**Supporting Statement A for**

**Paperwork Reduction Act Submission**

**Natural and Cultural Resource Agencies Customer Relationship Management**

**(Formerly “Volunteer Partnership Management”)**

**OMB Control No. 1093-0006**

**Terms of Clearance:** None

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Laws, statutes, and regulations listed below authorize Federal land management agencies (identified in Table 1A below) to work with volunteers, youth, and partner organizations to plan, develop, maintain, and manage projects and service activities on public lands and adjacent projects throughout the nation by:

* 16 U.S.C. §1721 et. seq. – Public Lands Corps Act (PLC)
* 16 U.S.C. §4601 – Outdoor Recreation Authority
* 16 U.S.C. §558 a-d – Volunteers in the National Forests Program
* 16 U.S.C. §583j – Forest Foundation Volunteers
* 16 U.S.C. §1246 – Administration and development of national trails system
* 16 U.S.C. §1250 – Volunteer trails assistance
* 31 U.S.C. §3325 – Authorizes payment of vouchers
* [38 U**.**S**.**C**.** §4301](http://www.dol.gov/cgi-bin/leave-dol.asp?exiturl=http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=1994_uscode|docid=38USC4301&exitTitle=The_U.S._Code&fedpage=yes) **–** The Uniformed Services Employment and Reemployment Rights Act
* 16 U.S.C. §1246(h)(1) – Agreements to Operate, Develop, and Maintain Portions of National Trails
* 54 U.S.C. §101702(a) Cooperative Agreements, Transfer of Service Appropriated Funds
* 54 U.S.C. §101702(b) Cooperative Agreements, Cooperative Research and Training Programs
* Presidential Memorandum -- Expanding National Service, July 15, 2013
* Department of the Interior Secretary Order No. 3333

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| Table 1A – Participating Land Management Agencies |
| Department of Agriculture |
| * U.S. Forest Service, and * National Resources Conservation Service |
| Department of the Interior |
| * Office of the Secretary (OS), * Bureau of Indian Affairs (BIA), * Bureau of Land Management (BLM), * Bureau of Reclamation (BOR), * National Park Service (NPS), * Office of Surface Mining Reclamation and Enforcement (OSMRE), * U.S. Fish and Wildlife Service (FWS), and * U.S. Geological Survey (USGS) |
| U.S. Department of Commerce |
| * National Oceanic and Atmospheric Administration (NOAA) |
| U.S. Army Corps of Engineers |

Agencies and their authorized partners may recruit, train, and accept the services of individuals to aid in interpretive functions, visitor services, conservation measures, research and development, recreation, and or other activities in nearly all areas of service. Agencies provide the participants of these efforts with benefits that require verification of identification and enrollment.

The customer relationship management web based portals are the agencies response for meeting citizens’ expectations for streamlined digital services to access and apply for civic engagement opportunities and benefits such as but not limited to volunteer, youth, and partnership opportunities. The portals allows prospective and current program participants to establish an account for electronic submission of program applications and to obtain status of applications, enrollments, benefits, and requirements. Additionally, citizens have the option of using self-service features to report hours, apply for opportunities, or register for program benefits such as America the Beautiful Pass, Public Land Corps register, Service Learning verification and other items as allow per agency guidance.

Additionally, the collection addresses partners request to standardize and centralize data collection for more efficient and improved data sharing that results improved mission outcome and less burden. The renewal of this collection specifically reduces the number of portals from 7 to 3 while also establishing standard Application Program Interfaces (API) which allows for more effective data sharing so citizens are not burdened with entering the same information into different portals. This revision shifts the burden to agencies to establish imports and APIs to minimize the amount of data that citizens must enter.

Furthermore, this collection includes the modernization of electronic processes so citizens maintain a single account application for reuse and updating to apply for all interested opportunities verse existing process that requires program participants electronically complete the application anew for each opportunity they wish to be considered. This specifically minimizes the burden on this collection on the respondents. Additionally, modernization of the technology and a standard data collection will allow for data imports and application interfaces with partners to submit more efficiently the data for events, projects and positions.

While electronic records provides a means to streamline data collection and allow citizen access to track benefits and control the sharing of their data, the participating agencies may also provide an accessible paper version of the volunteer forms.

**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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

**Volunteer Management Portal**

The Volunteer Management Portal consolidates and enhances functions of Volunteer.gov, NPS Volunteer-In-Parks (VIP) Reporting Tool, Volunteer Time Tracking Portal, and the FWS Volunteer Tracker Module into one volunteer management portal offered as a shared service to federal agencies and partners managing natural and cultural resources projects, events, and programs. The Volunteer Management Portal provides digital services needed to manage the security, safety, reporting, recruitment, placement, training, on boarding, benefits, and experience of volunteers. This online portal provides volunteers and volunteer managers in the field the ability to perform recruitment, selection, orientation, project safety, and recognition activities locally and nationally by accessing required services and data in a friendly web-based format. Consolidation of portals reduces burden on individuals by providing a single access process to search and apply for appropriate opportunities and services. Additionally, the modernized architecture allows the ability for individuals to establish an account for applying, tracking, and managing their interests and applications.

