1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Youth Conservation Corps Application and Medical History Forms OMB Control Number 1093-0010

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.

The U.S. Department of the Interior (Interior, DOI, we) and the U.S. Department of Agriculture – U.S. Forest Service (USDA-USFS) jointly administer the YCC Program in accordance with 16 U.S.C. 1701-1706, Chapter 37 – Youth Conservation Corps and Public Lands Corps, Subchapter I – Youth Conservation Corps (Youth Conservation Corps Act of 1970 (P.L. 91-378; 84 Stat. 794) as amended in 1972 (P.L. 92-597) and in 1974 (P.L. 93-408), hereafter referred to as "the Act.")

This information collection request containing common forms is submitted on behalf of Interior and the USDA-USFS. Within the Department of the Interior, the U.S. Fish and Wildlife Service (USFWS) and the National Park Service (NPS), along with the USDA-USFS, collect information from applicants to evaluate the eligibility of youths for employment with the YCC. In addition, we collect medical history information from selected applicants to determine their ability to fully participate and to allow the agencies to make necessary reasonable accommodations as appropriate. Under the Act, Interior and the USDA-USFS cooperate to provide seasonal employment for youths between 15 to 18 years old.

The purpose of the YCC is to further the development and maintenance of the natural and cultural resources of the United States by American youth, and in doing so, prepare the young adults of this country for the responsibility of maintaining and managing these resources for the American people. Three equally important objectives, as reflected in the Youth Conservation Corps Act, are:

- Accomplish conservation work on the land,
- Provide gainful employment for individuals 15 through 18-year-old from all social, economic, ethnic, and racial classifications; and
- Develop an understanding and appreciation in participating youth for the Nation's natural environment and heritage.

Participating agencies evaluate the application, upon submission by eligible youth, to select candidates to the program. This information collection requests OMB approval for the continued use of two common forms with the YCC Program. Youths seeking training and employment with YCC must first complete the application form DI-4014, "*United States Youth Conservation Corps - Member Application*." Once selected for enrollment, the applicant is required to complete form DI-4015, "*United States Youth Conservation Corps - Medical History* Form."

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.

This a seasonal program and information is collected annually. Individuals wishing to participate must reapply each year. Only participating agencies (DOI's USFWS and NPS, and USDA-USFS) and partners who manage YCC programs on behalf of and within the participating agencies will have access to the information. This information is used to evaluate and select applicants seeking seasonal employment in the YCC program.

Form DI-4014, "United States Youth Conservation Corps - Member Application" -

The DI-4014, YCC Application will be used to evaluate each applicant's eligibility for and interest in employment. This form includes information needed to assist program staff ability to screen, evaluate, select, and assign applicants for employment. This form allows for an efficient review of the applicant's interest based on what information is needed to make a selection and to remove added burden from the application process. Also, the format has been updated to target youth audiences to YCC programs. Finally, DOI will ensure the forms are 508-compliant and fillable for electronic submission upon receiving OMB approval.

The structure and format of the YCC Application is designed to increase applicant knowledge regarding the YCC Program Overview, Eligibility Requirements, Benefits, Structure, and instructions on How to Apply on Page 1 of the form. Also, the form is organized by outlining questions to aid the applicant to be able to generate a complete application.

The justification and need for the information collected in each form is listed in the tables below.

Table 2.1 - DI-4014, YCC Application

Old Question	Updated/New Question	Reason For Change	
Gender £ Male £ Female £ Prefer not to disclose	Gender £ Male £ Female £ Prefer not to disclose £ Non-Binary £ Self-Identify as	Updated: Pursuant to the June 2022 Executive Order 14075 on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals.	
N/A	Question 7 What YCC site are you applying? Note that a separate application needs to be completed for each site you are applying to. Please specify the session dates if known. Some sites may have more than one session offered, which may be noted on the site's YCC opportunities page.	Updated: This is to make it easier for the YCC official to know what site they are applying to. Otherwise, it is difficult to tell, since there are YCC programs across three different agencies. Specifying session dates if known helps the YCC official know which session they are interested in, if there is more than one.	

