

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that require the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The authority for collecting information through the VISTA Progress Report Supplement (VPRS) is contained in 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973, as amended.

The VPRS is being revised to change the Performance Measures from the original submission to those measures now approved by OMB, and that will be collected by the AmeriCorps VISTA program.

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.

The VISTA Progress Report Supplement is used by the Corporation for National & Community Service to report on select performance measures to both internal and external stakeholders. The data is considered core reporting information to meet a variety of internal needs, including adding new data elements as needed to ensure information collection captures appropriate data for the Corporation's required performance measurement, project evaluation, and other reporting.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technical collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting that means of collection. Also, describe any consideration of using information technology to reduce the burden.

The Corporation for National & Community Service utilizes a web-based system, eGrants. eGrants is designed to automate the entire grants and project management process from application to closeout. The VISTA Progress Report Supplement will continue to be submitted through eGrants, CNCS' web-based grants management system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

The VISTA Progress Report Supplement requests only the minimum information required for proper management and does not duplicate information requested in other reports or available from other sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe the methods used to reduce the burden.

This collection of information does not impact small businesses because they are not eligible to apply for projects. The Corporation for National & Community Service is cognizant of the burdens imposed on sponsor organizations. We have made every reasonable effort to minimize burden imposed by data collection and to invite suggestions and comments from the broadest possible cross-section of sponsor organizations in its information management processes.

6. Describe the consequence to Federal program or policy activities if the collection is or is not conducted less frequently and any technical or legal obstacles to reducing the burden.

Less frequent collection would compromise CNCS' ability to capture, aggregate and report performance measures needed to annually report to decision-makers, including the Administration and Congress, including support of annual budgets and reporting Government Performance and Results Act (GPRA) actual yearly totals.

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 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 secret, or other confidential information unless the agency can prove that it has instituted procedures to protect the information's confidentially to the extent permitted by law.**

There are no special circumstances that require collection of information inconsistent with these guidelines.

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 before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments specifically address comments received on cost and hour burdens.

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, revealed, 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 three years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

The information collection was published, as a 60 Day Notice, in the Federal Register, Vol. 77, No. 84, page 9550 as required by 5 CFR 1320.8(d) for the solicitation of comments. No public comments were received in response to this notice.

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

No payments or gifts are provided to respondents, other than remuneration for services rendered by contractors or grantees.

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

No elements of confidentiality are involved so there is no specific assurance; however, information provided by respondents is subject to the Privacy Act and a Privacy Act Notice appears on the instrument.

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 such information is required to be reported.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Show 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 burdens, and explain the reasons for the variance. General 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 burdens estimates for each form and aggregate the hour burden in Item 13 of OMB Form 83-1.**
- **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.**

For the VISTA Project Report Supplement, the total number of respondents is 900 (comprised of AmeriCorps VISTA project sponsors). The estimated time burden for the annual VISTA Project Report Supplement is a maximum of 2 hours per respondent, for a total of 1,800 hours annually.

These estimated burden hours were calculated based upon experience in using the current VPRS form and collecting the required performance data over several years, the web-based grants management system (eGrants) and feedback regarding the actual time for sponsor organizations to prepare and submit the information.

13. 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 burden shown in Items 12 and 14.)

There are no additional total annual costs burden associated with the revision to this collection of information.

14. Provide estimates of the annualized cost 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There are no associated annual costs to the Federal Government with the revision to the VPRS.

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

There are no program changes or adjustments associated with the revision of the VPRS.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

None of the collected information will be publically published.

Aggregated data is used to report externally to Congress and other audiences as part of the annual performance report, in support of the Government Performance and Results Act (GPRA). Various configurations of data compiled from individual VPRS forms are used for internal management, and to respond to specific data and information requests.

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.

No such approval is being sought.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions are being sought.