This submission is being made for revising the information collection requirements related to student applications for the provision of volunteer service to the FCC, as explained further below.

SUPPORTING STATEMENT

This information collection is seeking to revise the collection requirements from the Office of Management and Budget (OMB) for the three year clearance to collect information from students as part of their application to provide volunteer service. We previously obtained OMB clearance through the emergency process in order to comply with Executive Order 14043. This requirement is being removed from this collection.

A. Justification:

1. *Circumstances that make the collection necessary.*

The Civil Service Reform Act of 1978 authorized Federal agencies to establish programs designed to provide educationally related work assignments for students in a non-pay status. The Act provides that heads of agencies may accept, subject to regulations issued by the Office of Personnel Management, volunteer service for the United States if the service (1) is performed by a student, with permission of the institution at which the student is enrolled; (2) is to be uncompensated; and (3) will not displace any employee. Form A-384 establishes the responsibility of students, their institutions, and the FCC as a precondition to accepting individuals as unpaid volunteers.

We note that one such precondition previously included on Form A-384 was the requirement that students comply with regulations and policies pertaining to COVID-19 vaccination requirements for Federal workers. As the COVID-19 health emergency has been declared over, this requirement has been removed from this version of the form.

This information does affect individuals.

The Privacy Act Statement for this collection is the following:

Privacy Act Statement

Authority: The authority to collect this information derives from 5 U.S.C. 3111, Acceptance of volunteer service.

Purpose and Routine Uses: The information collected on this form is to allow the FCC to determine an individual's eligibility to participate in a volunteer service program administered by the agency. FCC may release information contained in this system to other individuals and entities when necessary and appropriate under 5 U.S.C. § 552a(b) of the Privacy Act, which may include but is not limited to the routine uses identified in FCC/OMD-16 (Personnel Security Files); FCC/OMD-24 (Physical Access Control System); and FCC/OMD-32 (FCC Telework Program), all posted at https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information#systems. Failure to provide the information requested on this form will result in an individual being deemed ineligible for volunteer service at the FCC.

2. *Use of information*. The information contained in the form allows the FCC to receive, evaluate, and process requests to provide volunteer service to the agency.

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- 3. Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. We anticipate that respondents will submit information through e-mail using a fillable PDF form.
- 4. *Efforts to identify duplication*. There will be no duplication of information. The information sought is unique to each employee. The Commission does not otherwise collect this information, and it is not available from other sources.
- 5. *Impact on small entities*. As respondents are individuals who wish to perform work for the FCC as volunteers, there will be no impact on small entities.
- 6. *Consequences if information not collected*. Failing to collect the information, or collecting it less frequently, would complicate the effort to evaluate and process requests by individuals to work for the agency on a volunteer basis.
- 7. *Special circumstances*. There are no special circumstances associated with this information collection.
- 8. *Federal Register notice; efforts to consult with persons outside the Commission*. The Commission published a 60-day notice in the Federal Register soliciting comments from the public on November 27, 2024 (89 FR 93583). No comments were received from the public as a result of this notice.
- 9. *Payments or gifts to respondents*. There will be no payments or gifts to respondents.
- 10. *Assurances of confidentiality*. Due to the personal and sensitive nature of the information to be collected, there is an assurance of confidentiality provided to respondents concerning this information collection.
- 11. Questions of a sensitive nature. Identifying information for student volunteers.
- 12. *Estimates of the hour burden of the collection to respondents*. The following represents the hour burden of the collection of information for whom this notice applies.
 - a. Number of estimated annual respondents: 140.
 - b. Total number of annual responses: 140.
 - c. <u>Frequency of response</u>: One-time reporting requirement.
 - d. <u>Total estimated annual burden</u>: 0.25 hours per respondent for 25 respondents filing once. Total estimated annual hours burden is calculated as follows:

140 estimated responses x 0.25 hours per response = 35 total estimated burden hours.

- e. Total estimate of annual in-house cost to respondents for the hours burden: \$1,608.
- f. <u>Explanation of calculation</u>: Although respondents will be unpaid volunteers and mostly (if not entirely) students, we value their time at an average rate equivalent to the hourly rate of a GS-11, Step 5 government staff member in the Washington, DC metro area (*i.e.*, the rate paid to a recent

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law school graduate) (\$45.94/hour in 2025). Therefore, the maximum anticipated in-house cost is as follows:

140 estimated responses x 0.25 hours per response x \$45.94/hour = \$1,608.

- 13. *Estimates for cost burden of the collection to respondents*. There are no external costs to respondents related to this information collection.
- 14. *Estimate of the cost burden to the Commission*. There will be few, if any, costs to the Commission because reviewing the completed forms will be quick and is encompassed by regular Commission duties performed by human resources personnel.
- 15. *Program changes or adjustments*. The Commission is reporting a program change to this collection. Due to the COVID-19 health emergency vaccination requirement being over, this requirement has been removed from this collection and form which did not result in any increases or decreases to the burdens.

No adjustments are being reported.

- 16. *Collections of information whose results will be published*. The collected information will not be published for statistical use.
- 17. *Display the expiration date for OMB approval of the information collection*. The Commission seeks approval to not display the expiration date for OMB approval on this information collection. OMB approval of the information collection's expiration date will be displayed on OMB's website.
- 18. *Explain any exceptions to the statement certifying compliance with* 5 *C.F.R.* § 1320.9 *and the related provisions of* 5 *C.F.R.* § 1320.8(*b*)(3). There are no exceptions to the Certification Statement.

B. <u>Collections of Information Employing Statistical Methods</u>:

The Commission does not anticipate that the collection of information will employ statistical methods.