

The 2013 Supporting Statement for OMB 0596-0084
YOUTH CONSERVATION CORPS
APPLICATION & MEDICAL HISTORY

Terms of Clearance: There are no terms of clearance on the current OMB approval.

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.**

Statutes and Regulations: 16 USC 1701-1706, Chapter 37 - Youth Conservation Corps and Public Lands Corps, Subchapter I - Youth Conservation Corps (Youth Conservation Corps Act of 1970 (P. L. 91-378; 84 Stat. 794) as amended in 1972 (P. L. 92-597) and in 1974 (P. L. 93-408), hereafter referred to as "the Act.")

This information collection request is submitted on behalf of the USDA Forest Service (FS) and the Department of the Interior Fish and Wildlife Service and National Park Service to collect information from applicants to evaluate the eligibility of youths for employment with the Youth Conservation Corps (YCC) and medical history information from selected applicants to determine their ability to fully participate, and to allow the agencies to make necessary reasonable accommodations as appropriate. Under the Youth Conservation Corps Act of August 13, 1970, as amended (U.S. 18701-2706), the Forest Service and the Department of Interior cooperate to provide seasonal employment for youths between 15 to 18 years old.

The purpose of the Youth Conservation Corps (YCC) is to further the development and maintenance of the natural and cultural resources of the United States by American youth, and in doing so, prepare the young adults of this country for the responsibility of maintaining and managing these resources for the American people. Three equally important objectives, as reflected in the Youth Conservation Corps Act, are:

- Accomplish conservation work on the land
- Provide gainful employment for 15 through 18 year old males and females from all social, economic, ethnic, and racial classifications
- Develop an understanding and appreciation in participating youth for the Nation's natural environment and heritage.

The application is collected from applicants and is evaluated by participating agencies to select candidates to the program. Youths seeking training and employment with YCC must first complete the application form FS-1800-18. Once selected for enrollment, the medical history form FS-1800-3 is completed.

- 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.**

- a. What information will be collected - reported or recorded? (If there**

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are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Below in table 1 is a list of the information collected. Data fields new to this revision are checked (✓).

Table 1

FS 1800-18--APPLICATION		FS 1800-3—MEDICAL HISTORY	
Name		Name	
Gender		Address	
Address		Date of birth	
email	✓	Status of health coverage	
Date of birth		Health Insurer and policy number	
Age	✓	Inventory of prior health conditions	
Social Security number removed	✓	Primary Care Physician contact information	✓
Home telephone #		Option to attach description of health conditions	✓
Applicant cell telephone#	✓	Medications and allergic reactions	
Best way & time to be reached	✓	Option to attach explanation of medications and allergic reactions	✓
How best to contact applicant	✓	Immunization history	
Parent/guardian contact information	✓	Option to attach immunization record	✓
Preferred YCC location	✓	Applicant signature and date	
Where applicant heard about YCC	✓	Emergency contact information	
School name and information	✓	Alternate or preferred form of emergency contact (optional)	✓
Highest grade completed/last day of school	✓	Parent/Guardian signature and date	
Essay questions about work, community service, and extracurricular experiences	✓	Remarks to enter explanations for special restrictions or needs responses as appropriate	
Essay questions about purpose for joining and team experience	✓	Reviewing official's signature and date	
Applicant and parent signatures and date			
Ethnicity and Race (optional)	✓		

This information is used by federal agency staff and partners that provide oversight to or coordinate youth employment activities to evaluate and select applicants seeking seasonal employment.

The essay questions may be considered burdensome for some applicants, but are included to help selecting officials ascertain applicants' willingness and ability to "*develop an understanding and appreciation for the Nation's natural environment and heritage*", one of the three primary objectives of the YCC Act. These questions are also an effort to support youth learning objectives to improve writing skills and promote their ability to advocate for their application for employment without benefit of a face to face interview.

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- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

All persons aged 15-18 years seeking seasonal employment through the YCC program must complete form FS-1800-18 (YCC Application).

Only those applicants whom have been selected for employment must complete form FS-1800-3 (Medical History).

- c. What will this information be used for - provide ALL uses?**

Form FS-1800-18 (YCC Application) is an application form used by participating agencies to evaluate each applicant's eligibility for and interest in employment.

Form FS-1800-3 (Medical History) provides information needed to determine the physical suitability and any special medical needs of selected applicants. This provides a record for both the participant and the agency and is collected for the safety of both the participant and other participants of the program.

YCC reportable information that is collected on the application is limited to the ethnicity and race to comply with the primary YCC Act objective to "provide gainful employment for 15 through 18 year old males and females from all social, economic, ethnic, and racial classifications." Other accomplishments data such as number of youth employed and types of work completed are also reported as part of the annual reporting requirement.

- d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

These forms are available both in paper form, and electronically on a number of websites. The form may be completed electronically and then printed, or may be printed and hand written or typed.

