

**11 SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION
Natural and Cultural Resource Agencies
Customer Relationship Management (Volunteer.gov) and OF 301 Forms**
*(Volunteer Service Application OF 301, Volunteer Service Agreement OF 301a, Volunteer Sign-up
Form for Groups OF 301b)*

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.

Federal land management agencies are authorized to work with volunteers to plan, develop, maintain, and manage projects and service activities on public lands throughout the nation. This information collection request will enable the effective engagement of and capture the required information for hundreds of thousands of volunteers, and enable seamless efficient reporting on their projects and activities.

Laws, statutes, and regulations listed below authorize federal land management agencies (identified in Table 1A below) to work with volunteers:

- 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-4 – Forest Foundation Volunteers
- 16 U.S.C. §1246 – Administration and development of national trails system
- 16 U.S.C. §1250 – Volunteer trails assistance
- 16 U.S.C. §1246(h)(1) – Agreements to Operate, Develop, and Maintain Portions of National Trails
- 16 U.S.C. 742a-742j – Fish and Wildlife Act of 1956
- 16 U.S.C. 760aa, 1-4 – The National Fish Hatchery System Volunteer Act of 2006
- 31 U.S.C. §3325 – Vouchers
- 33 U.S.C. §569c – Services of Volunteers
- 38 U.S.C. §4301 – The Uniformed Services Employment and Reemployment Rights Act
- 43 U.S.C. 1737 Federal Land Policy and Management Act of 1976 (FLPMA), as amended, including amendment by Public Law 98-540 of 1984 (the BLM volunteers for the Public Lands Statute)
- PL 92-300 all – Volunteers in the National Forest Act of 1972
- 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
- Water Resources Reform and Development Act of 2014, Pub. L. 113-121, Title I, Sec. 1047(d), 128 Stat. 1193, 1255 (2014).
- PL 105-242 Sec. 1-7 - The National Wildlife Refuge System Volunteer and Community Partnership Act of 1998

Table 1A – Participating Land Management Agencies
Department of Agriculture
<ul style="list-style-type: none"> - U.S. Forest Service, and - National Resources Conservation Service
Department of the Interior
<ul style="list-style-type: none"> - 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
<ul style="list-style-type: none"> - National Oceanic and Atmospheric Administration (NOAA)
U.S. Department of Defense
<ul style="list-style-type: none"> - U.S. Army Corps of Engineers (USACE)

Agencies and their authorized partners may recruit, train, and accept the services of individuals and groups to aid in interpretive functions, visitor services, conservation measures, research and development, recreation, 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.

In February of 2016, the U.S. Department of the Interior Inspector General Report [No: 2015-CR-001](#), noted that DOI's inability to maintain an accurate count of volunteers also impacts understanding of employee injury rates and associated costs. The report recommended that all DOI bureaus use a standard method for counting and reporting the number of volunteers and the amount of time they worked. This would allow DOI bureaus to formulate strategies to address safety issues more effectively by creating a better understanding of the causes and effects of such injuries.

The volunteer management web-based portal and common OF 301 forms ("the collection") are the participating agencies' response for meeting citizens' expectations for streamlined digital services while allowing the agencies to collect the data needed to keep volunteers and the public safe. The collection allows prospective and current program participants ("volunteers") to access and apply for volunteer opportunities.

The volunteer management web-based portal ("the volunteer portal") allows volunteers to establish an account for electronic submission of program applications and to obtain the status of applications and benefits, such as the America the Beautiful Pass. In addition, the volunteer portal enables volunteers to maintain a single account application for reuse and updating to apply for all interested opportunities, rather than requiring them to complete an application for each opportunity. The collection minimizes the burden on volunteers.

Additionally, the collection addresses partner's requests to standardize and centralize data collection for more efficient data sharing and for management for the safety and security of volunteers. The renewal of this collection maintains the common OF 301 forms and maintains a reduced number of portals (originally seven across agencies, now one). With this collection,

volunteers are requested to provide a common set of information across agencies and not burdened with entering the same information into different portals. This shifts the burden to agencies to minimize the amount of data that volunteers must enter.

Revision:

The U.S. Forest Service currently manages the OF 301 forms. This collection will bring the OF 301 forms to DOI management for continued standardization of information collection and to allow the future development of online collection of OF 301 forms via the volunteer portal. Department of Interior is making the OF 301 forms a common form for use by the other public land management agencies; other public land agencies will be able to submit a request for common forms to OMB to utilize these 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.

