Section A: Justification

- 1. 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, who has pertinent records pertaining to applicants' legal activities and suitability for Peace Corps volunteer service. 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 the best qualified candidates for Peace Corps 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 the 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. 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, 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 notice was published in the Federal Register on May 25, 2011, 76 FR 12939. Peace Corps received 16 identical comments stating that "the Peace Corps must ensure that the proposed information collection activity screens out and excludes those individuals motivated exclusively (or near exclusively) to promote or participate in the harmful male genital mutilation known as circumcision." As the NAC Questionnaire for Peace Corps Volunteer Background Investigation (OMB Control Number 0420-0001) requests only identifying information about Volunteer applicants in order to locate records pertaining to applicants' legal activities and legal suitability for Peace Corps Volunteer service. As those records are not likely to contain information concerning views about circumcision, it will not be possible to make such a judgment about applicants using this 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 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."
- 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. b.	Estimated number of applicants: Estimated number of applicants who submit NAC f	form:	13,500 13,500	
о. С.	Frequency of response:	.01111.	One time	
d.	Estimated Completion time:		15 minutes	
e.	Annual burden hours:		3,375 hours	
13. There	e is no total annual cost burden to respondents or reco	rd keepers		
14. Total	annual cost to the Federal Government per annum			
Printing	(per 13,500)	\$ 5,	130	
(includes	cost of paper, ink, printing labor)			
Mailing out of form to applicants		\$ 16,	\$ 16,470	
(\$1.22 (p	ostage cost) x 13,500 (#of mailings)			
Return postage costs		\$ 14,	\$ 14,823	
, ,_	ostage cost) x 12,150 forms blicants return form in person, 90% mail back)			
_	costs for mailing to OPM	\$ 2,	317	
' 'I	ostage cost, smaller envelope) x 5,265 forms % of applications that move to this phase)			
-	ng information and processing	\$ 8	,315	
(see table	e below for calculation of labor hours)			
TOTAL	per annum	\$ 47	,055	
Labor C	ost Calculations			

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Amt of NACs reviewed in by Admin Assistant in Recruitment Office	13,500
Amt of time Admin Assistant in Recruitment Office reviews NACs ((0.5 minutes per form* 13,500 forms) / 60 minutes)	113 hrs
Labor cost for review by Admin Assistant in Recruitment Office (113 hrs / 2087 hrs per year = 0.05 of a Admin Assistants' annual salary 0.05 of salary * \$42,637 annual salary of a Admin Assistant =)	\$2,118

Amt of time Recruiter reviews NAC forms ((0.5 minutes per form* 13500 forms) / 60 minutes)	113 hrs
Labor cost for review by Recruiter (113 hrs / 2087 hrs per year = 0.05 of a Recruiters' annual salary 0.05 of salary * \$53,358 annual salary of a Recruiter =)	\$2,668
# of applications that move to Nomination Phase (65% * 13,500 applications)	8,775
Amt of time Admin Assts in Placement Office screen NACs (8,775 NACs* 0.5 minutes per form = 4,388 min./ 60 minutes = 65 hrs)	73 hrs
Labor cost for screening by Admin assistants in Placement Office (73 hrs / 2087 hrs per year = 0.03 of a Assistants' annual salary 0.03 of annual salary * \$42,637 annual salary of a Placement Assistant =)	\$1,279
Amt of time Placement Assistants screen NACs (8,775 NACs* 0.5 minutes per form = 4,388 min./ 60 minutes = 73 hrs)	73 hrs
Labor cost for screening by Placement Assistants (PA) (73 hrs / 2087 hrs per year = 0.03 of a PAs' annual salary 0.03 of PAs' annual salary * \$42,637 annual salary of a PA =)	\$1,279
Amt of NACs given to Suitability Specialist for further review (5% of 8,775 NACs received)	439
Amt of time Suitability Specialist will follow up (if needed) (439 NACs received *10 minutes per form = 4390 minutes 4390 minutes/ 60 minutes per hour = 73 hrs	73 hrs
Labor cost for follow up with references by Suitability Specialist 73 hrs / 2087 hrs = 0.03 annual salary of a Suitability Specialist 0.03 of annual salary * 65,840 annual salary of a Suitability Specialist)	\$1,885
TOTAL LABOR HOURS	\$9.229

TOTAL LABOR HOURS

\$9,229

- 15. Not applicable. There were no program changes or adjustments.
- 16. This information will not be published for statistical use.

- 17. The Peace Corps will display the expiration date in accordance with OMB regulations.
- 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.