Furthermore, this centralized volunteer management database captures the hours needed to provide America the Beautiful Volunteer Passes for those individuals that have contribute more than 250 hours. Volunteers can apply their hours toward earning an American the Beautiful Pass that provides free access to more than 2,000 federal recreation sites. Each pass covers entrance fees at national parks and national wildlife refuges as well as standard amenity fees at national forests and grasslands, and at lands managed by the Bureau of Land Management, Bureau of Reclamation and U.S. Army Corps of Engineers. The pass covers entrance and standard amenity fees for a driver and all passengers in a personal vehicle at per vehicle fee areas (or up to four adults at sites that charge per person). Children age 15 or under are admitted free. This time reporting is required to receive the benefit of the America the Beautiful pass. As government property with monetary value, the government must track and audit the passes annually.

The government uses the on-line portal to manage and account for passes and aids in the prevention of fraud and misuse of government property for services. The business impact of misused or abused passes and services could reach millions of dollars of lost revenue yearly without management. The on-line portal allows agencies to track volunteer hours through a log that collects the address, name, email, and locations of the volunteer service prior to receiving the pass or reporting a Worker Compensation claim per established guidance.

**Stewardship Engagement Portal Module**

The Stewardship Engagement Portal consolidations and streamlines the Youth Partner Tracking Module and the Outreach Recruitment Resume Module. This Stewardship Engagement module will collect data from individuals who apply and engage in youth, veteran, internships, apprenticeships and other special programs designed to support skill development and enhance employment opportunities, while engaging in meaningful projects that further public service to citizens. The streamlining of these portals also establishes core common data fields to lessen the reporting burden to collect data from individuals between 16 and 30 who participate in youth employment under the 16 U.S.C. §1722 et. seq., Public Lands Corps (PLC) Act and Interior Departmental Secretarial Order 3332.

The PLC Act under Section 1726 of Title 16 of the United States Code (USC) authorizes the Secretary of Agriculture and Secretary of the Interior to grant members of the Public Lands Corps (PLC) credit for time served with the PLC. This credit may be used towards future Federal hiring; and provides former eligible members of the PLC with qualifying experience noncompetitive hiring status for a period of time not more than 2 years after completion of their PLC service. Some of this information is currently collected on paper, and in various formats. This renew will update the collection to allow for imports and interfaces that consolidate the data and lessen the burden on respondents. Additionally, the updated portal reduces paper and entering data into multiple systems by allowing individuals to maintain one account to view and share qualifying experience with agencies.

The DOI and USDA will collect contact information, hours of service performed, date of birth, and optional demographic information such as race, ethnicity, and veteran’s status from these individuals to document and report their eligibility for non-competitive hiring status. We will collect this optional demographic information to monitor compliance with the Administration’s and Secretary’s goals of attaining a more diverse workforce.

**Partnerships and Cooperating Association Portal Module**

This renew consolidates the Partnership Module and Cooperating Association Module. Formal partners such as Friends groups and Cooperating Associations, which are under national agreements to manage services, programs, and or bookstores on public lands for citizens, provide an annual summary of their activities. These not-for-profit partners enhance site visits through services such as operating bookstores, developing publications, and supporting public programs for their local or regional public land partners. The information collected from these partners includes reporting yearly events, contact information, annual sales reports, and IRS public financial data and program activities. The information is currently collected annually and allows for tracking impacts and risks. Collecting this information and housing it electronically allows the agencies to easily track and reuse all partnership data to conduct real time reports. The on-line portal assists in gathering this information in a timely and cost effective manner and establishes common data elements to reduce the burden on partners for submissions.

**Table 2A1: Itemized Listing of Modules**

We designed these modules to meet the requests and expectations of customers for on-line access and transactions. The information collected once from the on-line portal and with paper forms, stored in a common database in a more efficient and effective way, and ensures the information is reusable for multiple purposes. Customers also have easy access to update and review data.

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| **Data Collection Methods** | Name, Address, Phone, and E-mail | Contact and Emergency Notification Information | Consent of Parent/Guardian | Areas of Interest | Physical Limitations | Qualifications/ Experience | Gender and Age (optional) | Ethnicity (optional) | Pubic Financial | Photo and Program Reports | Time Volunteered or Served | Training Information | References |
| **On-line Portal Modules** | | | | | | | | | | | | | |
| Portal Account (all) | X |  |  | X |  |  | X | X |  |  |  |  |  |
| Volunteer Management Portal |  |  | X |  | X | X |  |  |  | X | X | X | X |
| Stewardship Engagement Portal |  |  | X |  | X | X |  |  |  |  | X | X | X |
| Partnership & Cooperating Assoc. Module |  |  |  |  |  |  |  |  | X | X |  |  |  |
| **Paper-Based Volunteer Forms** | | | | | | | | | | | | | |
| Standard Form 301 | X | X | X | X | X | X | X | X |  | X |  |  |  |
| Standard Form 301a | X | X | X | X | X | X | X | X |  | X |  |  |  |
| Standard Form 301b | X | X | X | X | X | X | X | X |  | X |  |  |  |

We collect information from potential and selected volunteers; youth program participants, veterans, prospective job applicants, cooperating associations, and partner organizations. Those under 18 years of age must have written consent from parent or guardian.

