

## **The 2013 Supporting Statement for OMB 0596-0080**

### **Volunteer Application and Agreement for Natural and Cultural Resource Agencies**

**Terms of Clearance:** None

**PLEASE NOTE:** With this submission, the title of this Information Collection Request will be changed from *Volunteer Application for Natural Resource Agencies* to *Volunteer Application and Agreement for Natural and Cultural Resource Agencies*.

#### **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.**

##### Participating Agencies:

- Department of Agriculture: U.S. Forest Service, National Resources Conservation Service
- Department of the Interior: National Park Service (NPS), Fish and Wildlife Service (FWS), Bureau of Land Management (BLM), Bureau of Reclamation (BR), Bureau of Indian Affairs (BIA), and U.S. Geological Survey (USGS)
- Department of Defense: U.S. Army Corps of Engineers
- Department of Commerce: National Oceanic and Atmospheric Administration (NOAA)

##### Laws, Statutes and Regulations:

- Public Law 92-300: Volunteers in the National Forest Act of 1972
- 16 USC 558 a-d - Volunteers in the National Forests Program
- 16 USC 583j-4 - Forest Foundation Volunteers
- 16 USC 1246 - Administration and development of national trails system
- 16 USC 1250 - Volunteer trails assistance
- 31 USC 3325 - Authorizes payment of vouchers

Volunteers contribute significant and diverse services on public lands in a wide range of activities that range from providing interpretive services, to performing campground host and maintenance duties, to building and repairing trails, to supporting a myriad of research, administration and operational support activities. All public lands agencies provide volunteer opportunities and hundreds of thousands of citizen stewards serve in a volunteer capacity every year. Volunteers represent the broad diversity of the American public and many international communities. They are children, families, and retirees. Their contributions are critical to Public Land agencies' ability to effectively achieve their missions in a diminishing resources environment and to the broader goal of "working together, to preserve the public lands legacy."

Federal land management agency members of a Federal Interagency Team on

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Volunteerism (FITV) are authorized to work with volunteers and volunteer organizations to plan, develop, maintain, and manage volunteer projects and service activities on public lands and adjacent projects throughout the Nation. Agencies may recruit, train, and accept the services of volunteers to aid in interpretive functions, visitor services, conservation measures and development, research and development, recreation, and or other activities in nearly all areas of service. Volunteer engagement can be an efficient, effective, and cost-beneficial use of public resources.

In order to effectively engage tens of thousands of volunteers in meaningful service activities annually in at multiple locations, participating agencies must collect information including personally identifiable information from public citizens who are interested in volunteering on public lands. The information collected from volunteers includes contact information, demographic data including ethnicity and veterans and disability status.

**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.)**

The Forest Service has used the current OF-301 Volunteer Application to consider persons for enrollment as volunteers. Persons use this form to express interest in volunteering, list their skills and abilities and desired locations and timeframes. The agency uses the form as a position application, to review and determine if a potential volunteer is a good fit for a particular volunteer position. The agency uses the OF-301a to enroll volunteers, collect their contact information, describe their duties, project locations, schedules and any reimbursements, describe safety requirements, and delineate any other terms of service. This form also collects parent or guardian approval for minor volunteers, and records the date on which the volunteer terminates their service. The OF-301b is a new form that will be used to record the name and contact information of the volunteer group, and the names and signatures of volunteers participating in a project.

TABLE 1: ITEMIZED LISTING OF FORMS AND INFORMATION COLLECTED

Form Number and Title	Type of Information Collected								
	Volunteer's Name	Contact and Emergency	Consent of	Areas of Interest	Physical Limitations	Qualifications/	Gender and Age	Ethnicity (optional)	Visa Information
OF-301: Volunteer Service Application for Natural Resource Agencies	X	X		X	X	X			X
OF-301a: Volunteer Service Agreement- Natural & Cultural Resources	X	X	X				X	X	

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Form Number and Title	Type of Information Collected								
	Volunteer's Name	Contact and Emergency	Consent of	Areas of Interest	Physical Limitations	Qualifications/	Gender and Age	Ethnicity (optional)	Visa Information
OF-301b: Volunteer Sign-Up Form for Groups	X	X	X						

**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.**

The information is collected from potential and selected volunteers of all ages. Those under 18 years of age must have written consent from parent or guardian.