Applicants are required to submit a paper copy of the completed forms with original signatures.

- e. How frequently will the information be collected?**

The program is seasonal and information is collected annually. Individuals wishing to participate must reapply each year.

- f. Will the information be shared with any other organizations inside or outside USDA or the government?**

Only participating agencies and partners who manage YCC programs on behalf of the participating agencies within the USDA Forest Service and the Department of the Interior will have access to the information. The participating agencies are USDA Forest Service (FS) and the Department of the Interior's Fish and Wildlife Service and National Park Service.

- g. If this is an ongoing collection, how have the collection requirements**

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changed over time?

Please refer to table 1 above for details of the additional information to be collected. Form FS-1800-18 has been substantially updated to include information collection that will improve program staff ability to screen, evaluate and assign selected applicants and communicate with applicants utilizing diverse the range of communication tools that were not previously included on the application.

Applicants will be required to respond to the essay questions in the sections labeled Work, Community Service, and Extra-curricular Experiences and General Questions to help selecting officials ascertain applicants' willingness and ability to "develop an understanding and appreciation for the Nation's natural environment and heritage," one of the three primary objectives of the YCC Act.

Gender and ethnic background information will be collected to aid the agencies in complying with the Civil Rights Act which prohibits discrimination. Title VI of the Civil Rights Act requires federal agencies to provide access to federal programs. Ethnic and gender data are collected to facilitate civil rights monitoring. Additionally, the YCC Act directs agency programs to attempt to hire 50% females and 50% males, requiring gender data collection to meet this goal.

Form FS 1800-3 has been also been updated to improve program staff ability to screen, evaluate and assign selected applicants and communicate with applicants utilizing diverse the range of communication tools that were not previously included on the application. Additionally, the form will provide expanded information on whom to contact in case of an emergency, including the contact information for the primary care physician. As recommended by the Center for Disease Control for this age group, an expanded request for immunizations, that if not current, could propose a risk to other YCC participants due to the team based nature of the work.

In an effort to reduce burden, the Medical History form will now be collected only after an applicant has been accepted for enrollment. In response to comments received, the ability to attach records as separate documents has been added.

In response to comments received, upon OMB approval of this request, FS will have the approved versions of the both forms translated into Spanish, and will then initiative a change request with OMB to approve the Spanish language versions of the forms.

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 forms are available to potential participants at <https://youthgo.gov/> and the [USDA Forest Service YCC website](#). The forms may be completed electronically,

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printed, and then signed. Participating agencies require submittal of a paper copy with original signatures. Interested members of the public may submit an application online, but a signed (by both the applicant and a parent or guardian) hard copy of the application must be submitted along with the Medical History form if an applicant is accepted for employment.

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.

The use of the same forms by the Forest Service and participating Department of Interior agencies avoids duplication in the application process. The YCC is a unique program that is only operational on public lands within the USDA Forest Service and Department of Interior Fish and Wildlife Service and National Park Service with specific requirements for participation. There are no other existing application forms suitable for YCC purposes.

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

This information collection has no impact on small businesses 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.

This information collection is necessary to carry out this legally mandated program. The use of the FS-1800-3 (YCC Application Form) ensures uniform collection of information from potential program participants. The information collected provides participating agencies with data needed to select program participants.

The Medical History form (FS-1800-18) ensures that adequate medical information is available, ensuring that participants have the ability to perform the work assigned. Failure to collect this information would create an unacceptable safety and liability risk.

If we are unable to collect this data the Departments of Agriculture and Interior would be unable to select candidates to participate in a legally mandated program.

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;**

Although there is no requirement, due to the nature of the process of applying for employment, respondents may complete the application, and typically would complete medical history forms in fewer than 30 days from receipt. In general, recruitment and outreach takes place over a three month period. Applicants may submit their application anytime throughout the recruitment cycle or otherwise, as the application is available year round.

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Applicants that have been selected for employment typically complete the form FS-1800-3 shortly after receiving notice of their acceptance to the program.

- **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 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in Title 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.**

The Federal Register 60-day notice was published on December 13, 2012, volume 77, pages 74168-74169. In response, FS received 1 comment.

The Equal Employment Opportunity Commission (EEOC) provided the advice that the YCC Medical History form, if required pre-employment, could potentially be used to discriminate on the basis of disability and/or criminal history information.

FS responded by explaining that Medical History form is now collected from respondents only after an offer of employment has been made. Criminal history data collection has been removed from the Medical History form FS-1800-3, and from the certification statement found on the application form FS-1800-18.

Based on input from EEOC, FS has decided to reduce the quantity of information originally proposed to be collected and essentially retain the existing Medical History form currently approved by OMB with the exception of expanded immunization history and primary care physician contact, and other minor edits as described above.