Participating natural and cultural resource agencies will use this information to manage agency volunteer, youth, outreach, recruitment and partner programs that support work on public lands and projects. Federal agencies will be more accountable to taxpayers by providing annual reports and program descriptions of partnership activities. This information will be accessible on-line from information gathered through the Volunteer.gov website and on the participating federal agency websites. The specific uses for each of the on-line portal are as follows:

**Volunteer Management Portal:** The module allows for time and cost saving by providing standard volunteer management processes to field managers and also a means to address volunteer security, safety and operational readiness by tracking volunteer required training, orientation, and project task on public lands. The purpose of the module is to reduce redundancies and replications and have safeguards to manage volunteer vital deployment records and forms. This address specifically feedback from our customer who desire a streamlined system for gathering and managing their data. Additionally, the portal captures their volunteer hours for obtaining benefits of the America the Beautiful pass. Those individuals that volunteer over 250 hours are eligible for an American the Beautiful Pass that allows them free access to over 2,000 federal recreation sites. The portal also provides a means for agencies to account and track safety requirements as well as passes given to volunteers.

**Stewardship Engagement Portal:** The collection of youth, internships, apprenticeships, and other related special programs participants service hours, project information, and demographic information allows the agencies to provide effective customer service to program participants who have served in Public Lands Corps (PLC) and other programs seeking to leverage their skills development or non-competitive hiring authority to search for eligible employment. Many of the programs provide former program participants who have qualifying experience noncompetitive hiring status for a period of not more than 2 years after completion of their service. In this portal, we will collect name, project details, dates and optional qualification information that would be useful to matching employment opportunities such as references. In addition, we may share the information collected with Congress and the White House for accountability purposes.

**Partnerships and Cooperating Association Module:** Collects partnership agreements and partner information including public financial data, annual reports, and contact information for sharing with employees and compiling reports. This information will leverage program assistance, challenge cost share, and foundation dollars to support programs on public lands using volunteers, youth program participants, and partners. We will use partnership data to expand the number of projects and resources for addressing critical needs and or to support disaster recovery efforts. The Cooperating Association On-line Form collects education, sales, contributions, and events provided to engage all citizens in stewardship of our public lands. The effectiveness of this on-line capture of information will enable federal agencies to share with citizens who wish to participate and donate their time and resources to improve public lands.

We collect the information using the on-line portals and paper forms listed and/or given to federal employees as follows. All of these on-line and paper forms are accessible via the Internet and the data is stored in a centralized database for ongoing use.

| **On-line Module Portal Data Collection** | **Frequency of Information Collected** |
| --- | --- |
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| **Portal Account Management** | |
| Create Individual or Group Account | Once for each new portal member or group; They update their information at least once annually or have option to update as needed to apply for programs, events, or positions. |
| **Volunteer Management Portal** | |
| Submit In Application | One application is maintained and submitted to multiple opportunities as desired by individuals |
| Time Entry | Every two weeks during active periods or as designated by an agency process for type of opportunity (this may be auto filled based on opportunity type) |
| Training and Supporting Information | As required for position, event, or program |
| Complete a volunteer agreement | Auto-filled from position and application. More than one position can be listed on agreement for same supervisor or government rep to sign. |
| Registration for volunteer event | Registration is required for each event but is auto filled with details from profile and event description. |
| Customer Service Survey | Standard 5 point optional Customer Service Survey to be completed after self-service portal tasks in this module |
| **Stewardship Engagement Module** | |
| Create Application/Profile | One account per individual is maintained and updated for applying/recording events or requesting services. |
| Time Entry | As needed by individuals to provide accurate and up to date information for services and benefits. No more than once prior to end of term of service. |
| Manage Partner | At least imported and updated yearly from internal and external sources. This will auto fill options for individuals to records and manage time. We will also provide data import and sharing feature to collect this information. |
| Manage Project | Based on the number of projects acquired by partner, we will validate the data by external partner at least by the end of project. (This data will be auto filled as much as possible from existing databases or by internal resources.) We will also provide data import and sharing feature to collect this information. |
| Manage Youth Participants | Multiple times per year depending the number of youth participants that are added to or leave a particular partner |
| Customer Service Survey | Standard 5 point optional Customer Service Survey to be completed after self-service portal tasks |
| **Partnership and Cooperating Association Module** | |
| Annual Updates | Once per year per respondent |
| Customer Service Survey | Standard 5 point optional Customer Service Survey to be completed after self-service portal tasks in this module |

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| **Paper-Based Volunteer Forms** | |
| OF-301 | Once for every volunteer opportunity they seek to apply. Unlike the electronic application which is maintained to apply for multiple opportunities in the catalog. |
| OF-301a | Once for every volunteer opportunity they seek to apply. Unlike the electronic application which is maintained to apply for multiple opportunities in the catalog. |
| OF-301b | Once for every volunteer opportunity they seek to apply. Unlike the electronic application which is maintained to apply for multiple opportunities in the catalog. |

We will share general and summary information in reports to participating agencies youth, recruitment, and partnership programs. We may also provide this information to Congress and the public in reports. However, we will not share information regarding individuals.

