

September 5, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0089

Title: FEMA Mitigation Success Story Database

Form Number(s): None

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. 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.

Consistent with performance-based management practices mandated by the Government Performance Results Act (GPRA), FEMA has outlined its critical functions to meet strategic goals and objectives, including the use of risk communication practices aimed at reducing the loss of life and property due to disasters. FEMA will partially fulfill these requirements by collecting and disseminating information describing successful mitigation and flood insurance practices occurring in communities nationwide. The Mitigation Success Stories database is one of several program strategies specifically addressing, strategic objective 1.4 which aims at helping individuals, local governments, States, Territories, tribal nations, and Federal agencies make good risk management decisions. The database is a tool that enables FEMA to translate hazard data into usable information for community risk management through risk communication. To this effect, FEMA enhanced an existing web-based database of Mitigation Success Stories, which

documents and promotes mitigation practices that encourage communities, individuals, and other key decision-makers to take action to reduce hazard risks. The All-hazards Success Story Database incorporates mitigation strategies for different hazards and project types. The core of the information comes from a format that features several required fields to include the following data elements: Project Title, Project Geographical Boundaries, State, Type of Mitigation Project, Type of Hazard, Project Cost, Funding Source, Funding Recipient, and Name of Funding Recipient.

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: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA will use the information in the database to document and disseminate first-hand experiences of States, communities, private businesses, and homeowners that incorporate mitigation and flood insurance activities that are cost effective and promote strategic partnerships. By sharing information, communities and individuals can learn about available Federal programs to support the implementation of noteworthy local activities. As an official element of the agency's website, the information collected in the database is subjected to rigorous review (validation) to ensure its credibility, accuracy, and worthiness. Prior to being posted, the information submitted is initially stored for review by authorized FEMA staff or designees, who may edit the narration, reject the story based on the credibility or worthiness of the information, or accept the story.

Specific criteria for credibility and/or worthiness of the information requires that the mitigation work featured in the story meets the following standards: (1) potential/actual ability to save money, (2) potential/actual ability to save lives, and (3) potential/actual ability to reduce property damage incurred by future disasters through preventive measures (floodplain management, building codes, etc.).

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 Mitigation Success Story database is web-based, stored on <http://www.fema.gov/plan/prevent/bestpractices>. Users may enter information voluntarily, directly into the database or they may email FEMA staff at mitsuccess@fema.gov. The database has been designed as a "user-friendly" tool that allows potential users to access and/or provide a variety of information in a centralized location, saving considerable time. The format features required fields in an effort to standardize and thus facilitate the organization, categorizations, and retrieval of the information. Such standardization permits the database to be coded to present the stories in a standardized design that is

appealing to the reader, while reducing users' time in searching and/or providing information. Factual information that is captured in the required fields is listed in a chart located in the same place on a page so frequent users of the database site can quickly locate information on a printed story. The geographical information captured in the database is integrated into a graphic depiction of the respective State. This standardized layout permits decision-makers to print short descriptive synopsis. In addition, the site supports attachments of supporting documentation such as a longer case studies, photos, maps, e-mails, and URLs.

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.

FEMA researched to locate other external databases containing similar information and/or similar objectives and have determined the database is not duplicating an effort.

Stories are stored in a central location located in different publications, web pages, or other resources to increase the ease in finding these stories. FEMA is not actively seeking information from other governments, organizations or people to duplicate writing. Instead, FEMA is creating a system for other governments, organizations or people to voluntarily submit stories to a FEMA Regional office, and the actual database entry is completed by FEMA staff at Headquarters, Regional level, or a FEMA Disaster Field Office. However, FEMA staff is actively encouraged to write new stories in the database, particularly after a disaster occurred and FEMA staff becomes aware of a success in a community that should be captured in writing to share with other communities. Each story is unique as they cover a variety of mitigation project types, as well as exceptional planning, flood insurance, and Map Modernization Outreach strategies. Communities vary in demographics and population density, and thus the diversity of submissions essentially nullifies the possibility of duplication of entries.

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.

The database does not impact 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.

FEMA outreach activities will be affected if the collection of information is not conducted or is conducted less frequently. Case Studies and Success Stories are a component of FEMA mitigation outreach strategy. FEMA intends to share the information within the Mitigation Success Story database with target key internal and external stakeholders to encourage new implementation or continuation of successful all-hazard and manmade threat mitigation efforts related to construction, retrofitting, building science, applied engineering technologies and practices, so the Department of

Homeland Security (DHS) is better able to convey the benefits of its programs and strategies. The database also provides tools, or information, for communities to replicate successes in their own risk reduction efforts.

The database serves to support other communities and State offices by providing a user-friendly means to search a variety of best practices, success stories, and mitigation projects. Otherwise, the option to locate such concise information would entail government offices searching numerous web pages or contacting several government offices nationwide to seek it themselves. The database provides an efficient service for governments that implement FEMA programs and policies.

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.

There are no special circumstances that would cause this information collection to be conducted in any manner indicated for this item.

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

There are no special circumstances that would require respondents to prepare a written response to this collection in fewer than 30 days after receipt of it.

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

There are no special circumstances that would require respondents to submit more than an original and two copies.

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

There are no special circumstances that would require respondents to retain records for more than three years.

(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.

This collection is not a statistical survey and does not require the use of statistical methodology.

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

This collection is not a statistical collection and does not use statistical data classifications.

(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 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.

