

October 31, 2006

Supporting Statement for Paperwork Reduction Act Submissions

Title: General Admissions Application (Long and Short) and Stipend Forms

FORMS: 75-5, 75-5a, 95-22, 75-3, 75-3a

OMB Control Number: 1670-0002

A. Justification

1. Describe the need for the collection of information and legal or administrative requirements.

Public Law 93-498, Federal Fire Prevention and Control Act, as amended, established the National Fire Academy (NFA) to “advance the professional development of fire service personnel and of other persons engaged in fire prevention and control activities...” and authorizes the Superintendent, NFA, to “conduct courses and programs of training and education...”. Public Law 106-390, Robert T. Stafford Disaster Relief and Emergency Assistance Act, authorizes the President to establish “a program of disaster preparedness that utilizes services of all appropriate agencies and includes...(2) training and exercises...” Under the authorities of Executive Order 12127 and 12148, the Director, Federal Emergency Management Agency, is responsible for carrying out the mandates of the public laws mentioned above. The Director established the National Emergency Training Center (NETC), located in Emmitsburg, Maryland, which houses the NFA and the Emergency Management Institute (EMI). In addition, the Homeland Security Act of 2002, creating the Department of Homeland Security, transfers some of the powers and responsibilities of the Director of the Federal Emergency Management Agency to the Under Secretary for Emergency Preparedness and Response to carry out the mandates specified above.

NFA works to enhance the ability of the fire service and allied professions to deal more effectively with fire and related emergencies. NFA's courses and programs are delivered on-campus at the NETC facility and the Noble Training Center (NTC) in Anniston, AL, and throughout the Nation in coordination with State and local fire training officials and local colleges and universities. Off-campus courses are offered in conjunction with State and local training institutions.

Courses presented at NFA are equal in difficulty to those at the college-university level. Academy students may be eligible for college credits upon completion of certain courses. Although the Academy itself is not an accredited institution, college credits can be transferred to a student's degree program already underway.

EMI provides State and local emergency managers, public officials, and related professionals with quality emergency management training. EMI serves as the national focal point for the development and delivery of emergency management technical training and professional education to enhance the mitigation, preparedness, response, and recovery capabilities of Federal, State, local, and tribal government emergency managers and others in the public and private sectors who have responsibility for serving the public in time of disaster or emergency. EMI's courses and programs are delivered on-campus at NETC and NTC, and throughout the Nation in coordination with Regional, State and local emergency management officials and local colleges and universities. Resident and off-campus training is administered by EMI. A number of EMI courses are recommended for accreditation by the American Council on Education (ACE), and can be taken for credit. In addition, the majority of EMI courses have Continuing Education Units assigned to them.

2. Identify how, by whom, and for what purpose the information is to be used.

NFA and EMI use FEMA Form **75-5, General Admissions Application**, to admit applicants to courses and programs offered at NETC, NTC, and various locations throughout the United States. Applicants complete FEMA Form 75-5 and send it to the Office of Admissions. NETC personnel use the application to determine eligibility for courses and programs offered by NFA and EMI. Information from the application is maintained securely in the Admissions System.

NFA and EMI use FEMA Form **75-5a, General Admissions Application Short Form**, to admit applicants to courses and programs offered at NETC, NTC, and various locations throughout the United States. Applicants use these forms only when NETC personnel do not need to determine eligibility for courses and programs offered by NFA and EMI. Information from the application is maintained securely in the Admissions System.

Both forms **75-5 and 75-5a** are currently available electronically for downloading, filling out, and printing. A new online version of the form is being developed (Please refer to Question #3 for the form prototype). In the near future, it is expected that applicants will be able to provide the information on-line through a web module to the admissions system.

FEMA forms **75-3 and 75-3a**, Student Stipend Agreement and Student Stipend Agreement (Amendment), respectively, will also be available to students electronically since it constitutes a part of the application and admission process for which forms 75-5 and 75-5a will be used. Consequently, copies of both forms and the estimation of its respective burden hours are included in this package.