Collection requirements have evolved over time to include data collection that will result in enhanced ability to centralize and standardize reporting across participating agencies concerning volunteers, youth programs, and partnership demographics and activities. The retirement of the paper and legacy systems will allow thousands federal field units’ one system of records for citizen engagement opportunities allowing for greater citizen usability, security, and accessibility to digital services.

**NOTE:** Some forms associated with this request are “Common 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 and specifically how this collection meets GPEA requirements.**

Electronic on-line versions of these forms are available and their use is highly encouraged. Federal employees will assist and enter data for citizens who are unable to provide data electronically. This increases the efficiency and accuracy of the process by eliminating the inconsistently used paper forms.

**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.**

These on-line portal and paper forms were developed to help centralize tracking and reporting and to provide better customer service. The public expects on-line methods to provide information that is essential to providing great customer service. The on-line portals will also eliminate duplication of efforts by creating one central point for partner tracking as opposed to using various independent systems among agencies and by streamlining individual cumbersome reporting and tracking tools currently used within large decentralized agencies. These on-line portals are available for use as a shared service.

The on-line portals are customizable for agency specific needs, but contain data elements common for all participating agencies. We consulted with the 21st Century Service Corps, the Federal Interagency Team on Volunteerism, Public Lands Alliance, and the Corps Network who represent 130 service and conservation organizations that work in close partnership with land and water management agencies who endorse development of these efforts to streamline and consolidate data collection for these purposes.

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

Small businesses that have entered into partnership agreements currently collect this information for multiple Federal, state, and private purposes. This effort establishes common data elements and centralizes the data collected for repurposing. The information on the on-line portal is minimal. It does not impose new data elements on small businesses above what they already collect. They will repurpose the already collected data for use by multiple federal agencies rather than reporting different data elements that are unique to each federal agency. Information collected is the minimal necessary for program participation and reporting.

We developed the on-line portals to minimize the number of forms collected from members of non-profit organizations, youth, volunteers, and prospective applicants and to eliminate the need for multiple forms and formats when partners serve on or organize a project. Additionally, we ask partner organizations to input the data on the front end of each project resulting in a lessened burden due to a decrease in data calls.

**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.**

Without these types of feedback, the Agency will not have timely information to adjust its services to meet customer needs.

**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;**

**\* 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 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.**

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6. Through this revision, we expect to meet citizens’ expectations to provide on-line services while reducing the burden on partners. We have centralized the data elements across agencies and this allows for those providing the data to have one way of provided data rather than different ways for each different federal agency. If we do not implement these methods of collection, the current disorganized and less efficient methods will continue. We collect data as infrequently as possible - generally once, yearly, or updated only as necessary.

The time tracking portions of the system is updated weekly or monthly contingent on the type of event, program or position. Some positions require (i.e. children caretaker vs weed removal) to track their hours due to audit requirements, and therefore this data is collected more frequently than quarterly.

**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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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 recordkeeping, 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 three 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.**

**8.1 – Publication of 60-day Federal Register Notice**

On May 11, 2018, we published a notice asking for comments on this information collection in the *Federal Register* ([83 FR 22097](https://www.gpo.gov/fdsys/pkg/FR-2018-05-11/pdf/2018-10026.pdf)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 10, 2018. We received one public comment in response to this notice. This public comment represented the consolidate feedback for 130 Service and Conservation Crops. Here are specific comments and our responses to the comments:

***Comment****:* Is the collection necessary to the proper functions of the Office of the Secretary, Department of the Interior? While information on our partnerships is important, we believe data around project accomplishments, outcomes, funding, and number of Corps members engaged etc. is already covered through reporting to one of the DOI units, states, regions, or national DOI bureau offices and could be compiled through existing information sources. If this is the level of information envisioned through the Partnerships Module, we encourage DOI to examine internal processes and existing information collection that could be streamlined or revised to provide this data. We hope other Federal land management agencies will adopt this same approach of a unified data collection system by utilizing this new system DOI is developing, and also examine existing internal data sources before requiring new information collection and reporting which may be duplicative.

***Answer****:* This is a valid point and DOI does establish with this collection a single system of record as mandatory. Furthermore, modernization of portal technology will allow for importing, exporting and sharing by internal sources before validation and use by external partners. Additionally, DOI will offer this portal as a shared service to other federal agencies so end user/respondents input will be not duplicative and redundant for same purposes.

***Comment****:* With respect to the Stewards Engagement Portal, we support an electronic and uniform system to collect information to determine eligibility for NCE. Presently, different DOI bureaus have different rules around qualifying for PLC NCE, making it confusing for our Corps and even more so for our Corpsmembers. The ability to upload information once, toward the end of a term of service, would be important to minimize the time burden.

As to the desire to collect from PLC Corps members “agency work for, partner organization, project dates, where the work was completed, and total hours worked on the specific project,” it would be useful to have a profile for each partner organization and Corps member on the new system that can be matched and sorted. NCE qualification can be organized that way as well as different Corps member contributions to different partner organizations. For example, Corps members may serve with different Corps, on different projects, and with different project partners during their terms of service.

