

OMB Forms Justification Package
Corporation for National and Community Service (CNCS)
Disaster Response Cooperative Agreement
Application Instructions

PART A: JUSTIFICATION

- A1. 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 purpose of this request is to seek approval for the CNCS Disaster Response Cooperative Agreement Application. Existing CNCS statutes require a formal agreement to be established between CNCS and grantees to allow for the reimbursement of grantee expenses incurred while supporting CNCS mission assigned activities.

In order to establish these formal agreements, CNCS will seek out interested programs and encourage them to apply for a Disaster Response Cooperative Agreement. The enclosed application will allow CNCS to ensure that interested programs meet the appropriate programmatic and fiscal requirements to successfully execute mission assigned activities. Additionally, the collected information will help CNCS best match the capabilities of the programs to the needs of the communities requesting assistance.

The Corporation plans to accept applications on a rolling basis, and approve them for a Cooperative Agreement on a pass/fail basis.

- A2. Indicate how, by whom, and for what purposes 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.**

The information collected will be used to help CNCS more effectively utilize its deployable resources to meet the needs of disaster affected communities. A better understanding of the participating programs will allow CNCS to match the capabilities of the programs to the needs of the communities and will allow better asset mapping and resource typing. Additionally, the information collected will allow CNCS to conduct better outreach to interested programs by providing them with more information about CNCS disaster procedures, reimbursement requirements, reimbursable expenses covered by the agreement, and support services offered.

- A3. 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 application, instructions and procedures will be provided in pdf format to all applicants. This file will be housed on the agency website. Applications can be submitted electronically via e-mail to CNCS.

A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There are no other sources of information by which the Corporation can meet the purpose described in A2.

A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

This collection of information does not impact small businesses since they are not eligible to apply for a CNCS base grant. Economic burden to other small entities is limited to the cost of staff time to develop and submit the application. This is minimized to the degree possible by asking only for the information absolutely necessary to make responsible grant approval decisions, and by excluding information already provided in the grantee's base grant application.

A6. 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 obstacle to reducing burden.

The Corporation would be unable to fully utilize its programs effectively in times of disaster. The only information currently collected from Cooperative Agreement partners comes with the grantee's SF-424 Application for Federal Assistance and their base grant. Since neither document provides information on disaster capabilities, number of participants available for disaster deployment, dates of availability or like information; CNCS will have to suspend efforts to map assets and inform partner organizations (including FEMA) of the assets CNCS can bring to bear on impacted communities. Additionally, CNCS runs the risk of deploying programs not suitable for specific disaster assignments, thereby endangering the service activity and possibly the deployed participants. Finally, CNCS will be constrained in meeting its obligations under the National Response Framework for supporting communities affected by disaster.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record for more than three years; (e) 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; (f) requires the use of a statistical data classification that has not been reviewed and approved by OMB; (g) 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 (h) requires 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 that will require information to be collected in a manner that is not consistent with the requirements outlined above.

- A8. 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 the notice and describe actions taken by the agency in response to the comments.**

The Federal Register notices were published on October 18, 2011 on page 64328 and on January 27, 2012 on page 4283. No comments were received.

- A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There will be no payments or gifts to respondents.

- A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Information provided by respondents is subject to the Privacy Act and the instrument includes a Privacy Notice. The information requested is collected pursuant to 42 U.S.C 12592 and 12615 of the National and Community Service Act of 1990 as amended, and 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973 as amended. Purposes and Uses - The information requested is collected for the purposes of reviewing applications for cooperative agreements. Routine Uses - Routine uses may include disclosure of the information to federal, state, or local agencies pursuant to lawfully authorized requests. In some programs, the information may also be provided to federal, state, and local law enforcement agencies to determine the existence of any prior criminal convictions. The information may also be provided to appropriate federal agencies and Department contractors that have a need to know the information for the purpose of assisting the Department's efforts to respond to a suspected or confirmed breach of the security or confidentiality or information maintained in this system of records, and the

information disclosed is relevant and unnecessary for the assistance. Effects of Nondisclosure - The information requested is mandatory in order to receive benefits.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.

The proposed data collection does not include any questions of a sensitive nature.

A12. Provide estimates of the hour burden of the collection of information. The statement should: (a) indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 expected hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. (b) if this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in line 13 of OMB Form 83-1. (c) provide estimates of annualized costs 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 14.

The total hour burden is estimated at 200 hours. The frequency of response will not be greater than once per three years and should average 2 hours of effort per respondent for the full application submission. There is no estimated annual hour burden outside of the customary and usual business practices.

Form	Respondents	Estimated Number of Respondents	Estimated Burden per Respondent (Hours)	Total Burden Estimate (hours)
Application	Existing CNCS grantees and sub-grantees (public charities, community organizations, private foundations, and Higher education schools)	100	2 hours	200 hours

A13. Provide an estimate 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 burdens shown in Items 12 and 14.

There is no actual annual cost burden to respondents resulting from this information collection activity. However, based on the Independent sector value for a volunteer hour, the total estimated cost would be \$3,688.

A14. 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.

The Corporation is a grant-making agency, and a certain portion of its administrative budget is tied to creating opportunities for interested and eligible applicants to submit information on approved collection instruments and evaluating the information in order to approve grants. These costs relate to receiving and evaluating Cooperative Agreement applications, and issuing agreements to selected grantees. No operational expenses are anticipated to support this collection.

There are no additional costs beyond the cost of conducting the agency's usual business.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There were no changes or adjustments to Item 13 or 14 given that this is a new information collection.

A16. 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.

The collection of information resulting from the grant competition will not be published.

A17. 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 Corporation is not seeking this approval. The expiration date will be displayed on the application instructions.

A18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.