

**Peace Corps
Intelligence Background Questionnaire
OMB Control Number 0420-xxxx
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.**

It has been the Peace Corps' longstanding policy to exclude from Peace Corps Volunteer service and Peace Corps employment any persons who have engaged in intelligence activity or related work or who have been employed by or connected with an intelligence Agency. This policy has been reaffirmed by each successive administration.

The policy is founded on the premise that it is crucial to the Peace Corps in carrying out its mission that there be a complete and total separation of Peace Corps from the intelligence activities of the United States government, both in reality and appearance. Any semblance of a connection between Peace Corps and the intelligence community would seriously compromise the ability of the Peace Corps to develop and maintain the trust and confidence of the people of the host countries. To insure that there is not the slightest basis for the appearance of any connection between Peace Corps and the intelligence community, the policy contains certain permanent bars. Serious doubts about an applicant's connection with intelligence activities are to be resolved in favor of exclusion.

Authority to collect information from the public in order to effectuate this policy appears in 22 U.S.C. § 2502(a), which states that "the President is authorized to carry out programs in furtherance of the purposes of this Act, on such terms and conditions as he may determine." See *also* 22 CFR 305.2(e), which discusses eligibility standards for people with intelligence backgrounds.

- 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.**

Peace Corps' Office of the General Counsel uses the form to determine what kind of intelligence connection an applicant or an applicant's relative might have and how close an applicant and a relative with an intelligence connection are. The form asks about the nature of the applicant's or applicant's relative's duties, when and for how long the person performed intelligence work or worked at an intelligence agency or division

thereof. The Office of the General Counsel uses the information to determine whether the intelligence connection is substantial enough to prevent the person from being employed at the Peace Corps or being a Volunteer for the Peace Corps permanently or for a set period of time from the last intelligence connection. If an applicant disagrees with the General Counsel's determination, he or she may appeal the determination to the Director of the Peace Corps.

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.

Peace Corps currently emails the questionnaire to applicants or their relatives with an intelligence connection. The respondent returns the questionnaire by email or fax. A typical email by which the questionnaire is sent as an attachment is included with this justification.

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.

Information applicants supply when applying to work at the Peace Corps or to be a Peace Corps Volunteer may not specifically address the nature of an applicant's intelligence connection, particularly when it is the applicant's relative who has the intelligence connection.

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.

N/A

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.

Without this information Peace Corps cannot make a judgment about whether an applicant's intelligence connection is substantial enough that the applicant should not be permitted to apply to Peace Corps either permanently or for a set period of time.

It is crucial to the Peace Corps in carrying out its mission that there be a complete and total separation of Peace Corps from the intelligence activities of the United States government, both in reality and appearance. Any semblance of a connection between Peace Corps and the intelligence community would seriously compromise the ability of the Peace Corps to develop and maintain the trust and confidence of the people of the host countries. It could also put Volunteers at risk in the countries in which they serve.

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.

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 and 30 day notice was published in the Federal Register on September 30, 2011 (76 FR 60945) and December 12, 2011 (76 FR 77575), respectively. . No public comments were received.

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

Peace Corps does not provide a payment or gift to respondents.

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

Peace Corps provides no assurance of confidentiality.

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.

The form does not ask any questions of a sensitive nature.

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.**

a. Estimated number of respondents	100
b. Estimated average burden per response	10 minutes
c. Frequency of response	one time
d. Annual reporting burden	16.67 hours

Peace Corps arrived at the estimated average burden per response on the basis of how long it takes to respond to the questions. No form requires the respondent to search records in order to respond. It is not possible for Peace Corps to identify nine people who could fill out this form, as such people would not be working at Peace Corps, because they would have an intelligence relationship. Peace Corps arrived at the estimated number of respondents based on current use.

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.

Three attorneys and one support staff person would spend a half an hour a week each most weeks analyzing and discussing answers to the questionnaires.

Labor cost of three attorneys (FS-1):

100 applications * 30 minutes per application = 3000 minutes = 50 hours

50 hours = .025 average salary of FS-1 attorney (based on 2087 hours working per year)

.025 of average salary * \$123,758 average salary FS-1 attorney = \$3094.

\$3094 average per year x 3 attorneys = \$9282

Labor cost for support staff (FS-4):

100 applications * 30 minutes per application = 3000 minutes = 50 hours

50 hours = .025 average salary of FS-4 support staff (based on 2087 hours working per year)

.025 of average salary * \$65840 average salary FS-4 support staff = 1646.

\$1646 average cost per year x 1 FS-4 support staff = \$1646

Total labor cost: \$10,928

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

N/A

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.

The information collected will not be quantified and/or 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.

N/A

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

N/A

Section B: Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.