

Supporting Statement for Paperwork Reduction Act Submissions

Title: Citizen Corps Council Registration

OMB Control Number: 1660-0079

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

To complete the supporting statement, type in your responses in the white space below each question. Your responses should be full and complete and provide sufficient information to help the OMB desk officer to understand what you are planning to do and why and how the Agency/Federal Government will benefit from and use the information you will be obtaining or soliciting.

Specific Instructions

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.

Citizen Corps, an initiative launched by President George W. Bush in January 2002, has a mission to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds. In order to fulfill its mission, Citizen Corps has established a growing network of state, local, and tribal Councils that coordinate activities at these levels. The Citizen Corps Council Registration Form allows Citizen Corps personnel to ensure that proposed Councils have the support of the appropriate government officials in their area and have a dedicated member assigned to the coordination of Council activities.

Citizen Corps also manages the Community Emergency Response Team (CERT) Program. CERT has been a Citizen Corps Federal Program Partner since 2002 and directly supports the Citizen Corps Mission. As part of the CERT Program's transition from management by FEMA to the Office of Community Preparedness within the Department of Homeland Security, Citizen Corps provides a registration form for state, local, and tribal CERT Programs based on the existing Citizen Corps form. The CERT Program form will also include additional fields to provide program specific information to management and the public, and will be connected to the Citizen Corps Councils in their areas.

Information collected for Citizen Corps Councils and CERT Programs includes:

- Council/Program Name and Jurisdiction
- Council/Program Point-of-Contact Information
- Council/Program Description

- Local Endorsing Organization and Point-of-Contact Information

Additional information collected for CERT Programs includes:

- Date CERT Program established
- Number of CERT Teams within jurisdiction
- Number of trainings held and number of individuals trained
- Specific communities or individuals targeted by trainings, such as individuals with disabilities or teenagers
- Number of and times CERT Teams have been activated and the types of activities performed
- Types of additional training received and number of individuals who received additional training
- Number of CERT trainers in program, including information on where completed train-the-trainer course, and trainer's professional background
- Sources of funding
- Connection to Homeland Security strategy

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 Citizen Corps Council Registration Form is available on-line at <https://www.citizencorps.gov/citizenCorps/councilAddStart.do>. These Councils allow Citizen Corps to fulfill its mission of making communities safer by regularizing and coordinating activities between Citizen Corps and community groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues. Citizen Corps personnel review submissions to the registry in order to ensure that prospective Councils have the support of the appropriate government officials in their community and have a point of contact available to coordinate Council activities at the local, tribal, state and national levels. .

The CERT Program Registration Form is available on-line at the same website, <https://www.citizencorps.gov/citizenCorps/councilAddStart.do>. Citizen Corps personnel review submissions in order to ensure that local CERT Programs have the support of the appropriate government officials in their community and have a point of contact available to coordinate CERT Program activities at the local, tribal, state and national levels.

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.

Requested information is submitted through an electronic registration page at <http://www.citizencorps.gov>. Electronic registration of the information reduces the time burden on respondents and also increases the utility of the information for the Office of Community Preparedness.

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 information that Citizen Corps collects is not available elsewhere. Citizen Corps seeks to collect information from potential Councils specifically documenting the community that will be served by the

proposed Council or CERT Program, support from the appropriate government official in that community, and information for a point of contact for the Council or Program.

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.

N/A. Citizen Corps' collection of information should have no impact on small businesses or other small entities. Potential Councils and CERT Programs are generally sponsored and would be registered by government agencies or infrequently by large, community-based non-profits such as American Red Cross.

6. Describe the consequence to Federal/DHS program or policy activities if the collection of information is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without the collection of information as requested, Citizen Corps cannot effectively and efficiently maintain its mission to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds due to an inability to regularize and coordinate activities between Citizen Corps and community groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

N/A. Citizen Corps will collect information from potential Councils when a state, local, or tribal group seeks recognition as a Citizen Corps Council. Citizen Corps will collect information from CERT Programs when they are formally created and not more frequently than the four times/year thereafter.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

N/A. Citizen Corps is not instituting such requirements.

(c) Requiring respondents to submit more than an original and two copies of any document.

N/A. Citizen Corps is requesting one copy of all documents.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

N/A. Citizen Corps is not making such a request.

(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.

N/A. No statistical surveys are requested.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

N/A. Citizen Corps is making no such requirement.

(g) 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.

N/A. No such pledge of confidentiality is offered.

(h) 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.

N/A. No such information is requested.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

Date: March 13, 2006, p. 12705, updated May 26, 2006. No comments were received.

b. 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.

The staff of Citizen Corps has discussed in individual meetings and conversations the Council registration process, as well as the collection of data needed to facilitate this program, with representatives of several Councils, with State and local representatives at the Western, Eastern, and Central territorial SLGCP conferences on August 15-17, 2005; December 13-15, 2005; and January 9-11, 2006, respectively.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Consultations with State Citizen Corps points-of-contact and affiliates occurred at the aforementioned territorial SLGCP conferences. Citizen Corps did not receive any substantive feedback regarding the burden of relevant solicitations of information.

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

N/A. Citizen Corps Council registrants will not receive payments or gifts.

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

Citizen Corps will not collect sensitive or proprietary information. If an organization requests confidentiality, we will comply with applicable privacy regulations.

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.

N/A. Citizen Corps is not requesting such information.

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 desired. 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.

Citizen Corps anticipates one response per year from approximately 1000 potential Councils and up to four updates per year from 1110 existing CERT programs. It is estimated that entering the information requires ten minutes, resulting in an annual hourly burden of 906 hours or an average of less than one-half hour per program.

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.

N/A.

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 14.

The annualized costs should be minimal, as it will take each respondent an average of less than one-half hour per year to enter the information. The costs incurred will not exceed those incurred from normal business practices.

13. Provide an estimate 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 estimate should be split into two components: (1) 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 to keep records for the government, or (4) as part of customary and usual business or private practices.

The total annual cost of this collection of information will be minimal for respondents and will not rise above those costs incurred for customary and usual business practices.

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

This collection of information will utilize equipment and software already being used by Citizen Corps. As a result, this collection will require no additional equipment expenses beyond those incurred by Citizen Corps' normal operation. Collected information for local Councils will be reviewed primarily by Citizen Corps state points of contact who work for their state governments, resulting in no additional equipment or staff costs to the Federal Government. State and territorial Council registrations will be reviewed by Federal regional personnel and will incur minimal staff expenditures. It is estimated that the review and verification of a state Council application would take 30 minutes. These Federal employees average Grade 13 salaries and the cost of their review would be approximately \$706.44 (0.5 hours X 56 respondents X \$25.23 hourly wage).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

The addition of some data to be collected regarding CERT Programs is a program change and it will result in an estimated additional 40 minutes per year per CERT Program. The additional financial and time burden is included in 12.a above.

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.

N/A. Citizen Corps will not publish the information it collects.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

N/A. Citizen Corps is not seeking this approval.

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

N/A. There are no exceptions in the Citizen Corp submission.