

June 2, 2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0044

Title: Emergency Management Institute Follow-up Evaluation Survey

Form Number(s): 95-56

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.

44 CFR part 360 implements the Emergency Management Training Program, designed to increase States’ emergency management capabilities through training of personnel with responsibilities over preparedness, response, and recovery from all types of disasters. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93–288) as amended, authorizes training programs for emergency preparedness for State, local and tribal government personnel.

In response to the Government Performance and Results Act (GPRA), the information obtained from the Emergency Management Institute “Follow-up Evaluation Survey,” will be a follow-up tool used to evaluate the knowledge and/or skills participants obtained at EMI during training courses, and to improve Emergency Management Institute courses. The information is critical to determine if the Emergency Management

Institute is meeting strategic goals and objectives established by the Federal Emergency Management Agency in order to fulfill its mission.

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 information collected through FEMA Form 95-56 is primarily used by EMI course managers and senior management for ongoing course reviews and revisions. The information is also used to document program performance. As such, and due to the qualitative nature of participant's feedback collected from this survey, results are used in combination with other program metrics to document performance of EMI training program in compliance with GPRA and accountability reporting requirements. To date, the information has been published in reports distributed to staff, been included in GPRA and accountability reports, and has caused management to closely review and modify courses based on survey results.

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.

At present, there are no technological collection techniques in place. EMI is currently in a multi-year process of reviewing the entire Level 3 Evaluation procedures. During this process, EMI will consider how best to provide this form and collect the information in an electronic format.

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.

The responses for the survey are from courses that are only offered through EMI and the questions are not asked on any other collection forms. This information is not available from any other source. Since training courses and content are modified often to reflect changing priorities, techniques, and methodologies of emergency management, and different trainees take different courses, there is no duplicated data being collected.

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 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 the collection of information is not conducted EMI would be missing the information needed to demonstrate that training conducted is beneficial in helping emergency management personnel be better prepared to deal with disaster events back on the job. Also, EMI would be lacking valuable information needed to review and revise courses and to respond to GPRA requirements effectively.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(e) Requiring respondents to report information to the agency more often than quarterly.

Respondents are not required 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.

Participants are requested, but not required to respond within 2 weeks of receiving the one-page survey. Since this is a voluntary activity, there is no deadline requirement or penalty for taking longer to respond. We are in the processing of moving to an electronic format that would better facilitate the two-week timeframe being requested.

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

This collection does not require respondents 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.

There is no requirement for respondents to retain records beyond those mentioned above.

(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 requirement of a statistical survey of the above mentioned nature.

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

No special circumstances would necessitate the use of a 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.

No special circumstance would require a pledge of confidentiality as mentioned above.

(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 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 inviting public comments was published on April 28, 2008, Volume 73, Number 82, pp. 22966. No comments were received. Please see attached copy of the published notice included in this package.

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 collection of data has been discussed in the past with a number of State Training Officers in State Emergency Management Agencies. These individuals approve the applications for students who take the EMI courses and they agree we should collect this information. They also concur that the effort to respond to the request for information is minimal and not a burden on our students.

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 contract staff who compiles records to identify improved versions of the questions asked, in order to obtain better data from more participants. EMI has also consulted with survey participants who are members of the agency staff to solicit recommendations for improving the survey.

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

There is not payment to gift to respondents for this collection of information.

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

There is no information of a confidential nature requested in this collection, and there is no assurance of confidentiality provided to the respondents.

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 with this survey.

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 total estimated burden hours are 950 based on 3,800 respondents surveyed once with an estimated questionnaire completion time of 15 minutes (.25 hours). Of the 14,000 questionnaires sent, 13,800 of them are received.

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)
FF 95-56 Post-Course Evaluation Questionnaire	3800	1	.25	3,800	950
TOTAL				3,800	950

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 collection only involves one form (FEMA Form 95-56, Post-Course Evaluation Questionnaire).

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	95	\$19.29	\$4.82	\$1,832.55
State, Local and Tribal Government	855	\$23.99	\$6.00	\$20,511.45
Total	950			\$22,344.00

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Individuals and Households is \$19.29 and State, Local and Tribal Government is \$23.99. Ten percent of the questionnaires are mailed to Individuals and Households, and 90% are mailed to State, local and Tribal government respondents. Therefore, the estimated burden hour cost to respondents (Individuals and Households and State, Local and Tribal Governments) is estimated to be \$22,344 annually.

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:

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 costs 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-Costs 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 [annual cost for labor associated with printing and mailing surveys; entering data from returned surveys; generating reports regarding surveys]	\$10,000
Staff Salaries [1 GS7 employees spending approximately 10% of time annually on collection related activity]	\$4,000
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing [Approximately 14,000 forms and 40 copies of reports for staff]	\$1,000
Postage [annual number of data collection instruments x postage] 14,000 x.41 = \$5,740 x 2 (Postage paid envelope sent in each one) = \$11,480	\$11,480
Other	
Total	\$26,480

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.

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 95-56, Post Course Evaluation Questionnaire			600	+350
Total(s)			600	+350

Explain: The Hour Burden per Response and Frequency of Responses remain the same; increased enrollment has resulted in the number of respondents increasing from 2,300 to 3,800 which has therefore increased the Annual Burden hours to 950. This shows a positive adjustment of +350 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.

The results of the collection are tabulated and compiled in a quarterly report that is distributed to the Director of the Training Division and the Section Chiefs within the Division. Surveys are not sent until 90 days after a participant completes a course and results are usually not received in less than 30 days. When a report is issued, it is for the period of activity 4-6 months previous. The data is tabulated in three columns without any complex analysis, and participant comments are included in the report.

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

FEMA Form 95-56 will display a valid OMB number and expiration date.

**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”.