Justification for emergency approval of information collections for the Youth, Volunteer, and Partnership Activities of Natural and Cultural Federal Agencies

Why following the normal clearance process would lead to public harm. We seek emergency approval for the information collections for on-line collection forms because following the normal Paperwork Reduction Act clearance procedures would result in public harm for the following reasons:

Failure to immediately implement DOI Secretarial Order 3332: "Engaging the Next Generation" will deny opportunities to hundreds of thousands of disadvantaged young people between the ages 18 and 35. This order ensures these young people can reach their full potential, regardless of who they are, where they come from, or the circumstances into which they are born, Secretarial Order 3332 implements the action plan for the Presidential My Brother's Keeper Initiative which will help every boy and young man of color who is willing to do the hard work to get ahead. Secretarial Order 3332 also supports the Presidential Memorandum: Expanding National Service through Partnerships to Advance Government Priorities intended to help Americans gain valuable skills, pursue higher education, and jumpstart their careers, which can provide immediate and long-term benefits to those individuals, as well as the communities in which they serve.

Failure to act immediately will result in hundreds of thousands of young Americans and veterans being stripped of their ability to get jobs due to a lack of verification of credit time under Section 1726 of Title 16 of the United States Code (USC) which authorizes the Secretary of Agriculture and Secretary of the Interior to grant members of the Public Lands Corps (PLC) credit for time served towards future Federal hiring; and provide former members of the PLC noncompetitive hiring status for a period of not more than 120 days after completion of PLC service.

Additionally, cost sharing funds recently became available from partners and congressionally chartered foundations will be lost if not used in a timely manner eliminating hundreds of thousands of opportunities to serve on career building projects and gaining employment skills.

Failure to act immediately will mean delay in completing government priority work protecting, restoring, and enhancing America's great outdoors as well as limiting for citizens' use and enjoyment of public lands. Use of many of these lands is seasonal so completing projects now will enable more public use during the 2015 peak season.

Obtaining full Federal funding for this program in future fiscal years will be difficult or impossible due to fiscal constraints imposed by the current budget environment. Effective partnerships will leverage resources to encourage communities (cities, rural municipalities, and tribal nations) to implement a coherent strategy for improving the life outcomes of all young people .

**The need for expeditious approval is the result of an unanticipated event.** This program immediately implements Secretarial Order 3332: Engaging the Next Generation. The need for emergency clearance arises because of the combination of the recent issuance of the goals by the administration and the fortuitous availability of private funds for implementing this program.

## This information collection is essential to the Department of the Interior's mission.

Partnership, youth, and volunteer programs are essential to the mission of the Department of the Interior. All federal public land management agencies have requirements to provide quality volunteer and education opportunities in accordance with the agency's needs. The Department of the Interior is well positioned to expand its work in engaging the next generation, as our bureaus collectively provide over 15,000 work opportunities, benefit 317,000 volunteers, educate more than 4 million young people and welcome 478 million visitors on public lands every year.

**We've already consulted with the affected parties.** We ask OMB to waive the requirement for a public comment period because in development of the system used to provide these information collections, we consulted with affected federal agencies, the Corps Network and the 21<sup>st</sup> Century Conservation Service Corps partnership of 91 organizations recognized for their commitment to offer job and training opportunities in America's Great Outdoors.

Specifically, we held consultation sessions with over 60 organizations noted above which led to the development of on-line forms to meet customer demand for better tracking of projects, contributions, and youth members' time. We plan to continue the consultation, outreach and planning with partners. We ask for approval of this emergency collection for a maximum of 180 days.

During this time, we will request approval for this information collection under the normal clearance procedures. We will also be able to improve the information collection during this period by considering public feedback from forms used by recipients after we implement the emergency collection.