Old Question	Updated/New Question	Reason For Change
	Question 8 Applicants are required to provide their own housing in the local area unless the YCC announcement clearly states that housing is provided as part of the program. Do you currently have housing in the local area from which you can commute each day?	New: Most YCC programs cannot offer housing, so this question helps the YCC official understand the applicant's housing situation.
N/A	£ Yes £ No £ N/A: The YCC site has clearly indicated that housing is provided.	
	If you do not currently have housing, explain your plans for obtaining housing if offered the position. Please note that finding short-term rentals in communities near public lands is often extremely difficult and sometimes does not exist.	
Emergency Contact Information	Removed:	This information is not needed until after the applicant has been selected. It is already included on the Medical History form
How did you learn about the YCC program? (Select all that apply)	Question 9 How did you learn about the YCC program? (Select all that apply)	Updated to include additional known resources used to communicate the YCC Program
f Website f Past/Current YCC f School Counselor f Poster f National Park	£ Website £ Past/Current YCC Member £ School Counselor/ School Newspaper/School Newsletter	
Service or U.S. Fish & Wildlife Service, or U.S. Forest Service Staff Member£ £ Other	£ Poster £ Federal Staff Member £ Online Job Board £ Social Media £ Other	
Will you require accommodations to perform work that may be assigned to you? o Yes o No	Question 11 Will you require reasonable accommodation (modification or adjustment to a job, the work environment, or the way things are usually done) to perform work that may be assigned to you? £ Yes £ No	Updated: Language is clarified to specify "reasonable accommodation" because not all youth will not be familiar with this term. They may think we are asking if they need housing accommodations. In addition, language is clarified to explain how to provide further details depending on whether the question answered is a "yes" or a "no."

Old Question	Updated/New Question	Reason For Change
N/A	Question 13. Are you a current YCC member or have you served as a YCC member in the past? £ Yes £ No If yes, where: When: Briefly describe the project(s) or work you performed:	New: This question is added because YCC members may not work more than 90 days in a calendar year. In addition, if an applicant has past YCC experience, they receive a higher wage. Past experience may also influence the work assigned to a YCC member.
You are encouraged to use the space below to complete the following essay question or attach a new page for your entire response.	Question 14. Tell us why you want to join the YCC. Optional. Your answer will help the YCC site understand what you hope to get out of the position and how they can provide a positive YCC experience for you. Since selection is random, your response will not be used in the selection process. You may choose not to respond to this question. In 250 words or less, please explain why you want to serve as a YCC member	Updated: This question was updated to make it optional so that it will not be a barrier to some people applying.
N/A	Question 15. Additional Information Please use this section to answer questions or to include more information to submit a complete YCC application. This section is optional and may be skipped if the applicant has no further information to share	New: Provides extra space to provide any additional information. The question was moved up to after the optional question about telling us why you want to join YCC.
Applicant and parent signatures and date	Applicant and parent signatures and date	Updated: Specifies a digital signature is acceptable and format of the date to be mm/dd/yyyy for consistency. Added a space for a phone number and email address to collect contact information. Language clarified to explain that youth must be no less than 18 years old by the start of the program and not older than 19 years old by the last day of the program.

Old Question	Updated/New Question	Reason For Change	
References Please list two references not related to you, with full name, address, phone number, and relationship	References Please provide four references who know you well, such as teachers, coaches, or religious leaders. At least two references must be people who are not related to you. Complete all information requested.	Updated: The form now requests four references instead of two, with two of them being individuals the applicant knows outside of the family. Some examples of references are provided to help provide the information.	

Form DI-4015, "United States Youth Conservation Corps - Medical History Form" -

Form DI-4015, YCC Medical History (Medical History) provides information needed to determine the physical suitability and any special medical needs of selected applicants. This provides a record for both the participant and the agency and is collected for the safety of both the participant and other participants of the program. Only applicants selected for employment will complete the Medical History form. For applicants under the age of 18, parental signatures and date are required.

Table 2.2 DI-4015, YCC Medical History

Old Question	Updated/New Question	Reason For Change
Gender £ Male £ Female £ Prefer not to disclose	Question 2 Gender £ Male £ Female £ Prefer not to disclose £ Non-Binary £ Self-Identify as	Updated: Pursuant to the June 2022 Executive Order 14075 on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals.
Immunization history	Question 9 Removed Polio Vaccine (IPV) Measles, Mumps, Rubella (MMR) Meningococcal Conjugate Vaccine (MCV)	Updated: The Tdap (tetanus toxoid, diphtheria, pertussis) is the only immunization required to ensure safe workplace conditions.
Are you currently taking any medications?	Question 10 Are you currently taking any prescribed medications? Are you currently taking any prescribed medications?	Updated: Added "prescribed medications" to clarify the type of medications.
To my knowledge, I have not been exposed to a contagious or infectious disease in the past three weeks, and I am in a state of health that would allow full participation in all YCC activities	Removed	New: This question was removed because it is not deemed necessary for the program.

