

January 9, 2008

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0021**

**Title: National Fire Academy Executive Fire Officer Program  
Application Forms**

**Form Number(s): 95-22**

### 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.**

Public Law 93-498, Fire Prevention and Control Act of 1974, as amended, created the National Fire Academy (NFA) to advance the professional development of fire service personnel and allied professionals. The Act provides for, among other things, the conduct of courses and programs of training and education to train fire service personnel in such skills and knowledge as may be useful to advance their ability to prevent and control fires including tactics and command of firefighting for fire chiefs, commanders, and administration and management of fire services.

NFA is a component of the Department of Homeland Security (DHS), Federal Emergency Management Agency's (FEMA) United States Fire Administration (USFA) located at the National Emergency Training Center (NETC) in Emmitsburg, Maryland.

**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.**

In 1985 USFA began the Executive Fire Officer Program (EFOP) which consists of four executive level courses completed over a period of four years. This program is available to senior fire executives such as Fire Department Chiefs, Assistant Chiefs, and other ranks/positions who are responsible for a major functional area within their organization, or other key leaders within the organization.

FEMA Form 95-22, National Fire Academy Executive Fire officer Program, Application for Admission, is used in conjunction with FEMA Form 75-5, General Admissions Application, under the approved OMB Number 1660-0100 (formerly 1660-0007) to select applicants for the program. In addition to FEMA Form 95-22, the following items are required:

- A letter of intent from the applicant stating why they wish to be considered for the EFOP.
- A resume.
- A letter of recommendation and support from the applicant's immediate Supervisor or Chief of Department.
- A photocopy of the applicant's academic diploma or transcript.
- An organizational chart that depicts the applicant's position within the organization.

All of the above documents cited, are collectively used to select applicants to the EFOP, as DHS/USFA/NFA receives more applications than the number of slots available. Information must be collected to determine the most qualified applicants for the program.

The EFOP requires that applicants are executive level or hold other key leadership positions. The FEMA Form 95-22, resume, and organizational chart assist in this determination. The EFOP also requires a minimum attainment of an Associate Degree from a regionally accredited institution of higher learning. The resume and diploma/transcript photocopy validate this. The letter of intent verifies the applicant's interest in the program, and the letter from the supervisor provides an organizational commitment to support the applicant throughout the four-year program.

Once the Admissions Department receives the applicant package, the entire package is forwarded to the selection committee for review and action.

**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 95-22 is available electronically within the DHS/FEMA/USFA website (<http://www.usfa.fema.gov>). FEMA Form 95-22 is also available in paper format from USFA, which upon request would be sent to the applicant via mail.

**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.**

Since the application process is competitive, additional items and information are required. FEMA Form 95-22 requires a brief essay for questions specific to the Executive Fire Officers functions. FEMA Form 75-5 is used universally for all NFA programs and provides limited amount of information concerning the applicant's organizational responsibilities, duties and functions. Both FEMA Forms 95-22 and 75-5 are used for screening and selection purposes and have been reviewed for duplication of information.

**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 businesses or other small entities.

**6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

If FEMA Form 95-22 were not used, it would be very difficult to objectively validate EFOP requirements for participation, to assess writing and analytical ability, which is critical for admission into EFOP, and to select the most qualified EFOP participants for admission to the program.

**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 requirements for respondents to report information to the agency 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 are no requirements for respondents to prepare a written response to this collection of information fewer than 30 days after receipt of it.

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

There are no requirements for respondents to submit more than an original and two copies of any document.

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

**(d) 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 are no statistical surveys involved with this collection of information.

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

There is no statistical data classification that needs to be 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.**

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

**(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 are no requirements for respondents to submit proprietary trade or 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 collection on August 7, 2007, volume 72, number 152, Page 44562. There were no comments received for this collection of information.

**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.**

USFA regularly receives input from EFOP participants regarding the entire scope of the program. However; there have been no negative comments regarding the use of FEMA Form 95-22.

**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.**

USFA/NFA has received feedback the annual Executive Fire Officer Program Graduate Symposium which serves as an alumni program held each spring in Emmitsburg Maryland. Also, USFA/NFA has conduct strategic program reviews of EFOP where information and feedback is received. This has occurred approximately once every five years.

