#### **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.

Peace Corps Response uses the staff, personal and professional reference forms to learn from someone who knows the applicant and his or her background whether the applicant possesses the necessary characteristics and skills to serve as a Peace Corps Response Volunteer. Eligibility requirements for Peace Corps Volunteer service are set at 22 C.F.R. 305; attached.

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 information collected in the reference forms is an integral part of the screening and selection process and is used to determine whether an applicant would be a good candidate as a Peace Corps Response Volunteer. The information obtained from these forms is used by the recruitment and placement specialists within the Office of Peace Corps Response.

There is no other means of obtaining the required data, and the information gathered is not shared with outside sources or other government agencies.

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 Response collects reference forms electronically. Qualified applicants, following the submission of their application and only if contacted for an interview, will be required to submit reference contact information, which is saved electronically to the applicant's Peace Corps record. Peace Corps Response staff sends reference forms to references electronically. References complete and submit the forms electronically, unless they prefer to answer the questions over the phone. In this case, the Peace Corps Response staff person enters the responses into the electronic form.

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 from an applicant's references is not available elsewhere. If a candidate reapplies to serve as a Peace Corps Response Volunteer, Peace Corps Response will use existing contact information unless the applicant wishes to provide updated information.

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.

This collection of information does not impact small business 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.

If Peace Corps Response were unable to collect the reference information, the program would be unable to adequately assess applicants for qualifications and suitability. An inadequately screened Peace Corps Response Volunteer may have poor performance or bad judgment or lack qualifications. Peace Corps Response Volunteers are representatives of the United States. Volunteers who perform poorly or engage in unsatisfactory conduct reflect negatively on the Peace Corps and the United States, and may create conflict and embarrassment for the Peace Corps and the United States by attracting negative media or political attention and even more importantly potentially diminish the safety and protection of all of our Volunteers, and the communities and children they serve.

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- 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 information 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.

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 notice was published in the Federal Register on August 19, 2014, 79 FR 49115. No public comments were received during the 60-day period. The 30-Day notice was published October 27, 2014, 79 FR 63961.

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

No payments or gifts are provided to respondents.

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

Privacy protections are provided in the Privacy Act notice in the reference forms. It reads:

The Privacy Act is a federal law that states that everyone has the right to know about and receive information about, or copies of, documents about them that are maintained by the federal government. This law provides that the Peace Corps may keep the identity of the source of this reference confidential only if you request that it be kept confidential. Please indicate below whether you do or do not wish your identity revealed to the applicant.

- I DO NOT authorize the Peace Corps to identify me as the source of this reference, nor do I authorize the Peace Corps to release a copy of this reference to the applicant. I realize that a summary of this reference may be released without my authority.
- I AUTHORIZE the Peace Corps to identify me as the source of this reference and to release a copy of this reference, upon request, to the applicant.

Privacy Act Statement: Section 2504 of Title 22, United States Code, authorizes collection of this information. The primary use of this information, the provision of which is voluntary, is to determine whether applicants for Peace Corps Volunteer service are qualified and suitable. Without such information, the Peace Corps may be unable to determine the applicant's qualifications and suitability for Peace Corps service. To the extent permitted under the Privacy Act of 1974, 5 U.S. C. 552a(k)(5), this system has been exempted from the provisions of the Privacy Act of 1974 that permit access and correction. The exemption from access is limited in some instances by law to information that would reveal the identity of a confidential source. See 65 FR 53772, pp. 53783–84 (September 5, 2000); 50 FR 1950, 1962 (January 14, 1985); and Peace Corps regulations at 22 CFR 308.14(c).

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.

In the reference forms, the reference is asked the following question pertaining to the Peace Corps applicant: "Do you know of any reasons why this individual should not work with children?" The information obtained from the answer to this question will be part of the Peace Corps' assessment of the applicant's suitability to serve as a Peace Corps Volunteer.

The Agency considers this question necessary because Peace Corps Volunteers represent the United States and the American people in the countries and communities where they serve overseas. The Peace Corps expects Volunteers to conduct themselves at all times in a manner reflecting credit on the Peace Corps and the United States. Appropriate Volunteer conduct is critical because it is intimately tied not only to the reputation and effectiveness of the Peace Corps program, but even more importantly to the safety and protection of our Volunteers, and the communities and children they serve.

The explanation to be given to the person from whom the information is requested will be the following: "Peace Corps Response Volunteers represent the United States and the American people in the countries and communities where they serve abroad. The Peace Corps expects Volunteers to conduct themselves at all times in a manner reflecting positively on the Peace Corps and the United States. Appropriate Volunteer conduct is critical because it is intimately tied to the safety and protection of Volunteers, and that of the communities and children they serve, as well as the reputation and effectiveness of Peace Corps programs. Please consider these factors carefully when completing this recommendation. Please include any information that may inform our assessment of the applicant's suitability to serve as a Peace Corps Response Volunteer."

### 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. Number of interviewed applicants:\*

b.	Number of references required per interviewed applicant:**	2.25
c.	Estimated number of reference forms received:	1,575
d.	Frequency of response:	One time
e.	Completion time:	10 minutes
f.	Annual burden hours:	263

<sup>\*</sup>Reference information is collected only if an applicant is contacted for an interview.

\*\*Returned Peace Corps Volunteers (RPCVs) must submit two references; one staff and one professional reference. These applicants comprise of approximately 75% of the total applicants interviewed. Applicants who have not previously served with the Peace Corps must submit three references; one personal and two professional references. These applicants comprise of approximately 25% of the total applicants interviewed. Therefore, the number of references required per interviewed applicants is calculated at 2.25.

The estimated number of applicants interviewed increased from the 2011 submission from 350 to 700. This increase can be attributed to an increase in the number of applicants without previous Peace Corps experience.

- 13. Provide an estimate for 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 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 10/95
  - 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 keep records for the government, or (4) as part of customary and usual business or private practices.

Cost estimate to the respondent: \$0.00

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: \$2,436

- a. Number of reference forms reviewed: 1,575
- b. Amount of time spent reviewing reference forms: 79 hours *3 minutes per form x 1,575 forms /60 minutes*
- c. Labor cost: \$2,436
  79 hours/ 2087 hours per year = 0.03% of Recruitment and Placement Specialists' time;
  0.03% of Recruiters' salary \* \$64,341 average Recruitment and Placement Specialist annual salary
- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

No changes to item 13.

Changes to item 14 are due to an increased number of reference forms being reviewed. There are no longer printing costs associated with collecting references.

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 results of this collection of information 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 Agency is not seeking approval to conceal or omit the expiration date for OMB approval of the information collection.

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**

The collection of information does not employ statistical methods.