

June 30, 2009

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0073

Title: National Urban Search and Rescue Grant Program

Form Number(s): FEMA Form 089-10, FEMA Form 089-11, FEMA Form 089-12, FEMA Form 089-13, FEMA Form 089-14, FEMA Form 15

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 208 implements the National Urban Search and Rescue System (US&R), 42 U.S.C. 5144, 5149, 5170b(a)(3)(B), and 5197(c), by which FEMA provides specialized lifesaving assistance during major disaster or emergencies that the President declares under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5121 through 5208. US&R operational activities include locating, extracting and providing on-site medical treatment to victims trapped in collapsed structures, weapons of mass destruction events and when assigned, incident command or coordination of other operational activities. The Government Performance and Results

Act (GPRA) of 1993 gives provision for systematically holding Federal agencies accountable for achieving program results. This is accomplished by measuring program performance against those goals, reporting publicly on their progress, improving Federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction.

The information collection activity is the collection of program and administrative information from US&R Sponsoring Organizations relating to preparedness and response Cooperative Agreement awards. This information includes a narrative statement that FEMA uses to evaluate a grantee's proposed use of funds, progress reports to monitor overall progress on managing FEMA Cooperative Agreement program, extension or change requests used to consider changing or extending the time or the performance period of the preparedness or response cooperative agreement, evaluation and information to assess and ensure operational readiness and a memorandum of agreement between DHS/FEMA and the Sponsoring Organizations of US&R task forces as described in Question 2 below.

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.

Narrative Statement (FEMA Form 089-10): FEMA uses narrative statements to evaluate a grantee's proposed use of funds and is a requirement in order to receive Federal funding. Examples of information a grantee needs to provide FEMA for readiness and response cooperative agreements are descriptions of the types of eligible activities the grantee will undertake and a plan for expending and monitoring funds. Sponsoring Organizations make this information available to FEMA only when we request it. If a Sponsoring Organization has remaining preparedness or response cooperation agreement funds after completing specific disaster or preparedness work, we will require a second narrative statement describing the grantee's proposed use of the remaining funds.

Performance Reports (FEMA Form 089-11): FEMA program officers use progress reports to monitor overall progress on managing FEMA grant programs. FEMA does not prescribe a particular format; however, we ensure that the OMB standard elements outlined in the common rules, 44 CFR Part 13 and 2 CFR Part 215, are in any report or suggested format.

Extension /Budget Changes (FEMA Form 089-12): Grantees that want FEMA to consider changing or extending the time or the performance period of the preparedness or response cooperative agreement will need to request such changes or extensions in writing. FEMA will use the information to ensure that the Sponsoring Organization spends funds consistent with the intent of the appropriations and in accordance with

applicable laws and guidance. This type of information is available to FEMA only when we request it.

Self-Evaluations (FEMA Form 089-14): The Task Force Self-Evaluation is a preparatory measure to the Operational Readiness Evaluations conducted each year to ensure all Task Forces are ready to deploy to an incident when they receive a Federal activation.

Task Force Deployment Data (FEMA Form 089-15): To prepare for an event outside the continental United States (OCONUS), or a scenario where alternative transportation may be required, the program office requires each Task Force to report weights and cubes of their cache, as well as hazardous materials to provide to appropriate loadmasters, etc, for possible air/sea transport.

Memoranda of Agreement Revisions (MOA) (FEMA Form 089-13): FEMA and the Sponsoring Organizations of US&R task forces have entered into 28 separate MOAs. MOAs are signed by DHS, the Sponsoring Agency and the State, and describes the relationship of the parties with respect to the National Urban Search and Rescue Response System.

The following forms were approved under OMB approval number 1660-0025:

SF 424 - FEMA uses the SF 424, Application for Federal Assistance, for all of its grants and cooperative agreements. FEMA will enter into two types of cooperative agreements with each of the existing 28 US&R teams (and any other teams that may qualify in the future): (1) Readiness Cooperative Agreements and (2) Response Cooperative Agreements. Funds under Preparedness Cooperative Agreements will be available to Sponsoring Organizations to administer the Task Forces, provide initial and recurrent training, and to acquire and maintain a uniform cache of equipment and supplies. Funds under Response Cooperative Agreements will reimburse Sponsoring Organizations for actual direct costs and indirect costs incurred when FEMA activates US&R teams in response to a major disaster or emergency.

FEMA Form 20-20 -Grantees use FEMA Form 20-20, Budget Information –Non-construction Programs and Budget Narrative, to submit budget data when applying for grants where the major purpose is not construction. The information includes a budget narrative that relates items to program activities and justifies and explains budget items. Grantees make budget narrative information available to FEMA upon request. This form compiles the information necessary to fill out the SF 424 face sheet. Like the SF 424, both preparedness and response cooperative agreement grantees must submit a revised FEMA Form 20-20 when they know the final grant award amount.

