OMB Supporting Statement Part A

Disaster Response Database Corporation for National and Community Service (CNCS)

PART A: JUSTIFICATION

A1. 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.

The purpose of this request is to seek approval for the CNCS Disaster Response Database. This tool allows for the collection of narrative and accomplishment information from programs engaged in CNCS sponsored disaster activities. The attached database will allow the Corporation to evaluate the impact of service activities in communities affected by disasters and communicate those activities to interested parties.

A2. Indicate how, by whom, and for what purposes 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.

Programs engaged in CNCS sponsored disasters can complete and e-mail the attached form to track their disaster activities. This information will be used by the Corporation, FEMA, and state emergency management to track how federal disaster dollars are spent. This collection is designed specifically for programs engaged in CNCS Disaster Response Cooperative Agreements and will help them meet their reporting requirements under the agreement.

New quantifiable accomplishment measures will allow the in-kind value of volunteer service hours to be used to offset federal match requirements for disaster funds, thereby saving state taxpayer dollars.

The Corporation has used this information in the past in its publications on the impact of national service in Katrina impacted communities. The data has also supported reporting in the Congressional Budget Justification and other annual reports.

A3. 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.

All forms will be provided electronically to participating programs. Programs can complete these forms and submit them electronically to CNCS. This data will then be uploaded into the existing CNCS Disaster Response Database.

A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There are no other sources of information by which the Corporation can meet the purpose described in A2.

A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

This collection of information does not impact small businesses since they are not eligible to apply for a CNCS base grant. Economic burden to other small entities is limited to the cost of staff time to complete and submit the reports. This is minimized to the degree possible by asking only for the information absolutely necessary to assess the impact of the program's disaster activities.

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacle to reducing burden.

The Corporation would be unable to fully utilize its programs effectively in times of disaster. Presently, FEMA requires information to be reported on CNCS disaster activities as specified under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5121-5206. CNCS presently has no other mechanism to standardize these reports and meet FEMA requirements. This could impact the Corporation's capacity to respond to Stafford mandated mission assignments, and makes it harder for the Corporation fully account for the expenditure of taxpayer funds. Additionally, the inability to measure the impact of volunteer response activities results in states not being able to fully account for the in-kind contributions of these services, thus costing the state extra taxpayer dollars.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record 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) requires the use of a

statistical data classification that has not been reviewed and approved by OMB; (g) 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; or (h) requires 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 reporting instrument is being developed in conjunction with FEMA to be consistent with Stafford Act reporting requirements. Those requirements may require a greater than quarterly reporting frequency. This would be the only circumstance of the above listed items.

A8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to the notice and describe actions taken by the agency in response to the comments.

The Federal Register notice was published March 18, 2009 (Vol. 74, No. 51) and no comments were received.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information provided by respondents is subject to the Freedom of Information Act and the Privacy Act. No specific assurance of confidentiality is provided.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.

The proposed data collection does not include any questions of a sensitive nature.

A12. 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.

Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of expected 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 line 13 of OMB Form 83-1. (c) provide estimates of annualized costs 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.

The total hour burden is estimated at 50 hours. The Corporation expects no more than 100 respondents. Response time should be no more than 0.5 hours per response. Based on the Independent Sector value for a volunteer hour, the total estimated annual hour burden cost would be \$1,012.50. There is no additional cost burden outside of the customary and usual business practices.

Form	Respondents	Estimated Number of Respondents	Estimated Burden per Respondent (Hours)	Total Burden Estimate (hours)
Application	Existing CNCS grantees (public charities, community organizations, private foundations, and Higher education schools)	100	0.5 hours	50 hours

A13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burdens shown in Items 12 and 14.

There is no actual annual cost burden to respondents resulting from this information collection activity other than the time burden in A12.

A14. Provide estimates of annualized costs 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 not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Corporation's cost for this information collection is estimated to be \$2,250. As a grant-making agency, our administrative budget includes creating opportunities for interested and eligible applicants. These costs relate to receiving and processing the reports from this information collection including staff time, forms processing and system maintenance costs.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There were no changes or adjustments to Item 13 or 14 given that this is a new information collection.

A16. 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.

This information collection will be utilized in CNCS annual reporting and provided to FEMA for possible publication in multi-agency reports.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Corporation is not seeking this approval. The expiration date will be displayed on the application instructions.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.