

The 2016 Supporting Statement for OMB 0596-0084 **YOUTH CONSERVATION CORPS APPLICATION & MEDICAL HISTORY**

Terms of Clearance: There are no terms of clearance on the current OMB approval.

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.**

Statutes and Regulations: 16 USC 1701-1706, Chapter 37 – Youth Conservation Corps and Public Lands Corps, Subchapter I – Youth Conservation Corps (Youth Conservation Corps Act of 1970 (P.L. 91-378; 84 Stat. 794) as amended in 1972 (P.L. 92-597) and in 1974 (P.L. 93-408), hereafter referred to as “the Act.”)

This information collection request is submitted on behalf of the USDA Forest Service (FS) and the Department of the Interior (DOI) Fish and Wildlife Service (F&WS) and National Park Service (NPS) to collect information from applicants to evaluate the eligibility of youths for employment with the Youth Conservation Corps (YCC) and medical history information from selected applicants to determine their ability to fully participate, and to allow the agencies to make necessary reasonable accommodations as appropriate. Under the Act, the FS and the DOI cooperate to provide seasonal employment for youths between 15 to 18 years old.

The purpose of the YCC is to further the development and maintenance of the natural and cultural resources of the United States by American youth, and in doing so, prepare the young adults of this country for the responsibility of maintaining and managing these resources for the American people. Three equally important objectives, as reflected in the Youth Conservation Corps Act, are:

- Accomplish conservation work on the land,
- Provide gainful employment for 15 through 18 year old males and females from all social, economic, ethnic, and racial classifications; and
- Develop an understanding and appreciation in participating youth for the Nation’s natural environment and heritage.

The application is collected from applicants and is evaluated by participating agencies to select candidates to the program. Youths seeking training and employment with YCC must first complete the application form FS-1800-18. Once selected for enrollment, the medical history form FS-1800-3 is completed.

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.)

Below in table 1 is a list of the information collected.

Table 1

FS 1800-18--APPLICATION		FS 1800-3—MEDICAL HISTORY	
Do you have a preference for working with a particular land management agency?		Name	
Do you have a specific land management location where you would like to work?		Address	
Applicant Name		Date of birth	
Gender		Status of health coverage	
Address		Health Insurer and policy number	
Email		Inventory of prior health conditions	
Date of birth		Primary Care Physician contact information	
Age			
Phone 1		Option to attach description of health conditions	
Phone 2			
Best way & time to be reached		Medications and allergic reactions	
What date can you start?		Option to attach explanation of medications and allergic reactions	
Where applicant learn about YCC?		Immunization history	
Emergency Contact Information Name	✓	Option to attach immunization record	
Emergency Contact Information Email		Applicant signature and date	
Emergency Contact Information Phone 1		Emergency contact information	
Emergency Contact Information Phone 2		Alternate or preferred form of emergency contact (optional)	
Relationship	✓	Parent/Guardian signature and date	✓
Reasonable accommodation		Certification of Allowance for YCC Officials to provide medication including type and dosage	✓
Felony/criminal offenses		Reviewing official's signature and date	
Essay Question: In 250 words or less, please explain why you want to serve as a YCC Crew Member.			

Applicant and parent signatures and date	✓		
--	---	--	--

This information is used by federal agency staff and partners that provide oversight to or coordinate youth employment activities to evaluate and select applicants seeking seasonal employment.

The essay question concerning why the applicant is interested in YCC may be considered burdensome for some applicants, but is included to help selecting officials ascertain applicants' willingness and ability to "*develop an understanding and appreciation for the Nation's natural environment and heritage*", one of the three primary objectives of the YCC Act. This question is also an effort to support youth learning objectives to improve writing skills and promote the ability to advocate for one's application for employment without benefit of a face to face interview.

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.

All persons aged 15-18 years seeking seasonal employment through the YCC program must complete form FS-1800-18 (YCC Application). For applicants under the age of 18, parental signatures and date are required.

Only those applicants whom have been selected for employment must complete form FS-1800-3 (Medical History). For applicants under the age of 18, parental signatures and date are required.