The primary goal of this collection is to continue to provide thousands of federal field units a standardized system of records for volunteer management, allowing for greater citizen usability, security, and accessibility. We collect information from potential and selected volunteers in either the volunteer portal or in the OF 301 forms. All this information is currently used by participating agencies in the management of their volunteer programs. All information proposed for continued collection has been deemed necessary for effective and compliant volunteer management by participating agencies; information no longer required has been proposed for removal (see below). In addition, we solicited input from individual volunteers to verify that they concurred all information collected was reasonable and necessary (see section 8.2).

Participating natural and cultural resource agencies will use this information to manage agency volunteers. In addition, through the information collected, federal agencies will be more accountable to taxpayers by providing annual reports and descriptions of volunteer activities. This information will be accessible online from information gathered through the Volunteer.gov website and on the participating federal agency websites. As required, we will share general and summary information in reports to participating agencies. We may also provide this information to Congress and the public in reports. However, we will not share information regarding individual's PII. Volunteers under 18 years of age must have written consent from a parent or guardian.

See additional attachments for copy of information collected on Volunteer.gov (volunteer portal) and information collected via OF 301 forms. A review of information requested in this collection is outlined in Table 2A.

Volunteer Management Portal (Volunteer.gov)

The volunteer portal is a shared service to multiple federal agencies. The volunteer portal provides federal staff volunteer managers the ability to perform recruitment, selection, hours tracking, and certain recognition activities by accessing required services and data in a user-friendly web-based format. Additionally, the volunteer portal allows volunteers to establish an account for applying, tracking, and managing volunteer applications.

Previously, volunteers had to complete required forms for each volunteer opportunity they wished to apply to. Now, using the volunteer portal, volunteers may use a common

application to apply to multiple volunteer opportunities at the same agency or at any participating agency. All online forms are accessible via the Internet and the data is stored in a centralized database for ongoing use. All users also have easy access to update and review data.

In addition, because participating agencies can use the volunteer portal to track volunteer hours, they can capture the volunteer time reporting needed to provide America the Beautiful Volunteer Passes for volunteers that have contributed more than 250 hours. The America the Beautiful Pass provides free access to more than 2,000 federal recreation sites. Tracking volunteer hours is required to receive the benefit of the America the Beautiful pass and to prevent fraud or misuse. Previously, agencies could not track an individual's volunteer hours across agencies because there was no way to centrally share volunteer information. Now, using the volunteer portal, participating agencies can see volunteer hours across agencies. This allows agencies to reward volunteers with cumulative volunteer hours that meet the minimum.

OF 301 Forms

Participating agencies currently utilize the OF 301 Forms to collect required information to manage their volunteer programs. Agencies may choose to have volunteers complete paper-based or electronic PDF versions of the OF 301 forms. DOI intends to offer these standard forms through the volunteer portal in the future to further reduce volunteer burden and to enhance information sharing.

Revision:

The U.S. Forest Service currently manages the OF 301 forms. This collection will bring the OF 301 forms to DOI management for continued standardization of information collection and to allow the future development of online collection of OF 301 forms via the volunteer portal. Department of Interior is making the OF 301 forms a common form for use by the other public land management agencies; other public land agencies will be able to submit a request for common forms to OMB to utilize these forms.

Minor revisions are being proposed for the forms to provide clarity for users and to remove unnecessary requests for information. All revisions proposed are based on participating agency and volunteer input. A summary of those revisions is below.

OF 301 (Volunteer Service Application)

Note: Optional. Volunteers use this to express general interest, not to apply to a specific volunteer opportunity

- Instructions: "public lands officials" changed to "federal land and water management agencies" to be inclusive of all agencies which use these forms
- Instructions: Clarified that applications are submitted locally, not centrally
- Box 1: Removed request for middle name; deemed to be unnecessary
- Box 2: Updated to date of birth rather than age to interface with volunteer portal data collection and to ensure agencies can meet requirements regarding minors
- Box 5 – 8: Separated out City, State, and Zip into separate fields for clarity and easier data reporting
- Box 11: Added clarifying language to interface with volunteer portal data collection
- Box 13: Removed 'if no, additional information may be required' and updated language to align with same question on OF 301a

