optional Ethnicity Questionnaire (FS-1700-5), collects information from those participating in the following Forest Service programs:

- The Youth Conservation Corps
- The Volunteer Program
- Job Corps
- Miscellaneous Forest Service Hosted Programs (Hosted Programs in the National Forest Service, Programs established by Federal Legislation, and Programs under non-Federal Legislation).

The authority to collect this information comes from Title VI of the Civil Rights Act which prohibits discrimination based on race, color, or national origin in Federally assisted or direct programs of the Federal Government. Section 703 in Title VII of the Civil Rights Act which prohibits discrimination in employment based on race, color, religion, sex, or national origin in actions affecting employees or applicants for employment. Section 717, added in 1972 by Public Law 92-261 (42 U.S.C. 2000e-16), which covers employment by the Federal Government in the prohibition against discrimination.

Title 7, Code of Federal Regulations, Part 15 implements Title VI of the Civil Rights Act of 1964 and requires nondiscrimination in Federally assisted

programs and direct programs of the Department of Agriculture. Appendices to subparts A and B contain listings of Federally assisted and direct programs administered by USDA agencies, including the Forest Service (examples of Forest Service programs include Job Corps, Youth Conservation Corps, certain types of permits, etc.).

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.)

Both questionnaires will collect the following information:

- Ethnicity
- Race

The NRS Outreach Opportunity Questionnaire also collects responses on:

- Helpfulness of information provided by the Forest Service at career fairs,
- Whether information received was what the respondent was seeking,
- Whether application procedures were clear and simple, and
- Which (if any) Forest Service positions respondents had applied for via USA Jobs, AVUE, Youth Conservation Corps, Volunteer programs, etc.

In addition to the ethnicity and race questions, the Optional Ethnicity Questionnaire asks in which program the respondent is currently participating.

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.

The NRS Outreach Opportunity Questionnaire collects responses from individual college students attending university career day events.

The Optional Ethnicity Questionnaire collects responses from individual enrollees/participants in the Forest Service's Youth Conservation Corps, Hosted programs, Job Corps, and Volunteer programs.

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

The information will be used to evaluate effectiveness of the Civil Rights Outreach Programs conducted by the NRS, as well as the Forest Service's Youth Conservation Corps, Hosted programs, Job Corps, and Volunteer programs.

Responses to the NRS Outreach Opportunity Questionnaire evaluate the effectiveness of the Northern Research Station's Civil Rights Outreach Program and will be sent to the Forest Service's national office. In addition,

the information also helps determine the effectiveness of career days and to track outreach efforts at career fairs.

Responses to the Optional Ethnicity Questionnaire will be summarized in the Annual Senior, Youth, and Volunteer Programs Accomplishment Report.

- 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?**

NRS Outreach Opportunity Questionnaire: The information will be collected on a postcard size form (FS-NRS-1700-1), handed out and collected in person during university career fair events.

Optional Ethnicity Questionnaire: The information will be collected using Forest Service form FS-1700-5. Each enrollee/participant is given the form upon arrival at the participation site during completion of initial paperwork.

- e. How frequently will the information be collected?**

NRS Outreach Opportunity Questionnaire: Information is collected once annually from each career fair attendee.

Optional Ethnicity Questionnaire: Information is collected once annually from each program participant.

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

NRS Outreach Opportunity Questionnaire: The information will be shared with the U.S. Department of Agriculture and the Federal Executive Board.

Optional Ethnicity Questionnaire: The information will be included in the Forest Service's Annual Accomplishment Report, which is shared with Congress, various Federal agencies, and the public.

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

The body of the collection has not changed. The only changed is to the header of the form which should say "USDA Forest Service" instead of "US Forest Service."

- 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.**

NRS Outreach Opportunity Questionnaire: Use of information technology is not conducive to this method of collection. The post card questionnaire is a quick, hands-on collection method. Several other methods were considered, such as follow-up telephone contact and an e-mail survey. However, these methods were not used due to uncertainty of participation. The post card questionnaire method best fulfills the Forest Service Northern Research Station's needs, as the

information is received at the time of the contact.

Optional Ethnicity Questionnaire: The questionnaire is completed as part of an on-site program registration. The questionnaire is implemented as an individual is beginning one of the aforementioned programs (YCC, Job Corps, Hosted, and Volunteer) and all associated paperwork (excluding this questionnaire). The instrument requires original signatures and is completed on hardcopy. Therefore, utilizing automated or electronic technology is not conducive.

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.

This collection does not duplicate other collections. The NRS Outreach Opportunity Questionnaire is specific to the Forest Service and is not available from any other source or study.