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

Form FS-1800-18 (YCC Application) is an application form used by participating agencies to evaluate each applicant's eligibility for and interest in employment.

Form FS-1800-3 (Medical History) provides information needed to determine the physical suitability and any special medical needs of selected applicants. This provides a record for both the participant and the agency and is collected for the safety of both the participant and other participants of the program.

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?

These forms are available electronically on a number of websites. Forms should be completed electronically and then printed or submitted electronically. The YCC site location will provide detailed application instructions on how the form should be submitted by the respondent.

Applicants are required to submit a paper copy of the completed forms with original signatures.

e. How frequently will the information be collected?

The program is seasonal and information is collected annually. Individuals wishing to participate must reapply each year.

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

Only participating agencies and partners who manage YCC programs on behalf of the participating agencies within the FS and the DOI will have access to the information. The participating agencies are FS and the DOI F&WS and NPS.

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

Please refer to table 1 above for details of the additional information to be collected. Form FS-1800-18 has been significantly updated to include information collection that will improve program staff ability to screen, evaluate, and assign selected applicants and communicate with applicants utilizing diverse the range of communication tools that were not previously included on the application.

Form FS 1800-18 has been updated for more efficient review of the applicant's interest based on what information is needed to make a selection and to remove added burden from the application process. Also, the format has been updated to target youth audiences to YCC programs. Finally, forms have been made fillable for electronic submission.

The structure and format of Form FS 1800-18 has been substantially updated to increase applicant knowledge regarding the YCC Program Overview, Eligibility Requirements, Benefits, Structure and instructions on How to Apply on Page 1 of the form. Also, the form is now organized by outlining questions to aid the applicant to be able to generate a complete application.

Finally, significant changes to the form includes questions regarding reasonable accommodations and previous criminal history. Applicants will be responsible for describing conditions for which they may need to request accommodation. Although added burden, answering these questions allow YCC to provide equal employment opportunities to all interested youth applicants. Applicants are also required to answer questions regarding criminal and felony offenses to detail criminal history. While past criminal history will not disqualify an applicant, individuals seeking employment must comprehensively and truthfully provide information on all instances related to criminal background.

Other changes include: increased size of YCC logo; included all interagency logos—decreased size and moved agency logos to the bottom of the page; addition of statement regarding residential site locations; responses

regarding Gender; responses regarding source of learning about YCC; and refined language regarding preference for YCC site location.

Previous questions regarding ethnicity and race information, once collected to aid the agencies in compliance with the Civil Rights Act which prohibits discrimination, have been removed from the form. In addition, questions regarding school and school name were removed to reduce the burden of information collection on applicants. Privacy Act/Non Discrimination/and Burden Statements were moved to the end of the application.

Certain essay questions regarding Work, Community Service, and Extra-curricular Experiences have been removed from the form. Applicants are now required to respond to an essay question regarding on interest in YCC and General Demographic and Education questions to help selecting officials ascertain applicants' willingness and ability to "develop an understanding and appreciation for the Nation's natural environment and heritage," one of the three primary objectives of the YCC Act.

Form FS 1800-3 was updated to improve program staff ability to screen, evaluate, and assign selected applicants and communicate with applicants utilizing diverse the range of communication tools that were not previously included on the application. Form FS 1800-3 was updated to include Parent/Guardian signature and date and the certification of Allowance for YCC Officials to provide medication including type and dosage.

In an effort to reduce burden, the Medical History form remains to be collected only after an applicant has been accepted for enrollment.

At this time, the Forest Service is working on translating the forms into Spanish. FS is currently working to have the current drafts of the approved versions of both forms translated into Spanish. As the process is in progress, once approved, FS will initiate a change request with OMB to approve the Spanish language versions of the forms.

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.

The forms are available to potential participants at <https://youthgo.gov/> and the [USDA Forest Service YCC website](#). The forms may be completed electronically, printed, and then signed. Participating agencies require submittal of a paper copy with original signatures. Interested members of the public may submit an application online, but a signed (by both the applicant and a parent or guardian) hard copy of the application must be submitted along with the Medical History form if an applicant is accepted for employment.

