

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.

The Community Relations Service (CRS) is requesting a 3-year generic clearance to collect information necessary to measure the impacts of its services and programs; and to improve its new and existing programs based on participant feedback. CRS requests this clearance to conduct program evaluation surveys and gather feedback from program participants. CRS has a business need for the collection of this information to understand the impacts of its programs and to ensure they are aligned with the needs of its stakeholders. CRS does not have any legal or administrative requirements that require this collection.

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.

The information will be used by CRS's evaluation staff to measure program and service impacts, and to inform programmatic and service delivery decisions.

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.

CRS will use automated survey tools, such as Survey Monkey or other DOJ approved survey instruments, to collect the information.

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.

CRS does not currently collect any information related to program and service delivery impacts. This information collection is not duplicated by any other survey and/or work being done by CRS.

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.

CRS will collect information from small-to medium-sized community institutions, including schools, police departments, and city governments. CRS will use automated survey tools, such as Survey Monkey or other DOJ approved survey instruments, to collect the information to minimize the burden on these institutions.

6. Describe the consequence to the 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.

The consequences of not collecting this information will impact CRS's ability to understand the impact of its programs and services. This will also impact CRS's ability to make the necessary revisions to its programs and services to better serve its stakeholders.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines: (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) 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; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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; (h) 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.

CRS' collection of information will be collected in a manner consistent with OMB and JMD guidelines. CRS does not anticipate any special circumstances.

8. If applicable, provide a copy and identify the date and page number of publications 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. 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 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 60-Day Federal Register notice was published on April 24, 2020 (85 FR 23065, OMB No. 1190-NEW, p. 23065-23066). No public comments have been received.

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

CRS will not provide any payments or gifts to respondents.

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

CRS' mandate requires that the agency hold information learned during the regular performance of its duties confidential.

42 USC Chapter 21, Subchapter VIII §2000g–2. Cooperation with other agencies; conciliation assistance in confidence and without publicity; information as confidential; restriction on performance of investigative or prosecuting functions; violations and penalties

(b) The activities of all officers and employees of the Service in providing conciliation assistance shall be conducted in confidence and without publicity, and the Service shall hold confidential any information acquired in the regular performance of its duties upon the understanding that it would be so held.

In accordance with this mandate, CRS will not publish or make public any comments or other information collected that could be attributed any specific individual without written consent from that individual.

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.

CRS's collection of information does not include any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:
- a. 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.
 - b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
 - c. 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. Instead, this cost should be included in Item 13.

CRS estimates that approximately 80-90 respondents will be involved in the information collection conducted under this clearance over the requested 3-year clearance period. The average response time per respondent will be up to 1 hour.

The estimated total respondent burden for identified and future projects covered under this generic clearance over the 3-year clearance period is approximately 80-90 hours.

13. Provide an estimate for 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).

There are no costs to respondents for participating in the research being conducted under this generic clearance.

14. 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. 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.

- d. 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.
- e. Generally, estimates should not include purchases of equipment or services, or portions thereof, made:
 - i. Prior to October 1, 1995,
 - ii. To achieve regulatory compliance with requirements not associated with the information collection,
 - iii. For reasons other than to provide information or keep records for the government, or
 - iv. As part of customary and usual business or private practices.

The cost associated with obtaining information in this General Clearance is part of CRS' annual budget.

- 15. Provide estimates of annualized costs 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There are no changes in burden since this is a new Generic Clearance request.

- 16. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

CRS does not have any program changes or adjustments.

- 17. 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.

CRS anticipates it will publish program and service impact information in its annual report to Congress. This report is submitted in the first quarter of each fiscal year and reports on agency activities completed during the previous fiscal year. Program and service impact information included in this report will be collected during all four quarters of each fiscal year. The

information will be analyzed by CRS's evaluation staff using basic analytical tools, such as Likert scale averaging and trend identification.

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

CRS will display an OMB expiration date.

19. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

CRS is not requesting an exception to this certification statement identified in Item 19.