

July 10, 2018

Marta Kelly
National Park Service
U.S. Department of the Interior
1849 C Street, NW
MS 2266-MIB
Washington, DC 20240

Dear Ms. Kelly,

Thank you for the opportunity to provide comments on the US Department of the Interior's (DOI) Federal Register notice on "Natural and Cultural Resources Agencies Customer Relationship Management." On behalf of the nation's 130 Service and Conservation Corps (Corps) that work in close partnership with land and water management agencies of DOI, the US Forest Service (USFS), the US Army Corps of Engineers (USACE), and the National Oceanic and Atmospheric Administration (NOAA), we appreciate your efforts to streamline the information collection activities of the various DOI bureaus and offer an opportunity for other federal partners to utilize this new customer relationship management portal.

Corps provide youth and veterans (Corpsmembers) the opportunity to serve their country, advance their education and obtain in-demand skills. Serving in crews and individual placements, Corpsmembers perform skilled conservation, recreation, infrastructure, wildfire, disaster response, and community development service projects on public lands like through National Park Service or Bureau of Land Management. Corps enroll over 25,000 youth and veterans annually in all 50 states, DC and the territories. Corps engage an additional 100,000 volunteers, and complete thousands of service projects valuing hundreds of millions of dollars each year.

Corps have partnered with DOI and USFS on approximately \$150 million in projects over the past three years and brought an additional \$37 million more in matching funds and services to those projects. Additionally, many of our Corpsmembers qualify for federal non-competitive hiring eligibility (NCE) as authorized by the Public Lands Corps (PLC) Act (16 U.S.C. 1722 et. seq.). Ensuring a smooth and uniform information collection system for all federal land management agencies in order to accurately track impact and outcomes is important to ensure the continued best use of taxpayer funds, and also to ensure Corpsmembers are able to utilize their non-competitive hiring eligibility.

Specifically to address the questions raised in the Federal Register notice, we will provide comments on the "Stewards Engagement Portal" and the "Partnerships Module:"

(1) Is the collection necessary to the proper functions of the Office of the Secretary, Department of the Interior?

Generally we believe the collection of information is important for DOI, and other federal land management agencies, in order to identify and track the accomplishments of our Corps completing projects, and hours of Public Lands Corps participants (or Corpsmembers) to ensure their eligibility for NCE.

While information on our partnerships is important, we believe data around project accomplishments, outcomes, funding, and number of Corpsmembers engaged etc. is already covered through reporting to one of the DOI units, states, regions, or national DOI bureau offices and could be compiled through existing information sources. If this is the level of information envisioned through the Partnerships Module, we encourage DOI to examine internal processes and existing information collection that could be streamlined or revised to provide this data. We hope other federal land management agencies will adopt this same approach of a unified data collection system by utilizing this new system DOI is developing, and also examine existing internal data sources before requiring new information collection and reporting which may be duplicative.

With respect to the Stewards Engagement Portal, we support an electronic and uniform system to collect information to determine eligibility for NCE. Presently, different DOI bureaus have different rules around qualifying for PLC NCE, making it confusing for our Corps and even more so for our Corpsmembers. The ability to upload information once, toward the end of a term of service, would be important to minimize the time burden. As to the desire to collect from PLC Corpsmembers “agency work for, partner organization, project dates, where the work was completed, and total hours worked on the specific project,” it would be useful to have a profile for each partner organization and Corpsmember on the new system that can be matched and sorted. NCE qualification can be organized that way as well as different Corpsmember contributions to different partner organizations. For example, Corpsmembers may serve with different Corps, on different projects, and with different project partners during their terms of service.

As to Corpsmembers providing “qualifying factors and training” when developing a profile, we would urge further clarification and standardization around what those may be, as unclear definitions could hurt recruitment and placement of individuals with the wrong opportunities. In addition, it may be challenging to leave it up to Corpsmembers or the general public to determine their qualifying factors, training, and skill sets for certain projects or programs that Corps offer. Our Corps have their own recruiting, training, and screening processes that are used to hire Corpsmembers and meet project partner’s goals. Our Corps are liable for meeting the goals of a project agreement and for the safety of Corpsmembers and the public, so we should maintain an ability to screen and train Corpsmembers as necessary.