As to Corps members providing “qualifying factors and training” when developing a profile, we would urge further clarification and standardization around what those may be, as unclear definitions could hurt recruitment and placement of individuals with the wrong opportunities. In addition, it may be challenging to leave it up to Corps members or the public to determine their qualifying factors, training, and skill sets for certain projects or programs that Corps offer. Our Corps use their own recruiting, training, and screening processes to hire Corps members and meet project partner’s goals. Our Corps are liable for meeting the goals of a project agreement and for the safety of Corps members and the public, so we should maintain an ability to screen and train Corps members as necessary.

***Answer:*** DOI youth program managers have met and agreed to standardize the collection for NEC data and opportunities across the bureaus. Additionally, we will provide a template to provide data files for uploading information into the system at the end of service terms. Initially, we will import, and update annually, all partner organization information. We will work with Corps Network to identify best methods to have project information validated and matched to work projects and individuals. We have made a commitment to use the Corps Network for testing imports and process before final launch of on portal.

***Comments:*** (2) Will this information be processed and used in a timely manner?

Collection of information around accomplishments of partner organizations, and hours for NCE, housed electronically in one system will help with timeliness of compilation and utilization of this data. At the same time, if Corps are still required to report to the various DOI units, states, regions, and nationally and report through this new system, it will slow down the process and create an additional burden. Data is only as good as the inputs, so ensuring uniform definitions and categories for collection across DOI, and other federal partners utilizing this system, will be critical and will ease processing and use of data.

***Answer:*** DOI will only have one system of record and all units will be required to use a single system upon deployment of the portal. This portal will have a standard shared data dictionary and common data elements to ensure uniform definitions. We will also collaborate with Corps partners to create and peer review a detailed user manual to ensure common understanding of terms. We expect the manual to be available by the next renew cycle.

***Comments:*** (3) Is the estimate of burden accurate?

Given the different features envisioned through the new online portal system it is difficult for us to estimate the hour’s burden. If DOI internally utilizes such data, or Corps are able to utilize existing information already provided to various DOI bureaus, the hour’s burden would be lower. Additionally, if Corps members are able to enter their information for NCE one time toward the end of their term of service, and Corps themselves had the ability to upload Corps member information if necessary, that would be helpful in reducing the burden.

***Answer:*** We will allow Corps with approved accounts or via upload service to enter and update Corps member information as necessary. The burden will depend on if members are just opting to enter just information for PLC or want to share their status with other employment programs like an apprenticeship that may require additional data for placement or benefits.

***Comments:*** (4) How might the Office of the Secretary, Department of the Interior enhance the quality, utility, and clarity of the information to be collected?

Again, data is only as good as the inputs, so ensuring uniform definitions and categories for collection across DOI, and other federal partners utilizing this system, will be critical, and will ease processing and use of data. For example, when considering the Partnerships Module in the past, DOI defined “partner hires” based on the number of hours a Corpsmember worked through a partner organization for a DOI bureau. In order to ensure accurate data, definitions like this should be developed with input from partners, be uniform across DOI and projects should be tracked for example by partner organization, legal authority, dollar figure, and project type in order for DOI to accurately collect information. It should not be the burden of partner organizations to track the data though as these are DOI accomplishes these projects with DOI funding. A uniform system for tracking and reporting this information across DOI should streamline this information collection, and/or require a re-examination of existing data sources to be uniform across DOI.

On the Stewards Engagement Portal, one challenge with the utilization of PLC NCE is the inability to represent NCE electronically or search for NCE-approved jobs on USA Jobs. Developing the ability for Corps members who qualify for NCE to have a PLC NCE designation on their profile on USA Jobs would be helpful, and adding a search term for job postings, or some kind of PLC NCE signifier or certification would also be helpful. An additional consideration is that the federal project supervisor must certify the hours, and sign off on the certificate for NCE. An electronic system where project sponsors are able to certify the hours, and sign a digital certificate would eliminate paperwork and delays.

***Answer:*** Department of the Interior will establish a user guide with standard definitions so data can be accurate and uniform. While we can standardize the DOI definitions, we are only able to encourage non-DOI partners to consider a common data dictionary at this time. We agree with the Corps Network that recruitment is challenging and by expanding the portal to include all skill and special employment programs we can provide better exposure of opportunities to prospective candidates. We can also link existing employment resources and website to resources page on the portal. We are committed to working closely with Corps Network on recruitment strategies and to explore how to expand the use of veterans.

***Comments:*** (5) How might the Office of the Secretary, Department of the Interior minimize the burden of this collection on the respondents, including using information technology?

Again, we believe that a large amount of data is already available through the annual reporting our Corps provide to individual DOI units, states, regions, or the national office and through internal DOI bureau data sets and project information systems. It may warrant an examination of those existing sources and their reporting mechanisms to see how they can be fed in to this new online portal. After an examination of existing data sources and collection requirements by DOI, if there needs to be a new collection of information, we encourage there to be some thoughtfulness around data compatibility, and for batch upload ability along with an examination of what information is truly necessary to demonstrate the impact and outcomes.

