

Revisions to Clearance for a New Information Collection: Generic Clearance Community Relations Service Supporting Statement Part A

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.**

The Community Relations Service (CRS) is requesting a 3-year generic clearance to collect information necessary to measure the impacts of its services and programs; and to improve its new and existing programs based on participant feedback and service delivery observations and reflections. CRS requests this clearance to conduct program evaluation surveys and interviews and gather feedback from program participants and non-CRS facilitators (e.g., subject matter experts). CRS has a business need for the collection of this information to understand the impacts of its programs to ensure they are aligned with the needs of its stakeholders and to gain insights into strengths and areas for improvement CRS does not have any legal or administrative requirements that require this collection.

- 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.**

The information will be used by CRS's evaluation staff as an implementation and process assessment for assessing outcomes and effects of CRS's programs and services and to inform programmatic and service delivery decisions. Additionally, these data have been used in CRS's annual report to Congress, to develop public-facing case studies, and revise internal and external resources (e.g., online toolkits). Finally, CRS will continue to develop internal program reports and dashboards for staff professional development.

- 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.**

CRS will use automated survey tools, such as QuestionPro or other DOJ approved survey instruments, to collect the information. The interviews will be recorded using digital or web-recording services. In-person interviews will be recorded with a digital voice recorder and saved in a secured restricted folder only accessible by approved research personnel. Virtual interviews will be recorded on WebEx. These methods comply with government security standards like NIST and FEDRAMP.

- 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.**

CRS and the contractor are revising the current collection instruments based on learnings from previous collections. The contractor engaged in an instrument and tools crosswalk to remove any potential duplication and ensure the instruments collect unique information that is not otherwise available. This information collection is not duplicated by any other survey and/or work being done by CRS.

- 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.**

CRS will collect information from small-to medium-sized community institutions, including schools, police departments, and city governments. CRS will use automated survey tools, such as QuestionPro or other DOJ approved survey instruments, and will conduct semi-structured interviews in a virtual or in-person setting as preferred by each individual to minimize the burden on these institutions.

- 6. Describe the consequence to the 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.**

The consequences of not collecting this information will impact CRS's ability to understand the impact of its programs and services and measure the outcomes of CRS services delivered to communities. This will also impact CRS's ability to make the necessary revisions to its programs and services to better serve its stakeholders.

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines: (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (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; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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; (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.

CRS' collection of information will be collected in a manner consistent with OMB and JMD guidelines. CRS does not anticipate any special circumstances.

- 8. If applicable, provide a copy and identify the date and page number of publications 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 60-Day Federal Register notice was published on December 20, 2023 (88 FR 88114 , OMB No. 1190-0021, p. 88114-88115). No public comments have been received.

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

CRS will provide incentives for survey completion, \$15 for each survey response, and for participating in a semi-structured interview, \$50 for each participant. Responses to previous collections were as low as 5% in some programs and services, with an average response rate of 45%, and we hypothesize that providing an incentive for participants' time and effort in these activities would ensure more responses and more valid representation. Additionally, given that interviews require additional time from a participant, beyond the time spent in program participation, a larger incentive will be given for their time.

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

CRS' mandate requires that the agency hold information learned during the regular performance of its duties confidential.

42 USC Chapter 21, Subchapter VIII §2000g-2. Cooperation with other agencies; conciliation assistance in confidence and without publicity; information as confidential; restriction on performance of investigative or prosecuting functions; violations and penalties

(b) The activities of all officers and employees of the Service in providing conciliation assistance shall be conducted in confidence and without publicity, and the Service shall hold confidential any information acquired in the regular performance of its duties upon the understanding that it would be so held.

In accordance with this mandate, CRS will not publish or make public any comments or other information collected that could be attributed to any specific individual without written consent from that individual.

- 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.**

CRS's collection of information does not include any 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 in Item 13 of OMB Form 83-I.**
 - 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. Instead, this cost should be included in Item 13.**

CRS estimates that approximately 1,227 respondents will be involved in the information collection conducted under this clearance per year. The average response time per respondent will be up to 1 hour in the form of an interview or up to 15 minutes in the form of an online survey. The estimated total hours spent per interview is 1 hour per interview or 15 minutes for the online survey. If all participants choose to complete the survey, then the estimated number of respondent burden hours is 238 hours for 950 people per year. If the full sample of interview respondents chooses to interview, then the estimated number of respondent burden hours is 277 hours for 277 people per year. The estimated annual cost (by wage) for

respondents to participate in this information collection is \$6,627.97 for 15-minute surveys if all participants complete a survey, and \$7,703.75 for 1-hour interviews if the full sample of interview respondents chooses to interview. Table 1 shows estimated annualized cost and hour burden for the two instruments.

