

The 2014 Supporting Statement for OMB 0596-0207

Outreach Opportunity and Ethnicity Questionnaires

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.**

Law, Statutes, Regulations, and Policies:

- Civil Rights Act of 1964, as amended (42 U.S.C. 1971, 1975a - 1975d, 2000a - 2000h-6)
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency
- 7 CFR Part 15
- USDA Departmental Regulation - 4300-2, Non-discrimination in Programs and Activities Receiving Federal Financial Assistance from USDA
- USDA Departmental Regulation - 4300-3, Non-discrimination in USDA Conducted Programs and activities
- USDA Departmental Regulation - 4300-3, Equal Opportunity Public Notification Policy
- USDA Departmental Regulation - 4300-4, Civil Rights Impact Analysis
- USDA Departmental Regulation - 4330-005, June 4, 2013, Prohibition against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by the USDA.
- Forest Service Manual 1700, Civil Rights
- Forest Service Handbook 1709.11, Civil Rights Handbook

The Forest Service Plan: *Toward a Multicultural Organization* (TMO), requires outreach and recruitment of diverse candidates as a strategy to create a diverse and multicultural workforce within the Agency (FSH 1709.11, Chapter 10, § 17.05). Towards this goal the Forest Service uses form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire*. The questionnaire, developed by the Forest Service's Northern Research Station (NRS), gathers information from students attending local college and university career fairs about the

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effectiveness of information provided by NRS personnel regarding career opportunities in the Forest Service.

In order to measure the demographic information on public involvement and outreach activities, the updated questionnaire, form FS-1700-5 *Optional Ethnicity Questionnaire* will be used to collect and monitor the demographic information of those participating in the following Forest Service Programs: 1) The Youth Conservation Corps; 2) The Volunteer Program; 3) Job Corps and 4) Miscellaneous Forest Service Hosted Programs (Hosted Programs in the National Forest Service, programs established by federal legislation, and programs under non-federal legislation).

The Forest Service Strategic Public Outreach Plan, 2000: *Reaching Out to America*, requires program/public outreach to diverse communities as a strategy to inform, engage, and serve the diverse U.S. population, as required by Law, Statutes, Regulations, and Policies.

The authority to collect this information comes from Title VI of the Civil Rights Act which prohibits discrimination based on race, color, or national origin in Federally assisted or direct programs of the Federal Government. Section 703 in Title VII of the Civil Rights Act which prohibits discrimination in employment based on race, color, religion, sex, or national origin in actions affecting employees or applicants for employment. Section 717, added in 1972 by Public Law 92-261 (42 U.S.C. 2000e-16), which covers employment by the Federal Government in the prohibition against discrimination.

Title 7, Code of Federal Regulations, Part 15 implements Title VI of the Civil Rights Act of 1964 and requires nondiscrimination in Federally assisted programs and direct programs of the Department of Agriculture.

Executive Orders listed above and the recent USDA Departmental Regulation - 4330-005, June 4, 2013, Prohibition against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by the USDA, requires program participation data collection for use during the monitoring of program participation by beneficiaries of USDA programs.

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

Both questionnaires will collect the following information:

- Ethnicity
- Race

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire* also collects responses on:

- Helpfulness of information provided by the Forest Service at career fairs,

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- Whether information received was what the respondent was seeking,
- Whether application procedures were clear and simple, and
- Which (if any) Forest Service positions respondents had applied for via USA Jobs, Job Corps, Youth Conservation Corps, Volunteer programs, etc.

Form FS-1700-5 *Optional Ethnicity Questionnaire* also collects responses on:

- Whether participant was provided helpful information on FS program activities
- Whether the participant received the information sought, and in the preferred language
- Whether the procedures for applying and receiving Services from FS were described clearly and simply
- Whether the participant has a disability

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.

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire* - collects responses from individual college students attending local college and university career day events in PA, NJ, NY and DE.

Form FS-1700-5 *Optional Ethnicity Questionnaire* - collects responses from individual participants in, and beneficiaries of the following Forest Service programs: 1) The Youth Conservation Corps; 2) The Volunteer Program; 3) Job Corps and 4) Miscellaneous Forest Service Hosted Programs (Hosted Programs in the National Forest Service, programs established by federal legislation, and programs under non-federal legislation).

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

Responses to Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire* are used to evaluate the effectiveness of the Northern Research Station's Civil Rights Outreach Program and will be sent to the Forest Service's national office. In addition, the information also helps determine the effectiveness of career days and to track outreach efforts at career fairs.