- Box 20: Took out language ('such as tent; camper; own, relative's, or friend's place') flagged as confusing and unnecessary
- Box 21: Clarified that advancing applications is not guaranteed
- Box 22: Removed language flagged as confusing and unnecessary ('other internet')
- Burden Statement & Privacy Act Statement: Updated to include Department of Interior information

OF 301a (Volunteer Service Agreement)

Note: individual volunteers use this to apply and agree to a specific volunteer opportunity

- Box 1: Clarified agreements are individual or group, removed additional box that previously separated these options
- Box 3: Clarified individual volunteer or group leader complete form with their information, removed separate box for clarity
- Box 5 – 8: Separated out City, State, and Zip into separate fields for clarity and easier data reporting
- Box 9: Updated to date of birth rather than age to interface with volunteer portal data collection and to ensure agencies can meet requirements regarding minors
- Box 12: Updated to "Demographics" as title, instead of 'ethnicity and race' since those titles are already listed and since 'ethnicity and race' does not encompass 12c/veterans and 12d/disability
- Box 12a: Updated to Hispanic, Latino, or Spanish Origin, to match Census language
- Box 12c: Updated to include Active Duty military
- Box 21: Moved Agreement # to "Government Official Completes this Section" area of form for clarity
- Box 27: Added checkbox options for "Background Investigation Required" and "Medical Clearance required," updated "Job Hazard Analysis" to "Risk Assessment" and added an "Other" box. These improvements will help volunteer managers better manage volunteer applications that may have special requirements due to the nature of the position.
- Box 35: Updated to checkboxes to make the forms easier for volunteers to fill out and to make the forms easier to verify by federal staff
- Burden Statement & Privacy Act Statement: Updated to include Department of Interior information

OF 301b (Volunteer Sign-up Form for Groups)

Note: volunteers in a group use this to agree to a specific volunteer opportunity

- Changed language in introduction to "federal land and water management agency" to be inclusive of all agencies using these forms
- Updated the instructions to clarify the relationship between the OF 301b and the OF 301a form, to clarify that signing indicates cognizance of the position being performed, and to clarify group leader responsibilities
- Removed Group Contact info (as it is redundant of the information collected on the OF 301a)
- Added Volunteer Age as a data field for volunteers to fill out. Note: date of birth is not requested here as the form is meant to be used by a group and that would result in unnecessary sharing of PII.
- Reordered check boxes and signature section to make the flow easier for volunteers as they are filling out form
- Revised check boxes to align with the OF 301a form

Table 2A: Data Collection Methods

Similar information is necessary to collect in both the volunteer portal and the paper forms to ensure equal access to volunteer opportunities for all participants. This collection will bring the OF 301 forms to DOI management for continued standardization of information collection and to allow the future development of online collection of OF 301 forms via the volunteer portal.

The table below details what information is collected in what form, as well as the different purpose of each form in the collection. Of note: the volunteer portal allows volunteers to auto-fill previously completed information to reduce their burden.

Data Collection Method		Volunteer Portal – Complete Volunteer Profile <i>Note: volunteers use this to express general interest, not to apply to a specific volunteer opportunity</i>	Volunteer Portal – Apply for Volunteer Opportunity <i>Note: repeating information from Profile auto-fills into Application. Individual volunteers use this to apply to a specific volunteer opportunity</i>	Form 301 – Volunteer Service Application <i>Note: Optional. Volunteers use this to express general interest, not to apply to a specific volunteer opportunity</i>	Form 301a – Volunteer Service Agreement <i>Note: individual volunteers use this to apply and agree to a specific volunteer opportunity</i>	Form 301b- Form for Groups <i>Note: volunteers in a group use this to agree to a specific volunteer opportunity</i>
Information requested:	<i>Optional :</i>					
Name		X	X	X	X	X
Phone number		X	X	X	X	X
Email address		X	X	X	X	X
Address		X	X	X	X	
Date of Birth		X	X	X	X	
Email address		X	X	X	X	X
Citizenship, permanent resident, or visa type		X	X		X	
Ethnicity	X	X			X	
Race	X	X			X	
Veteran status	X	X			X	
Disability and accommodation	X	X			X	
Emergency contact information		X	X		X	
For minors only: parental contact information and consent		X			X	
Photo release checkbox	X	X	X		X	X
Physical condition			X	X	X	X

requirements						
Description of services to be performed			X		X	
Areas of interest	X	X		X		
Qualifications and skills	X	X	X	X		
Previous volunteer experience		X	X	X		
Schedule availability		X	X	X		
Location availability			X	X		
Lodging needs			X	X		

* Department of Interior intends to further reduce duplication across the paper forms and the volunteer portal by incorporating OF 301 forms directly into the volunteer portal; this would represent a significant reduction in the duplication of information requested from recurring volunteers across multiple agencies. We expect to accomplish this before the next renewal period.