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

There are no payments or gifts to respondents.

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

Confidentiality is provided to the respondents under the Privacy Act Statement included on FEMA Form 95-22, Application for Admissions. The use of the social security number on the 95-22 form is for the purposes of an individual locator number. A Privacy Threshold Analysis (PTA) was submitted to DHS for review and approval, on July 7, 2007. A System of Records Notice (SORN) was updated for this data collection on October 5, 2004, volume 69, number 192, Page 59609.

**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**

<b>Data Collection Activity/Instrument</b>	<b>No. of Respondents</b>	<b>Frequency of Responses</b>	<b>Hour Burden Per Response</b>	<b>Annual Responses</b>	<b>Total Annual Burden Hours</b>
	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D) = (AxB)</b>	<b>(CxD)</b>
FEMA Form 95-22	400	1	1 hour	400	400
Additional Documentation: Letter of Intent, Resume, Letter of Recommendation, Diploma Photocopy, Organizational Chart	400	1	1 hour	400	400
<b>TOTAL</b>	<b>400</b>				<b>800</b>

**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 (\$)
Executive Fire Officers	800	\$69.52	\$139.04	\$55,616.00
Total	800	\$69.52	\$139.04	\$55,616.00

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for Senior/Chief Executives is estimated to be \$69.52 per hour, therefore, the estimated burden hour cost to respondents (Executive Fire Officers) is estimated to be \$55,616.00 annually.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers 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:

**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.**

The cost to respondents for this data collection is minimal. The annual cost to respondents will be Mailing Postage for submission of applications. Based on 400 applicants mailing FEMA Form 95-22 and supporting documentation is estimated to be \$1,960.00 annually.

**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 startup or operational/maintenance costs 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 <b>[Describe]</b>	
Staff Salaries:  (1) GS 13 employee spending approximately 3 days annually reviewing the 95-22 Form and other items @ \$397.00/day = \$1,191.00 (2) GS 11 employee spending approximately 3 days annually reviewing the 95-22 Form and other items @ \$215.00/day = \$ 645.00	\$1836.00
Facilities: There are no direct facility costs for this data or record keeping.	
Computer Hardware and Software; There is no direct computer hardware or software support.	
Equipment Maintenance: There is no direct equipment maintenance.	
Travel: There is no associate travel.	
Printing: There is no printing of the form by the government.	
Postage: There is little mailing of forms since they are now available electronically.	
Other	
<b>Total</b>	<b>\$1836.00</b>

**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 Activity/Instrument	Program Change (currently on OMB Inventory)	Total Burden Hours (currently on OMB Inventory)	Adjustment (new)	Total Burden Hours (new)
FEMA Form 95-22 and Additional Documentation	300	<b>600</b>	+200	<b>800</b>
<b>Total(s)</b> 800 hours	300 hours	<b>600</b>	+200	<b>800</b>

**Explain:** The number of annual applicants has increased from 300 to 400. Therefore; the burden hours for this information collection has an adjustment increase of 200 (400 x 2 hours per response = 800 hours).

**Itemized Changes in Annual Cost Burden**

<b>Data Collection Activity</b>	<b>Adjustment (Old Cost Burden)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
Respondents Burden Hour Cost	<b>0</b>	\$55,616.00	<b>+\$55,616.00</b>
Mailing Postage for submission of applications Cost	<b>0</b>	\$1,960.00	<b>+\$1,960.00</b>
<b>Total(s)</b>	<b>0</b>	<b>\$57,576.00</b>	<b>+\$57,576.00</b>

**Explain:** The cost for respondents was not captured during the pervious OMB submission. Therefore; the estimated cost to respondents using wage rate categories is estimated to be \$55,616.00 and the cost for postage and mailing to respondents is estimated to be \$1,960.00 annually, which is reported as a program change due to agency discretion. The total annual cost to respondents is estimated to total \$57,576.00.

**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 plans for tabulation and publication for results, in this collection of information.

**17. If seeking approval not to 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 a valid OMB control number, expiration date and burden disclosure notice.

**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.**

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

**THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION”**