

## **A. Justification (November 2015)**

- 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.**

Collection of this information is necessary to document service of volunteers as required by FPM Supplement 296-33, Subchapter 33. Agencies are authorized to recruit, train and accept, with regard to Civil Service classification laws, rules, or regulations, the services of individuals to serve without compensation. Volunteers may assist in any agency program/project and may perform any activities which agency employees are allowed to do.

Volunteers have been a valuable human resource to the Natural Resources Conservation Service (NRCS) since 1985. The 1985 Farm Bill significantly increased the agency workload without increasing the staff. Volunteers have been instrumental in assisting paid staff to meet the agency mission. Volunteers are permitted to perform a wide range of activities such as planting of vegetative material, tours and demonstrations, administrative/management functions, environmental conservation education and outdoor classrooms, developing computer programs and assisting with data entry. Earth Team Volunteers must be 14 years of age.

- 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 will be used by supervisors of volunteers and the International Programs Division to evaluate potential international volunteers and evaluate the effectiveness of the volunteer program. Reference 7 U.S.C. Sections 1527 and 2272 of PL 97-98, USDA Departmental Regulations Number 5230-1, and Personnel Letter No 311-1. Use of two forms is requested.

Form NRCS-PER-002, Volunteer Interest and Placement Summary, is mandatory for foreign visitors and optional for all other potential volunteers; however, it may help a supervisor determine the interests, skills, and needs of an applicant. This form will be used by the International Programs Division when reviewing a foreign visitor's information and may be used by the volunteer's supervisor. The volunteer supervisor decides whether to use this form or not. Additionally, Form NRCS-PER-002 is sent to each person who calls the National Earth Team Office requesting information on the volunteer program. During FY15, the National Earth Team Office distributed 119 copies of the NRCS-PER-002. If there is an appropriate job available to suit a person's skills and interests, the agency follows up by having the applicant complete Form OF-301A, Volunteer Services Agreement for Natural Resources Agencies, is approved under 0596-0080. Public reporting burden for this collection of information is approximately 4 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

Form NRCS-PER-004, Time Sheet, is available to all volunteers to record the hours worked as a volunteer for NRCS. This form is for the volunteer's benefit in documenting their activities for protection under the Tort Claim Act and the Workers' Compensation. Public reporting burden

for this collection of information is approximately 4 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The above mentioned forms are placed in a volunteer “case file” and will be destroyed three years after the volunteer has completed service. In the event that a volunteer is injured, the “case file” will be transferred to an Official Personnel Folder.

- 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.**

All forms are available in an electronic format and can be submitted electronically via the E-Gov Web site at [www.sc.egov.usda.gov/](http://www.sc.egov.usda.gov/).

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in Item 2 above.**

NRCS has only one volunteer program. Information retained by this program is not duplicated.

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

The collection of this information does not impact small businesses or other small entities. There are no small businesses impacted by this collection.

- 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.**

Form NRCS-PER-002, Volunteer Interest and Placement Summary, is mandatory for International volunteers and optional for all others. This form assists International Programs Division when reviewing foreign visitor’s information and assists the volunteer supervisor in placing the volunteer in a position which is beneficial to the volunteer and agency. Collection of this form occurs only once and that is at the beginning of voluntary service. Without this information, the agency would not know which individuals are interested in volunteering. Also, the agency would not know which program/project they selected.

Form NRCS-PER-004, Time Sheet, is an optional form and provides the volunteer or the volunteer supervisor a simplified method for tracking the volunteer’s time. Collection of this information is required semi-annually.

- 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:**

At no point are respondents required to provide information 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;**

At no point are respondents required to provide information in fewer than 30 days.

- **requiring respondents to submit more than an original and two copies of any document;**

Respondents are required to provide only the original copy.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Volunteer case files remain active as long as the volunteer continues to provide service to the agency. Once a volunteer is terminated, case files are retained for three years and then destroyed.

