

**Peace Corps – Office of Volunteer Recruitment and Selection**  
**Peace Corps National Agency Check (NAC) Questionnaire for Peace Corps**  
**Volunteer Background Investigation Form**  
**OMB Control Number 0420-0001**  
**Supporting Statement**

**Section A: Justification**

1. The Peace Corps is seeking an emergency clearance authorizing use of the National Agency Check (NAC) Questionnaire for Peace Corps Volunteer Background Investigation form (herein the “NAC form”), OMB Control Number 0420-0001 which expired 2/28/2011. The Peace Corps has filed the 60-day Federal Register Notice to begin the normal clearance process on May 20, 2011, we are seeking an emergency clearance to allow us to continue our eligibility and selection process as outlined in 22 CFR 305.3.

The Office of Volunteer Recruitment and Selection at the Peace Corps utilizes the NAC form as authorization from the candidate to conduct a formal background check through the Office of Personnel Management, which has access to pertinent records pertaining to applicants’ legal activities and suitability for Peace Corps volunteer service. The Peace Corps Act (22 USC § 2501 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. *See esp.* 22 USC § 2519. Title 22 of the Code of Federal Regulations outlines the eligibility and selection standards used to determine the best qualified candidates for Peace Corps service. 22 CFR § 305.4

The NAC form is an essential vehicle which the agency uses to screen applicants for illegal and undesirable behaviors. Failure to collect this information would hinder the mission of the Peace Corps. If Peace Corps were unable to collect the information on this form, the agency would run the risk of sending questionable and/or dangerous representatives into foreign countries.

2. The NAC form is used to screen Peace Corps applicants for legal and 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 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. Peace Corps provides a postage-paid return envelope. Peace Corps only asks volunteer applicants to complete this form once. The form is only available in paper carbon copy format.
3. The NAC form is available in paper carbon copy format only. The carbon copies reduce the number of times an applicant must fill out the form,. The paper copy provides the receiving OPM office with the required original signature. One carbon copy is sent to the OPM office, the other copies are kept for internal Peace Corps use.

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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 authority to conduct a background check, and, as it is an electronic application, does not allow for an original signature from 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.
6. Failure to collect this information would substantially impede the mission of the Peace Corps by removing a very important means by which the agency screens applicants for illegal or undesirable behaviors. If Peace Corps were unable to collect the information on this form, the agency would run the risk of sending questionable or dangerous representatives into foreign countries. Host country nationals closely observe the actions of volunteers, who, although they are not employees of the U.S. Government, are representative of the United States. A volunteer with poor performance, bad judgment, or undesirable/illegal personal behavior could have a very large negative impact. Sending a poorly screened volunteer would not only 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, it could also run the risk of attracting negative media and political coverage from the United States, foreign press, and other organizations.
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. We are requesting simultaneous publication of the Federal Register Notice for emergency processing. In our 2007 renewal to this form, the 60-day Federal Register Notice, published on May 25, 2007, (72 FR 29356), and the 30-day Federal Notice, published on July 16, 2007, (72 FR 38847), received no public comments.
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 the purpose for which 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.”

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11. The form requests that applicants provide their Social Security number, which 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) 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.	Estimated number of applicants:	13,500
b.	Estimated number of applicants who submit NAC form:	13,500
c.	Frequency of response:	One time
d.	Estimated Completion time:	15 minutes
e.	Annual burden hours:	3,375 hours

13. There is no total annual cost burden to respondents or record keepers.

14. Total annual cost to the Federal Government per annum

<b>Printing</b> (per 13,500) <i>(includes cost of paper, ink, printing labor)</i>	\$ 5,130
<b>Mailing out of form to applicants</b> (\$1.22 (postage cost) x 13,500 (#of mailings))	\$ 16,470
<b>Return postage costs</b> (\$1.22 (postage cost) x 12,150 forms (10% applicants return form in person, 90% mail back)	\$ 14,823
<b>Postage costs for mailing to OPM</b> (\$0.44 (postage cost, smaller envelope) x 5,265 forms (Only 39% of applications move to this phase)	\$ 2,317
<b>Analyzing information and processing</b> (see table below for calculation of labor hours)	\$ 9,333
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<b>TOTAL per annum</b>	<b>\$ 48,073</b>

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**Labor Cost Calculations**

<b>Number of NACs reviewed by Admin Assistant in Recruitment Office</b>	13,500
<b>Amt of time Admin Assistant in Recruitment Office reviews NACs</b> (0.5 minutes per form* 13,500 forms) / 60 minutes)	113 hrs
<b>Labor cost for review by Admin Assistant in Recruitment Office</b> (113 hrs / 2087 hrs per year = 0.05 of Admin Assistants' average annual salary 0.05 of salary * \$42,637 average annual salary of a Admin Assistant = )	<b>\$2,132</b>
<b>Amt of time Recruiter reviews NAC forms</b> (0.5 minutes per form* 13500 forms) / 60 minutes)	113 hrs
<b>Labor cost for review by Recruiter</b> (113 hrs / 2087 hrs per year = 0.05 of Recruiters' average annual salary 0.05 of salary * \$53,358 average annual salary of a Recruiter)	<b>\$2,668</b>
<b>Number of applications that move to Nomination Phase</b> (65% * 13,500 applications)	8,775
<b>Amt of time Admin Assts in Placement Office screen NACs</b> (8,775 NACs* 0.5 minutes per form = 4,388 min./ 60 minutes)	73 hrs
<b>Labor cost for screening by Admin assistants in Placement Office</b> (73 hrs / 2087 hrs per year = 0.03 of Placement Assistants' average annual salary 0.03 of annual salary * \$42,637 annual salary of a Placement Assistant)	<b>\$1,279</b>
<b>Amt of time Placement Assistants screen NACs</b> (8,775 NACs* 0.5 minutes per form = 4,388 min./ 60 minutes)	73 hrs
<b>Labor cost for screening by Placement Assistants (PA)</b> (73 hrs / 2087 hrs per year = 0.03 of a PAs' average annual salary 0.03 of PAs' average annual salary * \$42,637 average annual salary of a PA)	<b>\$1,279</b>
<b>Amt of NACs given to Suitability Specialist for further review</b> (5% of 8,775 NACs received)	439
<b>Amt of time Suitability Specialist will follow up (if needed)</b> (439 NACs received *10 minutes per form = 4390 minutes 4390 minutes/ 60 minutes per hour)	73 hrs
<b>Labor cost for follow up with references by Suitability Specialist</b>	<b>\$1,975</b>

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73 hrs / 2087 hrs = 0.03 average annual salary of Suitability Specialist  
0.03 of annual salary \* 65,840 average annual salary of Suitability Specialist)

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**TOTAL LABOR HOURS** **\$9,333**

15. Due to an increasing number of volunteer applicants; the number of National Agency Check (NAC) forms sent out has increased. 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 or be used for statistical purposes.
  17. The Peace Corps is seeking to display the words “Continuous Use Form” with the OMB approval number in lieu of the expiration date. This is to account for the circumstance when old forms are still out in distribution; Peace Corps does not want to have to disregard an older form because it is outdated. This would force the Peace Corps to have to issue an applicant a new updated form and thereby incur additional costs. The function, design, and content of the form have not changed in 22 years. Earlier forms are still usable, and are likely to remain so.
  18. 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.