

Peace Corps – Office of Volunteer Recruitment and Selection
Peace Corps Confidential Reference Form PC-1532
OMB Control Number 0420-0006
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.

Peace Corps uses the confidential reference form in order to learn from someone, who knows a volunteer applicant and his or her background, about whether the applicant possesses the necessary characteristics and skills to serve as a Volunteer. See 22 CFR 305.4 (eligibility and selection standards for Peace Corps volunteer 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 Placement team, in the Office of Volunteer Recruitment and Selection, uses the Peace Corps Confidential Reference Form as an integral part of the selection process to determine whether an applicant is likely to succeed as a Peace Corps volunteer.

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 includes the Peace Corps Confidential Reference Form in its web-based application process. Applicants send the Peace Corps Confidential Reference Form to their references electronically, via the website. References return the form electronically, via the web service. To ensure equal availability of the form to those without computer capabilities, hard-copies of the form are made available upon request. When an applicant requests that Peace Corps send a hard copy of the form, Peace Corps provides the references with postage-paid envelopes.

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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 Peace Corps Confidential Reference Form provides information concerning an applicant's skills and character from people who are familiar with the applicant; such information exists nowhere else. In cases where an applicant has reapplied to serve as a Volunteer (either to serve an additional term, or because the applicant was not selected previously for any reason), Placement staff can refer back to the references already on file, if the prior application is less than two years old and the application has remained active. Peace Corps requires that an applicant provide new references if the prior references are more than two years old, or if the file has become inactive. A file would become inactive (even if it is less than two years old) if the applicant voluntarily withdrew their file or if the applicant was given a rejection by a member of Placement.

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 from the Peace Corps Confidential Reference Form does not impact small businesses or other small entities in any capacity.

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 were unable to collect the reference information requested on this form, the agency would run the risk of sending unqualified or unsuitable Volunteers into foreign countries which could potentially risk the reputation and effectiveness of the Peace Corps program, and even more importantly potentially diminish the safety and protection of all of our Volunteers, and the communities and children they serve.

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;**

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- * 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.**

Peace Corps requests, but does not require, that the applicant's reference form is returned within 7 days in order to facilitate the expedited processing of the applicant's application. Once the form is returned Peace Corps is able to continue processing the applicant's application so that a determination of whether the applicant is qualified and suitable to serve as a Peace Corps Volunteer can be made.

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

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consultation in a specific situation. These circumstances should be explained.

The agency's notice was published in the Federal Register on October 14, 2014 [79 FR 61671]. No public comments were received during the 60-day period. The agency's 30-Day Federal Register Notice was published on December 24, 2014 [79 FR 77537].

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.

Respondents are informed that the Privacy Act, 5 U.S.C. § 552a(k)(5), provides that Peace Corps may keep their identity confidential, if so requested. The form has a box to check if the respondent does not authorize the Peace Corps to identify him or her as the source of the reference. The form also has a box to check indicating that the respondent authorizes the Peace Corps to identify the respondent as the source.

The agency's policy for responding to Privacy Act requests from individuals for copies for references is as follows:

- a. If one or more person(s) in the group of an applicant's references requests confidentiality, no copies of the references are released. Since the applicants provide the names of the references, the applicants could determine who requested confidentiality. A reference summary is released with generic information containing nothing identifiable
- b. If requested, copies of all the references are released, but only if no one has requested confidentiality.

Privacy Act notices are printed on the form for assurance of confidentiality. It reads: (taken from the Reference Form)

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

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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 in its entirety to the applicant, I realize that a summary of this reference may be released without my approval.

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.

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 confidential reference form, 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 from whom the information is requested will be the following: “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. Please include any concerns that you may have about this applicant

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working with children while in the Peace Corps, or other information that may inform our assessment of the applicant's suitability to serve as a Peace Corps 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.**

Estimated burden (hours) of the collection of information:

- a. Average Number of Annual Applicants
(complete the application process): 20,000
- b. Number of references required per applicant: 2
- c. Estimated Number of reference forms received: 40,000
- d. Frequency of response: One time
- e. Completion time: 10 minutes
- f. Annual burden hours: 6,667
- g. Number of forms received electronically (99%): 39,600
- h. Number of forms received hardcopy (1%) 400

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).

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*** 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.**

There is no total annual cost burden to respondents or record keepers.

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 (1% of 30,000 forms)

Printing <i>(includes cost of paper, ink, printing labor)</i>	\$ 500
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Mailing out of form to references (\$0.49 (postage cost) x 400 (#of mailings))	\$ 196
Return postage costs (\$0.49 (postage cost) x 400 (#of mailings))	\$ 196
Analyzing information and processing (see table below for calculation of labor hours)	\$85,344
TOTAL per annum	\$86,236

Number of reference forms reviewed by a Placement Specialist: (40,000 completed applications x 2 reference forms each / 48 Placement Specialist)	1667
Average amount of time a Placement Specialist reviews reference forms: (1667 forms x 1 minutes per form / 60 minutes)	28 hours
Labor cost for review by all Placement Specialists: (20 hours / 2087 hours per year = 0.009 of a Placement Specialists' annual salary 0.013 of a Placement Specialists' salary x \$53,884 annual salary of a Placement Specialist \$700 x 48 Placement Specialists)	\$33,600
Amount of time a Placement Specialist follow up with references (if needed) (2% of annual labor hours x 2087 hrs = 42 hrs)	42 hours
Labor cost for follow up with references by Placement Specialists (PSs): (42 hrs / 2087 hrs = 0.02 annual salary of a PS 0.02 of a PS annual salary x 53,884 annual salary of a PS \$1078 x 48 PSs)	\$51,744
COST of TOTAL LABOR HOURS	\$85,344

Total annual cost to the federal government **\$171,580**

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

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An additional question has been added to the Peace Corps Confidential Reference form, but the burden has not changed.

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.

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.

N/A

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.