Old Question	Updated/New Question	Reason For Change	
N/A	To Be Completed By Parent Or Legal Guardian Of The Applicant I certify that I am familiar with the Youth Conservation Corps (YCC) program and that I give my consent for my child/ward to participate in the program as a YCC member. I understand that I will not hold the United States Government responsible for any non-program accident or illness, and I authorize first aid or emergency medical care to be performed at the nearest, most adequate facility approved by the YCC. I authorize the sharing of pertinent medical information with a medical care provider in the event first aid or emergency medical care is needed.	New: This section provides YCC authorization to release medical history information to designated DOI personnel for internal use and to medical care providers in the event the enrollee needs first aid or emergency medical care. Also allows for a digital signature and specifies the format for the date to be mm/dd/yyyy for consistency.	

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.

The Fillable/Printable forms can be downloaded from participating websites. The completed forms require either an original "wet" or digital signature (by both the applicant and a parent or guardian if the applicant is under the age of 18). The documents can be scanned and returned via email or printed via postal mail to the specific YCC station.

All forms in the collection are available at

- USDA-USFS YCC website: https://www.fs.usda.gov/working-with-us/opportunities-for-young-people/youth-conservation-corps-opportunities
- NPS YCC Website: https://www.nps.gov/subjects/youthprograms/ycc.htm
- <u>USFWS Website: https://fws.gov/youth-conservation-corps</u>
- Specific Stations that engage with YCC
- 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 YCC is a unique program that is only operational on public lands within DOI (USFWS and NPS) and the USDA-USFS with specific requirements for participation. There are no other existing application forms suitable for YCC purposes. The participating agencies will use the same forms, which avoids duplication in the application process.

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

This collection will not have a significant impact on 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.

This information collection is necessary to carry out the legal mandates of the program. If this information is not collected, the USFWS, NPS, and USDA-USFS would be unable to select candidates to participate in the program. The YCC Application Form ensures uniform collection of information from potential program participants. The information collected provides participating agencies with the data needed to select program participants.

The Medical History form ensures that adequate medical information is available, ensuring that participants have the ability to perform the work assigned. Failure to collect this information would create an unacceptable safety and liability risk.

- 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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in Title 5 CFR 1320.6.

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 April 6, 2023, we published the 60-day FRN in the Federal Register (88 FR 20548) to request OMB to approve the renewal of the information collection associated with the Youth Conservation Corps Application and Medical History Forms. We solicited public comments for 60 days, ending June 5, 2023. We did not receive any comments from the public.

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who are familiar with this collection of information in order to validate our time burden estimate and to provide feedback on the clarity of instructions, usability and overall need for the form.

Table 8.1

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Organization	Title
NDC	Youth and Volunteer Program Coordinator (Pacific West Region - PWR)
NPS	Youth and Education Program Coordinator (Alaska Region - AKR)
	Youth and Volunteer Program Coordinator (Northeast Region - NER)
	Youth and Volunteer Program Coordinator (National Capital Region - NCR)
	Youth and Volunteer Program Coordinator (Southeast Region - SER)
	Youth and Volunteer Program Coordinator (Midwest Region - MWR)
	Youth and Volunteer Program Coordinator (Intermountain Region - IMR
USFS	Program Manager, National Partnership Office in DC (remote from CO)
USFWS	 Connected Communities Coordinator, Division of Visitor Services and Communications (DC)

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;

Comments from NPS Regions

All NPS regions: Yes, the Application and Medical History Form are necessary to operate this federal program.

AKR: I do not think that medical information should be collected as part of the application process. I do not think that having this information on applicants is appropriate at all and certainly would not be allowed if these applicants were not minors. I see the benefit of having this information "on file" for accepted YCC participants, but I do not think it should be in any administrator hands before the

participants have been offered and accepted a position.

