

November 17, 2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0070

Title: National Fire Department Census

Form Number(s): FEMA Form 75-100

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 provides for the gathering and analyzing of data as deemed useful and applicable for fire departments. The National Fire Department Census evolved from recommendations of the Blue Ribbon Panel. In the spring of 1998, the Director of the Federal Emergency Management Agency (FEMA) convened a Blue Ribbon Panel of prominent members of the U.S. fire service to review the structure, mission, and purpose of the United States Fire Administration (USFA) and to make recommendations for the future of the Federal fire focus. The Blue Ribbon Panel noted the lack of a comprehensive list of fire departments and baseline data for the definition of the composition, capabilities, and activities of the nation's fire service. Their recommendation was for the USFA to develop a fire department census.

The action report asks the following: “Develop a fire service census that captures demographic information that will help clarify the perception issue and establish baselines and benchmarks for USFA activities, and identify and maintain the demographics of fire departments in the United States by conducting a fire services census.”

USFA receives many requests from fire service organizations and the public for information related to fire departments, including total number of departments, number of stations per department, population protected, and number of firefighters. Additionally, USFA maintains the census for the purpose of disseminating fire safety and prevention information to fire departments across the country.

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 USFA is working to identify all fire departments in the United States to develop a database that includes information related to their demographics, capabilities, and activities. The database is used by the USFA to guide programmatic decisions and to provide the Fire Service and the public with information about fire departments. The Critical Infrastructure Protection (CIP) program uses the census for the purpose of distributing sensitive information to senior fire and EMS personnel. A fire department database was developed and populated with the responses and made available to the public for online look-ups through the USFA Web site. The database contains fields included on the census form instrument with the exception of the name and contact information of the individual completing the form and the specialized services fields. Information collected to date (26,000 departments) is being used as described. The data are updated typically every five years based on current experience. Updates can be executed at any time through the USFA Web site, or can be mailed or faxed via the paper-version questionnaire.

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.

Fire departments are able to complete the census form online through the USFA Web site: <http://www.usfa.dhs.gov/applications/census/> Fire departments can also complete the paper census form and fax or mail the completed form. Instructions for completing the form are provided online or included in the cover letter accompanying the paper form.

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.

A nationwide search for existing databases was conducted, and it was determined that existing databases were either well short of the estimated 30,000 fire departments (based on the 2004-2006 National Fire Protection Association annual average estimate of fire departments), or they did not have the demographic information necessary for future sample surveys, which are not part of this effort. Existing mailing lists are combined and geocoded to avoid duplicate mailings in an effort to identify every fire department possible.

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.

By not conducting the fire department census, the Agency's ability to conduct future fire loss surveys will be severely limited. The ability to assess current needs of the fire service based on services currently provided will also be limited.

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 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 to provide a written response to the collection in less than 30 days after receipt of it.

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

There is no requirement 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 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.

There is no use of statistical data classification in this collection 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 data 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 December 4, 2008, Volume 73, Number 234, pp. 73949. 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.

Several organizations were contacted to identify the type of information they collect about fire departments nationwide. These organizations were asked if they collected similar information and were also asked about the numbers of fire departments included in their databases. Organizations contacted include the National Fire Protection Association (NFPA), Insurance Services Office (ISO), State Fire Marshal's Offices, as well as several commercial vendors that maintain fire department mailing lists.

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.

Four individuals who are active fire/rescue responders were asked for input regarding the questions included on the census form. These individuals were asked if the questions were clear and if the information was relatively easy to retrieve. The individuals were also asked to provide an estimate for the amount of time it would take to complete the form.

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 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.

