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.

Section 10(a)(4) of the Peace Corps Act authorizes the Director to accept gifts of voluntary services, money, or property, for use in furtherance of the purposes of the Peace Corps Act. 22 USC § 2509(a)(4). The information collected is essential to fulfilling this authority and acceptance of gifts. The Peace Corps Manual Section, MS 721, outlines the parameters for acceptance of gifts to the agency.

The Peace Corps currently has three online donation programs to receive donations in support of its mission, namely the Peace Corps Partnership Program, the Peace Corps Fund and the Let Girls Learn Fund.

The Peace Corps Partnership Program (Partnership Program or PCPP) was established in 1964 to link interested donors with grassroots development projects in which Peace Corps Volunteers are involved around the world. The Partnership Program supports Volunteers as they work with their host communities to identify a local need and design a sustainable solution.

The Peace Corps Fund was established in March 2011 as a means to receive non-PCPP donations to the agency that can be used to support special initiatives and other agency activities. The Let Girls Learn Fund was established in December 2014 in support of an agency program focused on expanding access to education for girls around the world.

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.

Peace Corps' Office of Gifts and Grants Management (GGM) uses the information to oversee and manage all private sector donations to the Peace Corps.

The type of information collected from potential donors to any of the funds includes name, address, gift amount, payment method and payment information, dedication message, donor intent, status as a returned Peace Corps Volunteer, consent to be listed in the agency's donor recognition page, consent to share name with Peace Corps Volunteer, and consent to receive information about agency activities and opportunities to donate to or partner with the Peace Corps. Personal information, such as credit card information, is necessary to: a) process donations to the agency, b) respond to donor intent regarding the donation (i.e. dedication message or in honor or in memory of or a restricted gift to support a specific activity or Volunteer community project), c) send donor recognition items, where applicable, and/or, d) send the requisite tax

acknowledgement letter.

The Peace Corps Manual, in MS 721, outlines the parameters for acceptance of gifts to the agency. Among those criteria is whether acceptance of the gift will either raise a question of impropriety or conflict of interest. To comply with this requirement, the Peace Corps asks for information about whether the donor is doing or seeking to do business with the Peace Corps.

3. <u>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.</u>

Peace Corps collects the information through electronic and mechanical means, namely via online donations (e.g., Peace Corps donation website, email), phone-in and mail-in forms. The agency receives the majority of this information via web-based technology application. This is a faster, more secure process and also reduces the amount of hard copy communication. [See attached forms]

Form #1 is the online donation form which collects information electronically via the agency's web portal. The donor is guided to click on tabs and input their information.

Form #2 is the phone or in-person form used when a donor calls the office to make their donation by phone or appears in person to the office. The donor is asked a series of questions and an authorized staff collects the information. This payment information is passed to the GGM Administrative Officer and then deleted or shredded.

Form #3 is the mail-in form. This information is delivered in hard copy to the GGM Administrative Officer and then deleted or shredded.

4. <u>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.</u>

The Office of Gifts and Grants Management is the agency office with oversight for the management and documentation of gifts and contributions made to the Peace Corps. No other agency office collects this type of information so there is no duplication issue.

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.

As the agency recommends and generally receives the majority of its information via web-based technology, this e-collection approach reduces the donation transaction cost and eliminates most hard copy communiqués on the part of small businesses or entities.

6. <u>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.</u>

The information is collected once, at the time of donation. Without the information, the agency would not be able to process the donations, provide confirmation and tax deductibility information to the donors, or otherwise manage the program.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances. Collection will be conducted consistent with 5 C.F.R. 1320.6 guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

The agency's 60-day notice was published in the Federal Register on November 10, 2014, 79 FR 66755. No public comments were received during the 60-day period. The 30-Day notice was published on March 24, 2015, 80 FR 15643. No public comments were received during the 30-day period

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The agency has determined that donors to the agency may receive an agencydesignated donor recognition gift commensurate with their giving level. The agency may continue or cancel this donor recognition item in the future. The donor recognition items

are for the donation, not the information provided.

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

Donors are informed during the donation process that no information will be shared with any third parties without the donor's consent. It is clearly stated that the information collected will be used to process contributions and to generate a confirmation receipt letter. The respondent has the option whether to authorize the Peace Corps to include their name on a Donor Recognition page on Peace Corps' website or to contact them about Peace Corps events and activities.

The donor making a gift in honor or memory of someone must also indicate whether they wish their name to be provided to the family of that person.

The donation webpage offers the following statement regarding security of the information collection process:

The secure server software (SSL) that processes Peace Corps donations is the industry standard and among the best software available today for secure commerce transactions. It encrypts all of your personal data including credit card number, name, and address, so that it cannot be read as the information travels over the Internet. You can tell when you are protected by encryption — the lock or key at the bottom of your browser changes color or is no longer broken. To use this option, you must have a browser that supports SSL (e.g. Microsoft Internet Explorer, AOL, or Netscape Navigator).

None of the information collected is released to the public without consent of the individual providing the information.

11. <u>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.</u>

No questions of a sensitive nature are asked.

12. Provide an estimate in hours of the burden of the collection of information.

Number of donations (respondents):

b. Estimated number of project applications received:

d. Frequency of response:

e. Completion time:

f. Annual burden hours:

g. Number of forms received electronically (92.2%)

13,000

820

One time

10 minutes

2,167 hours

11,960

h.	Number of f	forms received hardo	opy (7	.8%)	1,040
i.	Number of p	phone-in donations (2015-2017)	130

13. <u>Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).</u>

There will be no cost to respondents. Peace Corps will provide a return envelope that covers postage.

14. Provide estimates of annualized cost to the Federal government.

TOTAL per annum	\$ 12.340.25
Analyzing information and processing (8 hours per week/ x 52 weeks = 416 hours per year) (\$45,000 av salary @ \$22/hour x 416 = \$9,152)	\$ 9,152
Return postage costs (\$0.49 (postage cost) x xxx (#of mailings))	\$955.5.00
Printing (includes cost of paper, ink, printing labor) (9,100 TY letters x 1 copy @ \$0.05 b/c printout = \$455) (1,235 non-electronic donations x 1 copy @ \$.05 = \$61.75) Mailing (\$0.49 (postage cost) x 3,900 (mailings))	\$516.75 \$1,911

TOTAL LABOR HOURS

\$12,340.25

15. Explain the reasons for any program changes or adjustments.

The donation forms have been in use without a control number. The Office of Gifts and Grants Management became aware that such a collection needed to have PRA clearance, and thus work commenced with the FOIA office.

16. For collections whose results will be published, outline the plans for tabulation and publication.

This information will not be published for statistical use or complex analytical techniques.

The agency may on occasion, and with consent of the donor, acknowledge donors with a donor recognition listing by name.

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

N/A

18. Explain each exception to the certification statement.

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Our collection does not employ statistical methods.