

September 7, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 --0029

**Title: Approval and Coordination of Requirements to Use the NETC
Extracurricular for Training Activities**

Form Numbers: FEMA Form 75-10 and FEMA Form 75-11

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.

In accordance with the Federal Emergency Management Agency (FEMA) Instruction 6200.3, Facility Utilization and Expenses at the National Emergency Training Center and Instruction 6900.1, Smoking in Facilities Occupied or Controlled by the Federal Emergency Management Agency, provides FEMA policy, responsibilities procedures and fees charge for using the National Emergency Training Center (NETC) facilities. The National Emergency Training Center (NETC) is a Federal Emergency Management Agency (FEMA) facility, which houses all FEMA employees in headquarters, regions, field establishments, and other individuals and organizations authorized to use the facilities,

which provides training and educational programs in emergency response, preparedness, fire prevention and control, disaster response, and long-term disaster recovery. The principal purpose of FEMA Form 75-10, Request for Housing Accommodations is used to request for housing at the NETC and FEMA Form 75-11, Request for Use of NETC Facilities is to conduct official business at the NETC.

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.

The program office must write, email, or telephone a request to determine if housing is available. If housing is available, the program office must follow up by completing **FEMA Form 75-10, Request for Housing Accommodations**. The form provides the names, purchase order number, gender, and disability status so that NETC can coordinate housing for contract instructors and attendees of the conference/meeting scheduled. The form also identifies if lodging fees need to be collected from the conference/training attendees.

The policy of USFA is to also accommodate other training activities on a space-available basis at the Emmitsburg campus. Special groups must write, email, or telephone a request to determine availability of the facilities. If space is available, the contact person for the special group must follow up by completing **FEMA Form 75-11, Request for Use of NETC Facilities**. The form provides information that enables NETC to assign classrooms, schedule equipment, and other facility services.

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 Forms 75-10 are produced via an electronic micro-purchasing system, and the information is automatically downloaded into the admissions system, which is used to assign housing. All other requests for housing for **FEMA Form 75-10** are hard copy (or faxed). FEMA form 75-11

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.

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 to small business or other small entities for this data collection.

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 is collected when housing accommodations and training activities are conducted at NETC. If it was not collected, unauthorized use of the facilities could occur.

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 is no requirement for respondents to report this information 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.

There is no requirement for respondents to prepare a written response fewer than 30 days after receipt of the collection.

© Requiring respondents to submit more than an original and two copies of any document.

There is no requirement for respondents to submit more than 1 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.

There is no requirement for 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.

There is no statistical survey involved with this data collection.

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

There is no use of statistical data classification involved with this 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation required for this data collection.

(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 requirement to submit proprietary trade secret, or other confidential information that the agency cannot demonstrate procedures to protect.

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 on June 18, 2007, volume 72, number 116, page 33509-33510. There were no comments received for this data collection. The 30-day federal register notice was change to capture additional burden hours 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.

There was no consultation with persons outside the agency to obtain their views on this data collection. FEMA form 75-10 and FEMA form 75-11 are used for internal management purposes to accommodate a federal facility for official business.

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.

The purpose of FEMA Form 75-10 and FEMA Form 75-11 are only use to request housing and use the NETC for official business. Consultation with NETC staff and requestors are coordinated before submitting FEMA Form 75-10. To determine if housing is available, requestor must write, email or telephone the facility to confirm space availability and follow-up with the request by submitting a FEMA Form 75-10. To assign classrooms, schedule equipment, and arrange for other services, requestors must follow-up by completing FEMA Form 75-11.

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

There is no decision to provide any payment or gift to respondents for this collection.

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

A Privacy Threshold Analysis (PTA) was submitted to DHS on June 6, 2007 to determine if a Privacy Impact Analysis (PIA) is required for this data collection.

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 is one question regarding special needs status included on FEMA form 75-10 to ensure adequate accommodations are provide for handicapped requestors.

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) | (Cx D) |

| | | | | | |
|-----------------|------------|---|-------------------|------------|-----------------|
| FEMA Form 75-10 | 60 | 1 | 6 minutes | 60 | 6 Hours |
| FEMA Form 75-11 | 60 | 1 | 6 minutes | 60 | 6 Hours |
| | | | | | |
| TOTAL | 120 | | 12 minutes | 120 | 12 Hours |

*The estimated burden hours for this data collection was change during the 60 day comment period to include an increase of 4 minutes per response.