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

Participating natural resource agencies will use this information to manage agency volunteer programs. Specifically:

- Applications are used to select and assign volunteers to appropriate activities.
- Agreements set forth the details of volunteer assignments and outline the responsibilities of participating individuals and agencies.
- Group sign-up Forms collect information about volunteers serving on a particular project and secures their agreement to serve.

**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?**

The information is collected using the forms listed and may be completed electronically or by hand. Electronic submission of form OF-301 is accepted via email and/or via [www.volunteer.gov](http://www.volunteer.gov). Form OF-301a must include original signature on a hardcopy, which can then be scanned and emailed if necessary. Form OF-301b is typically used just prior to a volunteer project, often on the day of the event as volunteers arrive at the event so is usually completed in hardcopy. Representatives of an organized volunteer group with whom the agency already has a completed form OF-301a may scan and email the OF-301b if the agency representative has agreed to this method.

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

OF-301 *Volunteer Service Application*: Once per year, per respondent.

OF-301a *Volunteer Service Agreement*: Once per year, per respondent.

OF-301b *Volunteer Sign-up for Groups*: Once for each group-performed project; average of 3 per year per respondent.

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

General non-identifying information is shared in reports of participating agencies volunteer programs. This information is also provided to Congress and the public in reports. No information regarding individual volunteers is shared.

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

Collections requirements have evolved over time to include data collection that will result in enhanced ability to standardize reporting across participating agencies about volunteer demographics and volunteer activities.

In response to increasing group volunteers at all participating agencies, and in an effort to reduce paperwork burden, a group volunteer sign-up form is proposed with this submission.

The addition of form OF-301b will allow many volunteers to provide minimal information on one group form, rather than completing one form for each volunteer. It collects: Project title, project date, name and contact information of volunteer group, volunteer's names and contact information, and whether they agree or do not agree to be photographed (photo release).

Additionally, form OF301 and form OF-301a have been updated as follows:

OF-301: Throughout the form deleted the word "work" or "working" to clarify volunteer roles as not employment.

- Block 7 - Added check boxes for "Campground maintenance", "GIS/GPS", "Trail maintenance".
- Block 8 - Added "or GIS/GPS" to "Map reading".
- Edited Block 9 for clarity.
- Block 11b - Added request for name of organization, contact name, phone # or email address.
- Block 14 - Changed "specify" to "list"; changed "influence" to "impact".
- Block 15c - Added "Check all that apply".
- Block 16 - Deleted "three" and "specific".
- Block 19 - Changed from a blank field in which to provide detailed responses to a block for indicating how the applicant heard about the opportunity. Added check boxes for different media.
- Block 20 - Deleted "(Sign in ink)".

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OF-301a: Blocks 1 & 2 are new – Check boxes for “Individual” or “Group”

- Block 4 is new – “Agreement #”
- Blocks 5 and 7 were one block on old version
- Block 13 – edited age categories
- Block 14 is new – added “Ethnicity & Race (Optional)” explanation of collection of this data; added check boxes for ethnicity, race, veteran status, disability yes/no.
- Blocks 15-19 - Repositioned “Emergency Contact Information” blocks.
- Blocks 20-23 – Retitled/repositioned.
- Block 24 – Titled description area as “Volunteer/Service Activity Abstract”.
- Block 25 is new. Deleted “International drivers license”.
- Blocks 26-32 – Repositioned.
- Block 31 – Removed “Name of sponsoring organization” and “Name of volunteer duty station”.
- Block 33 – Retitled “Volunteer & Group Leader Affirmation”; added check box for non-consent to being photographed”. Added new field for (Name of Federal Agency”.
- Public Burden Statement – updated to current version.