FEMA Form 20-16 A, B, and C - Grant recipients use FEMA Forms 20-16, Summary Sheet for Assurances and Certifications, 20-16A, Assurances – Non-construction Programs, and 20-16C, Certifications Regarding Lobbying; Debarment, Suspension and

Other Responsibility Matters; and Drug-Free Workplace Requirements to certify their compliance with important Federal Requirements.

FEMA Form 76-10A –Obligating Document for Award/Amendment must be signed by the State representative and returned to FEMA.

SF LLL - Grantees must complete SF LLL, Disclosure of Lobbying Activities, if expending Federal funds in attempts to influence Federal agency employees or members of Congress or their representatives.

FEMA Form 20-10 - Sponsoring Organizations will use FEMA Form 20-10, Financial Status Reports, to report the status of financial expenditures for both preparedness and response grants. FEMA uses this report for all of its grant and cooperative agreement programs. To maintain consistency among FEMA grant programs and alleviate paperwork burdens on grantees, we will use FEMA Form 20-10 for financial reporting rather than the SF 269.

Audits of States, Local Governments and Non-profit Organizations - In accordance with OMB circular A-133, recipients that expend \$500,000 or more in a year in Federal funds must have an independent auditor perform a single or program-specific audit for that year.

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 also provided Sponsoring Organizations with user manuals and CDs to facilitate templates, spreadsheets, reports and applications for the collection, maintenance, and out use of the data. US&R grant forms can be downloaded from the GSA website. The US&R Task Forces are required to submit all information via email. Nearly 100% of US&R cooperative agreement information is handled electronically using email.

FEMA US&R uses the Department of Health and Human Service's SMARTLINK web-based payment system. SMARTLINK permits reporting requirements to be completed on-line, and will permit access to the Sponsoring Agencies to cooperative agreement funds on an as-needed basis.

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 information collection required from the US&R Sponsoring Organization is specific to the FEMA Cooperative Agreement program for US&R. There is no other US&R grant program in FEMA that is required to collect information similar to that requested by this collection.

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.

Collection of information does not impact small businesses of 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.

FEMA uses OMB standard grant administration procedures and related data elements to manage grants and cooperative agreements. If FEMA did not request and obtain this information, FEMA could not comply with OMB grant requirements. The collection of this information by FEMA is to exercise comprehensive financial management, ensure that efficient and effective use of Federal funds, and to maintain readiness and response standards. The information and data that FEMA seeks through this collection is the least amount that is necessary. For example, FEMA monitors grant programs for compliance with financial management requirements.

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.

Quarterly financial and program reporting are the standards for the US&R Cooperative Agreements. (Program progress reports are required semi-annually) However, a situation could arise due to the concern over the performance of a grant recipient where FEMA may determine that more detailed information, on a shorter term basis, may be needed for a defined period of time.

If a recipient demonstrates a consistent pattern of non-compliance with good grant administration practices, after appropriate efforts to resolve the situation and appropriate notice to the recipient, FEMA would consider requiring more frequent reporting as permitted in the Common Rule on Cooperative Agreements. (e.g., High Risk grantees)

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

Respondents are not required to prepare a written response in fewer than 30 days.

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

There are no requirements 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.

Respondents are not required 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.

This collection does not involve a statistical survey.

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

This collection does not require statistical data classification.

(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.

This collection does not require a pledge of confidentiality that is not supported by authority established in statute or regulations.

(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 collection does not require respondents to submit proprietary trade secret, 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 January 23, 2009, Volume 74, Number 14, pp. 4213. 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.

FEMA consults with the National Urban Search and Rescue Advisory Committee Working Groups, including its Legal Issues Working Group, on a semi annual basis. These consultations involve discussions as to the nature of the information that FEMA needs to manage the cooperative agreements. The working groups and the advisory committee are both comprised of federal, state, and local officials, as well as representatives of labor organizations, some of whose members serve on Task Forces.

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.

The information being collected is obtained from Sponsoring Organizations of US&R. Each of the Sponsoring Organizations and US&R Task Forces has experience with Cooperative Agreement administrative and financial reporting data collection elements requirements in 44 CFR Part 208. Consultation with FEMA and Sponsoring Organizations and teams with data collection requirements are provided as necessary.

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.

There are no assurances of confidentiality provided to the respondents for this information collection. A Privacy Threshold Analysis has been completed and submitted to the FEMA Privacy Office 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 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.

FEMA Urban Search and Rescue Response System is currently comprised of 28 Sponsoring Organizations which are required to submit approximately 16 burden hours (each Task Force) to prepare for the collection of financial, program and administrative information for US&R Sponsoring Organizations relating to preparedness and response Cooperative Agreement awards.

The Narrative Statement (FEMA Form 089-10) is completed once annually by 28 grantees with an average burden per response of 4 hours and the total annual burden is 112 hours..

The Performance Reports (FEMA Form 089-11) are completed semi-annually by 28 grantees with an average burden per response of 2 hours and the total annual burden is 112 hours.