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 use of the same forms by the FS and participating DOI agencies avoids duplication in the application process. The YCC is a unique program that is only operational on public lands within the FS and DOI F&WS and NPS with specific requirements for participation. There are no other existing application forms suitable for YCC purposes.

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

This information collection has no impact on small businesses 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.

This information collection is necessary to carry out this legally mandated program. The use of the FS-1800-3 (YCC Application Form) ensures uniform collection of information from potential program participants. The information collected provides participating agencies with data needed to select program participants.

The Medical History form (FS-1800-18) ensures that adequate medical information is available, ensuring that participants have the ability to perform the work assigned. Failure to collect this information would create an unacceptable safety and liability risk.

If we are unable to collect this data the FS and DOI would be unable to select candidates to participate in a legally mandated program.

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;**

Although there is no requirement, due to the nature of the process of applying for employment, respondents may complete the application, and typically would complete medical history forms in fewer than 30 days from receipt. In general, recruitment and outreach takes place over a three month period. Applicants may submit their application anytime throughout the recruitment cycle or otherwise, as the application is available year round.

Applicants that have been selected for employment typically complete the form FS-1800-3 shortly after receiving notice of their acceptance to the program.

- **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 Title 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 Notice (FRN) was published on Federal Register /Vol. 81, No. 101 / Wednesday, May 25, 2016 Pages 33203 and 33204. FS received no comment(s) from the public in response to this FRN.

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. 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.

FS and DOI staffs collaborate regularly to share resources, streamline requirements, and establish common practices and procedures for joint programming, including YCC, to the extent possible. Erica Austin, Program Analyst Youth Programs Division for the National Park Service, and Phil LePelch, Visitor Services Specialist, Fish and Wildlife Service were consulted specifically regarding OMB 0596-0084. The Forest Service did not consult with anyone outside of the agencies on the two forms.

Our agencies use similar processes and procedures for recruiting YCC participants and collecting information from applicants including standardizing the collection of medical history only from selected applicants. We similar schedules and use the same forms and instructions to collect the data. Record keeping and reporting procedures are similarly conducted annually. Our

collaboration on the development of these forms have resulted clearly defined guidance for using the forms.

All agencies received considerable comments from local and regional YCC programs, applicant comments, and parental/guardian comments that reflect in the current format of the version of the forms including clarification for gender; the application process and where to send applications; and the removal of essay questions that do not provide insight into the interest and qualifications of an applicant.

Specifically, Bruce Perry assisted his son Christopher Perry and Brian Epps assisted his son Brian Epps, Jr. with completing the forms for the YCC program. The former and updated copies of the form were provided to gain insight on the functionality of the new format and questioning. Bruce and Christopher indicated confusion regarding the difference between residential and daily site locations and the full list of requirements to apply.

FS Response:

Clarified language regarding residential site locations.

Clearly outlined the eligibility requirements for how to apply to the YCC program
Changed the format to include a program overview, benefits, and how to apply page.

Daryl Lederle, FS Employee, reviewed the forms for clarity and found that more information was necessary regarding applicant certifications, targeting the form to youth audiences, and developing language regarding reasonable accommodations and criminal background for equal opportunity and liability.

FS Response:

Updated the look and format of the forms; included questions related to reasonable accommodation and criminal background; use of questions as headers to move applicants through the form; and the refinement of plain language for readability and understandability. Included information in the certification and signatures box to include detailed overview about the nature of the position and requirements for member eligibility information. We also included a parent/guardian signature requirement for certification for applicants under 18.

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

Payments or gifts will not be made to respondents of this information collection.

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

The information collected is stored and accessed as set forth in Privacy Act Systems of Records USDA/FS-27 – YCC Medical Records; USDA/FS-29 – YCC Enrollee Records; and USDA/FS-30 – YCC Recruitment System.

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 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.

Neither of the forms included in this request contain 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.

- **Indicate the number of respondents, frequency of response, 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.**

This renewal submission is for 8,599 respondents, 11,409 responses and 4,238 burden hours. See separate spreadsheet for individual breakout and cost.

