

**Supporting Statement
Volunteer Service Agreements and
Volunteer Service Time and Attendance Record
OMB No. 0579-0477**

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.

Section 1526 of the Agriculture and Food Act of 1981 [7 U.S.C. 2272] permits the Secretary of Agriculture to establish a program to use volunteers in carrying out programs of the United States Department of Agriculture (USDA).

The regulations in Title 5 Code of Federal Regulations (CFR), Administrative Personnel, Part 308, authorizes an Agency to establish programs designed to provide educationally related volunteer assignments for students.

The information collection is necessary to: (a) facilitate establishment of guidelines for acceptance of volunteer services under the above authorities; (b) determine an individuals' eligibility and suitability to serve as a volunteer in Marketing and Regulatory Programs (MRP), USDA; and (c) comply with the Office of Personnel Management (OPM) regulation to require documentation of volunteer service.

MRP is asking OMB to approve, for 3 years, its use of these information collection activities associated with its volunteer service program.

2. Indicate how, by whom, how frequently, 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.

MRP uses the following information collection activities to assist its program officials, administrative personnel, and human resources offices in determining volunteers' eligibility and suitability for volunteer service.

Student Volunteer Service Agreement and Recordkeeping (MRP Form 126A); (5 CFR 308.102(b)); (Individuals; Business)

The form is used to record the agreement between the Agency, the educational institution, and the student. The agreement must be completed by the student volunteer and legal guardian (if the student is under age 18) for each period of volunteer service before the volunteer begins the

work assignment. The agreement is maintained by MRP in the Official Volunteer File and by the Educational Institution as a record of volunteer service.

Nonstudent Volunteer Service Agreement (MRP Form 126B); (7 U.S.C. 2272); (Individuals)

The form is used to record the agreement between the Agency and the prospective volunteer. The agreement must be completed by the nonstudent volunteer and legal guardian (if the volunteer is under age 18) for each period of volunteer service before the volunteer begins the work assignment. The agreement is maintained by MRP in the Official Volunteer File as a record of volunteer service.

Volunteer Time and Attendance Record and Recordkeeping (MRP Form 126C); (5 CFR 308.102(b)); (Individuals; Business)

The form is used to record the periods of volunteer service, and the information is maintained by MRP in the Official Volunteer File and by the Educational Institution as a record of volunteer service.

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.

The forms are fillable and are sent and received through e-mail. The forms listed below are available on the MRP website, https://www.aphis.usda.gov/aphis/resources/forms/ct_mrp_forms.

- MRP Form 126A, Student Volunteer Service Agreement
- MRP Form 126B, Nonstudent Volunteer Service Agreement
- MRP Form 126C, Volunteer Time and Attendance Record

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

MRP collects the information listed above from individuals interested in performing volunteer assignments with MRP agencies. The information collected is required to fulfill the Agency's responsibility to establish guidelines and procedures for acceptance of volunteer services from students and individuals. This information collection is not duplicative of any other information collection effort.

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

APHIS has determined none of the respondents in the information collection are considered small entities. This information collection is designed to comply with OPM regulations that require documentation of volunteer services and establish guidelines and procedures for acceptance of volunteer services from individuals in compliance with USDA regulations.

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 this information collection were not conducted, MRP would not be able to determine the individual's eligibility and suitability to serve as a volunteer in compliance with USDA and OPM regulations.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

- **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 secret, 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.**

No special circumstances exist that require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

APHIS engaged in productive consultations with the following individuals concerning the information collection activities associated with this program. They were contacted by email to request their feedback about the information APHIS collects to establish its Volunteer Service Agreements and Volunteer Service Time and Attendance Record program. The respondents stated that they had no concerns with any of these items and had no further recommendations.

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On Wednesday, May 17, 2023, APHIS published in the Federal Register (85 FR 31478), a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. APHIS did not receive any comments from the public.

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

This information collection activity involves no 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.

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a. In addition, the collection and use are covered by Privacy Act System of Records (SORN) OPM/GOVT-1 and USDA/OP-1, and is consistent with the provisions of 5 U.S.C. 552a (Privacy Act of 1974), which authorizes acceptance of the information requested on this form. The data will be used to maintain official records of volunteers of USDA for the purposes of tort claims and injury compensation. Furnishing this data is voluntary; however, if this form is incomplete, enrollment in the program cannot proceed.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

The information collection activity is necessary to assess the eligibility and suitability of individuals who seek to volunteer their services to MRP. Individual volunteers may be subject to the Agency's Personal Identification Verification systems of identity proofing and background investigations to verify identity defined in USDA's Departmental Manual 4620-002, Chapter 4.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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.**

See APHIS Form 71. Burden estimates were developed from information maintained in the MRP Volunteer Service Data Base maintained by the Human Resources Division Operations Branch.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

APHIS estimates the total annualized cost to respondents to be \$7,688. APHIS arrived at this figure by multiplying the hours of estimated response time (151 hours) by the estimated average hourly wage of the above respondents (\$35.14) and then multiplying the result by 1.449 to capture benefit costs.

The average hourly rate used to calculate the estimate is \$35.14, SOCC 25-9031 (Instructional Coordinators). The rate was found at the U.S. Bureau of Labor Statistics website, https://www.bls.gov/oes/current/oes_stru.htm. The individual respondents are engaged in activities for which they are not paid except for authorized expenses associated with performance of volunteer activities. The activities that the volunteers perform will vary based on the needs of the Agency and the interest of the individual. A total annualized cost to these respondents is not applicable, as information on paid employment status of the respondents was not collected.

According to DOL BLS news release USDL-23-0488 dated March 17, 2023 (see <https://www.bls.gov/news.release/pdf/ecec.pdf>), benefits account for 31 percent of employee costs, and wages account for the remaining 69 percent. Mathematically, total costs can be calculated as a function of wages, resulting in a multiplier of 1.449.

13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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.

There is zero annual cost burden associated with capital and start-up costs, operation and maintenance expenditures, and purchase of services.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

See APHIS Form 79. The annualized cost to the Federal government is estimated at \$3,535.

MRP arrived at the total cost for collecting, processing, and analyzing the information collected based on a tally of the number of volunteer agreements documented within the MRP Volunteer Service Data Base. The resulting figures were based on the average grade level of employees in field and headquarters locations (GS-07 and GS-11) who would assist the volunteers with completion of an agreement and recordkeeping.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

In this renewal, there are no changes in the estimated burden.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

MPR has no plans to publish information collected in connection with this program.

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.

MPR has no plans to seek approval for not displaying the OMB expiration date on the forms in this collection.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act."

MPR certifies compliance with all provisions of the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection activity.