

Peace Corps
Supplemental Intelligence Background Questions
OMB Control Number 0420-xxxx
Supporting Statement A

Section 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.**

It has been the Peace Corps' longstanding policy to exclude from Peace Corps Volunteer service and Peace Corps employment, either permanently or for a period of time as determined by the agency, any persons who have engaged in intelligence activity or related work or who have been employed by or connected with an intelligence Agency. This policy has been reaffirmed by each successive administration.

The policy is crucial to the Peace Corps in carrying out its statutory mission that there be a complete and total separation of the Peace Corps from the intelligence activities of the United States government, both in reality and appearance. Any connection between Peace Corps and the intelligence community would seriously compromise the ability of the Peace Corps to develop and maintain the trust and confidence of the host country governments and their populations. To ensure that there is no appearance of any connection between Peace Corps and the intelligence community, the policy contains certain permanent bars. Serious doubts about an applicant's connection with intelligence activities are to be resolved in favor of exclusion.

22 U.S.C. Section 2502 (a) provides authority to collect information from the public to effectuate this where it states that "the President is authorized to carry out programs in furtherance of the purposes of this Act, on such terms and conditions as he may determine." See *also* 22 CFR 305.2(e), which discusses eligibility standards for people with intelligence backgrounds.

- 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.**

Peace Corps' Office of the General Counsel uses the form to determine any intelligence connection an applicant or an applicant's relative may have or have had and the closeness of an applicant and any relative of the applicant with an intelligence connection. The form asks about the nature of the applicant's or applicant's relative's duties, when and for how long that person performed intelligence work or worked at an intelligence agency or division thereof. The Office of the General Counsel uses this

information to determine whether the intelligence connection is substantial enough to prevent the person from being employed at the Peace Corps or serving as a Volunteer for the Peace Corps either permanently or for a set period of time from the last intelligence connection, as determined by the Office of the General Counsel. Any applicant who disagrees with the General Counsel's determination may appeal the determination to the Director of the Peace Corps.

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.

Peace Corps currently emails the questionnaire to applicants, or their relatives identified by the applicant as having an intelligence connection. The respondent returns the questionnaire to the Peace Corps by email.

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.

Information that applicants supply when applying to work at the Peace Corps or to serve as a Peace Corps Volunteer may not specifically address the nature of an applicant's intelligence connection, particularly when it is the applicant's relative who has the direct intelligence connection.

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.

Not applicable.

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 this information Peace Corps cannot make an informed judgment about whether an applicant's intelligence connection is substantial enough to prevent the applicant from applying to the Peace Corps, either permanently or for a set period of time as determined by the Office of the General Counsel.

For the Peace Corps in carrying out its statutory mission, there must be a complete and total separation of the Peace Corps from the intelligence activities of the United States government, both in reality and appearance. Any connection between Peace Corps and the intelligence community would seriously compromise the ability of the Peace Corps to develop and maintain the trust and confidence of host country governments and their populations. It could also put Volunteers at risk in the countries in which they serve.

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.**

There are no special circumstances that would cause an information collection to be conducted in a manner as described above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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 agency's 60-Day notice was published in the *Federal Register* on **September 10, 2024 [89 FR 73453]**. The agency received one (1) comment. After reviewing the comment, the Peace Corps determined that it was not germane to the Information Collection Request.

The agency's 30-Day notice was published in the *Federal Register* on **December 6, 2024 [89 FR 97079]**.

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

Peace Corps does not provide a payment or gift to respondents for completing this form.

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

Confidentiality is assured to respondents in accordance with the Privacy Act of 1974, as amended. This is set forth in the Privacy Act Statement on the questionnaire. Respondents are also directed to Section 897 of the Peace Corps Manual entitled, Privacy Act Administration.

The Supplemental Intelligence Background Questionnaire includes the following Privacy Act Statement:

Privacy Act Statement

The Peace Corps, an agency of the federal government, is required by the Privacy Act of 1974, 5 U.S.C. 552a (The Privacy Act) to advise you of the following information regarding this form. The Peace Corps follows the requirements of the Privacy Act which protects personally identifiable information that the agency maintains and uses in its systems of records.

Authority: The Peace Corps Act, 22 U.S. Code § 2501 – Congressional declaration of purpose; and MS 611 Eligibility for Peace Corps Employment or Volunteer Service of Applicants with Intelligence Backgrounds.

Purpose: The purpose of this form is to determine your eligibility for hire for a position at the Peace Corps.

Routine Uses: Use of the information collected based on this form is restricted to the purposes cited in this privacy statement or unless the disclosure is otherwise permitted under the provisions of the Privacy Act of 1974, and the agency's privacy policy. The information you provide may be used for the routine uses described in the Privacy Act, and the Peace Corps' published General System of Records Notices PC-8 Legal Files – Staff, Volunteers and Applicants for Employment.

Disclosure: The information you provide is voluntary. However, failure to provide complete information and to submit this form may slow down the hiring process, and may, over time, disqualify you from being hired for a Peace Corps position. The agency is committed to ensuring that any personal information it receives is safeguarded against unauthorized disclosure.

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.

Not applicable. The form does not ask any questions of a sensitive nature.

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 in Item 13 of OMB Form 83-I.**

*** 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.**

BURDEN HOURS

a. Estimated number of respondents	100
b. Estimated average burden per response	10 minutes
c. Frequency of response	one time
d. Annual reporting burden	16.67 hours

Peace Corps arrived at the estimated average burden per response based upon the length of time it takes to respond to the questions. No form requires the respondent to search records to respond. Peace Corps arrived at the estimated number of respondents based on current use.

13. Provide an estimate for the total annual cost burden to respondents or record-keeper's resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 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.**

*** 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 collections 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.

The four staff employees who will be assigned this project will use their government-issued, previously provided Peace Corps computers and technology (estimated at approximately \$1,000 per person). There will be no additional systems, information technology, hardware, software, operational, or service costs required beyond the pre-existing technology.

14. 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.

It is estimated that three attorneys and one support staff person would spend a half an hour a week analyzing and discussing answers to the questionnaires.

Labor cost of three attorneys (FP-1):

- 100 applications * 30 minutes per application = 3000 minutes = 50 hours.
- 50 hours = .025 average salary of FP-1 attorney (based on 2087 hours working per year).
- .025 of average salary * \$163,964 average salary FP-1 attorney = \$4,099.
- \$4,099 average per year x 3 attorneys = \$12,297.

Labor cost for support staff (FP-4):

- 100 applications * 30 minutes per application = 3000 minutes = 50 hours.
- 50 hours = .025 average salary of FP-4 support staff (based on 2087 hours working per year).
- .025 of average salary * \$87,233 average salary FP-4 support staff = \$2,181.
- \$2,181 average cost per year x 1 FP-4 support staff = \$2,181.

Description	Estimated annualized cost
Peace Corps Labor Cost for Questionnaire Processing	\$14,478

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

Not applicable.

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.

Not applicable. The information collected will not be quantified and/or published.

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.

Not applicable.

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

In accordance with the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," this form:

- (a) Is necessary for the proper performance of the agency's statutory functions;
- (b) Avoids unnecessary duplication;
- (c) Reduces the burden on small entities;
- (d) Uses plain, coherent, and unambiguous language that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) Indicates the retention periods for recordkeeping requirements;
- (g) Informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);

- (v) Nature and extent of confidentiality; and
- (vi) Need to display a currently valid OMB control number;
- (h) Was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected; and makes appropriate use of information technology.

Section B: Collections of Information Employing Statistical Methods

Collection of this information does not employ statistical methods.