

February 1, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0046

Title: EMI Independent Study Course Enrollment and Test Answer Sheet

Form Number(s): 95-23 (Paper and electronic)

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 or 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 (give details as to why this information is being collected). 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. Provide a detailed description of the nature and source of the information to be collected.

FEMA's Training Division provides a wide variety of training to emergency management personnel throughout the country. The FEMA Independent Study (IS) Program is part of

FEMA's training program authorized under the Robert T. Stafford Disaster Relief and Emergency Act, Public Law 93-288 as amended. These courses are offered online by the Emergency Management Institute (EMI). The IS Program provides valuable training to Federal, State, local and Tribal emergency management personnel and the general citizenry of the United States without having to attend a resident course at EMI, or at a State-sponsored course. This significantly reduces the cost of hosting training and associated travel costs for students. The National Incident Management System (NIMS) is our nation's incident management system. Homeland Security Presidential Directive 5, "Management of Domestic Incidents" requires the adoption of NIMS by all Federal departments and agencies. This directive also requires that Federal preparedness assistance funding for States, Territories, local jurisdictions and Tribal entities be dependent on NIMS compliance. Training is one of the important elements that State, Territory, local and Tribal entities must complete during FY 2007 and in out years in order to become NIMS compliant. The NIMS training courses are a core part of EMI's Independent Study Program. In order to provide training completion data to the State, local, and Tribal emergency management agencies to satisfy their compliance with HSPD-5 and HSPD-8, it is necessary to collect registration information.

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. Provide a detailed description of: a) how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Form 95-23 EMI Independent Study Course Enrollment Application has been combined with FEMA form 95-9, Test Answer Sheet, to allow students to enroll in EMI IS Program course and submit their answers for course exams using one form. Previously FEMA Form 95-23 was used to order course materials for IS Program courses and FEMA form 95-9 was used to record and submit answers for course exams. The IS program office collect data from FEMA Form 95-23 to create and update student records and provide students with credit for training completion. The system will also allow FEMA to track completions and failures of course exams. The data on the electronic form will be encrypted and sent to the server to be parsed into the Independent Study database. The paper version of the form will be scanned and parsed into the database or key entered into the database. Students who complete course exams using the electronic form will receive an electronic certificate of completion. Students who complete courses exams using the paper version of the form will receive a generated version of a certificate of completion which is sent through the mail.

Students can receive college credit for successfully completing FEMA IS courses. Student completion data may be provided to Frederick Community College and Clacamus College, upon the students' request for college credits. Students can also request, completion data and/or their transcripts be provided to institutions to help obtain continuing education units. Military personnel can also provide this information to military institutions to earn retirement points for successful completion of IS courses.

FEMA will report student completion data to the State Training Officers (STO) in order to ensure compliance with NIMS as defined by HSPD-5 and HSPD-8.

- 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.**

The paper FEMA Form 95-23 is currently scored automatically through an (OpScan) optical scanner. During FY 2007 this information, in addition to all student data, will be automatically entered into the Independent Study Database System (ISDBS). This automation will reduce the burden on the government by reducing the need for multiple numerous data entry clerks to process nearly 400,000 paper application forms.

An electronic version of FEMA Form 95-23 will be accessible from FEMA's, EMI IS program training website at www.training.fema.gov/EMIweb/IS. When data from the electronic version of FEMA Form 95-23 is entered into the system, the data will be encrypted and sent to the server to be parsed into the IS database. The electronic version of FEMA form 95-23 reduce burden on students because they are able to enroll and select course information for immediate processing, using drop-down menus.

During FY 2007 EMI is planning to have a web reporting tool that allows the students to access completion of courses information and transcripts via the internet. Security measures will be taken to protect the data that is accessible to them by instituting unique identifiers other than Social Security Numbers, password protection of data, firewalls, encryption, etc. This will reduce the burden for students requesting course information.

- 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.**

There is no duplication efforts involved with this data collection. The consolidation of FEMA form 95-23 and 95-9 eliminate the need for a student to complete two forms. The consolidation of the forms will reduce by one half the amount of paperwork burden on the applicant as well as for government processing.

- 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.**

There is no impact on 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.**

The IS program is the primary platform for distribution of basic emergency management training to professionals and volunteers in emergency management, as well as awareness training for the general public. If FEMA Form 95-23 is not available for enrollment and certification for completion of FEMA EMI Independent Study's, emergency management training will not be available and emergency management officials will be in noncompliance with NIMS as defined by HSPD-5 and HSPD-8.

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.

Respondents are not required to report information to the agency more than quarterly.

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

Respondents are not required to prepare a written response to a collection of information in fewer than 30 day after receipt of it.

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

Respondents are not required 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.

Respondents are not required to retain records.

(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.

There is no statistical survey necessary for this data collection.

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

There is no requirement for 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 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.

The collection does not involve a pledge of confidentiality that is not supported by authority established in statute or regulations.

(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.

This collection does not require respondents to submit proprietary trade secret, or other confidential information.

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 System of Records Notice (SORN) was published for this information collection on October 5, 2004, volume 69, number 192, Page 59609.

A 60-day federal register notice was published on February 12, 2007, volume 72, number 28, Page 6574. There were no comments received for this data 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 (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with Federal, State, Local, and Tribal Emergency Management officials occurs annually at the EMI-hosted National Training and Exercise Conference. Consultation was also held with the New Jersey Office of Emergency Management and Office of the Attorney General. Throughout the daily use of the document by students and State, Tribal and local emergency management officials, comments are directed to the agency.

