

Changes to Collection OMB No. 1660-0009

The following questions have been updated since the last OMB Approval:

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. **Changes are that the use of information is more detailed and how the information is shared.**

Last Supporting Statement information - The information contained in the Governor's request to the President for supplemental Federal assistance, through the appropriate Regional Director, combined with the finding of the joint FEMA, State and local Preliminary Damage Assessment (PDA) is analyzed provides the basis for the Regional Summary and Analysis and Recommendation that is submitted to the Director of the Recovery Division.

Current Supporting Statement - The information contained in the Governor's request to the President for supplemental Federal assistance, through the appropriate Regional Administrator, combined with the finding of the joint FEMA, State and local Preliminary Damage Assessment (PDA) is analyzed and provides the basis for the Regional Summary, Analysis, and Recommendation that is submitted to the Assistant Administrator of the Disaster Assistance Directorate. The information is submitted to the President for consideration of a declaration.

Pursuant to Section 569 of the Consolidated Appropriations Act, 2008 (Public Law 110-161) that Congress is informed of PDA information used in the declaration process. The provision in the FY08 Omnibus requires a report 30 days after a determination is made on a declaration request or appeal. The information contained in the Regional Summary, Analysis, and Recommendation is not releasable under FOIA Exemption 5, 5 U.S.C. § 552(b) (5). Documents that are inter-agency or intra-agency, which would not be available by law to a party other than an agency in litigation with the agency, are exempt from disclosure. These records are part of the Deliberative Process in that they are Pre-decisional in nature.

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. **The information is now sent electronically via e-mail and the answer in the new Supporting Statement is updated to reflect this.**

Last Supporting Statement - At this point there are no electronic or web-based capabilities for State Governors and/or Designees to submit this information.

FEMA uses an agency-wide system of hardware, software, telecommunications, and applications known as the National Emergency Management Information System (NEMIS) to process disaster declarations internally. Information about the event, the joint PDA, the Governor's request, and the Regional Summary and Analysis and Recommendation are entered and housed into NEMIS by authorized FEMA staff, where it can be accessed and used by FEMA regional, headquarters, and field offices that have access to this information. NEMIS provides an integrated and automated tool to streamline, standardize, and support the disaster declaration process. This is accomplished through the Emergency Coordination Incident Activity and Declaration Manager Modules.

Current Supporting Statement - Information for the collection is received electronically via e-mail. All documentation is submitted in PDF format. Original signatures are required to be maintained for each request, and are mailed in separately.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: **This multi-part question has remained essentially unchanged; there are slight changes to the language to make the answers more clear but the scope of the answers remain unchanged.**

8. Federal Register Notice: **Sub-part "a" reflects the new publication date, sub-parts "b" and "c" now contain answers previously not submitted.**

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.

Last Supporting Statement - A 60-day Federal Register Notice inviting public comments was published on February 17, 2006, Volume 71, Number 33, pp. 8605-8606. No comments were received. Please see attached copy of the published notice included in this package.

Current Supporting Statement - A 60-day Federal Register Notice inviting public comments was published on March 13, 2009, Volume 74, Number 48, pp. 10956. 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.

Last Supporting Statement - No answer submitted

Current Supporting Statement - Consultations with officials at various levels of government occur as a result of disaster activity. All information collected as a result of these consultations are used to monitor the effectiveness of the declaration process.

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.

Last Supporting Statement – No answer submitted

Current Supporting Statement - Consultation with Federal, State and local officials takes place each and every time a request for a PDA is submitted by a State. This is necessary to obtain accurate information about the incident and affected area/s in order to prepare for and conduct the joint PDA.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. Information is updated in the current Supporting Statement answer.

Last Supporting Statement - There are no confidentiality assurances involved in this information collection. This collection does not involve personal identifiable information.

Current Supporting Statement - The information contained in the Regional Summary, Analysis, and Recommendation is not releasable under FOIA Exemption 5, 5 U.S.C. § 552(b) (5). Documents that are inter-agency or intra-agency, which would not be available by law to a party other than an agency in litigation with the agency, are exempt from disclosure.

12. Provide estimates of the hour burden of the collection of information. The statement should: PLEASE NOTE: All changes are detailed in Question 15 (below).

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.

