

October 18, 2007

Supporting Statement for Paperwork Reduction Act Submissions

**Title: Request for Federal Assistance Form – How to Process Mission
Assignments in Federal Disaster Operations**

OMB Control Number: 1660-0047

Form Number(s): FEMA Forms 90-129 and 90-136

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.

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.

The Mission Assignment (MA) form, (FEMA Form 90-129) formerly referred to as the “Request for Federal Assistance Form” (RFA) is necessary to support the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288 as amended, 42 U.S.C. 5121 et seq. The MA form is used to record a request for Federal assistance by States and Federal entities to FEMA, and is used as the official FEMA obligating document to any other Federal agency. Mission assignments are directives provided by FEMA to another agency to perform specific tasks in disaster operations, on a reimbursable basis as defined in the 44 Code of Federal Regulations, 206.2(a)18.

The Stafford Act and its implementing regulations 44 CFR 206.7 authorize FEMA to issue mission assignments to other Federal agencies. Mission Assignments are not provided to respondents for solicitation from FEMA. The respondents generate a Action Request (ARF) form FEMA Form 90-136, based on needs during and after a disaster has impacted a State. FEMA Form 90-136 Action Request form (ARF) is a working document used to request federal assistance, and to prepare a FEMA Form 90-129, Mission Assignment, which is used to record Federal approved signatures, and assist in obligating funds for services from other Federal agencies and States. 44 CFR 206.8 authorizes mission assignments to be approved by State Officials. Requirements for program and finance Officials' signatures, to approve funds from the President's Disaster Relief Fund, are authorized in standard Federal financial regulations for financial operations and separation of duties.

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.

A written request for Federal Assistance is submitted on FEMA Form 90-136, Action Request Form (ARF). However, requesters of Federal assistance may also coordinate verbally with FEMA Operations Section staff. FEMA Form 90-136, ARF is the working document that produces FEMA Form 90-129 Mission Assignment (MA) form. The MA contains information that is used by FEMA management to evaluate requests for assistance from States, other Federal agencies, and internal FEMA organizations, which may result in a Mission Assignment. FEMA form 90-129 records FEMA management approval of a mission assignment obligation and records the signature of the disaster-affected State, in cases required by FEMA regulations.

- 1) State Approving Officials, make requests and certify the work is beyond their capability to perform using FEMA Form 90-136 or verbally. (Direct Federal Assistance and Technical Assistance for mission assignments).
- 2) FEMA Project Manager, agreement to monitor agency work performance and review bills for payment.
- 3) FEMA Comptroller is credentialed by and accountable to FEMA CFO for financial management, financial reporting, and management control and approve available of funds.
- 4) State Approving Official, approve the mission requested, start and end date of the assignment, and estimated cost. The State will pay any applicable cost share.
- 5) FEMA Federal Approving Official, authorizes final approval of obligating documents and obligate Federal funds stated on FEMA Form 90-129.

Federal Operations Support mission assignments to other Federal agencies do not require the signature of the State, therefore, requirements for signatures at steps 1) and 4) above are eliminated.

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.

FEMA Form 90-136 (ARF) is a working document that is submitted by facsimile or coordinated verbally with Operations Section staff and the State. FEMA Form 90-136 is not an electronic document and is processed manually. The Operations Section Chief reviews FEMA Form 90-136 before it is processed to produce a FEMA Form 90-129.

FEMA Form 90-129 (MA) is programmed into the Enterprise Coordination Approvals Processing System (eCAPS) which is incorporated into the National Emergency Management Information System (NEMIS) for electronic use. FEMA Form 90-129 feeds directly into FEMA's Integrated Financial Management Information System (IFMIS) for automatic obligation processing of funds. FEMA staff use the electronic version FEMA Form 129 and secure electronic signature authority. An electronic version of FEMA Form 129 can be printed manually for obligations, if a disaster situation warrants a power and communication outage, or if computers and other applications are unavailable.

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 are no duplication efforts.

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 information and signatures required for FEMA form 129 (MA) are in compliance with 44 CFR 206.208 regulations. FEMA would not be in compliance with this regulation if information is not collected.

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 FEMA 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.

All actions taken with respect to completing the MA are taken in the most expedited manner to facilitate efficient disaster operations. It is a self-generating request which results only when requirements arise.

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

The respondents are not required to submit more than the original and two copies of any documents associated with this collection.

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

FEMA and performing Federal agencies are required to keep any records relating to a mission assignment. FEMA retains the original and distributes, as requested, by the States.

(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.

Statistical Surveys are not involved with this information collection.

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

Statistical data classification is not needed in this information collection.

(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.

This information collection does not include a pledge of confidentiality that is not supported by authority established in statute or regulation.

(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.

There is no proprietary trade secret, or other confidential information involved in this collection.

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 August 8, 2007, volume 72, number 152, Page 44562. There were no comments received for this 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.

The Emergency Management Institute in Emmitsburg, Maryland, is the facility used to train State representatives the process for completing FEMA Form 90-136 (ARF) and FEMA Form 90-129 (MA). During training sessions, questions, comments, and suggested improvements relating to the mission assignment process are open for discussion.