Table 2B: Data Collection Frequency

The table below details the frequency of information collected across the various forms. Of note: the volunteer portal allows volunteers to utilize previously completed information again to reduce their burden.

Form	Frequency of Information Collected
Volunteer Management Portal (online)*	
Complete a volunteer profile	Complete once and update only as needed for use across all participating federal agencies.
Apply for a volunteer opportunity	Complete once for every volunteer opportunity. The information is auto filled from the volunteer profile, minimizing time and effort. User also receives automatic notification when application is submitted and approved.
OF 301 Forms (paper or PDF)	
OF 301	Volunteer Service Application. Optional. Complete as needed to express general interest in volunteering with a particular agency or site.
OF 301a	Volunteer Service Agreement. Complete once for every volunteer opportunity.
OF 301b	Volunteer Sign Up Form for Groups. Complete once for every volunteer opportunity.

* Department of Interior intends to further reduce duplication across the paper forms and the volunteer portal by incorporating OF 301 forms directly into the volunteer portal; this would represent a significant reduction in the duplication of information requested from recurring volunteers across multiple agencies. We expect to accomplish this before the next renewal period.

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.

Volunteer information in the collection can be completed via the online volunteer portal or through hard copy or PDF. While paper versions are still available to ensure equal access, electronic use of these forms is highly encouraged. Completion of volunteer applications on the volunteer portal allows for information to autofill, reducing volunteer burden. Federal employees will assist citizens who are unable to provide data electronically.

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.

The collection helps standardize and streamline volunteer management among participating agencies. As a shared service, the volunteer portal eliminates duplication of efforts and the creation of duplicate volunteer records by creating one central point for volunteer tracking among multiple federal agencies. The common OF 301 forms eliminates duplication of similar volunteer management forms across multiple agencies. There is not a similar collection available for use.

Department of Interior intends to further reduce duplication across the paper forms and the volunteer portal by incorporating OF 301 forms directly into the volunteer portal; this would represent a significant reduction in the duplication of information requested from recurring volunteers across multiple agencies. We expect to accomplish this before the next renewal period.

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

This collection establishes common data elements and centralizes the data collected. The intention of the collection is to minimize the number of forms collected from volunteers and to eliminate the need for multiple forms across federal agencies. Information collected is the minimal necessary for program participation and reporting.

Small businesses or partner organizations that have entered into partnership agreements may currently collect this information for multiple Federal, state, and private purposes, if required. The information collected does not impose new data elements on small businesses or partner organizations above what they already collect.

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 the information gathered through this collection, participating agencies will not be able to effectively manage their volunteer programs or coordinate with other federal agencies on volunteer initiatives. If the volunteer portal online collection of information is not available, the impacted agencies would not have an efficient means to advertise volunteer opportunities or collect information about volunteers. If paper or PDF versions of the OF 301 forms are not made available, volunteers without internet access would be unable to participate in volunteer programs. If the collection is not approved, individual volunteers will need to complete more

forms that are uniquely established by individual agencies, increasing the burden on the volunteer.

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 collection, we offer volunteers a more streamlined way to participate in volunteer programs while also reducing the burden on participating agencies. We have centralized the data elements across agencies, therefore preventing multiple submissions for each different federal agency. We collect data as infrequently as possible - generally once, yearly, or updated only as necessary.

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 March 5, 2021, we published a notice asking for comments on this information collection in the *Federal Register* ([86 FR 12966](#)). In that notice, we solicited comments for 60 days, ending on May 4, 2021. We received 0 public comments in response to this notice

8.2 – Targeted Outreach

In addition to the Federal Register Notice, we consulted with the following nine individuals to obtain their views. We specifically requested input on:

- (1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;
- (2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;
- (3) Ways to enhance the quality, utility, and clarity of the information to be collected; and
- (4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

General comments on the data elements and methods led to further streamlining reflected in this supporting statement.