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 (\$) |
|-------------------------------------------|----------------------------------|----------------------------|-----------------------------------------|--------------------------------------|
| | | | | |
| All Occupations | 12 hours | \$18.84 | \$2.26 | \$226.08 |
| | | | | |
| Total | 12 hours | \$18.84 | \$2.26 | \$226.08 |

*The cost to respondents calculate during the 60-day comment period was incorrect and the program office included an additional 4 minutes to the estimated burden hours. Therefore; the annual cost to respondents have increased from \$15.80 to \$226.08.

The respondents attending NETC training and education programs are Individuals and households, Business or other for profit, Not-for-profit institutions, farms, Federal Government, and State, local, or Tribal Government. The cost to respondents for the hour burden was estimated using the Bureau of Labor and Statistics (BLS) website (www.bls.gov). Respondents wage rates have been estimated using “All Occupations” wage estimates.

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.)

An estimate of the total cost burden to respondents or record keepers resulting from the collection of information is minimal.

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 is no operation and maintenance or purchase of service components involved with 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 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.

Annual Cost to the Federal Government

| Item | Cost (\$) |
|--------------------------------------------------------------------------------------------------------------------------|-------------------|
| Contract Costs [Describe] | 0 |
| Staff Salaries [1 of GS-09 employees spending approximately 15% of time annually processing FEMA Forms 75-10 and 75-11] | \$6,700. |
| 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 [120 Forms @ \$.04 per page] | \$4.80 |
| Postage [annual number of data collection instruments x postage] | 0 |
| Other | |
| Total | \$6,704.80 |

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.

Itemized Changes in Annual Burden Hours

| Data collection | Program Change | Program | Adjustment | Adjustment |
|-----------------|----------------|---------|------------|------------|
|-----------------|----------------|---------|------------|------------|

| Activity/Instrument | (hours currently on OMB Inventory) | Change (New) | (hours currently on OMB Inventory) | (New) |
|---------------------|------------------------------------|--------------|------------------------------------|-----------|
| FEMA Form 75-10 | | | 125 | 6 |
| FEMA Form 75-11 | | | 17 | 6 |
| Total(s) | | | 142 | 12 |

The total burden hour for this collection has an adjustment decreased from 142 hours to 12 hours (-130), due to an adjustment change in responses and burden hours. The hour burden for FEMA Form 75-10 has increased from 5 minutes to 6 minutes and FEMA Form 75-11 has decreased from 10 minutes to 6 minutes (-4 minutes). The number of responses decreased from 1,600 to 60 (-1,540). The reason why there is a decrease is because A few years ago, Mt. Weather became a secure facility, meaning that EMI courses and special groups historically conducted at Mt. Weather had to be relocated and conducted at the NETC. Since special groups were the larger requestors in the pass, the security of the facility reduced the number of special groups using the NETC.

Itemized Change in Annual Cost Burden

| Data Collection Activity/Program | Program Change (Old Cost Burden) | Program Change (New) | Adjustment Old Cost Burden | Adjustment (New) |
|----------------------------------|----------------------------------|----------------------|----------------------------|-------------------|
| All Occupations | | | 0 | \$226.08 |
| Federal Government | | | \$3,000. | \$6,704.80 |
| Total | | | \$3,000 | \$6,930.88 |

The previous cost burden for this collection was incorrect. The estimated \$3,000 reported during the previous submission, was the cost to the Federal Government. This estimated cost did not capture any cost to respondents, although it would have been minimal.

The cost to respondents using wage rate categories for hour burden is estimated to be \$226.08 annually. This cost was estimated using the Bureau of Labor and Statistics (BLS) website (www.bls.gov). Respondents wage rates have been estimated using “All Occupations” wage estimates. The cost to the Federal Government is estimated to be \$6,704.80 for staff processing forms and production of forms annually. Therefore: the total cost for this data collection is estimated to be \$6,930.88 annually (+3,930.88).

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 is no plan for tabulation and publication for this data 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 seek approval not to 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" Question #3 in the supporting statement justifies the non-use of information technology.

B. Collections of Information Employing Statistical Methods.

There is no Statistical Methods involved with this data collection.