Information collected via the Optional Ethnicity Questionnaire is collected via some of the forms used for the subject programs, but is not collected in an organized or cohesive manner. Since the questionnaire covers several programs, it assists the Forest Service in gathering the necessary data. The information on the form assists in compiling responses to data calls for annual reports on these national programs.

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

The information collection does not affect small businesses or other small entities. Respondents are individuals.

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.

Both forms covered by this information collection provide the Forest Service with data used in program analysis and reporting, as well as program improvement strategies. All Federal agencies are required to develop planned actions designed to address any present effects of past discrimination and make certain that qualified minorities, women, veterans, and individuals with disabilities have a full and fair opportunity to participate in the Agency's workforce and programs. The Agency's ability to accomplish these goals is severely impaired without this collected information.

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;**

There is no requirement for respondents to reply, response is optional and requested at the time of contact (Outreach Opportunity Questionnaire) or completion of preliminary paperwork (Optional Ethnicity Questionnaire).

- **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 authority 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 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.**

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.

A Federal Register Notice requesting comments was published on June 1, 2010 on page 30364 in Volume 75, Number 104. The Forest Service received one comment. The Civil Rights Director determined the comment was unrelated to the information collection.

The Forest Service contacted several members of the respondent universe, as

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well as college placement counselors to obtain opinions on the forms. Individuals responded to these specific requests with comments (summarized below):

- Ruben Britt, Jr., Career and Academic Planning Center, Rowan University, Glassboro, NJ.
Comment: Combine the race and ethnicity questions.
- Kerri Gardi, Career Services, Kutztown, University, Kutztown, PA.
Comments: Wanted to add on an answer box in addition to “yes” and “no” that would say “n/a” and to make the Ethnicity question optional.

Forest Service response:

- Ethnicity and race questions wording established by OMB
- Optional response is stated at the top of the form and to restate would be repetitive.

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

Respondents will not receive monetary payment for responses. Respondents to the NRS Outreach Opportunity Questionnaire will receive small token items with Forest Service logos (Woodsy Owl/Smokey Bear/Forest Service) and emblems (NRS) such as pencils, rulers, key chains, caps, and bags. Respondents to the Optional Ethnicity Questionnaire will not receive gifts.

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

While no assurance of confidentiality is given, the names of respondents are not taken nor are the forms attached to any paperwork associated with the respondents. All responses are anonymous and used for reporting purposes.

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.

Race/ethnicity information is requested to assist the Forest Service in tracking program accomplishment. The Forest Service Civil Rights program analyzes data by ethnicity and race as a means of measuring ability to reach underserved populations.

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.

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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 Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
NRS Outreach Opportunity Questionnaire	NRS-FS-1700-1	500	1	500	5 minutes (.08333 hrs)	41.6667
Optional Ethnicity Form	FS-1700-5	77,000	1	77,000	5 minutes (.08333 hrs)	6,416.6667
Totals	---	77,500	---	77,500	---	6,458.3333 ≈ 6,458

- **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 Respondents
NRS Outreach Opportunity Questionnaire	41.6667	\$7.25	\$302.08
Optional Ethnicity Questionnaire	6,416.6667	\$7.25	\$46,520.83
Totals			\$46,822.92

*Federal minimum wage is \$7.25/hour, based on information from Department of Labor, Bureau of Labor Statistics (<http://www.dol.gov/whd/minwage/america.htm>)

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

Item	NRS Outreach Opportunity Questionnaire	Optional Ethnicity Form	Total
Employee labor and materials for developing, printing, storing forms	\$4,767	\$5,355	\$10,222
Employee Travel Costs	\$900		\$900
Employee labor and materials for collecting information	\$973		
Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information	\$389	\$8,419	\$8,808
Total cost to the government	\$7,029	\$13,774	\$20,803

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

The cost to the government increased which estimated a cost increase of 2% for printing and materials and 3% for labor. Also, travel cost increased.

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

NRS Outreach Opportunity Questionnaire: Reports mainly used and distributed internally, occasionally shared with the Philadelphia Federal Executive Board Partner's in Equality Council - Careers in Government Outreach Team (FEB) to show agency accomplishments. The FEB is an organization whose mission is to affect change towards organizational excellence through periodic educational forums. The forms assist in the development of a diverse work force; assist in sharing resources, concepts, methods and tools.

Optional Ethnicity Form: The data gathered from this information collection is to be published in the Forest Service Annual Report, which is available to Congress, other Federal agencies, and the public.

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 OMB expiration date will be displayed on the questionnaires.

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 identified in item 19, "Certification Requirement for Paperwork Reduction Act."

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.