

June 24, 2009

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0097

Title: Citizen Corps Affiliate Programs and Organizations Application

Form Number(s): None

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.

Citizen Corps, an initiative launched by President George W. Bush in January 2002, is authorized by Executive Order 13254. “Citizen Corps Affiliate Programs and Organizations offer communities resources for public education, outreach, and training; represent volunteers interested in helping to make their community safer; or offer volunteer service opportunities to support first responders, disaster relief activities, and community safety efforts. Providing formal recognition to these programs and similar organizations through Affiliation with Citizen Corps, the program reaches a broader audience which can assist in reaching the goal of having every American participate in making their communities and families safer”. In order to ensure that interested parties appropriately further the Citizen Corps mission, Citizen Corps requests supporting information from those programs and organizations seeking to become Affiliates.

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.

In order to ensure that Citizen Corps partners only with those programs and organizations that are capable of supporting its mission, Citizen Corps will request the following application process information from not-for-profit organizations that would like to become Affiliates:

1. To be considered for official affiliation with Citizen Corps, programs and organizations must:
 - Support the mission of citizen participation in making America safer,
 - Be non-profit or government sponsored and nationwide in scope,
 - Be non-partisan, and
 - Not be listed on any Federal or State registers of financial non-responsibility.
2. Interested programs and organizations are asked to provide a written request for affiliation to the Citizen Corps Affiliate Review Panel; Suite 200; 500 C Street SW; Washington D.C. 20472 and to include the following information:
 - A signed Citizen Corps Affiliate Programs and Organizations Acceptance of Terms and Conditions form (attached);
 - A copy of the organization's Constitution or charter, and bylaws, with evidence therein of their commitment to non-discrimination in hiring and in the provision of services;
 - A brief history of the organization, including its mission statement, membership, and examples of past practices;
 - A copy of the Internal Revenue Service's certification of the organization's 501(c)(3) status or a State non-profit certification (N.B. This provision does not apply to government entities);
 - A statement as to how the organization plans to further the Citizen Corps mission;
 - A statement as to how the organization will work with Citizen Corps Councils at the National, State, Tribal, or local levels;
 - Names and titles of administrative personnel or points of contact; and
 - Address and telecommunications information, including e-mail and web site addresses.

3. Upon review and approval of a request for affiliation, Citizen Corps and the approved organization will sign a “Statement of Affiliation,” which will include an agreement to:
 - Recognize the common purpose and mission between Citizen Corps and the approved organization;
 - Publicly acknowledge the affiliation, which may include website links, co-logos on publications, and references in printed materials;
 - Coordinate activities to ensure efficient use of the organization’s resources for Citizen Corps; and
 - Keep each other informed of activities conducted in support of Citizen Corps and provide an annual report summarizing those activities
 - Re-evaluation of the Statement of Affiliation and partnership every 3 years by Citizen Corps and approved organization.

Affiliation with Citizen Corps at the Federal level does not constitute endorsement of any specific program or organization by the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), or the Federal government, nor will an affiliate’s membership or employees be deemed agents or assigns of DHS, FEMA or the Federal government. In addition, affiliate status does not confer or encompass financial support of or obligations from Citizen Corps, DHS, or the Federal government to affiliates programs or organizations.

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.

Requested information can be sent via electronic mail, although most applicants choose to submit documents in hardcopy as well via the United States Postal Service or fax. Information is collected electronically 100% of the time. Parties interested in becoming a Citizen Corps Affiliate may send an email of interest to citizencorps@dhs.gov. FEMA Community Preparedness Division (CPD) Office will send Affiliate Application requirements to interested party. The interested party will then need to submit the documentation, from which FEMA CPD will determine eligibility and affiliation.

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.

Without the collection of information as requested, Citizen Corps will not be able to operate effectively and efficiently due to an inability to regularize and coordinate activities between Citizen Corps and those groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues.

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.

Respondents would only need to report information to the agency more often than quarterly if significant changes occur to the listed documents request for Affiliation:

- A copy of the organization's Constitution or charter, and bylaws, with evidence therein of their commitment to non-discrimination in hiring and in the provision of services;
- A brief history of the organization, including its mission statement, membership, and examples of past practices; A copy of the Internal Revenue Service certification of the organization's 501(c)(3) status or a state certification, if the organization is not-for-profit entity;
- A statement as to how the organization plans to further the Citizen Corps mission;
- A statement as to how the organization will work with Citizen Corps Councils at the national, state, tribal, or local levels; Names and titles of administrative personnel or points of contact; and Address and telecommunications information, including e-mail and web site addresses.

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

There are no special circumstances related to this matter.

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

There are no special circumstances related to this matter.

(c) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

There are no special circumstances related to this matter.

(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.

There are no special circumstances related to this matter.

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

There are no special circumstances related to this matter.

(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 are no special circumstances related to this matter.

(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 are no special circumstances related to this matter.

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 April 9, 2009, Volume 74, Number 67, pp. 16225. 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.

A Program Specialist from the FEMA Community Preparedness Division has discussed in individual meetings and conversations the purpose of the Affiliate program, as well as the collection of data needed to facilitate this program, with representatives of several potential and current Affiliate Organizations, including the United States Power Squadrons, the Home Safety Council, and the Civil Air Patrol.

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.

FEMA Community Preparedness Division meets individually with representatives from several Not-for-profit institutions on a weekly basis that have expressed an interest in working with Citizen Corps. Before receiving their required documentation, FEMA discusses the Affiliate program and inform them of the data needed to participate in the program. Following the document submission, consultation happens on a quarterly basis.

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 (PTA) was completed for this collection and forwarded 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.

N/A. Citizen Corps is not requesting such information.

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.

Not-for-profit Institutions – FEMA has estimated that approximately 8 respondents will submit application requests to become Affiliates. Each request is estimated to take 4 hours to complete. The total annual burden is estimated to be 8 responses x 4 hours per response = 32 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
Not-for-Profit Institutions	Application Process	8	1	4	32	21.00	\$672.00
Total		8			32		\$672.00

* Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.4. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4, and the entry for the "Avg. Hourly Wage Rate" would be \$59.51.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Not-for-Profit Institutions is estimated to be 21.00 per hour; therefore, the estimated burden hour cost to respondents Office Administrative Support Occupation is estimated to be \$672.00 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:

- 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.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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
Total				

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] If any?	0
Staff Salaries [_1_GS-12 employee spends approximately 7% of time annually to review and follow-up on submissions for this data collection.] $\$73,000.00 \times 7\% = \$5,111.00$	\$5,111.00
Facilities [cost for renting, overhead, ect. 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 annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	0
Total	\$5,111.00

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
Not-for-Profit Institutions				64	32	-32
Total(s)				64	32	-32

Explain:

There has been no change from the last OMB approval to the current request in the number of respondents or responses. The previous OMB Notice of Action approved 64 burden hours, however the actual total burden hours should have been, and still is 32.

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
Not-for-Profit Institutions				\$480.00	\$672.00	+\$192.00
Total(s)				\$480.00	\$672.00	+\$192.00

Explain:

There has been an increase in the estimated annual cost burden previously reported for this collection due to the “Average Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

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 and exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.