Table 8A: Targeted Outreach

Individual	Organization They Volunteer With
Volunteer A	National Park Service, Cabrillo National Monument
Volunteer B	National Park Service, George Washington Memorial Parkway
Volunteer C	Fish and Wildlife Service, National Wildlife Refuge System, San Francisco Bay National Wildlife Refuge Complex, CA
Volunteer D	Fish and Wildlife Service, National Wildlife Refuge System, Audubon National Wildlife Refuge, ND
Volunteer E	USACE, W. Kerr Scott Reservoir, NC
Volunteer F	USACE, Table Rock Lake, MO
Volunteer G	USACE, Lewis and Clark Lake/Gavins Point Dam, SD
Volunteer H	Bureau of Land Management
Staff I	USACE Park Ranger/Volunteer Coordinator staff at Table Rock Lake, MO

Summary of feedback received:

1. No respondents expressed concern with the collection of information in general. One respondent asked why race/ethnicity was collected, one respondent asked why age was collected, and one respondent asked how a couple might fill out a form together.
 - o Response: The participating agencies have determined that collecting demographic data is necessary to better understand the program and provide support and customer service to the volunteers. In addition, this information is frequently requested government-wide for prospective program participants during the exchange of benefits and services. Providing a form meant for couples to complete together was determined to be outside of the scope for this collection, as agencies can use existing forms (i.e., individual forms).

2. No respondents believed that any form in the collection would take longer than 15 minutes to complete, minus the respondent who said couples may be confused as to how to complete the form.
 - o Response: 15 minutes will be used as the accepted average to complete the forms, since providing a form meant for couples to complete together was determined to be outside of the scope for this collection. The exception is the OF 301b form, which is expedited for group members and will take 2 minutes for each individual to complete.
3. Respondents recommended several potential improvements:
 - o explaining the meaning of an OMB control number,
 - o providing more writing space for responses,
 - o providing more context around the volunteer availability schedule
 - o clearly mark required sections
 - o describe what is meant by agency/bureau
 - o update ethnicity and race section
 - o provide more context for 'group' leader
 - o offer space for a second emergency contact
 - Response: Many of these recommendations are reflected in the proposed changes. OMB control number is standard and will not be updated. Adjustments to form will attempt to provide as much space as possible for written responses (recognizing many volunteers will complete the forms electronically), and to provide context and instructions where possible on the forms. Agency/bureau has been moved to the agency completion section to reduce volunteer confusion. The ethnicity and race section has been updated to align with US Census categories. The group leader sections have been updated to provide clarity. A second emergency contact was deemed inessential for this collection's purpose; each volunteer program is able to collect additional information as needed.
4. All respondents recommended making the forms able to be completed electronically, such as through PDF with digital signature and the volunteer portal.
 - o Response: Improving access to electronic completion of forms is a goal of this collection. Department of Interior intends to further reduce duplication across the paper forms and the volunteer portal by incorporating OF 301 forms directly into the volunteer portal; this would represent a significant reduction in the duplication of information requested from recurring volunteers across multiple agencies. We expect to accomplish this before the next renewal period.

8.3 Additional Consultation

In a series of meetings during 2020 and 2021, the following agencies provided input on the desired content, format, and collection processes for this collection of required information. All represented agencies are members of the Federal Interagency Team on volunteerism, an interagency community of practice for volunteer managers in the federal government.

This collection is part of a continuing effort by participating agencies to adopt a standardized approach to volunteer management. When the volunteer portal and common forms were first created, these agencies were also engaged in the design and review of the prototypes.

Table 8B: Additional Consultation

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
US Army Corps of Engineers	Volunteer and Partnership 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.

Each form will show the presence of Privacy Act statement and Burden Statement as assurance to respondents. Collection and use is covered by Privacy Act System of Records DOI-05 and OPM/GOVT-1, and is consistent with the provisions of 5 USC 552a (Privacy Act of 1974), which authorizes acceptance of the information requested. Authority includes Public Law (PL) 91-357; 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107. 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.

No information on sexual behavior and attitudes or religious beliefs is collected. Demographic information that may be considered private by some such as gender, disability, race, ethnicity, and veteran status is optional. Citizenship or visa status is collected to ensure only eligible individuals volunteer, according to agency requirements.* The government commonly captures this information government-wide for prospective program participants during the exchange of benefits and services.

