The Supporting Statement for OMB 0596-0207

Outreach Opportunity Questionnaire

A. Justification

 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.

Law, Statutes, Regulations, and Policies:

- Civil Rights Act of 1964, as amended (42 U.S.C. 1971, 1975a 1975d, 2000a 2000h-6)
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency
- 7 CFR Part 15
- USDA Departmental Regulation 4300-2, Non-discrimination in Programs and Activities Receiving Federal Financial Assistance from USDA
- USDA Departmental Regulation 4300-3, Non-discrimination in USDA Conducted Programs and activities
- USDA Departmental Regulation 4300-3, Equal Opportunity Public Notification Policy
- USDA Departmental Regulation 4300-4, Civil Rights Impact Analysis
- USDA Departmental Regulation 4330-005, June 4, 2013, Prohibition against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by the USDA.
- Forest Service Manual 1700, Civil Rights
- Forest Service Handbook 1709.11, Civil Rights Handbook

The Forest Service Plan: Toward a Multicultural Organization (TMO), requires outreach and recruitment of diverse candidates as a strategy to create a diverse and multicultural workforce within the Agency (FSH 1709.11, Chapter 10, § 17.05). The Forest Service was utilizing two related questionnaires to preform these important activities. The previouse questionnaire was titled NRS Outreach Opportunity Questionnaire (FS-NRC-1700-1). The questionnaire, initially developed by the Forest Service's Northern Research Station (NRS), gathered

information from students attending local college and university career fairs about the effectiveness of information provided by NRS personnel regarding career opportunities in the Forest Service.

The authority to collect this information comes from Title VI of the Civil Rights Act which prohibits discrimination based on race, color, or national origin in Federally assisted or direct programs of the Federal Government. Section 703 in Title VII of the Civil Rights Act which prohibits discrimination in employment based on race, color, religion, sex, or national origin in actions affecting employees or applicants for employment. Section 717, added in 1972 by Public Law 92-261 (42 U.S.C. 2000e-16), which covers employment by the Federal Government in the prohibition against discrimination.

Title 7, Code of Federal Regulations, Part 15 implements Title VI of the Civil Rights Act of 1964 and requires nondiscrimination in Federally assisted programs and direct programs of the Department of Agriculture. Appendices to subparts A and B contain listings of Federally assisted and direct programs administered by USDA agencies, including the Forest Service.

Executive Orders listed above and the recent USDA Departmental Regulation - 4330-005, June 4, 2013, Prohibition against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by the USDA, requires program participation data collection for use during the monitoring of program participation by beneficiaries of USDA programs.

- 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.)

The Outreach Opportunity Questionnaire will collect the following information:

- Ethnicity
- Race

and responses on:

- Helpfulness of information provided by the Forest Service at career fairs.
- Whether information received was what the respondent was seeking,
- Whether application procedures were clear and simple, and
- 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.

The Questionnaire collects responses from individual college students attending University career day events.

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

The information will be used to evaluate the effectiveness of the Civil Rights Outreach Programs conducted by the Northeastern Service Center (NESC).

Responses to the questionnaire evaluate the effectiveness of the The Northeastern Service Center (NESC) Civil Rights Outreach Program and will be sent to the Forest Service's national office. In addition, the information helps determine the effectiveness of career days and to track outreach efforts at career fairs.

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?

- c. The information will be collected on an 8 and ½ by 11" size form (FS-NESC-1700-1), handed out and collected in person during university career fair events.
- d. How frequently will the information be collected?
 - Information is collected once annually from each career fair attendee.
- e. Will the information be shared with any other organizations inside or outside USDA or the government?

The information will be shared with the U.S. Department of Agriculture and the Federal Executive Board. In addition, it will be included in the Forest Service's Annual Accomplishment Report, which is shared with Congress, various Federal agencies, and the public.

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

Under "Race" category, added selection for "Two or More Races"

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.

Use of information technology is not conducive to this method of collection. The questionnaire is a quick, hands-on collection method. Several other methods were considered, such as follow-up telephone contact and an e-mail survey. However, these methods were not used due to uncertainty of participation. The questionnaire method best fulfills the Northeastern Service Center (NESC)' needs, as the information is received at the time of the contact. Utilizing automated or electronic technology is not conducive to the collection.

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.

This collection does not duplicate other collections. The Questionnaire is specific to the Forest Service and is not available from any other source or study. The information gathered assists in compiling responses to data calls for annual reports on these national programs.

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

The information collection does not affect small businesses or other small entities. Respondents are individuals.

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 provides the NESC with data used in program analysis and reporting, as well as program improvement strategies. All Federal agencies are required to develop planned actions designed to address any present effects of past discrimination and make certain that qualified minorities, women, veterans, and individuals with disabilities have a full and fair opportunity to participate in the Agency's workforce and programs. The Agency's ability to accomplish these goals is severely impaired without this collected information.

- 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;

There is no requirement for respondents to reply, response is optional and requested at the time of contact.

- 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 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.

A Federal Register Notice requesting comments was published on November, 07 2017 on page 51597 in Volume 82 Number 214. The Forest Service received one comment.

Public Comment: "xpensive survey not necessary since downsizing in evil govt agencies is taking place." Our response of acknowledgement is "Thank you for your comment."

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.

Preformed outreach to several Agencies. Our understanding of wording to obtain comments from "outside the agency" was outside the Forest Service Agency. We were not aware that the comments needed to come from outside of USDA. Below are the comments received:

"I would add for the candidates to explain why they answered "no" to any questions. This way you can make any improvements necessary based on their recommendation."