The YCC-administering federal agencies were surveyed for the number of forms they have received annually in the past 3 years, and their anticipated usage over the next 3 years. Burden estimates are based on an analysis of the actual collection rates for the past three years, combined with a prediction of future interest in the program, and taking into account projected budgets, using professional judgment. Please note that the tracking numbers account for both forms FS-1800-18 and FS-1800-3. These numbers would also include the number of medical forms submitted since they only represent the applications of selected YCC member. The total number of applications received on the excel spreadsheet is an estimate since none of the agencies track applications which include those not selected to their programs.

Federal minimum wage is chosen for average income per hour. National minimum wage is reported by the Department of Labor which can be found at <http://www.dol.gov/whd/minwage/america.htm>. Specific wage information for youth in recreation jobs can be found at <http://www.dol.gov/whd/regs/compliance/whdfs18.pdf>. However for most applicants of the YCC program, YCC would be their very first employment opportunity, meaning that they are most likely unemployed at the time of application.

- **Record keeping burden:**

There is no record keeping requirement placed upon the respondents.

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.

The method used is a calculation of the number of hours a GS-7 Recreation Technician normally spends to print, store, collect, and analyze the forms on a Ranger District, National Park, or Refuge. Average GS-7 wage is \$16.77 per hour; this figure is multiplied by the number of hours such technicians would engage in these activities throughout the federal YCC agencies over one year.

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection.

Table 2. Estimated cost to Government

(a) Description of the Collection Activity	(b) Forms Processing Time per Applicant	(c) Estimated Average Income per Hour of Processor	(d) Total Estimated Cost per Applicant (b) x (c)	(e) Applicants per year	(f) Subtotal (d) x (e)
FS-1800-18: YCC Application					
FS	25.2 minutes (.42 hour)	GL-07 \$16.77/hour	\$7.04	3,499	\$24,633
DOI	25.2 minutes (.42 hour)	GL-07 \$16.77/hour	\$7.04	5,100	\$35,904
Subtotal					\$60,537
FS-1800-3: Medical History					
FS	14 minutes (.23 hour)	GL-07 \$16.77/hour	\$3.86	1,065	\$4,111
DOI	14 minutes (.23 hour)	GL-07 \$16.77/hour	\$3.86	1,745	\$6,736
Subtotal					\$10,847
TOTALS	46 minutes (.65 hour)	---	----	----	\$71,384

(a) Description of the Collection Activity	(g) Approval and Monitoring per applicant	(h) Estimated Average Income of Supervisor	(i) Total Estimated Cost per Applicant (g) x (h)	(j) Applicants per year	(k) Subtotal (i) x (j)
FS-1800-18: YCC Application					
FS	14 minutes (.23 hour)	GL-09 \$20.32/hour	\$4.67	3,499	\$16,340
DOI				5,100	\$23,817
FS-1800-3: Medical History					
FS	14 minutes (.23 hour)	GL-09 \$20.32/hour	\$4.67	1,065	\$4,974
DOI				1,745	\$8,149
TOTALS	28 minutes (.46 hour)	---	----	----	\$53,280

(a) Description of the Collection Activity	(l) Sub-total Item f	(m) Sub-total Item k	(n) Total Estimated Cost
FS-1800-18: YCC Application	\$60,537	\$40,157	\$100,694
FS-1800-3: Medical History	\$10,847	\$13,123	\$23,970
TOTALS	\$71,384	\$53,280	\$124,664

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

This renewal submission reflects a decrease in burden. The applicants have decreased by 3,411; responses decreased by 4,694 and burden by 1,721 hours. The decrease is due to significant budget cuts to the YCC program across all agencies, there is a projected decrease in the number of site locations offering YCC programming and Crew Member slots—thus a projected decrease in the number youths applying to the YCC. Also, the average GL-7 wage increased to \$16.77 per hour and the average GL-09 increased to \$20.32/hour.

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

Results of this information collection 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 valid OMB control number and expiration date will be displayed on all information collection instruments.

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

There are no exceptions to the certification statement. The agency is able to certify that the collection of information encompassed by this request complies

with 5 CFR 1320.