

May 13, 2009

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660-0001**

**Title: National Defense Executive Reserve Personal Qualifications Statement**

**Form Number(s): FF 646-0-1 (replaces FF 085-3 in number only)**

### 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.

To complete the supporting statement, type in your responses in the white space below each question. Your responses should be full and complete and provide sufficient information to help the OMB desk officer to understand what you are planning to do and why and how the Agency/Federal Government will benefit from and use the information you will be obtaining or soliciting.

### Specific Instructions

#### A. Justification

**1. Explain the circumstances that make the collection of information necessary (give details as to why this information is being collected). 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 National Defense Executive Reserve (NDER) program was established by Section 710(e) of the Defense Production Act of 1950, as amended. Under Executive Order 12919, National Defense Industrial Resources Preparedness, June 3, 1994, Part VI, Section 601, the Director of the Federal Emergency Management Agency (FEMA) coordinates the NDER program activities of departments and agencies with NDER units. The Homeland Security\_

Act of 2000 (P.L. 107-296) transfers to the Secretary of the Department of Homeland Security (DHS) the authorities and responsibilities of the Director of FEMA. Under the provisions of DHS Delegation Number 9000, the Secretary has delegated authority to perform functions relating to the NDER program to the Director of FEMA.

**2. Identify 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: a) how the information will be shared, if applicable, and for what programmatic purpose.**

FEMA Form 646-0-1 (new number assignment replacing FEMA Form 85-3), National Defense Executive Reserve Personal Qualifications Statement, is an application form that is used by Federal departments and agencies to fill NDER vacancies. To become a Reservist, individuals with the requisite qualifications must complete the application form. FEMA serves as the NDER coordinator for all Federal departments and agencies. As the government-wide coordinator, FEMA ensures that applicants are not already serving in a Federal department or agency sponsored unit; reviews the application form to ensure that the candidate meets all basic membership qualifications for the program; and in some cases, determines the Federal department or agency best suited for the applicant.

**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 completed collection of information tool can be sent to FEMA via fax at (940) 323-2766 or scanned into a PDF document and then submitted via e-mail.

**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.**

Each Federal department and agency unit is required to do an initial name check with FEMA when considering a candidate in order to eliminate duplications. FEMA is charged with collecting this data and no other entity does so, so there is no duplication of data 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.**

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.**

If FEMA Form 646-0-1 (formerly 85-3) were not used, Federal departments and agencies sponsoring NDER units would be unable to meet the criteria to fill NDER vacancies.

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

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

**(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.**

**(c) Requiring 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.**

**(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.**

**(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.**

**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 March 13, 2009, Volume 74, Number 48, pp. 10952. 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.**

As administrator of the NDER program, FEMA chairs the Interagency National Defense Executive Reserve Committee, which is composed of representatives from other Federal departments and agencies with NDER units.

**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.**

Comments from those whom information is collected are welcomed and any received are considered for the program.

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

NOT APPLICABLE. There are no payments or gifts to respondents involved in this collection.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. Provide details on:**

The information is protected under the mandates of the Privacy Act of 1974. Please see copies of the NDER Privacy Act Statement and System of Records Notice (SORN) covering FEMA Form 646-0-1 (formerly 85-3) included in this collection package. Candidates submitting information on the FEMA Form 646-0-1 for the NDER program are assured confidentiality under the Privacy Act Notice.

**11. Provide additional justification for any questions 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 who 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.**

The estimated annual hour burden FEMA Form 646-0-1 for this collection is .5 hours per response, and based on 10 respondents completing this application form the estimated total annual hour burden is 5 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 estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.**

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 (x1.4)	Total Annual Respondent Cost
Individuals or households	National Defense Executive Reserve Personal Qualifications Statement / FEMA Form 646-0-1	10	1	.5 Hours	5 Hours	101.88	\$509.40
Total		10			5 Hours		\$509.40

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for Chief Executives is estimated to be \$101.88 per hour (including the 1.4 modifier representing wage plus benefit); therefore, the estimated burden hour cost to respondents Chief Executive is estimated to \$509.40 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:**

NOT APPLICABLE. There are no start-up operational or maintenance cost to respondents 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.**

The estimate is based on receiving 10 applications.

**ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

Item	Cost (\$)
Staff Salaries [1 GS-14 Analyst @ \$43.98/hour spending approximately 1 hour per application in collection-related activities.	\$219.90
<b>Total</b>	<b>\$219.90</b>

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping hour and cost burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.**

**Itemized Changes in Annual Burden Hours**

<b>Data collection Activity/Instrument</b>	<b>Program Change (hours currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (hours currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
National Defense Executive Reserve Personal Qualifications Statement / FEMA Form 646-0-1				15	5	-10
<b>Total(s)</b>				<b>15</b>	<b>5</b>	<b>-10</b>

***Explain:***

Funding for the program has been reduced and as a result the number of positions expected to be filled has been reduced, which reduces the number of respondents and decreases the total annual burden hours.

<b>Itemized Changes in Annual Cost Burden</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
National Defense Executive Reserve Personal Qualifications Statement / FEMA Form 646-0-1				\$1,015.00	\$509.40	- \$505.60
<b>Total(s)</b>				<b>\$1,015.00</b>	<b>\$509.40</b>	<b>-\$505.60</b>

***Explain:***

Due to the reduction in number of respondents expected as a result of reduced funding, the total annual cost burden is also affected.

**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.**

There are no outline plans for tabulation and publication of data for this information collection.

**17. If seeking approval to not 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 the certification statement referenced above.

**B. Collections of Information Employing Statistical Methods.**

**NO STATISTICAL METHODOLOGY IS INVOLVED IN THIS COLLECTION**