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 60-day Federal Register Notice was published for this information collection on June 28, 2007, Volume 72, number 124, page 35504-35505. In the 60-day federal Register notice the "Type of Information Collection: Extension, without change of a currently approved collection" has been revised to read "Revision of a currently approved collection" to identified the increase adjustment in burden hour cost to the respondents.

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 in the data elements to be recorded, disclosed, or reported.

FEMA engineering consultants have been tasked to review stories for credibility and accuracy, and also participate in functionality testing the web-based database, the fields, and the instructions by entering new success stories and attaching supporting material. For several of the narrations describing technical projects, FEMA requests that the consultants review the database fields and the narration and make a determination of the validity of the documented success. FEMA will accepted, these success stories and post

them onto the FEMA website. Database fields limit narrations' lengths to a synopsis description.

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.

In addition to the extensive internal review conducted by FEMA staff at the regional and HQ level, the Mitigation Division, including all its organizational units, maintains constant consultation with constituents that include state, local and tribal governments, private profit and non-profit entities, and individuals on issues related to disaster mitigation. Consequently, a reliable and well-documented internal body of knowledge pertaining the interests and needs of such constituencies exists to support the success stories database. Considering that over 90 percent of the actual writers are FEMA employees (even though the content of the stories comes from actual constituents), the database has gone through considerable review by FEMA staff in the ten regional offices and by Disaster Assistance Employees (per Stafford Act), who work in the actual response to federally-declared disasters within affected communities. In addition, the website encourages users to provide feedback as to its content.

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. Present the basis for the assurance in statute, regulation, or agency policy.

A PTA was submitted to DHS on . to determine if a PIA is required for collection of this information from the public.

11. Provide additional justification for any question 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 required for 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 Hour Burden

Data Collection Activity/Instrument	No. of Respondents	Frequency of Responses	Hour Burden Per Response	Annual Responses	Total Annual Burden Hours
	(A)	(B)	(C)	(D) = (AxB)	(CxD)
Electronic (website)	15	1	1.5	15	23
Informal Interviews and Follow-up sessions	135	1	4.0	135	540
TOTAL	150	1	5.5	150	563

The database offers two ways in which respondents can provide the information: (1) directly entering the information electronically using the format on the website or, (2) personally providing the information to FEMA staff through informal interviews and discussions. The electronic submission takes approximately 30 minutes for filling in all fields in the submission form, and approximately an hour to conceptualize the narrative description of the story totaling 1.5 hours per response.

It is estimated that respondents who chose to supply their information directly to FEMA Regional or Headquarter staff or to Disaster Field Office staff through informal interviews and discussions, will spend approximately four (4) hours. This timeframe includes follow-up sessions to verify the information.

Since the program is asking for voluntary story contributions from those who can attest to the success of various mitigation strategies, an estimation of the number of respondents per year was calculated by forecasting the number of stories collected following a disaster. FEMA is asking for voluntary story contributions from those who can attest to the success of various mitigation strategies. We are currently receiving approximately 150 submissions per year.

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 an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties

for information collection activities should not be included here. Instead this cost should be included in Item 13.

Annual Cost to Respondents for Hour Burden

Respondent's Occupational Category	Total Annual Burden Hours	Mean Hour Rate (\$)	Average Cost per Respondent (\$)	Total Annual Cost Burden (\$)
Individuals and Households	563	\$18.84	\$103.62	\$10,606.92
Total	563	\$18.84	\$103.62	\$10,606.92

* This cost was not capture during publication of the 60-day federal register notice. However; it is justified in the 30-day Federal Register Notice.

The current U.S. Department of Labor, Bureau of Labor Statistics (BLS) website data indicated the median hourly earnings of Individuals and households (all Occupations) is \$18.84. Therefore the estimated burden hour cost for respondents using wage rate categories is estimated to be \$10,606.92.

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.)

There is no total annual cost burden to respondents resulting from recordkeepers or purchasing of contracting services for this collection of information.

The cost estimates should be split into two components:

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 operation and maintenance and purchase of services cost involved in 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 are no capital and start-up cost involved with 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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [functionality testing the web-based database, the fields, and the instructions by entering new success stories and attaching supporting material.]	\$54,000.
Staff Salaries [1 GS 13 employees spending approximately 15% of time to review and edit information.]	\$11,909.55
Facilities [cost for renting, overhead, ect. for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle]	0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
Printing [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	
Total	\$65,909.55

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

The burden hours for this data collection have not changed. However the burden hour cost to respondents is estimated to be:

Itemized Change in Annual Cost Burden

Data Collection Activity/Instrument	Program Change (Old Cost Burden)	Program Change (New)	Adjustment Old Cost Burden	Adjustment (New)
Burden hour cost to respondents.	0	0	0	+\$10,606.92
Difference				+\$10,606.92
Total(s)	0	0	0	+\$10,606.92

The previous OMB submission did not capture the burden hour cost to respondents. The OMB submission for this data collection captures the cost of respondents using wage rate categories. Therefore there is an increase adjustment cost of +\$10,606.92. The current U.S. Department of Labor, Bureau of Labor Statistics (BLS) website data indicated the median hourly earnings of Individuals and households (all Occupations) is \$18.84 (\$18.84 x 563 burden hours).

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 results to be published, or outline plans for tabulation and publication for this information collection.

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

This collection does not seeking to not display the expiration data for OMB approval.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”. This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable".

B. Collections of Information Employing Statistical Methods.

This collection does not employ the use of statistical methodology.

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.