

December 15, 2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NW40

Title: Integrated Public Alert and Warning System (IPAWS) Inventory and Evaluation Survey

Form Number(s): None

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.

Presidential Executive Order 13407 establishes the policy for an effective, reliable, integrated, flexible, and comprehensive system to alert and warn the American people in situations of war, terrorist attack, natural disaster, or other hazards to public safety and well being. The Integrated Public Alert and Warning System (IPAWS) is the Department of Homeland Security's (DHS) response to the Executive Order. This Executive Order requires that DHS establish an inventory of public alert and warning resources, capabilities, and the degree of integration at the Federal, State, territorial, tribal, and local levels of government. The information collected will consist of the communication systems being used for emergency alerts and warnings at the Emergency Operations Center (EOC). In order to conform with this *Executive Order*, we are estimating collecting information from 1,932 respondents per year with an effort to reach all EOCs. This information will help FEMA identify the capabilities currently in use, current gaps, and desired capabilities for inclusion into IPAWS.

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 has tasked the Joint Interoperability Test Command (JITC) with identifying the public alert and warning capabilities of Emergency Operating Centers (EOCs) in order to facilitate IPAWS integration with all the existing resources. Survey questions covering public alert and warning systems currently in operation will be asked by JITC staff to

EOC personnel. The accumulation of data received will be compiled into a comprehensive and cohesive report as requested by *Executive Order 13407*. In addition, FEMA will use this report to integrate various alert and warning systems into IPAWS.

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 collection of information will involve the use of electronic submission. JITC will visit each EOC to physically identify public alert and warning equipment at the EOC as well as ask pertinent questions related to their public alert and warning systems. Due to the physical inspection required of each location and the likelihood of damage to laptop computers during the process, all information will be gathered manually using questionnaires and then transferred to a laptop for uploading into the selected database upon return to FEMA to be readily accessed.

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.

Prior data collection efforts have been researched by DHS and FEMA; there is currently no record of information on all the public alert and warning systems being used by EOCs.

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.

This information collection does not have an 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 requested is required to provide the President and Congress an accurate representation of the public alert and warning systems currently available. Failure to obtain this information will negatively impact IPAWS and the ability to warn the American public in a timely manner of emergencies that may be a threat to life and property.

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.

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

(b) Requiring 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.

(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.

(f) Requiring 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.

(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 information collection is conducted in a manner consistent with the guidelines in 5CFR 1320.5(d) (2).

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 June 9, 2008, Volume 73, Number 111, pp. 32591. No comments were received. 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.

An effort to consult with EOC staff in order to collect their views on the availability of data and clarity of instructions will be made subsequent to the publication of request. Additionally, knowledge experts from The Joint Operability Test Command (JITC) will provide input into questions that will be used during the interview process. Views will not be sought regarding frequency of collection or recordkeeping, as these are either mandated or driven by *Executive Order 13407*. Additional feedback may be collected during the survey if volunteered by the personnel providing data.

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.

An effort to consult with the JITC staff will be continuous throughout the collecting the data during EOCs site interviews. Feedback will be used to improve record compilation and subsequent data collection.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

The information will be kept private or anonymous to the extent allowable by law. A Privacy Threshold Analysis was completed on January 14, 2008 and submitted for review.

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 sensitive nature.

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.

FEMA has determined that during this collection, information will be gathered from 1,932 EOC facilities using FEMA Form 142-1-1 and that the burden for each respondent will be 5 hours equaling 9,660 burden hours. In order to conform to Executive Order 13407, we are estimating collecting information from up to 1,932 respondents per year with an effort to reach all EOCs. This initial data collection will focus initially on the coastal areas of the U.S. affected by hurricane season.

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 approval does not cover more than one form.

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.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, local and tribal government	FEMA Form 142-1-1 / IPAWS Inventory & Evaluation Survey	1,932	1	5	9660	\$24.26	\$234,531.60
Total		1,932			9660		\$234,351.60

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Emergency Management Specialists is estimated to be \$24.26 per hour. Therefore, the total annual cost burden to 1932 respondents with hour burden of five hours each for a total of 9660 annual burden hours is \$234,351.60.

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 are no record keeping, capital, start-up or maintenance costs associated with this information 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 [This cost includes the cost for labor, hotel rooms and rental cars]	2,368,590.00
Staff Salaries [One GS 13 employee spending approximately 100% of time annually managing the IPAWS inventory and evaluation effort]	103,220.00
Facilities	0
Computer Hardware and Software [electronics purchased to process inventory]	0
Equipment Maintenance	0
Travel [Travel cost include cost for airfare]	94,376.02
Printing	0
Postage	0
Other	0
Total	\$ 2,566,186.02

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
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Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 142-1-1	0	9,660	9,660			
Total(s)						

Explain: This is a new program; therefore an increase of 9,660 Annual Burden Hours will be included on OMB Inventory for FEMA IPAWS data collection.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 142-1-1	0	\$234,351.60	\$234,351.60			
Total(s)						

Explain: This is a new program; therefore an increase of \$234,361.60 Annual Cost burden will be included on OMB Inventory for FEMA IPAWS data collection.

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.

FEMA does not intend to employ the use of statistics or the publication thereof 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.

FEMA will display the expiration date for OMB approval of this information collection.

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

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.