Once a volunteer has signed form OF-301a *Volunteer Service Agreement*, they become a Federal Entity in relation to the volunteer service work performed. All information collected from volunteers after becoming a Federal Entity is associated with the work performed in the volunteers’ official capacity, and is not covered by the Paperwork Reduction Act (PRA). For the purposes of PRA, the following forms and the associated burden that had been included in previous submissions are being removed from this submission:

- FS-1800-24 Volunteer Annual Report
- FS-1800-25 Volunteer Timesheet
- FS-6500-229 Claim for Reimbursement
- ENG Form 4882R Volunteer Service Record
- Form 10-67 Volunteer Claim for Reimbursement

**PLEASE NOTE:** With this submission, the forms associated with this request will be classified as “Common Forms”, and with this submission the Agency will no longer account for the participating Agencies’ burden as had been done in previous actions under this OMB control number. Upon OMB approval of this request, participating Agencies will be responsible to account for their own burden as separate requests to OMB.

**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,**

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**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.**

Electronic versions of the OF-301 form can be found at [www.volunteer.gov](http://www.volunteer.gov) and <http://www.fs.usda.gov/volunteer>.

Electronic or hardcopy completion of the OF-301 is offered; the completed form can be emailed or hardcopy mailed to the selected Forest Service office, or if the applicant is using [www.volunteer.gov](http://www.volunteer.gov) the form can be submitted electronically.

The OF-301a must include original signature on a hardcopy, and therefore must be printed and mailed, or scanned and emailed.

Form OF-301b is typically completed just prior to a volunteer project, often on the day of the event as volunteers arrive at the event and therefore is usually completed in hardcopy. Representatives of an organized volunteer group with whom the agency already has an OF-301a may scan and submit by email the OF-301b if the agency representative has agreed to this method.

**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 OF-301 suite of common forms was developed to eliminate duplication of efforts among FITV member agencies by streamlining cumbersome systems for referral between agencies. This suite of forms is available for use by all Federal natural and cultural resource agencies.

OF-301a provides a generic volunteer agreement format for all participating agencies. OF-301b provides a group volunteer sign-in sheet which eliminates the need for multiple OF-301a forms in a group volunteering situation.

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

Information collected is the minimal necessary for program participation. The OF-301b was developed to minimize the number of forms collected from members of non-profit organizations; it eliminates the need for multiple OF-301a forms when a volunteer group, small or large, serves on a project.

**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 the information is not collected, natural resource agencies will be unable to recruit and/or screen hundreds of thousands volunteer applicants that contribute millions of hours of service valued at hundreds of millions of dollars annually, and subsequently administer and operate volunteer programs. Data is collected as infrequently as possible, given that it is generally collected once and updated only as necessary.

**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**

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**than quarterly;**

Form OF-301b is completed once per volunteer project, and therefore may be collected more frequently than quarterly.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- Due to the nature of the application process for participation in an event, although not required to do so, respondents typically prepare the applications in fewer than 30 days of receipt.
- **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 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 September 13, 2013 (FR Vol. 78, 178). Two comments were received.

One comment received falls outside the scope of the comment request, and no response was warranted.

The second comment received was from a participating Agency, commenting on their approval of the proposed changes to the forms.

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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.**

**Participating Agencies and Contact Information**

These interagency forms are part of an effort by participating agencies to adopt standardized forms. Table 2 lists the agencies currently participating (or who have participated in the past) as proponents of this information collection. These agencies are members of the Federal Interagency Team on Volunteerism and were contacted to obtain their views on availability of data; frequency of collection; the clarity of instructions and record keeping; disclosure or reporting format; and data elements to be recorded, disclosed, or reported.

TABLE 2: PARTICIPATING AGENCIES AND CONTACT INFORMATION

Agency	Contact Information
USDA - FS	<a href="mailto:mmazyck@fs.fed.us">Merlene Mazyck</a> , 202-205-0650, mmazyck@fs.fed.us
National Park Service	Joy Pietschmann, 202-513-7141, <a href="mailto:Joy_Pietschmann@nps.gov">Joy_Pietschmann@nps.gov</a>
National Resources Conservation Service	Michele Brown, (515) 289-0325, <a href="mailto:Michele.Brown@ia.usda.gov">Michele.Brown@ia.usda.gov</a>
Army Corps of Engineers	Heather Burke, (503) 808-4313, heather.d.burke@usace.army.mil
Fish and Wildlife Service	Deborah Moore, (703) 358-2386, <a href="mailto:Deborah_Moore@fws.gov">Deborah_Moore@fws.gov</a>
Bureau of Reclamation	Amy Sjerven, (303) 445-2849, <a href="mailto:asjerven@usbr.gov">asjerven@usbr.gov</a>
US Geological Survey	Cheryl Smith (703) 648-6105, <a href="mailto:cherylsm@usgs.gov">cherylsm@usgs.gov</a>
Bureau of Land Management	Linda Schnee (202) 912-7453, <a href="mailto:lschnee@blm.gov">lschnee@blm.gov</a>
Bureau of Indian Affairs	Fredericka Joseph, (703) 390-6324, fredericka.joseph@bia.gov
National Oceanic and Atmospheric Administration	Tracy Hajduk, 301-713-7279, tracy.hajduk@noaa.gov

