

Peace Corps  
Peace Corps Response Application Form  
OMB Approval No. 0420-  
Supporting Statement

**Section 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.**

The Peace Corps Response Application (hereinafter "the Application"), is necessary to recruit qualified Volunteers to serve in Peace Corps Response, which deploys volunteers throughout the world to work in short term assistance (6 months on average) projects. Applicants are recruited from the Returned Peace Corps Volunteer community as well as the general public and are selected based on their qualifications for a specific volunteer assignment. The Peace Corps Act (22 U.S.C. § 2501 et seq.) authorizes the recruitment of persons for service in Peace Corps Volunteer programs. See 22 U.S.C. § 2504. Eligibility requirements for Peace Corps Volunteer service are set at 22 C.F.R. 305. Attached are 22 U.S.C. § 2504 and 22 C.F.R. 305.

**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.**

This information is used by Peace Corps Response staff to perform initial screening for potential candidates for specific Peace Corps Response assignments. The Peace Corps Response Application is completed by applicants for Peace Corps Response assignments to provide basic information concerning technical and language skills, and availability for Peace Corps Response assignments.

**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 Peace Corps Response application is available on the Peace Corps website and submitted electronically to Peace Corps Response. Adopting a means of transmitting and collecting this information electronically will reduce the amount of time applicants spend filling out the form. Drop-down and cascading menus will also reduce burden to applicants and staff. Additionally, improved search functionality and reporting capabilities stemming from an electronic application

will speed the application and review processes.

**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.**

Although the form requests information about prior Volunteers service, the information requested in the Application does not exist in its entirety within the Agency's records. Agency records concerning Volunteers' service experiences are kept for a limited period. Even when records are available, Volunteers routinely acquire new skills and languages during service that may not be reflected in Agency records. Former Volunteers may have acquired new skills, degrees, or work experience following their Peace Corps service. In addition, the Agency has no previous records or information on applicants who were not previously Peace Corps Volunteers. Peace Corps does not collect this particular information in any other way.

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

This collection of information does not impact small business 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.**

If the Application is not used, US Citizens will not be able to apply for Peace Corps Response service. The Application is the only means by which a US Citizen can apply for Peace Corps Response service.

**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 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 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.**

No special circumstances exist that require the information collection to be conducted in a manner inconsistent 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 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 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.**

The agency's 60-day Federal Register notice was published in the Federal Register on May 16, 2011, 76 FR 28246. No comments were received during this period. By letter dated November 3, 2011, EEOC sent a comment directly to OMB concerning the Peace Corps Response Application.

The EEOC commented that questions about criminal history with respect to drug and alcohol use may not be used in a manner that is not "job related [or] consistent with business necessity." The EEOC states that if the Peace Corps plans to exclude applicants because of convictions no matter when they occurred, it is unlikely that Peace Corps' decision would be job related. The EEOC requests that the Peace Corps ensure that the conviction information is related to "the specific positions in question" and that the conviction has occurred within the last seven years.

The EEOC also noted that arrest records "are unreliable indicators of guilt for several reasons," since an arrest is not a conviction and the arrest record may be

inaccurate. So the EEOC recommends limiting arrest record information to arrests and charges that are related to the specific position in question.

Peace Corps notes that an indication that an applicant has an arrest or conviction is never an automatic screen out for a Volunteer applicant. But it is a source of information about applicants, who, if they become Volunteers, will go overseas as representatives of the United States Government twenty-four hours a day during their assignments. In most circumstances, a Volunteer's assignment is to live unsupervised in a community distant from Peace Corps' country offices. In light of this, when the Peace Corps receives arrest or conviction information from an applicant, Peace Corps considers the nature of the offense, how long ago it occurred, and what the applicant did in the interim. If an applicant was convicted of child abuse, for example, more than ten years ago, Peace Corps may look at the applicant more closely before agreeing to place the applicant unsupervised in a community. And Peace Corps needs to be sure before sending anyone overseas that he or she has no outstanding legal obligations whenever the legal obligation arose.