(2) Will this information be processed and used in a timely manner?

Collection of information around accomplishments of partner organizations, and hours for NCE, housed electronically in one system will help with timeliness of compilation and utilization of this data. At the same time, if Corps are still required to report to the various DOI units, states, regions, and nationally and report through this new system, it will slow down the process and

create an additional burden. Data is only as good as the inputs, so ensuring uniform definitions and categories for collection across DOI, and other federal partners utilizing this system, will be critical and will ease processing and use of data.

(3) Is the estimate of burden accurate?

Given the different features envisioned through the new online portal system it is difficult for us to estimate the hour's burden. If DOI is able to internally utilize such data, or Corps are able to utilize existing information already provided to various DOI bureaus, the hour's burden would be lower. Additionally, if Corpsmembers are able to enter their information for NCE one time toward the end of their term of service, and Corps themselves had the ability to upload Corpsmember information if necessary, that would be helpful in reducing the burden.

(4) How might the Office of the Secretary, Department of the Interior enhance the quality, utility, and clarity of the information to be collected?

Again, data is only as good as the inputs, so ensuring uniform definitions and categories for collection across DOI, and other federal partners utilizing this system, will be critical, and will ease processing and use of data. For example when considering the Partnerships Module, in the past there was a definition of "partner hires" at DOI that was based on the number of hours a Corpsmember worked through a partner organization for a DOI bureau. In order to ensure accurate data, definitions like this should be developed with input from partners, be uniform across DOI and projects should be tracked for example by partner organization, legal authority, dollar figure, and project type in order for DOI to accurately collect information. It should not be the burden of partner organizations to track the data though as these are DOI projects being accomplished with DOI funding. A uniform system for tracking and reporting this information across DOI should streamline this information collection, and/or require a re-examination of existing data sources to be uniform across DOI.

On the Stewards Engagement Portal, one challenge with the utilization of PLC NCE is the inability to represent NCE electronically or search for NCE-approved jobs on USA Jobs. Developing the ability for Corpsmembers who qualify for NCE to have a PLC NCE designation on their profile on USA Jobs would be helpful, and adding a search term for job postings, or some kind of PLC NCE signifier or certification would also be helpful. An additional consideration is that the federal project supervisor must certify the hours, and sign off on the certificate for NCE. An electronic system where project sponsors are able to certify the hours, and sign a digital certificate would eliminate paperwork and delays.

Recruiting can be a challenge at times. We encourage further dialogue with DOI around how we can work together to improve recruiting on a local and national level, and how this new system may help. Veteran recruitment is challenging as well, so a more strategic and coordinated approach in addition to an online portal is needed. At the same time, we post opportunities for our Corps on different platforms already and don't want to duplicate those efforts again on a new system. This new portal should be compatible with other systems like volunteer.gov for example.

(5) How might the Office of the Secretary, Department of the Interior minimize the burden of this collection on the respondents, including through the use of information technology.

Again, we believe that a large amount of data is already available through the annual reporting our Corps provide to individual DOI units, states, regions, or the national office and through internal DOI bureau data sets and project information systems. An examination of those existing sources and their reporting mechanisms may be warranted to see how they can be fed in to this new online portal. After an examination of existing data sources and collection requirements by DOI, if there needs to be a new collection of information, we encourage there to be some thoughtfulness around data compatibility, and for batch upload ability along with an examination of what information is truly necessary to demonstrate the impact and outcomes.

Corps also report outcomes and performance measures to the Corporation for National and Community Service, which administers the AmeriCorps and National Civilian Community Corps (NCCC) programs. Often this is duplicative data since the AmeriCorps and NCCC members are working on federal public lands. Having these systems be compatible would minimize the reporting burden and improve efficiency.

Thank you again for your work to streamline data collection and reporting across DOI and other federal land management partners. This effort is sorely needed along with cross-federal coordination to show the full impact of these public-private partnerships, best utilizing taxpayer resources to maintain and enhance our public lands and waters, and providing ongoing career development opportunities for our nation's young adults and veterans. We look forward to working further with DOI, and other federal partners, to ensure an efficient and effective new system.

Sincerely,



Mary Ellen Sprenkel
President & CEO