

Peace Corps – Office of Volunteer Recruitment and Selection
Peace Corps Questionnaire for Peace Corps Volunteer Background Investigation
Form
OMB Control Number 0420-0001
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.**

The Office of Volunteer Recruitment and Selection at the Peace Corps utilizes the Questionnaire for Peace Corps Volunteer Background Investigation form (BI form), formerly known as the National Agency Check Questionnaire for Peace Corps Background Investigation Form, as authorization from the invited Peace Corps Volunteer candidate to conduct a background check through the Office of Personnel Management (OPM) or other contract background investigator of pertinent records pertaining to applicants' interaction with the judicial system, qualifications, eligibility and suitability for Peace Corps volunteer service, as well as information relating to whether a Peace Corps assignment is consistent with the national interest, as required by the Peace Corps Act (22 USC §2519.) #22 CFR Part 305 sets out the eligibility and selection standards for Peace Corps service.

- 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 BI form is used to collect information and consent from Peace Corps applicants for a background check relating to their legal and/or criminal history and other interaction with the judicial system. The information obtained on the form is provided to the OPM or other contract investigator to obtain necessary information as to an applicant's qualifications, eligibility and suitability for service. All applicants who complete the initial Peace Corps Application Form are asked to complete this BI form and the FBI Fingerprint Chart (FBI Form FD-258), as well as a postage-paid return envelope. The BI form is only requested to be completed once and currently is only available in carbon-hard copy format.

- 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.**

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The BI form currently used in connection with the Peace Corps' arrangements with OPM is available in carbon-hard copy format only. This has been intended 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. In the future, it may be possible to submit personal BI information via electronic means (secure on-line form) and/or via other entities with which the Peace Corps may contract to perform background investigations of Peace Corps applicants.

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.

Some of the information requested on the BI form is also requested in the Peace Corps Volunteer Application Form. Although the information requested on the BI form exists 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 or consent for release of documents; therefore, the BI form is a separate and additional requirement. We hope in the future to have access to an electronic system.

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.

The collection of information through the BI form does not impact small businesses or other small entities in any capacity. It is completed only by individuals who have been invited to serve in Peace Corps.

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.

Failure to collect this information would hinder the mission of the Peace Corps by eliminating a mechanism the agency uses to screen applicants for conduct that would affect their suitability for Peace Corps service or the statutorily required determination whether their assignment would be in the national interest. Moreover, although Peace Corps Volunteers are not employees of the Peace Corps or the United States, they are closely observed in the foreign countries in which they serve, and volunteers may at times be considered representatives of the United States. The negative impact of a volunteer with inappropriate, undesirable or illegal personal

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behavior while serving as a Peace Corps Volunteer could diminish his or her effectiveness as a Volunteer or the effectiveness of the Peace Corps 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;**
- * 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 that require the collection to be conducted in a manner inconsistent with the guidelines in 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.

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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 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 Day Federal Register Notice was published in the Federal Register on February 28, 2014 [79 FR 11472]. No public comments were received during the 60-day period. The agency's 30-Day Federal Register Notice was published on May 6, 2014 [79 FR 25907].

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

No payment or gift is provided to respondents.

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

The Peace Corps Privacy Act Statement is printed on the front of the BI form. It sets out the purpose for which the information is being collected to whom the information may be sent and the relevant Privacy Act routine uses.

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.

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The form requests the applicant to provide their Social Security number, which is required to conduct a Background Investigation through OPM or other BI contractor for criminal/legal history. This requirement is authorized by the Peace Corps Act (22 USC 2519), which requires 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. Completion of this form, including the SSN, is voluntary, but without it, the Peace Corps will be unable to process the application.

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.**

Estimates of hour burden of the collection of information:

a.	Estimated number of applicants:	20,000
b.	Estimated number of Invitees who submit BI form:	4,500*
c.	Frequency of response:	One time
d.	Estimated Completion time:	1-2 minutes**
e.	Annual burden hours:	150 hours

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*Estimated number of BI forms has decreased (from 13,500 to 4,500) because we are only collecting information from those who have been invited to serve as Peace Corps Volunteers. We collected this information from ALL nominated applicants in the past.

**Completion time has decreased (from 30min to 1-2min) because qualified applicants who have been invited to serve are expected to be able to complete this form in a much faster time.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

*** The cost estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

*** If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

*** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or**

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keep records for the government, or (4) as part of customary and usual business or private practices.

- a. There are no associated start-up costs as this is an existing business process.
- b. There are no costs associated with operation or any maintenance of purchased resources.

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.

Total annual cost to the Federal Government per annum

Printing (@ \$0.40 per form x 5,000)	\$ 2,000
<i>(includes cost of paper, ink, printing labor and 11% overage (actual number of processed forms is estimated at 4,500 but an additional 500 will be printed to cover loss and improperly completed forms))</i>	

Mailing out of form to applicants	\$ 5,715
(\$1.27 (postage cost) x 4,500 (#of mailings))	

Postage costs for mailing to OPM or Investigator	\$ 248
(\$5.50 (postage cost, bulk mailing 100forms) x 45 mailings)	

Annual fees for external provider completing BIs:	\$90,000 – \$310,500
a. OPM completes NAC investigation (4,500 BIs x \$69 = \$310,500)	
b. Contract Investigator completes BI (4,500 BIs x \$20 = \$ 90,000)	

Analyzing information and processing	\$ 2,232
(see table below for calculation of labor hours)	

TOTAL per annum	\$100,195 -- \$320,695
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Labor Cost Calculations

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Amount of time Placement Officer reviews BI forms 37.50 hrs
 ((4,500 forms x 0.5 minutes per form) / 60 minutes)

Labor cost for review by Placement Officer \$999
 (37.50 hrs / 2087 hrs = 0.0180 annual hours of a Placement Officer)
 0.0180 of salary x \$55,492 annual salary of a Placement Officer)

Number of BIs given to Suitability Specialist for further review 225
 (5% of 4,500 BIs received)

Amount of time Suitability Specialist will follow up (if needed) 37.5 hrs
 (225 BIs received x 10 minutes per form = 2,250 minutes
 2,250 minutes / 60 minutes per hour = 37.5 hrs)

Labor cost for Suitability Specialist's follow up with references \$1,233
 37.5 hrs / 2087 hrs = 0.0180 annual hours of a Suitability Specialist
 0.0180 of salary x 68,474 annual salary of a Suitability Specialist)

TOTAL LABOR HOURS \$2,232

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

The following factors resulted in the reduction of estimates:

- a. The Agency collects BI information from candidates that have been invited to serve. This reduces the estimated # forms submitted from 13,500 to 4,500.
- b. The agency is using bulk mailing to send BI forms to OPM/Investigator instead of individually.
- c. The Agency has reduced the burden on Federal Employees by eliminating the number of staff that reviews the BI form (from 5 to 2).

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.

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This information will not be published for statistical use.

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

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

Section B: Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.