Last Supporting Statement Charts:

Table 1. Annual Burden Hours

| Project/Activity (Survey, Form(s), Focus Group, etc.) | No. of Respondents | Frequency of Responses | Burden Hours Per Respondent | Annual Responses | Total Annual Burden Hours |
|---|-----------------------|---------------------------|-----------------------------------|---------------------|------------------------------------|
| | (A) | (B) | (C) | (AxB) | (AxBxC) |
| Governor's Requests | 58 | 3 | 76 | 174 | 13,224* |
| TOTAL | 58 | 3 | 76 | 174 | 13,224 |

Table 2. ANNUAL COST TO RESPONDENTS

| Program | Burden Hrs | Median Hr. Rate ⁽¹⁾ (\$) | Average Cost per Respondent ⁽²⁾ (\$) | Annualized Cost All Respondents (\$) |
|-----------------------------|---------------|---|---|--|
| State Governors' Request | 13,224 | \$47.74 | \$3,628.00 | \$631,314.00 |
| Total | 13,224 | \$47.74 | \$3,628.00 | \$631,314.00 |

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. **Information has been updated to more accurately reflect the hours burden per response and a split of the work by respondent. See Question 15 for details on changes to hours burden and cost burden.**

Current Supporting Statement Chart:

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 Government | Governor's Request / No Form | 56 | 6 | 9 | 3,024 | \$65.67 | \$198,586.08 |

| | | | | | | | |
|---|---|-----------|---|----|---------------|-------|---------------------|
| State, Local or Tribal Government | Initial Data Gathering for Governor's Request / No Form | 56 | 6 | 24 | 8,064 | 33.64 | \$271,272.96 |
| Total | | 56 | | | 11,088 | | \$469,859.04 |

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for State Government Chief Executive is estimated to be \$65.67 per hour (including the 1.4 modifier representing wage plus benefit), therefore, the estimated burden hour cost to respondents State Government Chief Executive is estimated to be \$198,586.08 annually. According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for State Administrative Support Workers (BLS 43-1011) is estimated to be \$33.64 per hour (including the 1.4 modifier representing wage plus benefit), therefore, the estimated burden hour cost to respondents State Government Chief Executive is estimated to be \$271,272.96 annually.

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. Costs are updated to more accurately reflect those associated with this collection. See the information in the current Supporting Statement Chart for an explanation of how costs were calculated.

Last Supporting Statement -

Table 3. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

| Item | Cost (\$) |
|---|--------------------|
| Staff Salaries: \$30.00 per hour for review by 5 FEMA Headquarter Senior Officials @ approximately \$110,000 x 48 hours (average) | \$5,280,000 |
| Total | \$5,280,000 |

Current Supporting Statement –

Table 3. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

| Item | Cost (\$) |
|--|----------------|
| Staff Salaries: 5 FEMA Headquarter Senior Officials (GS 15 Step 5) earning \$91.87 (65.62 base salary times 1.4 multiplier) per hour with an average of 48 hours of review for each response. There are a total of 336 responses (56 respondents times 6 responses per respondents). The total cost to the Federal government is 336 responses times 48 hours per response to review times | \$1,481,679.36 |

| | |
|--|-----------------------|
| \$91.87 per hour wage equaling \$1,481,679.36. | |
| Total | \$1,481,679.36 |

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. See descriptions below each chart for changes.

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.

Last Supporting Statement – No changes submitted

Current Supporting Statement – See charts below

| Data collection Activity/Instrument | Program Change (hours currently on OMB Inventory) | Program Change (New) | Difference | Adjustment (hours currently on OMB Inventory) | Adjustment (New) | Difference |
|---|--|-----------------------------|-------------------|--|-------------------------|-------------------|
| Governor's Request | | | | 13,224 | 3,024 | -10,200 |
| Initial Data Gathering for Governor's Request | | | | 0 | 8,064 | +8,064 |
| Total(s) | | | | 13,224 | 11,088 | -2,136 |

Explain: The overall decrease in the annual burden hours is due to the more accurate estimation of hour burden per response as a result of the past historical data available to review. There has been a lessening of the overall decrease due to increased disaster

activity (and related increase in responses) and the disaster declaration requests that result from this. Also, the actual data collection work has been separated to more accurately reflect the burden hours for each activity.

| 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 |
| Governor's Request | | | | \$631,314.00 | \$198,586.08 | -\$432,727.92 |
| Initial Data Gathering for Governor's Request | | | | \$0 | \$271,272.96 | + 271,272.96 |
| Total(s) | | | | \$631,314.00 | \$469,859.04 | -161,454.96 |

Explain: The decrease in Annual Cost Burden results from the overall decrease in the total number of burden hours as explained above and the associated cost reduction from less hours burden multiplied by the wage rate category (now updated to include the 1.4 multiplier) amount. Also, the actual cost burden associated with each data collection activity has been separated to more accurately reflect the totals for each.