This request for 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, or Tribal	FF 75-100	528	1	25 minutes (.4167 hours)	220.02	\$21.22	\$4,668.82
State, Local, or Tribal (volunteers)	FF 75-100	3472	1	25 minutes (.4167 hours)	1,446.78	0	0
State, Local, or Tribal	FF 75-100 (update)	660	1	10 minutes (.1667 hours)	110.02	\$21.22	\$2,334.62
State, Local, or Tribal (volunteers)	FF 75-100 (update)	4340	1	10 minutes (.1667 hours)	723.48	0	0
Total		9,000			2,500		\$7,003.44

The majority of the responses will be from volunteer fire departments for which no direct labor costs will be incurred. Volunteer firefighters receive no compensation for their services. The minimal direct labor cost of a single firefighter or emergency service worker completing the census form only applies to those fire departments and emergency service agencies with career firefighters. In 2006, the NFPA estimated that approximately 13.2 percent of fire departments are considered career departments. According to the U.S. Department of Labor, Bureau of Labor Statistics Web site (www.bls.gov), the wage rate category for firefighters is estimated to be on average, \$21.22 per hour. To compute the total annual respondent cost, the number of respondents who have a wage, 528, is multiplied by 25 minutes (the time it takes to complete the census form) and then multiplied by the national mean hourly wage rate of a career firefighter (\$21.22). The average burden per response of 25 minutes is based on the estimate provided by five fire/rescue responders who were involved with the creation of the census form and the average time that it took four in-house USFA personnel to complete the National Fire Department Census. The total burden hours for this collection are 2,500 and the total annual respondent cost is \$7,003.44.

Approximately 5000 of the current census registrants are contacted by USFA on a rotating basis each year. The chief of the fire department is asked to update the census record for the department. This results in each fire department being contacted by USFA about once every five years to supply census follow-up data updates. This ensures that USFA has the most up to date information as possible regarding the registered departments. With the establishment of the online census database, however, fire departments may provide data updates to USFA at any time.

For the updates, fire departments do not need to re-complete the entire form. The data already exist online. The departments access the data online and then only need to change those items that have changed. Based on this fact, it is estimated that 10 minutes is sufficient for them to provide updates.

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 start-up, maintenance, or operational costs to respondents resulting from this collection.

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.

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/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, ect.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
FEMA Form 75-100	0	0	0	0
Total	0	0	0	0

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 [includes software development and modification, preparing letters and forms for mailing]	\$20,000
Staff Salaries [one GS-7 employee spending approximately 75% of time annually maintaining database records for this data collection and one GS-13 employee spending approximately 10% of time monitoring database records maintenance]	\$43,100
Facilities [cost for renting, overhead, etc. 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 [number of data collection instruments/letters annually: 4,000]	\$770
Postage [4,000 x .42]	\$1,680
Other	\$0

Total	\$65,550
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This effort is a one time effort with limited periodic follow-ups. Contract costs include a contractor to develop and modify software (\$17,000) and prepare letters and forms for mailing (\$3,000). The staff salaries include one Federal employee at a GS-7 level (30 hours per week) to maintain the database and process paper forms and one employee at a GS-13 level (1/10 of the employee's time is spent on the census project) to monitor database maintenance. The annual cost burden to the Federal Government is \$65,550.

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 75-100				3,750	2500	-1,250
Total(s)				3,750	2500	-1,250

Explain: There is a decrease of 1,250 burden hours from the current OMB inventory of 3,750. This difference is a negative adjustment as fewer fire departments are needed to complete the remaining census database. Since the National Fire Department Census is a one-time initial registration and this is a continuing collection, fewer fire departments (respondents) are needed to meet the objective of this collection which is to incorporate into the database all 30,000 fire departments nationwide. With this collection effort, approximately 87% of the desired respondents are already registered. The primary continued use of this form is to collect information from the remaining estimated 4,000

fire departments. Follow-up information is also given from approximately 20 percent of previously registered departments each year on a rotating basis over a five year period.

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 75-100				0	\$7,003.44	+\$7,003.44
Total(s)				0	\$7,003.44	+\$7,003.44

Explain: At the time of the last approval OMB did not capture this cost on the Notice of Action.

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.

A summary of the results collected is tabulated and made accessible to the fire service and general public via the U.S. Fire Administration’s Web site (www.usfa.dhs.gov). In addition, a fire department database was developed with the responses and made available to the public for online look-ups through the USFA Web site. The database contains fields included on the census form instrument with the exception of the name and contact information of the individual completing the form and the specialized services fields.

The proposed schedule is as follows:
 Publish collection on the Internet on a continual daily basis.
 Update summary results on Internet: Spring 2009, 2010, 2011, etc.
 Additional follow-up, as needed FY10-FY12

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.” This collection does not use efficient statistical survey methodology as Statistical Survey methodology "is not applicable".