1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

TECHNICAL SERVICE CENTER SUMMER INTERN PROGRAM APPLICATION

OMB Control Number 1006-NEW

Terms of Clearance: Not Applicable - New Collection in use without OMB approval.

Justification

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

The principal purpose for collecting the requested information is to recruit eligible students to participate in the Bureau of Reclamation's (Reclamation) Technical Service Center's Summer Intern Program. Each summer Reclamation's Technical Service Center seeks 30 to 50 motivated, hard-working, resourceful individuals for our summer internship program. Candidates must be enrolled in an undergraduate or graduate program in engineering or related science fields. Interns are matched to groups and projects based on current workload and the intern's field of study. The program typically includes:

- an 11-week summer internship
- weekly professional development series
- field trips to local Reclamation facilities
- capstone poster or webinar symposium
- networking activities

This information collection is necessary for the recruitment and placement of interns.

Authority for this program is given under 16 U.S. Code § 1725: Resource assistants.

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.

Reclamation uses the information to evaluate applications to select individuals to be hired as interns. This information will be collected from students applying for an internship with Reclamation's Technical Service Center summer intern program.

The form used to collect information is electronic. The information will be collected once per year prior to the summer internship period. The general contact information collected from applicants, identified in Item 1 below, will be shared with Reclamation Human Resources for purposes of onboarding the selected interns.

Items 1 through 3 request general contact information such as name, telephone number, and email address.

Items 4 through 7 collect information regarding the applicant's education such as the name of the university or college they attend, information on academic standing, areas of study, and what year of study they will be entering in the upcoming academic year, ranging from undergraduate – freshman, to graduate – PhD program.

Items 8 through 10 ask if the applicant is a returning Reclamation intern, areas of interest, and desired location preferences.

Item 11 requests applicants to submit an interest letter and resume. This information will be used to identify the best candidates for internships and place them with appropriate groups and mentors.

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.

To streamline and improve efficiencies, Reclamation has determined that this information will be collected in an electronic format. All respondents are expected to respond electronically. The results of this information collection contain personally identifiable information that will not be made public.

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.

There is no duplication. The information requested is specific to individuals wishing to apply to Reclamation's Technical Service Center summer intern program and is not otherwise available in the agency.

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

This information collection does not impact small businesses or other small entities.

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.

If we do not collect the information, we would not be able to identify suitable intern candidates and, therefore, would not be able to implement an intern program. If we collect

the information less frequently, we will not be able to identify candidates that are available in a given summer to work as interns.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - a. requiring respondents to report information to the agency more often than quarterly;

N/A.

b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The application form will be open for a set period. Reclamation will make every effort to publicize the form at the beginning of the acceptance period so that applicants have ample time to complete the required information.

c. requiring respondents to submit more than an original and two copies of any document;

Each respondent will not be required to submit more than one copy of the form.

d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

No records retention requirements will be imposed on respondents associated with this information collection.

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;

N/A.

f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Statistical data classification will not be used.

g. 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

A pledge of confidentiality is not used. No special circumstances impede the sharing of this information with others. All Reclamation data security policies will be enforced.

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.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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.

On February 3, 2022, we published a notice in the Federal Register (87 FR 6200) soliciting public comments for a 60-day period. No comments were received.

In addition to the Federal Register notice, we consulted individuals who used the application process to apply for a summer internship. While we expect variance in the amount of time required to complete and submit applications, we want to ensure our process and instructions are clear. The three applicants that we contacted, who had also applied the previous year, reported that the form was "a very organized way to collect intern information," "worked really well and was an improvement on applying to be an intern the year prior," and was "very effective at hitting most of the main points of the candidate's resume in a simple and concise way." The only suggestion was to update Question 9 to limit the number of selections an applicant can make so that they are forced to pick the most relevant areas of interest. We will update the instructions for that question.

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

We will not provide 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.

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). The Privacy Act system of records notice associated with this ICR is OPM/GOVT-5, Recruiting, Examining, and Placement Records.

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.

We do not ask 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.
 - 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.

It is estimated that the number of respondents for this information collection is 150 annually. Respondents will need to only respond for each year that they wish to apply for the intern program. The estimated completion time per response is 140 minutes. This was estimated as follows (see Table below): completion of the form requires 5 minutes, formatting and emailing the pdf packet requires 15 minutes, writing a letter of interest requires 60 minutes, and preparing a resume requires 60 minutes. The total estimated annual burden hours for this information collection is 350 hours (150 estimated respondents multiplied by 140 minutes per response on average).

The 2021 Department of Labor (Bureau of Labor Statistics) reports a mean hourly wage of \$28.01 for all workers in the United States regardless of occupation or geographic location (source http://www.bls.gov/oes/current/oes_nat.htm). The mean hourly wage of \$39.20 includes the hourly wage of \$28.01 plus 11.19 for benefits using a factor of 1.4. The total annualized cost to respondents is \$13,720 (350 hours x \$39.20).

Metric	Burden of Information Collection
Total Burden Hours per Respondent	2.33 (140 minutes)
Completion of the Form	0.083 (5 minutes)
Formatting and Emailing pdf Packet	0.25 (15 minutes)
Writing a Letter of Interest	1 (60 minutes)
Preparing a Resume	1 (60 minutes)
Total Estimated Annual Burden Hours	350
Estimated Number of Respondents	150
Total Annualized Cost to Respondents	\$13,720
Mean Hourly Wage	\$39.20
Hourly Wage	\$28.01
Hourly Benefits (using factor of 0.4)	\$11.19

- 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.)
 - a. 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, 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.
 - b. 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.
- c. 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.

We have not identified any non-hour cost burden associated with this collection.

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 \$12,411, as itemized in the table below. The mean hourly wage of \$88.65 includes the hourly wage of \$61.17 plus \$27.48 (average hourly benefits), making the total annualized cost \$12,411 (140 hours x \$88.65).

The Office of Personnel Management <u>2022 Special Salary Table Number 0753</u>, as applies to Technical Service Center Civil Engineers, to determine the annual base salary costs for staff involved in reviewing and processing the information collected as shown below. The Bureau of Labor Statistics <u>News Release USDL-22-0469 "Employer Costs for Employee Compensation—December 2021"</u> was used to determine the benefits rate of 31% for civilian workers.

Item	Annualized Cost
Personnel (salary and benefits)	\$12,411
Person-hours required for task	140
Mean Hourly Wage (2021)	\$88.65
Average hourly wage of staff (average level of staff involved is GS-13/04)	\$61.17
Average hourly benefits (31%)	\$27.48

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

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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.

There are no plans for publication of the results of this information collection.

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 appropriate materials.

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.