Cathy A. Gross
Regional Recruitment Coordinator
OASAM, Philadelphia Region
U.S. Department of Labor
170 S. Independence Mall West, Suite 600 East
Philadelphia, PA. 19106
Phone: 215-861-5042
gross.cathy@dol.gov

"I would change may be just fine for you and that was the question with clearly and simply at the end. There's something to me that says those are the same words."

Cynthia D. Burrows Diversity/EEO Manager U.S. EPA, Region III (3DA10) 1650 Arch Street Philadelphia, PA 19103 215-814-5326 "You can ask "How easy was it for you to obtain about Forest Service opportunities, careers, and programs?" Please explain."

Brenda Gillison
Office of Equity, Diversity and Inclusion
National Institute of Health
Equal Opportunity Office
Philadelphia, PA
Phone - 267-466-3006
Fax - 267.466.1300

Comments were noted and incorporated into the questionnaire.

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

The questionnaires were anonymously submitted. We do not have their contact information. We are unable to reach respondents

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

Respondents will not receive monetary payment for responses. Respondents may receive small token items with Forest Service logos (Woodsy Owl/Smokey Bear/Forest Service) and emblems such as pencils, rulers, key chains, caps, and bags.

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

While no assurance of confidentiality is given, the names of respondents are not taken, nor are the forms attached to any paperwork associated with the respondents. All responses are anonymous and used for reporting purposes.

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.

Race and ethnicity information is requested to assist the Forest Service in tracking program accomplishment. The Forest Service Civil Rights program analyzes data by ethnicity and race as a means of measuring ability to reach underserved populations. Responses are strictly voluntary and no personally identifiable information is collected

- 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.
 - a) Description of the collection activity
 - b) Corresponding form number (if applicable)
 - c) Number of respondents
 - d) Number of responses annually per respondent, should be one per year
 - e) Total annual responses (columns c x d)
 - f) Estimated hours per response
 - g) Total annual burden hours (columns e x f)

Table 1

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responden ts	(d) Number of responses annually per Responden t	(e) Total annual response s (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Outreach Opportunity Questionnaire	FS-NESC-1700- 1	675	1	675	2 minutes (.03 hrs)	20.25

Initially, the ICR was used for Outreach Opportunity Questionnaire in combination with Ethnicity Questionnaire (FS-1700-5). As a result, there is a significant decrease in burden.

- Record keeping burden should be addressed separately and should include columns for:
 - a) Description of record keeping activity: Tally the questionnaires and insert into annual report requirements.
 - b) Number of record keepers: 1c) Annual hours per record keeper: 24 hours per year
 - d) Total annual record keeping hours (columns b x c
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Table 2

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Responden ts
Outreach Opportunity			
Questionnaire	20.25	\$7.25	\$146.81

^{*}Federal minimum wage is \$7.25/hour, based on information from Department of Labor, Bureau of Labor Statistics (http://www.dol.gov/whd/minwage/america.htm)

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 response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- Employee labor and materials for developing, printing, storing forms
- Employee labor and materials for developing computer systems, screens, or reports to support the collection
- Employee travel costs
- Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information
- Employee labor and materials for collecting the information
 Employee labor and materials for analyzing, evaluating,
 summarizing, and/or reporting on the collected information

Created table for breakdown of figures.

Reason for difference in updated figures, was able to get a more detailed estimate. More staff involved and less travel more specific salary estimates were available than from last collection.

Table 3

Item	Outreach Opportunity Questionnaire
Employee labor and materials for	\$505.00
developing, printing, storing forms	
Computer Systems/reports	\$360.00
Employee Travel Costs	\$5,760.00
Cost of contractor services	\$0.00
Employee labor and materials for	\$90.00
collecting information	
Employee labor and materials for	\$360.00
analyzing, evaluating, summarizing,	
and/or reporting on the collected	

	information			
	Total cost to the government	\$7,075.00		
Numbers changed due to addition of new staff member and some costs were lower due to stream				

lining of the form.

Estimate costs to government - break downs for how figures were calculated

Item 1		totals
Development	1 professional x \$30.00 x 15 hr = \$450	
Printing in house copier	1 clerical x rate x \$13.87 x 4 hr =\$ 55. (55.40)	
Storing on site no cost	0	
		\$505.0 0
Item 2		
Development of computer screens	0	
Reports	1 professional x rate x 30.00 x 12 hr=\$360	
		\$360.0 0
Item 3		
travel	2 employees x 4 local trips @ \$60.00/trip=\$960	
	2 professionals x 2 long distance trips @ \$1,200=\$4,800	
total		\$5,760
Item 4		
Contractor svc	0	\$0.00
Item 5		
Collecting information-distribution of questionnaires	1 professional \$30.00/hr x 3 hrs (½ hr x 6 times/year (3 hrs)) \$90.00	\$90.00
Item 6		
Analyzing/reporting	1 professional x \$30.00/hr x 12 hrs = \$360.00	\$360.0 0
Total cost to the government		\$7,075

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

This information collection decreases the burden to the public and currently measures the burden of one collection only. The previous collection was used to obtain the combined approval for two separate forms similar in nature. The title of the other form was the Optional Ethnicity Questionnaire. The author stated that there has not been a need for the form and that it has not been used in some time. This information was provided to us from the Director of the Northeastern Service Center in an email.

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

The data gathered from this information collection is to be published in the Forest Service Annual Report, which is available to Congress, other Federal agencies, and the public. The forms assist in the development of a diverse work force; assist in sharing resources, concepts, methods and tools. Reports are mainly used and distributed internally, occasionally shared with the Federal Executive Board Partner's in Equality Council – Careers in Government Outreach Team (FEB) to show agency accomplishments. The FEB is an organization whose mission is to affect change towards organizational excellence through periodic educational forums.

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 OMB 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 identified in item 19, "Certification Requirement for Paperwork Reduction Act."