The above-listed persons are Volunteer Coordinators for their respective federal agencies and are members of the Federal Interagency Team on Volunteerism. Via a series of meetings during 2012 and early 2013, these staffers provided input on the desired content, format, and collection processes for this collection of 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.**

Volunteers and volunteer coordinators in three Regions of the US Forest Service were consulted via telephone and email for their feedback on the forms in this collection.

General comments were that the forms and information being requested are easy to understand and that the forms are very similar to the current forms. It would take about 3 to 10 minutes to fill out each form.

1. OF-301b, Group Sign Up Form:
  - Respondents asked how biosocial data would be collected for groups, since there are no fields for these data on the sign up form.



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- The Forest Service responded that volunteer group representatives are responsible for collecting these data for their volunteers and providing it as anonymous, aggregate data to the Forest Service.
- Another respondent noticed there was not a field for the date of the project/sign-up; a field for the date was added.
- Appreciation was expressed for the checkbox for photo release.

2. OF-301, Volunteer Application:

One respondent suggested adding a field for RV size, and another asked if a field for References could be added. The Forest Service and its sister federal agency representatives response is that the RV information could be collected verbally from the applicant, and that there is not enough room on the form for references.

3. OF-301a, Volunteer Agreement:

- One respondent noticed there was no field for Reimbursements (as there is on the current version); the Forest Service added a field for Reimbursements.
- Another respondent felt certain boxes (fields) could be reduced in size to save space on the form. The Forest Service reduced the size of some fields.
- One person asked if the form really needs a street address for an EMERGENCY contact. The Forest Service responded that if contact could not be made by phone, an in-person visit would be made if necessary.
- Another respondent asked if the Agreement number (box 4) could have the correct number of slots in this location.
- The Forest Service responded that other agencies' numbering conventions (if any) may be different so the field is left un-segmented.

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

When applicable and allowed by agency regulations, volunteers receive per diem and reimbursement for incidental expenses. Agencies may have regulations that allow granting of monetary or non-monetary awards for volunteer service.

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

Privacy Act System of Records OPM/GOVT-1 covers the collection of this information. This system of records was last published in the Federal Register on June 19, 2006, pages 35342-35347, Vol. 71. In addition, Privacy Act System of Records USDA/OP-1 covers Department of Agriculture records (Forest Service, et al); this system of records was last published in the Federal Register on January 28, 1998, page 4213, Vol. 63.

Please see attached supplemental document entitled *Volunteer Website Screenshots* which shows the presence of online Privacy Act statement and Burden Statement on [www.volunteer.gov](http://www.volunteer.gov) and <http://www.fs.usda.gov/volunteer>.

**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**

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**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.**

There are no 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.**

Please refer to supplemental document entitled *0596-0080 Volunteer Application Burden-Cost Spreadsheet* for respondent burden and cost estimates.

**Please note:** with this submission, the Agency is requesting that these forms be converted to *Common Forms*. This submission will only report the Agency’s burden, and not the burden of participating Agencies as had been done in previous actions for this OMB control number. Upon approval of this request, participating Agencies will become responsible to report and account for their individual burden to OMB independently.

The estimate of the number of respondents was calculated by averaging annual Volunteers accomplishment report data for Fiscal Years 2011 - 2013. Forest Service units reported engaging an average of 78,314 volunteers annually.

Based on 2013 data (see Table 3 below) provided by local units on each of the nine Forest Service regions, of the total 5,872 volunteers reported, approximately 75% of volunteers were engaged as part of a group. Thus, about 25% completed the OF-301a *Volunteer Service Agreement* as a single participant/individual.