• NPS Response: We have made proposed changes to the medical history form that will greatly reduce the burden on the applicant and protect their privacy, while still getting needed information for the YCC official to run the program safely and effectively. The YCC medical history form is only required to be filled out only after the YCC applicant has been selected.

SER: I think we gather more information than is needed. I am more interested in the ages of the individuals than other information gathered.

NPS Response: We are making proposed changes that will reduce the amount of information being requested. The age requirement is one factor for eligibility, however, is it not the only requirement. Additional information is needed than just the age.

MWR: We've realized over years of vetting applicants; the collection of information teaches youth applicants the importance of accurately completing application information.

- Applicant information provides program supervisors the ability to develop Work Plans and Assignments based on applicant skills.
- Gathering of information introduces young inexperienced workers to the real-world responsibilities of applying for positions.
- The process alone of gathering information seems to "cull" out individuals who are not "serious" about a position with the government.
- Gathering of information provides park hiring officials the opportunity to evenly hire gender applicants per program recommendations.
- The question asking applicants "why you want to join the YCC" really has had no bearing in applicant selection. Selections are based on interviews and skills.
- Medical information serves the hiring manager and/or supervisor with allergy information, medical needs, etc. Otherwise, the applicant may not disclose until an issue arises.

<u>Comment from USFS:</u> I think the application form is fine "as is." It doesn't seem overly burdensome in my opinion. If someone isn't vaccinated properly? Are we really able to deny them to be considered? I just re-read Public Law 93-408 and could not find one mention of anything having to do with medical history and do we require these to be answered by other federal employees?

• NPS Response: We have significantly reduced the number of details being asked in the immunization history section. Now, only the Tdap is required. The COVID-19 vaccination is not mentioned, because it is not required that everyone be vaccinated against it. We do not ask other federal employees to provide such details. The need for medical history is mentioned in the 2019 YCC Reference Manual.

2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used

Comments from NPS Regions:

PWR: The estimate for 2020 seems roughly accurate. The Application is felled out by all applicants and the Medical History Form is only completed by enrollees, so it should be between a 3:1 and 4:1 ratio. The estimated amount of time to complete the forms seems accurate as well.

AKR: There is a lot to read on this form. I think 25 minutes estimated time is likely accurate for an

adult. I think students don't understand why they are needing to read and write so much for a job that does not choose them based on merit.

NER: The estimate is fine. Parks would select an applicant before asking them to submit a medical form, therefore estimated burden time for medical is lower. We estimate that the use of form would go up approximately 35% compared to 2020 since most YCC crews were canceled in 2020 due to the pandemic. Burden hours per form would be the same.

NCR: There are more applications because more youth apply for the positions than positions that are available, meaning that everyone that applies does not get selected. Only selected YCC members complete the medical form. It is accurate more applications would be completed than medical forms in a given year. The time estimate for each form is reasonable.

SER: Cannot estimate accurately.

MWR: My estimation is as additional funding may become available. Social Media promotions will cause the NPS to see an increase of applicants. The more visibility the program has through social media, the more interest we will realize. Estimated 10% a year over 4 year. Total increase of 40%.

IMR: The estimate provided by our region was based on a 3-year average of the previous years of parks that provided YCC enrollment information. We believe this data is accurate to the best of our ability. There are often many more YCC applicants and interest than available placements. One of the NPS' largest programs, Yellowstone National Park, receives a very high number of applicants as the program is residential and attracts applicants nationwide. The current estimate of 25 minutes for the application and 14-15 for the medical form seem appropriate. Length and duration of time may vary from applicant to applicant, but this overall averaged estimate seems accurate.

NPS Response to all: As noted, there will be more numbers of applications than medical history forms, since the latter are only provided to those who are selected.

3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

Comments from NPS Regions:

AKR: I think the application is fine as it is. It has all the important contact information. The only suggestion I have is adding something as basic as a check box that says, "I have housing in the local commuting area." I know that it is mentioned A LOT throughout the website and our own job announcement, but I spend a huge amount of time following up on out of state applicants seeing if they have housing in the area (99% do not).

NPS Response: We have added a question that will address this issue.

MWR: Highlighted areas of application requirements.