*National Park Service example, Director's Order 7:

5.8 Any non-U.S. citizens with legal permanent resident status in the United States may be accepted as Volunteers In Parks upon providing proof of resident status. All other non-U.S. citizens must meet Department of State and Department of Homeland Security requirements before participating as a VIP. All non-resident non-U.S. citizens who wish to volunteer for the NPS must enter the country pursuant to a J-1 or other approved visa. United States Citizenship and Immigration Services (USCIS) considers any type of reimbursement, whether it be for housing, meals, or other types of compensation (e.g., for training), as a form of payment. It is illegal for a person traveling under a normal tourist visa to work for compensation. The J-1 visa allows non-U.S. citizens to train/study in the United States for a limited time while receiving compensation. The J-1 visa application, Form DS-2019, will be issued by the NPS Office of International Affairs.

Any individual traveling on a tourist visa may volunteer provided there is absolutely no remuneration whatsoever, including, but not limited to, uniforms, meals, housing, or transportation.

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 **561,408 annual responses** totaling **100,918 burden hours**. We estimate the dollar value of the annual burden hours to be **\$2,744,979** (rounded). See **DOI Burden Calculator, Public Respondent Burden Calculator tab**.

Respondent number estimate:

We estimated the number of respondents by reviewing DOI agency numbers of volunteers, based on the average FY17, FY18, and FY19 combined; it is expected that this recent year average is a reasonable estimate for respondents moving forward. Note: FY20 data was not used for estimate as COVID-19 impacts made this an atypical year for operations.

Time estimate:

Based on consultation and current actuals, we estimated the total number of forms expected to be completed and average length of time per form. We expect each volunteer to take 15 minutes to complete one form, based on the consultation process. Because both the volunteer portal and the OF 301 forms collect similar information, the same time estimate is used across the forms. In addition, it is noted that the volunteer portal offers a time savings for volunteers, as their information auto-fills across later applications.

Cost estimate:

The estimated hourly wage estimate of \$27.20 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. This estimate is current as of submission.

Notes:

- This submission only reports DOI agency burden, and not the burden of other participating agencies using the common forms.
- There is no record-keeping burden placed upon respondents in relation to this information collection.

- Department of Interior intends to further reduce duplication across the paper forms and the volunteer portal by incorporating OF 301 forms directly into the volunteer portal; this would represent a significant reduction in the duplication of information requested from recurring volunteers across multiple agencies. We expect to accomplish this before the next renewal period.

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 to respondents or recordkeepers resulting from the collection of information; all hour burden is captured in item 12.

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 **\$2,166,136** (rounded). This amount includes \$918,912 (rounded) for Federal salary/benefits and \$1,247,223 for program administration costs. **See DOI Burden Calculator, Costs to the Federal Government Calculator tab.**

All costs are currently funded with existing government FTEs and program funds.

Revisions:

System operation and maintenance costs were undercounted in the previous collection submission because the volunteer portal was not yet in operation and because previously the OF 301 forms were managed by the Forest Service; all numbers have been updated in this submission to align with current actuals and projects.

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

Volunteer portal:

For the volunteer portal, this collection is receiving only minor updates and adjustments in hour or cost burden to reflect current use based on FY20 data (only one year of data is available for this new portal).

OF 301 forms:

The U.S. Forest Service currently manages the OF 301 forms. This collection will bring the OF 301 forms to DOI management for continued standardization of information collection and to allow the future development of online collection of OF 301 forms via the volunteer portal. Department of Interior is making the OF 301 forms a common form for use by the other public land management agencies; other public land agencies will be able to submit a request for common forms to OMB to utilize these forms.

Responses:

The number of responses estimated has been reduced over the previous approval. Previous response numbers were deemed no longer accurate for current operations (i.e., these numbers would be significant overcounts of current use). Therefore, we estimated an updated hour and cost burden by reviewing DOI agency numbers of volunteers, based on the average FY17, FY18, and FY19 combined; it is expected that this recent year average is a reasonable estimate for respondents moving forward. Note: FY20 data was not used for estimate as COVID-19 impacts made this an atypical year for operations.

Time estimate:

The overall time estimate has been reduced over the previous approval. The time estimate was reduced both due to the overall reduction in expected responses (see above), as well as the time savings anticipated for volunteers who complete forms in the volunteer portal. The volunteer portal offers a time savings for volunteers, as their information auto-fills across later applications.

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 volunteer information. We will not report any specific individual's 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 and on the OF 301 forms 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.