**TABLE 3: 2013 VOLUNTEERS & PERCENTAGE IN GROUPS AS REPORTED BY LOCAL UNITS ON THE 9 REGIONS**

	R1	R2	R3	R4	R5	R6	R8	R9	R10
<b>Location</b>	Spotted Bear RD	Canyon Lakes RD	Espanola RD	Bridger-Teton NF	Sierra NF	Deschutes NF	Pisgah NF	Midewin NP	Tongass NF
<b>Staff Contact</b>	Deb Mucklow	Kristy Wumkes	Jennifer Sublett	Angelica Cacho	Chor Yang	Sean Farrell	Michelle Mitchell	Allison Cisneros	Travis Mason-Bushman
<b># of Volunteers (5,872 total)</b>	350	615	388	612	493	1500	364	1400	150
<b>% in groups (75% average)</b>	70%	73%	77%	85%	92%	73%	90%	89%	33%

The frequency of response was calculated by the form type. Form OF-301 is not collected from every volunteer (see paragraph above). Form OF-301a is collected from either every individual volunteer and or an organization representative of a volunteer group. Therefore, the number of respondents represents the total number of volunteers and volunteer groups serving in a year. OF-301b forms will be collected from volunteer groups for a particular group project or volunteer event. As noted the average number of volunteers engaged by group was

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determined based on actuals reported by a local unit in each of the nine regions.

The estimated time per response was calculated by testing and timing of form completion with program employees, by observation of the time that is historically required by respondents, and then calculating an average time for completion. To determine the time required for the proposed new form (301b), a Washington Office staff recruited 10 Washington Office volunteers to participate in a project to prepare a large shipping to the regions. Prior to working on the project the volunteers completed a 301b form. The total time for all 10 volunteers to complete the form was 19 minutes or 1.9 minutes per volunteer.

The estimated hourly wage estimate is from the Independent Sector [http://www.independentsector.org/volunteer\\_time](http://www.independentsector.org/volunteer_time) , which establishes in arrears (by one year) the average national value of a contributed volunteer hour in the United States. The current value is \$22.14 per hour.

**Record keeping burden:**

There is no record keeping burden placed upon respondents in relation to this Information Collection.

- 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.**

TABLE 4: COST TO GOVERNMENT

ACTION ITEM	PERSONNEL	GS LEVEL	HOURLY RATE*	HOURS	SALARY/COST
Employee labor for printing and storing the forms	Technician	7	\$21.65	1,850	\$40,053
Employee labor, travel, and materials for collecting the information	Technician	7	\$21.65	13,000	\$281,450
Employee labor for evaluating the collected information	Technician	7	\$21.65	23,900	\$517,435
Cost of printing and storing of 92,000 forms at \$.20 per form					\$18,400
<b>Total cost to government</b>					<b>\$857,338</b>

\*Rates derived from OPM salary table for current year, GS-7 step 5

[http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/g\\_s\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/g_s_h.pdf)

- 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 responses in this request have decreased from

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1,672,000 to 106,014 due to:

- A reduction in the number of different collection instruments reported in this submission, resulting in an estimated reduction of 644,000 responses
- the conversion of this request to *Common Forms*, whereby Forest Service is now only reporting its own burden estimates, and not aggregating the usage of all Federal Agencies, as had been done in previous actions under this OMB control number, resulting in an estimated reduction of 769,123 responses
- The new Group Sign-Up Form will reduce the number of responses by collecting one response per volunteer group during in-field ad hoc sign-ups, as opposed to one response per group member, resulting in an estimated reduction of 152,863 responses

Correspondingly, the estimated burden hours has decreased from 418,500 hours to 17,368 for the same reasons above.

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

Other than inclusion in general agency reports, there were no plans for publishing or tabulation of volunteer information.

**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 Burden Statement will be displayed on all information collection instruments.

To avoid possible confusion and to fully promote the volunteer participation by avoiding situations where the volunteer forms may appear to be expired, the Agency requests that we not display the expiration date on the information collection instruments.

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

The Agency can certify that this request complies with 5 CFR 1320.