FEMA Forms 75-3 and 75-3a, Student Stipend Agreement and Student Stipend Agreement (Amendment), respectively, are provided to individuals who have been accepted to attend certain NFA and EMI courses for which a stipend is paid. With Stipend reimbursement is generally limited to classes offered at the Emmitsburg and Anniston facilities. The 75-3 is printed from the admissions system with the name business phone, and mailing address already on the form and is given to the student as part of the check-in process. The student only has to sign and date the form and provide certain supporting documentation. The 75-3a form is used when there is a supplemental reimbursement request for expenses that occurred after arrival at NETC.

In addition to the General Admissions Applications, individuals who have applied for and complied with the first portion of the application process for the NFA Executive Fire Officer Program will be sent a second essay-based application form (FEMA Form 95-22) to complete. This form is also included in the estimation of burden hours.

In addition to the General Admissions Applications, a letter requesting admissions, a resume, a letter of recommendation from the applicant's supervisor, a copy of the applicant's diploma or transcript, and an organizational chart depicting the applicant's position, the applicant completes and FEMA Form 95-22 as part of the application process for the NFA Executive Program Officer Program. This Program includes four courses over a four-year period and a requirement to produce an applied research project at the conclusion of each course. It is only open to senior level fire officers. This form is also included in the estimation of burden hours.

The Admissions system:

1. Provides a consolidated record of all NFA or EMI sponsored or NFA state sponsored training taken by a student that can be used to support the student's consideration for professional advancement.
2. Identifies or verifies participation in any prerequisite courses.
3. Produces a transcript that can be used by the student in requesting college credit or continuing education units for courses completed. Presently, most of the resident courses and many off-campus courses can be considered for

credit by degree granting institutions. It is the intent that all of the NFA or EMI sponsored courses will receive accreditation or continuing education unit consideration in the future.

4. Determines which students receive stipend payments. Stipends are not paid to Federal employees or foreign students.

In attempting to accomplish this goal it was determined that specific information needs to be collected by all parties so a unified database can be developed.

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, and any consideration of using information technology to reduce burden.

Currently EMI, NFA and the NETC Admissions Office are working towards consolidating, or linking databases so that FEMA can eventually have a single source for training information. Computer disks were developed to allow the States to enter information for students attending NFA hand-off courses. The disks are to be sent to the Admissions Office, where they will be downloaded into the Admissions System. That system is currently being upgraded.

Currently, the NETC Admissions Office is working towards a more automated system where applicants will be able to apply on-line for courses. This will permit the applicant to enter the information being collected directly into a format mirroring the admissions application that can be electronically downloaded into the admissions system. Coupled with this is an electronic approval process where electronic approval of the supervisor as well as any other required approvals can be obtained. For NFA courses conducted at the state and local level, there will be the capability to electronically transmit the student information to the admissions system. The system is currently being upgraded.

At this point both forms **75-5 and 75-5a** are electronically accessible for filling out, saving and printing. This involves two separate transactions for the student and the admissions staff. In the near future, applicants will have the ability to submit the requested information electronically using a web module to the admissions system. Since many of our students take courses on-line and in special groups it would be more efficient for the student and for FEMA to use the automated form which allows for simultaneous enrollment and testing.

A prototype of the online version is shown as a screen view in the NETC Admissions System Requirements Documents; a) Web and Vehicle Modules and b) Web Electronic Approval included in this submission package. The documents

also state the technological safeguards to secure the information. All required disclosures related to privacy issues, voluntary responses, the need to collect the required information and the OMB valid number and expiration date will be made available to respondents previous to their accessing the forms electronically and/or online. Once this capability is achieved, the application information and subsequent disposition of that application will be available for the applicants to apply and submit, and receive admission notification electronically. The electronic notification will also allow the student to download student information prior to attending the course.

4. Describe efforts to identify duplication.

Courses are only available via National Fire Academy.

Every effort is made to avoid requesting the same information more than once. As stated above, information from the admissions system is preprinted on the form 75-3 so that the student does not have to repeat that information.