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.

EMI has consulted with State Emergency Management Offices, FEMA regional staff, and the NIMS Integration Center (NIC) staff on the development of the data collection tool. Consultation with Federal, State, Local, and Tribal Emergency Management officials occurs at the EMI-hosted Annual Training and Exercise Conference.

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

There is no payment or gift to respondents for this data collection.

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

The collection of data is in compliance with the Privacy Act of 1974. A Privacy Impact Assessment, Independent Study Database (ISDBS) was prepared review and comments on January 2007.

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.

There are no questions of a sensitive nature involved with this data collection.

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.

Annual Burden Hours

Project/Activity (Survey, Form(s), Focus Group, etc.)	No. of Respondents	Frequency of Responses	Burden Hours Per Respondent	Annual Responses	Total Annual Burden Hours
	(A)	(B)	(C)	(AxB)	(AxBxC)
FEMA Form 95-23 Paper	88,312	4	45 mins.	353,248	264,936
FEMA Form 95-23 Electronic	794,805	4	30 mins.	3,179,220	1,589,610
TOTAL	883,117			3,532,468	1,854,546

It has been estimated that approximately ninety percent (90%) of respondents will use the electronic version of FEMA Form 95-23 to enroll and test in EMI Independent Study courses. Ten percent (10%) of the total participants will complete the paper version of FEMA Form 95-23. It has also estimated that it will take approximately 45 minutes to complete the paper version of this form verse 30 minutes to complete and submit the electronic version. The frequency of responses has been estimate to be four courses annually per respondent.

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.

This request does not cover more than one form.

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.

ANNUAL COST TO RESPONDENTS

Program	Burden Hrs	Mean Hr. Rate ⁽¹⁾ (\$)	Average Cost per Respondent (\$)	Annualized Cost All Respondents (\$)
Individuals and Households*	519,273	\$18.62	\$9.31	\$9,668,863
State, local, and Tribal government officials	1,335,273	\$23.31	\$17.48	\$31,125,213
Total	1,854,546			\$40,794,076

It is estimated that 28% of Individuals and Households will enroll in EMI Independent Study courses. Individuals and Households do not complete the NIMS required data on Section 2 of FEMA Form 95-23. State, local, Tribal and Federal officials must complete entire form and constitute seventy-two percent 72% of all respondents.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing

or contracting out information collection services should be a part of this cost burden estimate. Do not include the cost of any hour burden shown in Items 12 and 14. The cost estimates should be split into two components:

It is estimated that a total annual cost burden of \$137,767 will be for respondents who use a .39 cent stamp to mail FEMA Form 95-23. (353,248 x .39 cents = \$137,767). There is no other cost to the respondent for this data collection.

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing 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.

There are no operations and maintenance and purchase of services components, to respondents for this data collection.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There is no capital and start-up cost to respondents for this data collection.

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.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT

Item	Cost (\$)
Contract Costs [25% of input data from FEMA Form 95-23)	216,454
Staff Salaries (FEMA employee spending 65% of time @ GS-13 managing Independent Study Program; FEMA employee GS-13 spending approximately 35% of time managing Independent Study Database)	86,406
Facilities	0
Computer Hardware and Software (OpScan10 software \$276 + printer equipment \$7500)	7,776
Equipment Maintenance (2 OpScanner annual maintenance/service agreements for 1 year \$6865 + 2 pressure sealer maintenance/service agreements for 1 year \$3869 + 1 printer maintenance/service agreement for one year \$900)	11,634
Travel	0
Printing (500,000 FEMA Forms 95-23 annual and 353,248 completion certificates @ .20 cents each)	170,650
Postage (mailing 353,248 completion certificates @ .39cents \$137767 + FEMA Form 95-23 - 8000 groups of forms @2.55 \$20400 + 3000 individual forms @.39 cents \$1170)	159,337
Other	0

Total	\$652,257
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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.

Changes in Hour Burden		
Data Collection Activity/Instrument	Program Changes (hours)	Adjustments (hours)
FEMA Form 95-23 Paper and Electronic		
NIMS compliance	+1,851,430	
Increase in hour per response		
Total	+1,851,430	
Changes in Cost Burden		
Data Collection Activity/Instrument	Program Changes (\$)	Adjustments (\$)
Mailing FEMA Forms 95-23 (postage)		\$137,767.
Total		+\$137,767.

This OMB submission is a reinstatement with change of a previously approved collection for which approval has expired. This collection has a **program change** of +1,851,430 burden hours. The program change is due Homeland Security Presidential Directive 5, "Management of Domestic Incidents", which requires that Federal preparedness assistance in funding States, Local and Tribal entities for training courses that are required to become National Incident Management System (NIMS) compliance. Additional data fields have been included on FEMA Form 95-23, paper and electronic version, in order to provide Independent Study training course in emergency management for States, Local and Tribal entities. The program office has also increased the hour per respondent from 1 minute to 45 minutes. Due to an increase in the number of Individuals and houses participating in the independent study program, the number of responses, for individuals and households, has increased from 187,000 to 989,091 responses

The cost burden to respondents has increased from \$27,676 to \$137,767. The cost increase is due to 353,248 FEMA Form 95-23 @ .39 cents per stamp, being mailed by students.

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.

The results of this data collection will not be used for tabulation and publication.

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

There is no reason not to display the expiration date for this data 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 is no exception to the certification statement in this data collection.

B. Collections of Information Employing Statistical Methods.

This collection does not employ statistical methods.

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection has been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be

adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.