Corps also report outcomes and performance measures to the Corporation for National and Community Service, which administers the AmeriCorps and National Civilian Community Corps (NCCC) programs. Often, this is duplicative data since the AmeriCorps and NCCC members are working on federal public lands. Having these systems be compatible would minimize the reporting burden and improve efficiency.

***Answer****:* We agree that data exist in many systems so will continue to consolidate and reduce the burden by working closely with Corps Network to identify these data calls and eliminate them where possible or to incorporate the data via import and export features into one system of record.

**8.2 – Targeted Outreach**

In addition to the Federal Register Notice, we consulted with the following individuals to obtain their views on availability of data; frequency of collection; the clarity of instructions and record keeping; disclosure or reporting format; and record, disclose, or report data elements:

We consulted with the following partner organizations who provided comments during 2017 and 2018. General comments on the data elements and methods led to further streamlining and consolidation of portals in 2018 reflected in this supporting statement.

| **POC** | **Partner Organization** |
| --- | --- |
| The Corps Network | This organization represents 130 service and conservation corps. |
| The Public Lands Alliance | This organization represents nonprofit organizations and exceptional public-nonprofit partnerships for the benefit of public lands and their users. |
| Federal Interagency Team on Volunteerism | This is an interagency community of practice of volunteer managers in the federal government. |

**8.3 Additional Consultation**

Via a series of meetings during late 2017 and early 2018, these agencies provided input on the desired content, format, and collection processes for this on-line and paper collection of required information.

These interagency forms and web-based portals are part of an effort by participating agencies to adopt a standardized approach. Cooperating Associations, Friend Groups, Youth organizations, HR managers, youth program managers, and volunteer managers were engaged in the design and review of the forms and portal prototypes.

| **Agency** | **Title** |
| --- | --- |
| USDA – Forest Service | Volunteer, Recreation, and Youth Program Manager |
| DOI – All bureaus | Volunteer, Youth, and Partnership Managers |
| USDA - National Resources Conservation Service | Volunteer and Program Manager |
| U S Army Corps of Engineers | Volunteer and Youth Program Managers |
| National Oceanic and Atmospheric Administration (NOAA) | Volunteer Manager |

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

We will not provide payment or gifts for the collection of the information.

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

The following Privacy Act Systems of Record cover the collection of this information:

* DOI-5: Interior Volunteer Services File System (May 23, 2001, [66 FR 28536](https://www.gpo.gov/fdsys/pkg/FR-2001-05-23/html/01-12989.htm))
* DOI-58: Employee Administrative Records--Interior (April 20, 1999, [64 FR 19384](https://www.gpo.gov/fdsys/pkg/FR-1999-04-20/pdf/99-9830.pdf); modification published February 13, 2008, [73 FR 8342](https://www.gpo.gov/fdsys/pkg/FR-2008-02-13/pdf/E8-2584.pdf))
* OPM/GOVT-1: General Personnel Records (December 11, 2012, [77 FR 73694](https://www.gpo.gov/fdsys/pkg/FR-2012-12-11/html/2012-29777.htm))
* OPM/GOVT-5: Recruiting, Examining, and Placement Records (March 26, 2014, [79 FR 16834](https://www.gpo.gov/fdsys/pkg/FR-2014-03-26/html/2014-06593.htm))
* USDA/ [OP-1: Personnel and Payroll System for USDA Employees](https://www.ocio.usda.gov/sites/default/files/docs/2012/OP%20-%201.txt) (January 28, 1998, [63 FR 18](https://www.gpo.gov/fdsys/pkg/FR-1998-01-28/pdf/98-2051.pdf))

Each on-line form will shows the presence of online Privacy Act statement and Burden Statement. In addition, the Government-wide Systems of Records satisfies some requirements under the Privacy Act and DOI specific Systems of Records satisfies other requirements. Since this ICR establishes common forms, agencies using the common forms are responsible to ensure they have satisfied the Privacy Act Requirements with their own Systems of Records as necessary.

**11. 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. 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.**

Gender, disability, race, ethnicity, and veteran status is optional. The government commonly captures this information government-wide for prospective program participants during the exchange of benefits and services.

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

**\* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

**\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

**\* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that we will receive **1,415,817 responses** totaling **146,631 burden hours**. We estimate the dollar value of the annual burden hours to be **$3,692,164** (rounded).

The estimated hourly wage estimate is from the Independent Sector’s Value for Volunteer Time located at <http://www.independentsector.org/volunteer_time> which establishes (in arrears by one year) the average national value of a contributed volunteer hour in the United States as $24.69. We increased the rate by 2% to account for growth in 2018, result in an average hourly value of volunteer time of $25.18 per hour.