5. Describe the impact this collection of information will have on small businesses or other small entities, and any methods used to minimize burden.

This collection of information does not involve small businesses or other small entities.

6. Describe the consequence to Federal/FEMA 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.

If the information were not collected, there would be no way to ensure that applicants to courses offered by NFA and EMI were eligible to attend. In addition, if FEMA Forms 75-5 were not used for resident and select off-campus courses, it would be impossible to evaluate the appropriateness of students applying for classes. It would also be impossible to maintain the type of records necessary to keep the ACE recommendation for college credit awards, since accreditation standards require documentation of an official and consistent admission process. FEMA Forms 75-5a allow students to apply for select courses without having to fill out the longer form, but still provide information in the Admissions System. The new FEMA Forms 75-5 and 75-5a (automated) will allow students to apply and check the status of that application electronically.

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.

Potential students only complete the information when requested to do so. This does not occur more often than quarterly.

The information is only requested of individuals who are interested in applying for a course offered by NFA or EMI. Since the target audience for the courses involves a narrow scope of the population, providing the information is limited to that target audience.

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

There is not a timed response for these application and stipend forms.

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

Students are not required to provide more than the original 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.

Respondents are not required to retain any records in connection with the application process; however, they may want to retain a copy of the completed General Admissions Application.

(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.

Admissions applications or stipend forms are not statistically analyzed.

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

Statistical data classifications have not been utilized by these forms.

(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.

A pledge of confidentiality is not used for these applications.

(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.

Respondents are asked to provide certain privacy act protected information. Collection of this information is addressed in the Privacy Act statement on the application. Access to the information is tightly controlled within the organization.

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.

A 60-day Federal Register Notice was published for comments on October 24, 2006, Volume 71 No 205 on page 62274-62275. There were no comments received for this information collection.

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, and on the data elements to be recorded, disclosed, or reported.

The American Council on Education (ACE) reviews Academy courses and makes recommendations for credit equivalencies. Through the ACE's Program on Non-Collegiate Sponsored Instruction, ACE reviews formal training developed outside colleges and universities and publishes its recommendations in "The National Guide to Educational Credit for Training Programs," a guide used by educational institutions throughout the country.

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. Explain circumstances that preclude consultation in a specific situation.

United States Fire Administration has reviewed the forms and processes and determined that no changes were necessary to the existing forms or processes.

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

No gifts or payments were provided.

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

Since the recordkeeping system contains personal information about the program participants, the security of this information is maintained through administrative and technological controls. Administratively, student data use is restricted to authorized employees who must access such information in their normal duties. Release of individual student information must be requested in writing by the individual or with his or her written approval. A privacy act statement is present on each form to ensure each applicant that the confidentiality of information provided will be maintained. The automated versions of the forms provide the applicant with security precautions regarding the collection of his/her personal information through the use of technological safeguards (i.e. secured web-site, etc). Please refer to NETC Admissions System Requirement documents for detailed technological safeguards. The information collected is not shared with anyone nor used for any purpose other than training eligibility and tracking for students' records. Individual identifiers are used exclusively to ensure accuracy of recordkeeping.

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. 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.

The questions regarding sex, age, race and ethnicity of the applicant are strictly used for purposes of an overall student profile and the tracking of attained training. Applicants are informed of the voluntary nature of responding to these questions. The answers (or lack thereof) have no effect on the determination of training eligibility. However, such information provides a means for the Admissions Office to review the profile of the class to take other actions needed to

ensure equal opportunity in the admissions policies, if deficiencies are found. It also provides the Admissions Office with information that uniquely identifies the student and enhances accuracy in recordkeeping.

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. 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.