Responses to Form FS-1700-5 *Optional Ethnicity Questionnaire* will be used to monitor and evaluate effectiveness of Public Outreach Programs conducted by Forest Service staff at units across the country, and will be summarized in the Annual USDA Forest Service Civil Rights Performance Plan and Accomplishment Report, and the Annual Information Reporting Requirements Report.

d. How will the information be collected (e.g., forms, non-forms,

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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?

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire* is handed out, completed, and collected in person during university career fair events.

Form FS-1700-5 *Optional Ethnicity Questionnaire* is handed out, completed, and collected in person during initial public service contact, or public outreach activities conducted by Forest Service staff at units across the country. Each program participant is given the form upon arrival at the participation site or administrative field office during completion of initial paperwork.

e. How frequently will the information be collected?

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire*: Information is collected once from each career fair attendee.

Form FS-1700-5 *Optional Ethnicity Questionnaire*: Information is collected once from each program participant.

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

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire*: The information will be shared with the U.S. Department of Agriculture and the Federal Executive Board.

Form FS-1700-5 *Optional Ethnicity Questionnaire*: The information will be included in the Forest Service's Annual Accomplishment Report(s), which is shared with Congress, various Federal agencies, and the public.

g. If this is an ongoing collection, how have the collection requirements changed over time?

With this submission, on Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire* Job Corps is added to the list of venues.

Form FS-1700-5 *Optional Ethnicity Questionnaire* adds the categories for preferred language, and for persons with disabilities. These components expand collection capabilities to those segments consistent with U.S. Census Bureau statistics, and will allow the Forest Service to utilize and compare it's program participation and delivery strategies consistent with U.S. population demographics statistics established by the U.S. Census Bureau.

As mentioned above, all Law, Statutes, Regulations, and Policies have required the monitoring of program participation by program beneficiaries within the diverse U.S. population, including consideration and mitigation of cultural and language barriers that exist, and may present disparate treatment or impacts to these protected groups. Previous *Optional Ethnicity Questionnaire* forms were utilized sporadically on a local basis, and consistent application in the administration of these forms by agency personnel occurred on an inconsistent basis.

Now that the form has been expanded, including inquiry regarding disability

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and language preferences, under the requirements of the new USDA Departmental Regulation - 4330-005, June 4, 2013, Prohibition against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by the USDA, this will enable the Forest Service to increase its ability to implement specific program participation data collection procedures during the routine program delivery activities to the U.S. population; thus delivering the ability to improve and increase current levels of monitoring of program participation rates by demographically diverse beneficiaries of USDA programs; and to compare those rates directly to the U.S. Census Bureau statistics benchmarks.

The Forest Service is increasing the use of this form across the service field units for the purpose of increasing the administration of compliance enforcement activities under the existing and new authorities and policies. This form will enhance the current monitoring analysis process and enables the Forest Service to improve language service, interpreter's services, translation services to diverse and limited English proficient populations; through specific/designed national and local public outreach strategies, media, forums, and venues in the future.

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.

Use of information technology is not conducive to this type of information collection. The hardcopy questionnaire is a quick, hands-on collection method at the service delivery point of contact.

Several other methods were considered, such as follow-up telephone contact and an e-mail survey. However, these methods are not used due to the additional burden, costs, and uncertainty of participation.

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.

This collection does not duplicate other collections. The information collected is program specific and is not available from any other source or study.

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

The information collection does not affect 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

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any technical or legal obstacles to reducing burden.

Both forms covered by this information collection provide the Forest Service with data used in program analysis and reporting, as well as program improvement strategies. All Federal agencies are required to develop planned actions designed to address any present effects of past discrimination and make certain that qualified minorities, women, veterans, and individuals with disabilities have access to information, facilities, and program benefits, and equal opportunity to participate in the Agency's workforce and programs. The Agency's ability to accomplish these goals is severely impaired without this collected information.

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 for respondents to reply, response is requested at the time of initial contact or completion of preliminary paperwork.

- **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 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

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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.

A Federal Register Notice requesting comments was published on November 1, 2013 on page 65608 in Volume 78, Number 212. The Forest Service received no comments.

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.

The following knowledgeable person were consulted: (EEO/Civil Rights persons from other agencies)

Sylvia Anderson, EEO Specialist, General Services Administration

Adrienne Cropp, EEO Manager, United States Mint

Michele Sazo, Civil Rights Regional Director, Food and Nutrition Service

Marsheela Hines, Policy Analyst, Policy Division, Office of Compliance, Policy and Training, USDA Office of the Assistant Secretary for Civil Rights

Comments received overall were that the instructions are clear, and the data elements to be recorded are in line with Federal requirements. Contacts also suggested adding a few service satisfaction related questions.

Forest Service has taken the comments received under advisement.

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.

As the questionnaires are submitted anonymously, we are unable to consult past respondents. However, several FS employees not familiar with the forms were asked to complete the forms. The overall response was that the forms were quick and easy, self-explanatory, and took about one minute to complete.