- **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:**

No statistical survey information is required for the Volunteer Program – Earth Team.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

No statistical survey information is required for the Volunteer Program – Earth Team.

- **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**

No information collection includes a pledge of confidentiality.

- **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.**

Respondents are not required to submit proprietary trade secrets or other confidential information.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5CFR 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.**

On October 16, 2015, we published a 60-day notice in the Federal Register Volume 80, Number 207, pages 65692 -65603. The Agency did not receive any 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 National Volunteer Coordinator is a member of the Federal Interagency Team for Volunteerism. The team consists of nine other members who are responsible for Federal volunteer programs. This group meets quarterly and documentation needs, reporting procedures and format are discussed and ideas shared.

Volunteers and employees of NRCS are asked to provide input on Forms NRCS-PER-002 and NRCS-PER-004 on a regular basis. Feedback from these individuals indicates that the collection method is simple and easy to follow.

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

Service under the Volunteer Program – Earth Team must be without compensation from NRCS.

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

The Freedom of Information Act (5 U.S.C. 552) and the Privacy Act of 1974 (5 U.S.C. 552a) generally provides confidentiality to the extent possible that such records are protected from disclosure.

**11. Provide additional justification for any question 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.**

The Volunteer Program – Earth Team does not request information of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of responses, annual hour burden, and an explanation of how the burden was estimated. 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.**

Up through September 21<sup>th</sup> of FY15, the Earth Team consisted of 13,158 volunteers. Of these volunteers, 2,598 are individuals and 10,560 are members of groups and only the group leader (968) is required to complete Form NRCS-PER-004. Therefore, 3,566 volunteers will be asked to complete Form NRCS-PER-004 (4 minutes response per form).

Approximately 200 potential volunteers will complete Form NRCS-PER-002 one-time at the beginning of service (4 minutes response per form).

Form Number And Title	# of Respondents	# of Responses Annually Per Respondent	Total Annual Responses	Estimated Hours Per Response	Total Annual Hour
NRCS-PER-002 (Volunteer Interest & Placement Summary)	200	1	200	4 Minutes	13
NRCS-PER-004 (Time Sheet)	3,566	2	7,132	4 Minute	475
OF-301A 0596-0080 RCF	560	1	550	15 Minutes	550
<b>Total</b>	<b>3,766</b>	<b>3</b>	<b>7,322</b>	<b>8 Minute</b>	<b>488</b>

NRCS does not project an increase in volunteers in the next three year period.

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

As individuals are placed in volunteer positions with the agency, the agency will utilize an hourly rate established by the Independent Sector of \$22.55 per hour. Therefore, the estimated annualized cost to respondents is equal to \$10,981.85 (\$22.55 X 487).

**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 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 is no cost burden to respondents resulting from the collection of information. There are no capital/start-up costs or ongoing operation/maintenance costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses and any other expense that would not have been incurred without this collection of information.**

Record Keeping Burden to NRCS Staff using GS-9 as average grade of coordinators:

- Form NRCS-PER-002
  - i. 200 responses X three minutes = 600 minutes/10 hours

ii. 10 hours X \$22.96	\$229.60
- Form NRCS-PER-004	
i. 3,566 responses X one minute = 3,566/59 hours	
ii. 59 hours X \$22.96	<u>\$1,354.64</u>
TOTAL NRCS Staff handling (69 X \$22.96)	\$1,584.24

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

This is a revision to a currently approved collection resulting in an adjustment change. The change is due to a decrease in the number of respondents from the last approval and a decrease in the burden hours. In 2012, the number of respondents was 5,951, the respondents now are 3,766 and the burden hours were 776 now the burden hours are 488. The reason for the change is due to a decrease in the number of volunteers participating in the program.

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

There are no plans to publish any information relating to the information collected.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that display would be inappropriate.**

Displaying the OMB approval information does not pose a problem.

**18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

No exceptions to the certification statement identified in Item 19.