The total estimated burden for FEMA Forms 75-5, 75-5a, and the new FEMA Forms 75-5 and 75-5a (automated), FEMA 75-3, and FEMA 95-22 is **11,167 hours**, calculated as follows:

FEMA Form 75-5, General Admissions Application

Number of Responses	15,000
Time per Response	9 minutes
Estimated Annual Burden	2,250 hours

FEMA Form 75-5a, General Admissions Application, Short Form

Number of Responses	60,000
Time per Response	6 minutes
Estimated Annual Burden	6,000 hours

FEMA Form 75-5 (automated), General Admissions Application

Number of Responses	10,000
Time per Response	8 minutes
Estimated Annual Burden	1,333 hours

FEMA Form 75-5a (automated), General Admissions Application, Short Form

Number of Responses	15,000
Time per Response	5 minutes
Estimated Annual Burden	1,250 hours

FEMA Form 75-3 and 75-3a, Student Stipend Agreement and Student Stipend Agreement (Amendment)

Number of Responses	8,000
Time per Response	2 minutes
Estimated Annual Burden	267 hours

FEMA Form 95-22, National Fire Academy - Executive Fire Officer Program
Application for Admission

Number of Responses 400
Time per Response 10 minutes
Estimated Annual Burden 67 hours

TOTAL ANNUAL HOURS REQUESTED (ALL FORMS): 11,167

b. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

FEMA Forms	Number of Respondents	Hour/minutes Per Response	Annual Burden Hours	Average hourly wage rate	Estimated Annual Cost
75-5	15,000	9 minutes	2,250	\$33.65	\$75,712
75-5a	60,000	6 minutes	6,000	\$22.84	\$137,040
75-5 (automated)	10,000	8 minutes	1,333	\$33.65	\$44,855
75-5a (automated)	15,000	5 minutes	1,250	\$22.84	\$28,550
75-3	8,000	2 minutes	267	\$28.25	\$7,543
95-22	400	10 minutes	67	\$33.65	\$2,255
Total	108,400		11,167	\$26.50/hr	\$295,955

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Cost estimates include (a) a total capital and start-up cost component, and (b) a total operation, maintenance, and purchase of services component.

There are no start up or capital costs as this is an ongoing application process. Additional costs are explained in Question 14.

14. Provide estimates of annualized cost to the Federal Government and a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such a equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT	
ITEM	COST
Data Entry (50% of contract)	\$307,000.00
Annual Salary Cost (40% NETC Admissions Office personnel)	\$72,000.00
Printing Costs	\$500.00
New FEMA Forms 75-5 and 75-5A:	\$123,000.00
Maintenance Contract Cost (25% of contract)	\$150,000.00
TOTAL ANNUALIZED COST	\$652,500.00

15. Explain any 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 result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

There has been a program change in the number of responses and burden hours in this information collection. This is based on the average number of actual applications received each fiscal year since the last reporting period. It is also due to the EMI Independent Self-Study Program not being integrated into the admission system and applications form being consolidated. The largest single change was with the FEMA Form 75-5a (automated) which was used primarily for the Self-Study Program. The number of responses for the FEMA Form 75-3 and 75-3a may have been overstated since eligibility for the stipend program and the need to complete the form involves a limited audience. Information collection for the Independent Self-Study Program should be reported separately.

The total adjustment in burden for this collection of information requested is **now 11,167 burden hours**. The estimate for **FEMA Form 75-5 is estimated to be 2,250 hours, an increase of 750 hours**. **FEMA Form 75-5a is estimated to be 6,000 hours, an increase of 3,500 hours**. **FEMA Forms 75-5 (automated), estimated at 1,333 hours, a decrease of 2,000 hours, and FEMA Form 75-5a (automated), estimated at 1,250 hours, a decrease of 18,750 hours**. **FEMA Forms 75-3 and 75-3a are estimated at 267 hours, a decrease of 6,566 hours**. **A new form, FEMA Form 95-22 has been added with an estimated burden of 67 hours**.

16. Outline plans for tabulation and publication of results of the collection of information. 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.

These forms are used on a continual basis for the admissions and stipends of students. There are no plans to tabulate or publish the results of the collection.

17. Explain reasons why there is a need not to display the expiration date for OMB approved collections of information.

The expiration date and OMB Control Number will be displayed on all information collection instruments once OMB approves the collection.

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

There are no exceptions.