

November 6, 2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0034

**Title: Emergency Management Institute Resident Course Evaluation
Form**

Form Number(s): FF 95-41

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.

The Emergency Management Institute (EMI) develops courses and administers resident and nonresident training programs in areas such as natural hazards, technical hazards, disaster response, instructional methodology, professional development, leadership, exercise design and evaluation, information technology, public information, integrated emergency management, and train-the-trainer. A significant portion of the training is conducted by the State Emergency Management Agencies under cooperative agreement with the Federal Emergency Management Agency (FEMA). In order to meet current information needs of EMI staff and management, EMI uses this course evaluation form to identify problems with course materials, delivery, facilities, and instructors. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288, Section 611, 42 U.S.C. 5196)

as amended, authorizes training programs for emergency preparedness for State, local and tribal government personnel.

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.

EMI staff will use the information to monitor and recommend changes in course materials, student selection criteria, prerequisites, training experience, and classroom environment. Reports will be generated and distributed to EMI management, staff and individual instructors.

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.

This is a 100% paper-based collection. Chenega Federal Systems is the contractor for EMI's classroom and editorial support. The FEMA contractor scans the evaluation forms and generates the data reports using a Scan Mark scanner. The results of the data collected from the evaluation forms are processed through a Scan Mark machine. Once the information is compiled in the computer database, the results are provided to the FEMA course manager.

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.

This information is not collected in any form, and therefore is not duplicated elsewhere.

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.

This is a course evaluation meant to give feedback to individual instructors that can potentially improve their course delivery and effectiveness. Without this data, it would be difficult for EMI to determine the need for improvements, degree of student satisfaction, and instructor capability for each course delivery.

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 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 is no requirement for respondents to prepare a written response 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 requirements for 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 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 survey in this collection that is designed to not 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.

This collection does not involve statistical 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation 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 for respondents to submit proprietary trade secret, or other confidential information for this collection.

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 November 28, 2008, Volume 73, Number 230, pp. 72497. 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.

FEMA course managers consult with Chenega Federal Systems contractors regarding the form design and scanning of evaluation forms. .

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.

Participants who complete FEMA Form 95-41 are advised that the information collection on the evaluation forms is strictly voluntary. The forms are completed anonymously and there is no need to contact respondents once the course evaluation forms are completed.

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.

The information will be kept private or anonymous to the extent allowable by law.

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 in 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 for each collection instrument (separately list each instrument and describe information as requested). 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.

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.

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 or Tribal Government	FEMA Form 95-41	10,778	1	10 minutes (.167 hours)	1,800	\$23.99	\$43,182.00
Individuals in Households	FEMA Form 95-41	1000	1	10 minutes (.167 hours)	167	\$19.56	\$3,266.52
Total		11,778			1,967 hours		\$46,448.52

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Individuals in Households in occupations is \$19.56 per hour and the wage rate category for State and Local officials is \$23.99 per hour. Therefore the estimated burden hour cost to respondents is estimated to be \$46,448.52.

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 and purchase of services components cost to the respondents.

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.

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instr	*Annual Capital Start-Up Cost (investments in	*Annual Operations and Maintenance Cost (such as recordkeeping,	Annual Non-Labor Cost (expenditures on	Total Annual Cost to Respondents
--------------------------------	---	---	--	----------------------------------

ument	overhead, equipment and other one-time expenditures)	technical/professional services, ect.)	training, travel and other resources)	
	0	0	0	\$0.00
Total	0	0	0	\$0.00

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 [cost of one General Clerk I contractor working 20 hours per week on this specific task.]	\$24,460.80
Staff Salaries [36_ of GS_13_ employees (Salary \$95,407) spending approximately __1_ % of time annually distributing and collecting evaluation forms for this data collection]	\$34,346.52
Facilities [cost for renting, overhead, ect. for data collection activity]	\$0.00
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0.00
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$3,057.00
Travel	\$0.00
Printing [15,000 printed annually at cost of \$.40 each]	\$6,000.00
Postage [annual number of data collection instruments x postage]	\$0.00
Other	\$0.00
Total	\$67,864.32

The contract cost is the cost of one General Clerk I contractor spending 50% of their time (20 hours per week) on the specific task of processing EMI evaluation forms, running reports, and providing evaluation reporting information to EMI Staff. The equipment maintenance fee is the service agreement for the Scan Mark scanner, which totals \$1,019 per year and 3,057.00 for three years. The Scan Mark scanner was purchased in FY04 for \$7,524.00.

The salary for one GS-13 FEMA course manager spending approximately 1% of their time managing Chenega Federal Systems contract requirements for the course evaluation form is estimated to be a total of \$34,346.52.

The printing charge is the actual cost per evaluation form. The estimated average cost for printing the form is \$.40 per form x 15,000 forms annually = \$6,000.

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)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 95-41				1,671	1,967	+ 296
Total(s)				1,671	1,967	+ 296

Explain: Due to the increase in the number of attendees to EMI courses, the number of respondents has increased. Although the hours per response remain the same, an adjustment of 296 additional hours has been included in this information collection to account for the additional respondents. The total burden hours for this collection is estimated to be 11,778 responses x 10 minutes per response = 1,967 hours.

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 95-41				0	46,448.52	+46,448.52
Total(s)				0	46,448.52	+46,448.52

Explain: There was a failure to report annual cost burden in the previous submission of this 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.

This information collection will not be published for statistical purposes.

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 to not display the expiration date 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”.

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.