**Notes:**

* This submission will only report DOI’s burden, and not the burden of other participating agencies using the common form.
* There is no record-keeping burden placed upon respondents in relation to this information collection.
* We estimated the number of respondents by reviewing the program and participant accomplishment report data for fiscal years 2015 to 2018. We established the time estimates through system testing. Partner organizations will validate these estimates upon implementation of each module. Most partner organizations are seasonal in nature so we based the time reporting estimates on a 6-month season that is 26 weekly reporting cycles. Based on these assumptions, the following annual burden table was prepared:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Requirement** | **Average**  **Number of Annual Respondents** | **Average**  **Number of Responses Each** | **Average**  **Number of Annual Responses** | **Average Completion Time per Response**  **(Mins)** | **Estimated**  **Annual Burden Hours** | **Hourly Rate** | **$ Value of Annual Burden Hours** |
| ***Portal Account Management*** | | | | | | | |
| ***Create Individual or Group Account*** | | | | | | | |
| Individuals | 365,000 | 1 | 365,000 | 1 minute | 6,083 | $ 25.18 | $ 153,178.33 |
| ***Volunteer Management Portal*** | | | | | | | |
| **Submit Application** | | | | | | | |
| Individuals | 783,000 | 1 | 783,000 | 10 minutes | 130,500 | 25.18 | 3,285,990.00 |
| **Time Entry** | | | | | | | |
| Individuals | 4,390 | 5 | 21,950 | 1 minute | 366 | 25.18 | 9,211.68 |
| **Training and Supporting Information** | | | | | | | |
| Individuals | 6,000 | 4 | 24,000 | 3 minutes | 1,200 | 25.18 | 30,216.00 |
| **Complete a Volunteer Agreement** | | | | | | | |
| Individuals | 14,000 | 5 | 70,000 | 5 minutes | 5,833 | 25.18 | 146,883.33 |
| **Registration for Volunteer Event** | | | | | | | |
| Individuals | 10,000 | 1 | 10,000 | 1 minute | 167 | 25.18 | 4,196.67 |
| **Customer Service Survey** | | | | | | | |
| Individuals | 1,000 | 5 | 5,000 | 1 minute | 83 | 25.18 | 2,098.33 |
| ***Subtotals:*** | 818,390 |  | 913,950 |  | 138,149 |  | $ 3,478,596.02 |
| ***Stewardship Engagement Module*** | | | | | | | |
| ***Create Application/Profile*** | | | | | | | |
| Private Sector | 18,000 | 1 | 18,000 | 1 minute | 300 | 25.18 | 7,554.00 |
| ***Time Entry*** | | | | | | | |
| Private Sector | 7,200 | 3 | 21,600 | 1 minute | 360 | 25.18 | 9,064.80 |
| ***Manage Partner*** | | | | | | | |
| Private Sector | 659 | 1 | 659 | 1 minute | 11 | 25.18 | 276.56 |
| ***Manage Project*** | | | | | | | |
| Private Sector | 45,000 | 2 | 90,000 | 1 minute | 1,500 | 25.18 | 37,770.00 |
| ***Manage Youth Participants*** | | | | | | | |
| Private Sector | 3,000 | 1 | 3,000 | 3 minutes | 150 | 25.18 | 3,777.00 |
| ***Customer Service Survey*** | | | | | | | |
| Private Sector | 600 | 5 | 3,000 | 1 minute | 50 | 25.18 | 1,259.00 |
| ***Subtotals:*** | 74,459 |  | 136,259 |  | 2,371 |  | $ 59,701.36 |
| ***Partnership and Cooperating Association Module*** | | | | | | | |
| ***Annual Updates*** | | | | | | | |
| Private Sector | 258 | 1 | 258 | 5 minutes | 22 | 25.18 | 541.37 |
| ***Customer Service Survey*** | | | | | | | |
| Private Sector | 70 | 5 | 350 | 1 minute | 6 | 25.18 | 146.88 |
| ***Subtotals:*** | 328 |  | 608 |  | 28 |  | $ 688.25 |
| ***GRAND TOTAL:*** | ***1,258,177*** |  | ***1,415,817*** |  | ***146,631*** |  | ***$ 3,692,163.96*** |

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

**\* The cost estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

**\* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

**\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no non-hour costs.

**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, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate the total annual cost to the Federal Government to administer this information collection is **$566,456** (rounded). This amount includes 10,699 Federal hours totaling $478,956.27 for Federal salary/benefits and $87,500.00 for program administration costs as detailed below.

