**Section A: Justification**

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

The Peace Corps is seeking an emergency clearance authorizing use of the “Legal Status Update Form for the Virtual Volunteer Service Pilot Program” for a select group of members of the public who are Returned Peace Corps Volunteers (RPCVs). This applies to a select group of RPCVs chosen to participate in a Peace Corps pilot program based on virtually interacting with worldwide communities. The pilot program will test as a working alternate activity to the traditional in-person volunteers programs during the international pandemic. All RPCVs were evacuated from their international service Posts in response to the coronavirus disease 2019 pandemic (COVID-19). These individuals served as Peace Corps Volunteers within rural communities around the world, prior to their necessary mobilization and return to the U.S. This event abruptly caused the Peace Corps Volunteers to become members of the public. We seek an emergency clearance to collect information necessary for the RPCV to participate in this Peace Corps activity. This will be used to determine if the person has had any legal or Intelligence Community activities since their Close of Service date.

The Peace Corps Act, 22 U.S.C. 2504(a), gives the Peace Corps the authority to set the terms and conditions for enrollment of individuals as Peace Corps Volunteers. Further description of those terms and conditions is listed in 22 CFR Part 305, to include legal status requirements.

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

The information collected by the “Legal Status Update Form for the Virtual Volunteer Service Pilot Program” is used by the Peace Corps Office of Volunteer Recruitment and Selection (VRS) to collect essential legal information from individuals who previously served as Peace Corps Volunteers. The information will be used to confirm the individual’s legal qualifications to participate in an online pilot program interacting with communities in lieu of in-person activities. The information will be used by VRS staff to ensure the individual has not had a significant change in legal status since the Close of Service date with the Peace Corps. The form is designed to allow the individual to provide legal updates for certain events that may have occurred since exiting Peace Corps volunteer service. This form replicates the legal section of re-entry application form that is still in use, PC-1503, “Expedited Evacuee Re-entry Application,” OMB Control Number 0420-0571; and is a modification of the legal section of traditional application form, PC-1502, OMB Control Number 0420-0005.

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

The “Legal Status Update Form for the Virtual Volunteer Service Pilot Program” is accessed through the Peace Corps website and is collected electronically by the VRS staff.

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

The Peace Corps limited the legal update questions to three key questions, with a fill-in area to explain any affirmative answers. This form allows for RPCVs to provide legal updates for those who are interested in participating in the remote pilot program, and are not yet able to attend in-person Volunteer service due to COVID-19. The electronic, web-based nature of the application allows for essential staff to view the information and coordinate with Pilot program organizers.

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

N/A

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

The Legal Status Update Form for the Virtual Volunteer Service Pilot Program form only requests essential information needed to consider RPCVs who are already registered based on their earlier volunteer time. This supports the Peace Corps overall responsibility to host countries. The Virtual Pilot program participants will represent the United States in those countries overseas. This legal questionnaire is necessary to ensure that the individuals selected for the Virtual Pilot program meet the same standards and have not had a change in legal status since becoming members of the public.

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

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

1. **Consultation.**

The agency published a Federal Register Notice for emergency processing as 85 FR 58403 on September 18, 2020. We did not receive any public comments. There was an unforeseen internal delay since that publication. We have not consulted with other agencies to obtain this information because the information is about the Peace Corps RPCV applicant; therefore, other agencies are not likely to have this information.

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

There is no payment or gift provided to respondents.

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

The form has a Privacy Act of Statement listing the System of Records, PC-10, PC-17, and PC-18; and the Paperwork Reduction Act Burden Statement.

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

The following questions have been taken from PC-1503, “Expedited Evacuee Re-entry Application,” OMB Control Number 0420-0571; a modification of the original application form (OMB Control Number 0420-0005) with sensitive questions that make it possible for Peace Corps to determine if a virtual volunteer might neglect legal responsibilities while representing the Peace Corps, or if they are in compliance with Peace Corps’ restriction on intelligence activities.

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

|  |  |
| --- | --- |
| Peace Corps Application |  |
| 1. Number of respondents
 | 150 |
| 1. Frequency of response
 | One time |
| 1. Completion time
 | 5 minutes |
| 1. Annual burden
 | 8.5 hours |

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

The estimated start-up costs were as follows: There will be no cost to respondents.

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

|  |  |
| --- | --- |
| Year operations & maintenance | $10K |

1. **Explanation of change in burden.**

This is a first-time form. There is not a change in the burden.

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

The results of this collection of information will not be published.

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

N/A. The Agency is not seeking approval to conceal or omit the expiration date for OMB approval of the information collection.

1. **Exception to the certification statement.**

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