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

Respondents will not receive monetary payment for responses. Respondents may however receive small token items such as pens/pencils, posters, etc.

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

All responses are anonymous and used only for aggregated reporting purposes.

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No personally identifiable information is collected.

- 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.**

Race, ethnicity and disability information is requested to assist the Forest Service in monitoring program participation, service delivery accomplishment, and improvement of future information/communication/public outreach strategies needed to advertise specific program information to groups who demonstrate low program participation compared to the local U.S. Census population percentage(s) bench marks. The Forest Service Civil Rights program analyzes data by ethnicity and race as a means of measuring ability to reach underserved, socially disadvantaged, low income and limited English proficient populations. Responses are strictly voluntary and no personally identifiable information is collected.

- 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.**

Form FS-NRS-1700-1 NRS Outreach Opportunity Questionnaire: The annual number of respondents is estimated by taking the average of the number of forms received during the past 3 years from students attending local college and university career fair events in PA, NJ, NY and DE regarding career opportunities in the Forest Service.

Form FS-1700-5 Optional Ethnicity Questionnaire: Using professional judgment, the number of respondents is estimated to be 30 percent of individuals participating in these Forest Service programs each year across the country: 1) The Youth Conservation Corps; 2) The Volunteer Program; 3) Job Corps and 4) Miscellaneous Forest Service Hosted Programs (Hosted Programs in the National Forest Service, programs established by federal legislation, and programs under non-federal legislation).

The burden per response was estimated by asking several Forest Service employees to complete the questionnaire and timing them on how long it took. The average time was less than 2 minutes.

Table 1

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(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
NRS Outreach Opportunity Questionnaire	NRS-FS-1700-1	451	1	451	2 minutes (.033 hrs)	15 (rounded)
Optional Ethnicity Form	FS-1700-5	1,000,000	1	1,000,000	2 minutes (.033 hrs)	33,000
Totals	---	1,000,000*	---	1,000,000*	---	33,000*

*Columns do not add as significant total figures have been rounded.

- **Record keeping burden:**

There is no record keeping burden placed upon the respondents.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Respondents consist of students attending career fair events and members of the general public who participant in the Forest Service programs. The respondent's occupations are unknown and would be wide and varied. To calculate respondent cost a combination of the Federal minimum wage for PA - \$7.25; NJ - \$8.38; NY - \$8.75 and DE - \$8.25 was averaged and rounded to \$8/hr. The 2013 National average wage of \$44,888 divided by 52 = \$863 divided by 40 hours = \$22/hr. Added \$8 + \$22 = \$30 for an average of \$15/hr.

Table 2

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
NRS Outreach Opportunity Questionnaire	15	\$15	\$ 225.00*
Optional Ethnicity Questionnaire	33,000	\$15	\$ 495,000.00
Totals			\$ 495,000.00*

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

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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 start-up/capital or operation/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.**

Table 3

Item	Total
Employee labor and materials for developing and printing forms (1,000,451 forms @\$0.10 each)	\$100,045
Employee labor and materials for collecting, analyzing, evaluating, summarizing, and/or reporting on the collected information (1,000,451 forms processed at 5 minutes each by GS 5 step 7 @ \$20/hour plus 36.25 percent for benefits and 28 percent overhead equals \$33/hour.	\$2,740,221
Total cost to the government	\$2.8 Million*

*Cost of total benefits as a percentage of total hourly compensation for Federal government employees has been calculated by multiplying 36.25% by the hourly OPM wage in accordance with OMB Memorandum M-08-13. *Total figures are rounded.*

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

The estimated number of respondents has increased from 77,500 to an estimate of 1,000,000 due to an anticipated increase in compliance with Departmental regulation.

Although the estimated burden per response has decreased from 5 minutes to 2 minutes (based on the average response time during testing of the forms), the overall annual burden estimate has increased from 6,458 hours to an estimate of 33,000 hours as a function of the increase in the number of responses.

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

Form FS-NRS-1700-1 *NRS Outreach Opportunity Questionnaire*: Reports mainly used and distributed internally, occasionally shared with the Philadelphia Federal Executive Board Partner's in Equality Council - Careers in Government Outreach Team (FEB) to show agency accomplishments. The FEB is an organization whose mission is to affect change towards organizational excellence through periodic educational forums. The forms assist in the development of a diverse work force; assist in sharing resources, concepts, methods and tools.

Form FS-1700-5 *Optional Ethnicity Questionnaire*: The national data gathered

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from this information collection is to be published in the Forest Service Annual Report, which is available to Congress, other Federal agencies, and the public.

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 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. The agency is able to certify compliance with 5 CFR 1320.