**Section A: Justification**

1. **Circumstances that make the collection of information necessary.**

The Peace Corps Act, in 22 U.S.C. 2504(a), gives the Peace Corps the authority to set the terms and conditions for enrollment of individuals as Peace Corps Volunteers.

Peace Corps uses the confidential reference form in order to learn from someone who knows an applicant and his or her background whether the applicant possesses the necessary characteristics and skills to serve as a Volunteer.

1. **By whom, how, and for what purpose the information is to be used.**

The reference form is a tool that the Peace Corps employs to ensure a standardized suitability review of applicants. The Assessment and Placement Officer requests the completion of the reference form and uses the information therein to assist in determining the suitability and competitiveness of the applicant.

The reference form is an integral part of the selection process to determine whether an applicant is likely to succeed as a Peace Corps volunteer.

1. **Consideration of the use of improved information technology.**

The reference form is an electronic document accessed through a web-based form. An applicant’s reference gains access to the form via an automated email that is sent if and when the candidate is contacted for an interview. The information provided by the reference is collected electronically and becomes part of the applicant’s record.

The reference form employs the use of information technology to make the collection of the data electronic, reducing time for references and the use of agency resources. The use of a standardized, automated electronic form improves the quality of the information collected by ensuring that the same information is received from all references. It also ensures the confidentiality of the content, as the reference submits the form directly to the Peace Corps, and not through the applicant.

1. **Efforts to identify duplication. Why similar information cannot be used.**

The reference form is the only document of its type used by the Peace Corps. The electronic nature of the form results in the automatic addition of this information to the applicant’s record, which means that a staff person will not need to ask for the information again.

In cases where an applicant has reapplied to serve as a Volunteer (either to serve an additional term, or because the applicant was not previously selected), Peace Corps staff can refer back to the references already on file, which are considered valid for two years.

**5. Methods to minimize the burden to small business if involved.**

N/A

1. **Consequences to the Federal program if collection were conducted less frequently.**

This information is requested from each respondent only once, although overall many persons who act as references are asked to respond. Countries overseas request the Peace Corps to provide trained volunteers to serve in their countries. Those Peace Corps Volunteers represent the United States in those countries. In order to ensure that the applicants selected as Volunteers meet or exceed suitability standards, the Peace Corps uses references as an evaluation tool. Without references, the Peace Corps would be unable to fully assess a candidate’s suitability for service, jeopardizing the best interests of the volunteers, Peace Corps, and the host countries.

1. **Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.**

No special circumstances exist that require the information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**8. Consultation.**

The agency’s 60-Day notice was published in the Federal Register on February 28, 2017 [82 FR 12143]. No public comments were received. The agency’s 30-Day notice was published on May 15, 2017 [82 FR 22356]. No public comments were received.

**9. Explain any decision to provide any payment or gift to respondents.**

There is no payment of gift provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents.**

Respondents are given the opportunity to request that their identity as the source of the reference be kept confidential.

References can remain confidential under 22 C.F.R. 308.14 (c) which details the specific exemptions, in this case reference confidentiality, for Peace Corps’ implementation of the Privacy Act of 1974.

The SORN is PC-17 Volunteer Applicant and Service Records and PCV Application PIA.

**11. Additional justification for any questions of a sensitive nature.**

The Peace Corps asks the following questions which can be considered of a sensitive nature:

* Do you know of any reasons why this individual should not work with children?
* Do you have any concerns about this individual’s use of drugs or alcohol?

These questions are necessary for the evaluation of applicants’ suitability to serve as a Peace Corps Volunteer. Conduct around children and drug and alcohol use are of particular importance to the Peace Corps. Therefore, the Peace Corps asks applicant references these questions to learn if the applicant has a history of misconduct.

**12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.**

Estimated burden (hours) of the collection of information:

Number of Respondents 18,000

Frequency of response: one time

Completion time: 10 minutes

Annual total burden hours across all respondents: 3,000 hours

The estimated total reporting burden was determined by first establishing the estimated number of respondents, which is the estimated number of applicants interviewed (9,000) multiplied by the number of references requested per applicant (two). That number is multiplied by the estimated completion time.

We estimate that it will take each reference ten minutes to complete the questionnaire. If a reference form is completed in hard copy, the data will be inputted into Peace Corps’ system by staff, and the original copy will be scanned and attached to the applicant’s electronic record.

**13. Estimates of annualized capital and start-up costs.**

There will be no cost to respondents.

**14. Estimates of annualized Federal Government costs.**

|  |  |
| --- | --- |
| Year operations & maintenance | $10,000 |
| Design, build, test & deploy | $5,000 |
| Total | $15,000 |

**15. Explanation of change in burden.**

The annual burden hour has decreased due to the following:

* Fewer reference forms are now collected.
* The Volunteer selection model now requires less staff time spent following-up with references.

**16. Information collections data planned to be published for statistical use.**

The information collected will not be quantified and/or published.

**17.** **Explanation for seeking not to display the expiration date for OMB approval of the information collection.**

N/A

**18.** **Exception to the certification statement.**

N/A