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2018-DCB](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB.pdf) to determine the annual salary costs for staff involved in reviewing and processing the information collected as shown below. In accordance with Bureau of Labor Statistics News Release [USDL-18-0944](https://www.bls.gov/news.release/pdf/ecec.pdf), June 8, 2018, Employer Costs for Employee Compensation—March 2018, we multiplied the annual salaries by 1.59 to account for benefits:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Government Effort** | **Grade /Step** | **Hourly Rate** | **Fully Burdened Rate** | **Hours** | **Total** |
| **Volunteer Time Tracking Portal** – Validation of data and issuing of America the Beautiful passes | GS-07/05 | $ 24.96 | $ 39.69 | 1,116 | $ 44,294.04 |
| **FWS Volunteer Tracker Module** – Analysis & reporting and administration from 9 regional admins (9% of their time) and 2 national admins (20% of their time) | GS-12/05 | 44.28 | 70.41 | 1,768 | 124,484.88 |
| **NPS Volunteer in Parks (VIP) Reporting Online Form** – Analysis and reporting (460 parks & offices reporting quarterly at 10 mins/qtr) | GS-07/05 | 24.96 | 39.69 | 307 | 12,184.83 |
| **Youth Partner Tracking Online Form** – Report on eligibility and aligning with 15,000 open positions at 10 mins for identification, 15 mins for evaluation | GS-07/05 | 24.96 | 39.69 | 6,250 | 248,062.50 |
| **Recruitment Online Form** – Employee labor for entering recruiting data at 10 mins/respondent | GS-07/05 | 24.96 | 39.69 | 1,000 | 39,690.00 |
| **Partnerships Online Form** – Preparing catalog and financial report | GS-07/05 | 24.96 | 39.69 | 73 | 2,897.37 |
| **Co-operating Association Online Form** – Preparing catalog and summary report | GS-07/05 | 24.96 | 39.69 | 185 | 7,342.65 |
| ***Subtotal:*** | | | | ***10,699*** | ***$ 478,956.27*** |
| **Annual system operation & Maintenance Costs** | | | | | 87,500.00 |
| ***GRAND TOTAL:*** | | | | ***10,699*** | ***$ 566,456.27*** |

**Note:** All costs listed above are funded with existing government FTEs and program funds.

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

In 2017, the Department of the Interior reported approximately 330,000 volunteers. This customer persona will require mandatory data collection. In the past, this data collection has largely been a paper-based process with only 15% of DOI staff using electronic means to recruit and accept applications for volunteer positions and events. As documented by the 2015 Interior Inspector General report, the actual overall count for volunteers is difficult to determine without centralized source data.

Therefore, we are establishing baseline expectation that redesign with require all DOI 330,000 volunteers to be documented to source data via digital services portal. The improvements to collect data via electronic means has streamlined the time that individual must enter information but more individuals are entering data in some case. We also added Customer Survey, which will be standard and allow Interior to implement OMB Customer Services initiatives.

Unless we chart field by field, it is difficult to establish a one to one relationship with 2015 burden hours to show how streamlining and increased respondents for mandatory reporting impacts this data collection. Below we have summarized changes how burden hours were reflected as consolidated for 2018.

|  |  |  |  |
| --- | --- | --- | --- |
| **Summary of Changes from 2015** | | | |
|  | **2015** | **2018** |  |
| **Volunteers** | **Time Tracking** | **Time Tracking** | **Comments** |
| Number of Individuals | 13,900 | 4390 | 2015 distributed in different portals |
| Annual Responses | 26 | 21,950 | Time tracking is now mandatory for positions and events; Previously only counted time in position |
| Burden Per Response (Time) | 10 | 5 | Per fill from agreement to lessen time |
| Annual Burden Hours | 1733 | 366 | 2015 is higher but not able to translate fully due to different format reported in 2015 |
|  |  |  |  |
| **Volunteers** | **Create Account/Profile** | **Create Account/Profile** | **These functions were combined in 2018** |
| Number of Individuals | 10,500 | 365000 | DOI volunteers will have an account. |
| Annual Responses | 1 | 1 |  |
| Burden Per Response (Time) | 20 | 1 | Application and staff will prefill agreement so not collecting much up from for all. |
| Annual Burden Hours | 16,000 | 6083 | 2015 is higher but not able to translate fully due to different format |
|  |  |  |  |
| **Volunteers** | **Submit Application** | **Submit Application** |  |
| Number of Individuals | 7500 | 783000 | Includes applicants and volunteers; we did not previously account accurately for applicants. |
| Annual Responses | 1 | 1 |  |
| Burden Per Response (Time) | 20 | 10 |  |
| Annual Burden Hours | 16000 | 130000 | 2015 is higher but not able to translate fully due to different format |
|  |  |  |  |
| **Youth, Recuitment, and Outreach** | **All Functions** | **All Function** |  |
| Number of Individuals | 55938 | 73859 |  |
| Annual Responses | 29 | 8 |  |
| Burden Per Response (Time) | 20 | 8 |  |
| Annual Burden Hours | 43,011 | 150 |  |
|  |  |  |  |
| **Partnership and Cooperating Association** | **All Functions** | **All Functions** |  |
| Number of Individuals | 258 | 258 |  |
| Annual Responses | 1 | 1 |  |
| Burden Per Response (Time) | 60 | 5 | We are prefilling with existing info from agreement to reduce burden. |
| Annual Burden Hours | 185 | 22 |  |
|  |  |  |  |
|  | **CX Survey** | **CX Survey** | **Digital Service Survey** |
| Number of Individuals | 0 | 1670 | GAO recommend for Interior and a CX goal for OMB |
| Annual Responses | 0 | 5 |  |
| Burden Per Response (Time) | 0 | 1 |  |
| Annual Burden Hours | 0 | 155 |  |

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Other than inclusion in general summary agency reports, there were no plans for publishing or tabulation of partner, youth programs or volunteer information. We will not report any specific individuals or partner information.

**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.**

We will display the OMB control number and expiration date on the login page for the system prior to publishing the information collection.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.