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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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

USDA and DOI staffs collaborate regularly to share resources, streamline requirements, and establish common practices and procedures for joint programming, including YCC, to the extent possible. Eugenie Bostrom, Partnerships and Youth Engagement Specialist for the US Department of the Interior and George McDonald, Youth Programs Manager for the National Park Service were consulted specifically regarding OMB 0596-0084.

Our agencies use similar processes and procedures for recruiting YCC participants and collecting information from applicants including standardizing the collection of medical history only from selected applicants. We similar schedules and use the same forms and instructions to collect the data. Record keeping and reporting procedures are similarly conducted annually. Our collaboration on the development of these forms have resulted clearly defined guidance for using the forms.

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.

Gini Vuchetich assisted her son Victor Vuchetich with completing the forms for the YCC program. She indicated that the forms were very easy to complete and did not have any issues with any of the forms.

The Utah Dept. of Workforce Services suggested including the option to attach shot record from the health Dept. or family Dr. instead of filling in the form, and adding a physical address of the applicant, not just the mailing address (i.e. PO Box).

FS Response: We have added a notation on the form that an immunization record can be attached.

Jenn D'Emilio, Idaho

Input from my experience working with the local schools and parents this year: "The best way to reach our students this year was email or cell phone, they could stop in right after school if they needed to complete something or pick something up. This was much more efficient than leaving a message at the house, then they have to try to get before we close or the next day. A couple of our applicants last season attached their immunization records from the school nurse. I found that the Spanish version helped with some of the parents for filling out their sections. We will make them more available this year."

FS Response: There is no official OMB approved Spanish version of the

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Application or Medical History form. The form Ms. D'Emilio references is not authorized and all copies of the Application and Medical History form in alternative languages have been removed from all sites of which federal authorities are aware. We do plan to develop a Spanish version of the Application and Medical History form and will initiate a change request once the new form versions have been OMB approved, and translated.

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

Payments or gifts will not be made to respondents of this information collection.

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

The information collected is stored and accessed as set forth in Privacy Act Systems of Records USDA/FS-27 - YCC Medical Records; USDA/FS-29 - YCC Enrollee Records; and USDA/FS-30 - YCC Recruitment System.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

Neither of the forms included in this request contain questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

Please refer to supplemental spreadsheet document for burden hour and respondent cost estimates.

The YCC-administering federal agencies were surveyed for the number of forms they have received annually in the past 3 years, and their anticipated usage over the next 3 years. Burden estimates are based on an analysis of the actual collection rates for the past three years, combined with a prediction of future interest in the program, and taking into account projected budgets, using professional judgment.

Federal minimum wage is chosen for average income per hour. National minimum wage is reported by the Department of Labor which can be found at <http://www.dol.gov/whd/minwage/america.htm>. Specific wage information for youth in recreation jobs can be found at <http://www.dol.gov/whd/regs/compliance/whdfs18.pdf>. However for most applicants of the YCC program, YCC would be their very first employment

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opportunity, meaning that they are most likely unemployed at the time of application.

- **Record keeping burden:**

There is no record keeping requirement placed upon the respondents.

- 13. Provide estimates 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). The cost estimates 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.**

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The method used is a calculation of the number of hours a GS-7 Recreation Technician normally spends to print, store, collect, and analyze the forms on a Ranger District, National Park, or Refuge. Average GS-7 wage is \$16.28 per hour; this figure is multiplied by the number of hours such technicians would engage in these activities throughout the federal YCC agencies over one year.

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection.

Table 1 **Cost To Government**

ACTION ITEM	PERSONNEL	GS LEVEL	HOURLY RATE	HOURS	SALARY
Employee labor for printing and storing the forms	Technician	7	\$16.28	1334	\$21,718
Employee labor, travel, and materials for collecting the information	Technician	7	\$16.28	8000	\$130,240
Employee labor for evaluating the collected information	Technician	7	\$16.28	4000	\$65,120
Total cost to government					\$217,078

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

Due to a projected decrease in the number of youths applying to the YCC, along with the new requirement for only the YCC applicants selected for employment to submit a Medical History form vs. all applicants, the estimated total number of responses has decreased by 6,897, from 23,000 to 16,103. Of this, -4,545 is an adjustment for fewer applications received and -2,352 is a program change now that only applicants selected for employment complete the medical history.

Despite the decrease in the number of responses the total burden hours have

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increased by 3,259 from 2,700 to 5,959 hours. This increase is a combination of an adjustment decrease of 824 hours for the decrease in applications received, and a program change increase of 4,083 hours to account for additional information collected increasing the per response time for form FS-1800-18 from 6 to 25 minutes.

Due to the increase in the estimated number of burden hours and an increase in the minimum wage rate, the cost to respondents has increased from \$19,575 to \$43,197.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Results of this information collection 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.

The valid OMB control number and expiration date will be displayed on all information collection instruments.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

There are no exceptions to the certification statement. The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.