Additionally, if an applicant has an arrest or conviction within the past year, Peace Corps will delay consideration of the application until a year has passed since the arrest or conviction, but Peace Corps will not automatically reject the applicant on that basis. However, if an applicant is eventually rejected on the basis of an arrest or conviction, he or she always has the opportunity to appeal the decision.

Finally, Peace Corps crosschecks the arrest and conviction information that an applicant provides against information that Peace Corps receives through the National Agency Check. If Peace Corps has a basis for concluding that an applicant intentionally left off arrest or conviction information that should have been included, then Peace Corps will factor that into a consideration of whether the applicant is being truthful in other application responses.

Applicants always have the opportunity to respond to any conclusions or decisions that Peace Corps may reach.

The EEOC also noted that questions about alcohol and drug use have the potential to create Rehabilitation Act issues. Peace Corps has reworded the question so that it no longer asks only about alcohol and drug charges, arrests, and convictions, and so that it has the same language that appears on the Volunteer application, which is also currently under review at OMB. The reworded question asks about all charges, arrests, and convictions, regardless of the basis for the charge, arrest, or conviction. Peace Corps uses this information as stated above.

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

No payments or gifts are provided to respondents.

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

Assurance of privacy provided to respondents is on the Privacy Act notice on the bottom of the form.

**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 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.**

No questions of a sensitive nature are asked.

**12. Provide estimates of the hour burden of the 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 10) 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 collections 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.**

Estimates of hour burden of the collection of information:

- |  |             |
|--|-------------|
| a) Estimated number of respondents       | 2,500       |
| b) Frequency of response                 | one time    |
| c) Estimated average burden per response | 60 minutes  |
| d) Estimated total reporting burden      | 2,500 hours |

The average burden per response was estimated using feedback from a small (less than 10) sample population. The estimated total reporting burden is simply the estimated number of respondents multiplied by the estimated average burden per response.

**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: (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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major 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 collections 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 10), 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.**

Cost estimate to the respondent: \$0.00.

**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 also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimated labor cost to the Federal Government:

Employee labor costs:

Peace Corps Response Recruiter (reviewing):	\$81,432.00
(\$26 per hour x 522 hours (25% of time) x 6 recruiters)	

Peace Corps Response Staff Assistant (processing): \$20,880.00  
(\$20 per hour x 1,044 hours (50% of time) x 1 assistant)

Total cost: \$102,312.00

The estimated employee labor costs are based upon current application use by Peace Corps Response staff. The values have been adjusted to account for projected time savings resulting from the use of information technology to make the transmission and collection of that data electronic, reducing time for applicants and resources for staff.

Capital and start-up cost estimate to the Peace Corps: \$27,000.00 per year. This figure contains costs associated with the annualized total capital and start-up expenses (\$12,000.00) as well as the annual maintenance costs to the Peace Corps from its contractor (\$15,000.00). The capital and start-up costs include both payments to the contractor to design/develop/test and deploy the application as well as costs of Peace Corps employees. The annual operation and maintenance costs include all upgrades, hosting by the vendor, and Peace Corps staff costs.

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

The number of applications that Peace Corps Response receives varies from year to year and is dependent on a number of factors:

- a) Large scale disasters in countries where Peace Corps has current programs or has had large programs in the past spawn a large number of applications in response to the expressed need at the time.
- b) Resources available to the Peace Corps Response to carry out recruitment activities affects the volume of Peace Corps Response applications.
- c) The number of applications varies according to the number of Peace Corps Volunteers closing their service and their level of interest in programs like the Peace Corps Response.
- d) Peace Corps Response is now accepting applications from people who did not previously serve as Peace Corps Volunteers. Only those who have no previous Peace Corps Volunteer service will respond to the Cross Cultural Essay on page 5 of the application.

**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. The results of this collection of information 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.**

Not applicable. The Agency is not seeking approval to conceal or omit the expiration date for OMB approval of the information collection.

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

The agency is not seeking any exceptions to the certification statement.

**Section B. Collections of Information Employing Statistical Methods**

The collection of information does not employ statistical methods.