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.

States, other Federal agencies and FEMA organizations were consulted in a formal review process during the review and approval of “Managing Missions Assignments during Disaster Operations Job Aid” manual, which contain FEMA Form 90-129, Mission Assignment form. FEMA Form 190-129 was sent to all FEMA Regional Offices for distribution, and reviewed by the States and regional federal agency organizations. It was distributed to all Federal agencies that are signatory for the Federal Response Plan at the FEMA headquarters level. Data fields, and the format for FEMA Form 90-129, were designed based on reviews from primary users.

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

There is no payment or gifts to the respondents.

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

There is no assurance of confidentiality provided to respondents for this data collection.

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 information 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.

The number of possible requests for Federal assistance during a disaster is approximately 56, each State and U.S. territory to which the Stafford Act applies. For every disaster, each affected state could authorize request for Federal assistance to FEMA. A State can instantaneously assess whether a population is in need of emergency resources from damage reports, and information after the occurrence of a disaster. The mission assignment process has been expedited due to a State request for federal assistance. FEMA Form 90-136 (ARF) is the standard working document used by States to request Federal assistance. A FEMA liaison to the State is present to help with State requests before deploying into a disaster field office. State requests can be made verbally by telephone or a written request using FEMA Form 90-136 (ARF). The State signature will follow once FEMA Form 129 (MA) is processed and approved by FEMA. FEMA Form 136 (ARF) can also be facsimiled to FEMA from a requestor. FEMA Form 90-129 (MA) can be produced electronically using the eCaps System, which is incorporated into NEMIS or it can be produced manually.

The States are knowledgeable of requirement in 44 CFR 206, for requesting federal assistance from FEMA and the States requirements and obligations for signing FEMA Form 90-129 (MA). The Emergency Management Institute in Emmitsburg, Maryland, is

the facility used to train/brief at less 2 State representatives per State for approximately 8 hours on the process for mission assignments.

The hour burden for States to complete a FEMA Form 90-136 is approximately 20 minutes. The annual estimated burden hours for the FEMA Form 90-136, Action Request Form is estimated to be an average of 56 responses per disaster with 35 ARF responses per Disaster. The hour burden for States to complete FEMA Form 90-129 is estimated to be 3 minute per response, for States to review and sign FEMA Form 90-129.

Data Collection Activity/Instrument	No. of Respondents	Frequency of Responses *Number of Responses x 35 Disasters per Year	Hour Burden Per Response	Annual Responses	Total Annual Burden Hours
	A	B	C	D=AxB	E=CxD
FEMA Form 90-129 Mission Assignment	56	*35x2=70	3 minute	3920	196
FEMA Form 90-136, Action Request Form	56	*35x1=35	20 minutes	1,960	653
Training	56	2	8 hours	112	896
TOTAL				5992	1,745

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 14.

Annual Cost to Respondents for Hour Burden

Respondent's Occupational Category	Total Annual Burden Hours	Mean Hour Rate (\$)	Total Annual Cost Burden (\$)
State Officials	1,745 hours	\$35.19	\$61,406.55
Total	1,745 hours	\$35.19	\$61,406.55

FEMA as determine the wage rate for State Officials using the U.S. Department of Labor, Bureau of Labor Statistics (BLS), Standard Occupation Classification (SOC) System. The mean hourly rate for State Officials was \$35.19 x 1,745 total burden hours for this data collection. Therefore, the total cost to respondents for hour burden is estimated to be \$61,406.55.

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.)

There is no annual cost to respondents or recordkeepers.

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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Describe]	N/A
Staff Salaries [Four GS 12 employees spending approximately 5 % of time annually processing information for this data collection]	\$4,926.60
Facilities [cost for renting, overhead, ect. for data collection activity]	N/A
Computer Hardware and Software [cost of equipment annual lifecycle]	N/A
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	N/A
Travel	1,000
Printing [number of data collection instruments annually]	N/A
Postage [annual number of data collection instruments x postage]	N/A
Other [Training]	3,600
Total	9,526.60

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.

A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours

Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Adjustment (hours currently on OMB Inventory)	Adjustment (New)
FEMA Form 129			396	196
FEMA Form 136			380	653
Training	0	896		
Total(s)		+896	776	849

Explain:

This collection has been reevaluated by the program office. The number of responses for this collection has increased from 1,536 to 5992. The program office currently have an adjustment in burden hours due to an increase in disasters per year from 33 to 35 and the hour per burden for FEMA form 129 increased from 1 minute to 3 minutes, to allow State Officials more time to complete and approve this form. A new program change includes an addition 896 annual burden hours to train/brief at less two State representatives on the mission assignment process annually.

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.

There are no outline plans for tabulation and publication for this information collection.

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

The OMB number and disclosure statement will be displayed as appropriate.

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 to the certification statement.

B. Collections of Information Employing Statistical Methods.

This collection does not employ the use of statistical methodology.