- Video of "how to" complete and submit the application.
- Develop a standard fill-in-the-blank such as an online google poll design.
- A form that focuses on skills, volunteer experience, qualifications
- Explanations within an online form to accurately describe what information is being requested (with examples)

NPS Response We will take these suggestions into account. The form is currently available as a fillable PDF and will continue to be available in this way. We do not use

Google and therefore would not be able to provide this option. By law, YCC programs are not supposed to ask for further qualifications to participate in the program beyond the ones outlined in the law (including age, citizenship, legal residency, ability to complete the work, and whether they have/or will have a valid U.S. Social Security Number). No YCC applicant needs to have prior experience and therefore, asking to outline skills and other experiences would be helpful (as noted in the optional "tell us why you want to join YCC" question), but not required. We could consider providing an example of what a completed form might look like.

IMR: Providing spell check or further clarification in the long-answer sections of the form would be helpful for individuals with disabilities be successful in applying.

NPS Response: We have updated the language to make it clear the question is optional. Not all applicants have access to Word or spell check, so this would not provide a universal benefit.

<u>Comment from USFS:</u> On page 4, if they are going to provide blanks for four references, it seems better to say that we are asking for at least 2 to be completed. More inclusive gender identity question option for non-binary. Add the department of Agriculture icon to the top of the form so that forest service is represented.

NPS Response: We have updated the language to make this clear regarding the number of references required. We have also proposed more inclusive gender identity questions, including "non-binary" and "self-identify as." OMB will provide final approval on the options provided. We have added the USDA logo on the top of the form, and this will become an "open form," not specific to just DOI.

<u>Comment from USFWS:</u> We think the part on the form that asks the question about why the applicant is interested in this position should be made OPTIONAL, if it's even listed at all. This is supposed to be a random process (essentially blind) process to start with. If folks want to further access or narrow down the pool, those questions can be asked later. We want to avoid unconscious bias and remove barriers. This experience for some is their very first employment experience. They may not know what they don't know. USFWS feels strongly that the mention of providing a resume not be a factor. It should not even be listed as optional, for the same reasons mentioned above.

NPS Response: We have made this question optional so that YCC officials continue to receive additional background information from many of the applicants, as they choose to disclose additional information. We have also removed the mention of providing a resume to reduce barriers to applying.

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.

Comments from NPS Regions:

PWR and NCR: Having available a fillable electronic form that can be electronically signed would make the submission process more efficient.

NPS Response: We have added a digital signature option to the form.

AKR: It would be helpful to coordinate more with the parks on the national YCC website. For example, because the application paperwork is on the website all the time, as well as park contact information, I get "rolling" applications from the website outside of our official application period. All of these applications are from out-of-state applicants who do not have housing in the commuting area. Even with drafted email responses, it still takes time to respond to applicants who are ineligible and/or applying out of season. I see the benefit of having the information on the national page, but there has to be a way to make it clear when the application period is and who is eligible (read: ONLY THOSE WITH HOUSING). Since Yellowstone is the only residential program, I imagine this is an issue nationwide.

Although I think making this form electronic could be helpful. It has been my experience that students need help filling out the form. Some may give up and not apply if they receive the form electronically and don't have help to fill it out. Of course removing any unnecessary questions would be helpful.

NPS Response: We have updated language on the application and on the website when the application period is for each park. By law, a YCC program can be hosted at any time during the calendar year and is not limited to the summer months. Therefore, the application form should be available all year round. Parks and programs need to provide a response for those who apply who may be ineligible, or are outside of the application period, as that is the nature of this program. We can allow the form to be electronically signed, and applicants may also choose to print, manually sign, and submit by mail. We will not limit this to one option.

NER: Recommendation to use CMS element to make this OMB-approved form easier to submit to NPS sites, which would eliminate burden hours to submit form.

NPS Response: Currently, visitors to a website can send an email through the website but cannot include attachments. This is something that would need to be looked at by a developer and would not be done just for this specific program. It could take a long time before this becomes possible.

MWR:

- Permit "Zoom" meeting interviews.
- Permit applicants to forward online forms to references.
- Utilize document-sharing software between applicants, references, and receiving park hiring officials.
- Ability to set calendar reminders for applicants and/or parent(s) for completing forms.
- Notifications to hiring managers when online applications are completed and received.

NPS Response: There is currently no standard way for all of the above-mentioned points. Each program has constraints and limitations. Applicants are not required to have an interview to be selected. They may have an informational meeting once selected. Creating a portal where all applications could be viewed with the ability to send messages and reminders to applicants would require us to work with a developer to see if this is possible.