Table 1. Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Survey							
Law Enforcement Workers	159	1	159	15 min	39.75	\$32.49	\$1,291.48
First-Line Law Enforcement Supervisors	158	1	158	15 min	39.5	\$43.61	\$1,722.60
Secondary School Administrators	105	1	105	15 min	26.25	\$51.29	\$1,346.36
Secondary School Teachers	105	1	105	15 min	26.25	\$33.33	\$874.91
Educational Counselors	106	1	106	15 min	26.5	\$30.87	\$818.06
Students	317	1	317	15 min	79.25	\$7.25	\$574.56
Total	950	1	950	15 min.	237.5 hrs.		\$6,627.97
Interviews							
Law Enforcement Workers	46	1	46	1 hr	46	\$32.49	\$1,494.54
First-Line Law Enforcement Supervisors	46	1	46	1 hr	46	\$43.61	\$2,006.06
Secondary School Administrators	30	1	30	1 hr	30	\$51.29	\$1,538.70
Secondary School Teachers	31	1	31	1 hr	31	\$33.33	\$1,033.23
Educational Counselors	31	1	31	1 hr	31	\$30.87	\$956.97
Students	93	1	93	1 hr	93	\$7.25	\$674.25
Total	277	1	277	1 hr	277 hrs.		\$7,703.75

Unduplicated Totals							\$14,331.72
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Note: Except for the student wage, all wage averages were collected from the Bureau of Labor Statistics' website listings of national wage averages. The student wage average is the federal minimum wage. Government official positions were not included in the burden cost total due to wage information not being available.

*The wages for secondary school administrators and secondary school teachers were determined by dividing the annual mean wage per occupation by 52 weeks.

13. Provide an estimate for the total annual cost burden to respondents or record-keepers 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 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 are no start up costs or costs for operation and maintenance for providing the information associated with this collection.

- 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.**

The cost associated with obtaining information in this General Clearance is part of CRS' annual budget.

Agency Staff Costs

We estimate that CRS agency staff members will spend about 50 hours overseeing the evaluation and completing fidelity logs annually. Based on an estimated cost per hour of \$62 for a GS-13 staff member, the estimated total cost for staff members is \$3,100 per year.

Contractor Costs

The estimated cost to CRS of purchasing or contracting out information collection services to the contractor, Mathematica, is \$519,244.00 annually for process and outcome evaluations. The cost is broken down by evaluation type in Table 2 below.

Table 2. Annualized cost of government contractor

Item	Annualized cost
Process evaluations	\$259,674.33
Outcome evaluations	\$259,569.33
Total annualized cost	\$519,244.00

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

CRS does not have any program changes or adjustments. The increase in burden is due to an increased level of burden from the previously approved collection to reflect including a larger number of programs in the assessment and collecting information at multiple time points for an individual program to assess change over time. Additionally material changes were made to the surveys.

- 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.**

CRS anticipates it will publish program and service outcomes and effects information in its annual report to Congress. This report is submitted in the first quarter of each fiscal year and reports on agency activities completed during the previous fiscal year. Program and service impact information included in this report will be collected during all four quarters of each fiscal year. The information will be analyzed by CRS's evaluation contractor using basic

analytical tools, such as Likert scale averaging and trend identification. Additionally, CRS will share summarized data and trends with the public through concise formats like brief reports, one-page documents, updated program pamphlets on their website, and social media posts, as appropriate. The timing and schedule for these products are currently unknown, and basic analytical skills will be applied to these publications.

Participant Outreach

Participants in this study will be a subset of (1) individuals who are currently part of the working group or council that resulted from the program, and (2) individuals who participated in the program. All participants will be asked to participate in surveys and interviews, and will also be asked if they are willing to be contacted for follow up. Respondents will be given the option to participate in surveys and interviews virtually or in person when possible. We aim to collect 70% of the survey data virtually and 30% via paper surveys, 50% of the interview data virtually, and 50% of interview data in person, conditions allowing.

Data Analysis

At least a 35% response rate is desired to conduct data analysis. The data will be analyzed using Microsoft Excel, NVivo, or a statistical package such as R or SPSS as appropriate. The data analyst will look at the interview data and conduct statistical analyses for identifying trends, implementation successes and challenges, programmatic gaps, and areas CRS can better support the community's work after the 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.

CRS will display an OMB expiration date.

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

CRS is not requesting an exception to this certification statement identified in Item 19.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not contain statistical data.