The Extensions/Budget Changes (FEMA Form 089-12) are completed semi-annually by 28 grantees with an average burden per response of 1 hour and the total annual burden is 56 hours.

The Memorandum of Agreement (FEMA Form 089-13) is completed once annually by grantees with an average burden per response of 4 hours and the total annual burden is 112 hours.

The Self Evaluations (FEMA Form 089-14) are completed once annually by 28 grantees with an average burden per response of 2 hours and the total annual burden is 56 hours.

The Task Force Deployment Data (FEMA Form 089-15) are completed once annually by 28 grantees with an average burden per response of 1 hour and the total annual burden is 28 hours.

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.

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 (US&R Task Forces)	Narrative Statement / FEMA Form 089-10	28	1	4	112	\$32.67	\$3,659
State, Local or Tribal Government (US&R Task Forces)	Performance Reports / FEMA Form 089-11	28	2	2	112	\$32.67	\$3,659
State, Local or Tribal Government (US&R Task Forces)	Extensions/Budget Changes / FEMA Form 089-12	28	2	1	56	\$32.67	\$1,830
State, Local or Tribal Government (US&R Task Forces)	Memorandum of Agreement Revisions / FEMA Form 089-13	28	1	4	112	\$32.67	\$3,659
State, Local or Tribal Government (US&R Task Forces)	Self Evaluations / FEMA Form 089-14	28	1	2	56	\$32.67	\$1,830
State, Local or Tribal Government (US&R Task Forces)	Task Force Deployment Data / FEMA Form 089-15	28	1	1	28	\$32.67	\$915
Total		28			476		\$15,552

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category, using figures derived by taking the average salary of every full-time employee within each task force, the estimated burden hour cost to respondents is \$32.67 per hour. This is based on the following respondent occupational categories: job titles for these individuals are Program Manager (\$37.47), Grant Manager (\$41.97), Logistician (\$34.62) and Administrative Support (\$16.62).

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 operation, maintenance, capital or start-up costs involved 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 [Describe]	
Staff Salaries 2 of GS 13 employees spending approximately 70 % of time annually reviewing and analyzing information collected for this data collection, 1 of GS 9 employees spending approximately 90 % of time annually reviewing and analyzing information collected for this data collection	\$171,000
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$171,000

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
Narrative Statement / FEMA Form 089-10				224	112	-112
Performance Reports / FEMA Form 089-11				112	112	0
Extensions/Budget Changes / FEMA Form 089-12				5	56	+51
Memorandum of Agreement Revisions / FEMA Form 089-13				112	112	0
Self Evaluations / FEMA Form 089-14				0	56	+56
Memorandum of Agreement / No Form				8	0	-8
Task Force Deployment Data / FEMA Form 089-15				0	28	+28
Total(s)				461	476	+15

Explain: The change to the narrative statement (FEMA Form 089-10) burden hours results from the fact that it is now requested only once. The performance report (FEMA Form 089-11) burden hours remain the same. The extension/budget changes (FEMA Form 089-12) are now received of all applicants and the burden hours reflect this as a result of the increase in number of respondents. The memo of agreement (FEMA Form 089-13) burden hours remain the same. Self Evaluations (FEMA Form 089-14) were not part of the prior collection and are now a part of the collection. The task force deployment data (FEMA Form 089-15) was not part of the prior collection and is now a

part of the collection. There are no new memorandums of agreement received for this program, so the burden is removed.

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
Narrative Statement / FEMA Form 089-10				\$13,440	\$3,659	-\$9,781
Performance Reports / FEMA Form 089-11				\$6,720	\$3,659	-\$3,061
Extensions/Budget Changes / FEMA Form 089-12				\$300	\$1,830	+\$1,530
Memorandum of Agreement Revisions / FEMA Form 089-13				\$480	\$3,659	+3,179
Self Evaluations / FEMA Form 089-14				0	\$1,830	+1,830
Memorandum of Agreement / No Form				\$6,720	0	-\$6,720
Task Force Deployment Data / FEMA Form 089-15				0	\$915	+\$915
Total(s)				\$27,660	\$15,552	-\$12,108

Explain: Part of the overall change in the annual cost burden is attributed to a reduction in the per-hour wage-rate category that resulted from a more exact average cost calculated from the respondent categories. The remaining change results from: The narrative statement (FEMA Form 089-10) is now requested only once. The performance report (FEMA Form 089-11) annual cost burden remains the same. The extension/budget changes (FEMA Form 089-12) are now received of all applicants and the annual cost burden reflects this as a result of the increase in number of respondents. The memo of agreement (FEMA Form 089-13) reflects the receipt of information from all respondents. Self Evaluations (FEMA Form 089-14) were not part of the prior collection and are now a part of the collection. The task force deployment data (FEMA Form 089-15) was not part of the prior collection and is now a part of the collection. There are no new memorandums of agreement received for this program, so the burden is removed.

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.