IMR: Consider whether a system like Recreation.gov or similar system could allow for electronic, centralized form applications and collection. The system of Volunteer.gov uses a similar approach and has been well received by applicants. Mobile device ready or auto-fill capabilities can assist

users in reducing time.

NPS Response: Similar to the response above, this is beyond the capabilities we have available now and would require further discussion with a developer to determine if it is even possible.

<u>Comment from USFS:</u> Seems like it [the form] could be submitted digitally and eliminate the hard copy burden. I do like the ability for them to complete it online. Forms are ideal for rural communities, easy to pass along, easy for families to fill out, and easy to scan in. For areas that have a lot of applications like in big cities, then a QR code or SharePoint site should be developed for the applicants to apply through, then the Hiring manager can access the SharePoint portal to evaluate all applicants.

NPS Response: Similar response to above. SharePoint sites are generally not made publicly available to those outside of the organization. This could create some unnecessary confusion and may make it harder to manage what the applicant can see and what the YCC officials should be able to see. QR codes linking to the various YCC program sites could be created to quickly access the link.

Comment from USFWS: Supportive of electronic signing.

NPS Response: See response above. We are adding this as an option.

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

We do 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.

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 information is not publicly available, and we only share the information with agencies having a legal interest. The information collected in these forms and the routine uses are listed in the following DOI Office of the Secretary (OS) System of Records Notices:

- Youth Conservation Corps (YCC) Enrollee Records--Interior, Office of the Secretary-25 August 22, 1991, <u>56 FR 41700</u>
- Youth Conservation Corps (YCC) Recruitment Files--Interior, Office of the Secretary-29 October 16, 1986, <u>51 FR 36862</u>
- 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. However, the request for medical history may be considered sensitive in some cases request for medical information is considered necessary to ensure that participants have the ability to perform the work assigned. Failure to collect this information would create an unacceptable safety and liability risk for the program.

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 **11,409** responses totaling **4,239** annual burden hours (Table 12.1). The estimated dollar value of the burden hours associated with this information collection is \$182,574 (rounded). We used the Bureau of Labor Statistics (BLS) news release <u>USDL-23-1305</u>, June 16, 2023, Employer Costs for Employee Compensation—March 2023. to calculate the total annual burden. BLS Table 1 lists the rate for individuals as \$43.07, including benefits.

TABLE 12. 1. Total Estimated Annualized Hour Burden

FORM	Total Annual Responses	Avg. Time per Response (minutes)	Total Annual Burden (hours)*	Hourly Labor Costs (Incl. Benefits)	Dollar Value of Annual Burden Hours	
DI-4014, United States Youth Conservation Corps – Crew Member Application						
Individuals	8,599	25 mins	3,583	\$43.07	\$154,320	
DI-4015, United States Youth Conservation Corps – Medical History Form						
Individuals	2,810	14 mins	656	\$43.07	\$28,254	
TOTALS:	11,409		4,239		\$182,574	

^{*}Rounded

- 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 is no non-hour cost burden to respondents.

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 that the total cost to the Federal Government to administer this information collection is \$245,072 (rounded). We based this on staff time to review process this information collection. We used the Office of Personnel Management Salary Table <u>2023-DCB</u> to determine hourly wage rates for GS 9/5 employees and <u>2023 RUS</u> for GS 7/5 employees. To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with BLS News Release <u>USDL-23-1305</u>.

Table 14.1 Annualized cost to the federal government for processing forms

Form	Grade/Step	Hourly Pay Rate	Hourly Rate Incl. Benefits (x 1.6)	Total time spent (hours)	Annualized Cost
DI-4014 Application	GS 9/5	\$35.27	\$56.43	2,880	\$162,518
DI-4015 Medical History	GS 9/5	\$35.27	\$56.43	600	\$33,858

Form	Grade/Step	Hourly Pay Rate	Hourly Rate Incl. Benefits (x 1.6)	Total time spent (hours)	Annualized Cost
DI-4014 Application	GS 7/5	\$25.36	\$40.58	900	\$36,522
DI-4015 Medical History	GS 7/5	\$25.36	\$40.58	300	\$12,174
				Total:	0

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

There are no program changes.

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.

We will not publish 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.