

September 22, 2009

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0087

Title: PrepCAST (Preparedness Comprehensive Assessment Support Tool) (formerly NIMS Compliance Assistance Support Tool)

Form Number(s): No Forms

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.

All-hazards preparedness requires the development of a system to assess our Nation's capabilities to prepare for a major natural disaster or terrorist attack. The President and Congress understand this need and have issued two requirements pursuant to the development of such a system. Homeland Security Presidential Directive-8: National Preparedness (HSPD-8) calls for establishing a system that would assess and provide an annual report on our national preparedness. The Post-Katrina Emergency Management Reform Act (PKEMRA 649 (c) (1-4)), Public Law 109-295, includes requirements to establish a "comprehensive system to assess, on an ongoing basis, the Nation's prevention capabilities and overall preparedness."

In Homeland Security Presidential Directive (HSPD)-5, Management of Domestic Incidents, the Secretary of Homeland Security is directed to develop and administer a National Incident Management System (NIMS). The NIMS provides a consistent nationwide approach for federal, State, tribal, and local jurisdictions to work together to prepare, prevent, respond, and recover from domestic incidents, regardless of cause, size, or complexity. Beginning in FY 2005, federal departments and agencies made adoption of the NIMS by State and local governments a requirement for federal preparedness assistance through grants, contracts and other activities.

PrepCAST is the evaluative tool for jurisdictional ability to handle such incidents. By contributing to the establishment of a national baseline for compliance by all Federal, State, local, and tribal governments with the NIMS, PrepCAST enhances the ability of the United States to manage domestic incidents by establishing a single, comprehensive national incident management system.

In addition to HSPD-5, this information collection is supported by the following authorities: The Homeland Security Act of 2002, Homeland Security Presidential Directive/HSPD-8-National Preparedness, and The U.S. Department of Homeland Security (DHS)-National Incident Management System (NIMS), dated March 1, 2004.

Pursuant to these Federal requirements, the Federal Emergency Management Agency (FEMA) National Preparedness Directorate (NPD) developed the Preparedness Comprehensive Assessment Support Tool (PrepCAST). The PrepCAST is a standardized data collection and assessment process that effectively assesses prevention, protection, response, and recovery capabilities at the regional, State, local, and Tribal levels, eliminates redundant data calls, reduces the burden on respondents, and helps ensure FEMA collects meaningful data to guide policy and resource allocation decisions.

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.

Results of the collection will be used by FEMA to inform the analysis and reporting of the level of preparedness of the nation. This level of preparedness includes the degree to which the NIMS Implementation Objectives have been implemented by all jurisdictions.

PrepCAST collects capabilities-based data through the use of the State Preparedness Report (SPR) information and National Incident Management System (NIMS) compliance formerly collected through the National Incident Management System Compliance Assistance Support Tool (NIMSCAST). PrepCAST integrates various reporting requirements, and is used in conjunction with legacy and parallel assessments and reports to create documents such as the National Preparedness Report.

PrepCAST incorporates the function and format of the web-based NIMSCAST with which most respondents are already familiar. As such, PrepCAST functions as an independent, capabilities-based assessment addressing questions about current capabilities and focusing on key measures drawn from the 37 capabilities set forth in the Target Capabilities List (TCL) 2.0.

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 collection will be exclusively collected via electronic means, leveraging the NIMSCAST platform. The collection is available at <http://www.fema.gov/nimscast>.

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. The PrepCAST system assesses the preparedness of the nation to respond to all hazards. This collection will consolidate all information required to prepare this report and would eliminate the need to request similar information 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 this collection, a baseline of the current capability levels in the context of the Targeted Capabilities List (2.0) of the States will not be known and will not be able to be used to identify common areas of concern for National Preparedness

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.

There is no requirement for respondents to report 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.

There is no requirement to provide a written response to the collection in less than 30 days after receipt of it.

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

There is no requirement to submit more than an original and two copies of any document.

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

There is no requirement to retain records for more than three years.

(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 is no survey in this collection that is designed to not 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.

There is not use of statistical data classification in this collection 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(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 is no requirement for respondents to submit proprietary trade secret, or other confidential information for this data collection.

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 June 19, 2009, Volume 74, Number 117, pp. 29222. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on September 10, 2009, Volume 74, Number 174, pp. 46614. 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.

NIMS data collection requirements have been reviewed and jointly developed by multiple stakeholders. Stakeholders include Regional, State, Local and Tribal Nation representatives.

State Preparedness data collection is based directly on the Targeted Capabilities List (TCL). The TCL was developed jointly with Federal, State and Local representatives and subject matter experts.

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.

An annual conference has been hosted for the last 2 years to discuss the implementation of NIMS and to review the future direction of the NIMS implementation program. The TCL, which was initially published in October of 2007, are being revised based on feedback received from stakeholders.

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

There are no payments or gifts to respondents for this data collection.

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

The information will be kept private or anonymous to the extent allowable by law.

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 a sensitive nature required in this data collection.

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.

The NIMS Compliance module of the PrepCAST collection tool is expected to be completed by 3,926 respondents, and the annual hour burden per response is 5 hours. Each respondent will complete the tool once, and the total annual hour burden is estimated to be 19,630.

The SPR collection module of the PrepCAST is expected to be completed by 56 respondents, and the annual hour burden per response is 83 hours. Each respondent will complete the tool once, and the total annual hour burden is estimated to be 4,648.

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.

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	National Incident Management System Compliance Assistance Support Tool (NIMSCAST) (State) / No Form Number	56	1	5 hours	280	\$40.04	\$11,211
State, local or tribal government	National Incident Management System Compliance Assistance Support Tool (NIMSCAST) (Local) / No Form Number	3,310	1	5 hours	16,550	\$40.04	\$662,662
State, local or tribal government	National Incident Management System Compliance Assistance Support Tool (NIMSCAST) (Tribal) / No Form Number	560	1	5 hours	2,800	\$40.04	\$112,112

State, local or tribal government	State Preparedness Report (SPR) / No Form Number	56	1	83 hours	4,648	40.04	\$186,106
Total					24,278		\$972,091

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for “Administrators and officials, public administration, Level 9” is estimated to be \$28.60 per hour and when fully loaded with the 1.4 multiplier, the rate becomes \$40.04, therefore, the estimated burden hour cost to respondents (Administrators and officials, public administration, Level 9) is estimated to be \$972,091 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 operation and maintenance, or capital and start-up costs associated with this 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: Personnel to provide operations and maintenance of collection instrument	\$750,000
Staff Salaries [1 of GS 14 employees spending approximately 100% of time annually supporting the collection and analysis for this data collection]	\$96,572
Facilities [cost for renting, overhead, etc. 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	
Total	\$846,572

Contractors are used to assist with the development of the web-based collection instrument that is used to collect the information. The collection instrument is hosted on the www.fema.gov (an approved, Certified and Accredited system). As such, there are no additional HW/SW costs to operating the collection. Contractors are also used to analyze the data collected by the system and to develop summary reports. There are no travel related costs, instead, web-based remote training tools are used to assist users in providing collection. As an online collection, there is no requirement for printing or postage.

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
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Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
National Incident Management System Compliance Assistance Support Tool (NIMSCAST) / No Form Number	9,218	19,205	+9,987		425	+425
State Preparedness Report (SPR) / No Form Number	0	4,648	+4,648			
Total(s)	0	23,853	+14,635		425	+425

Explain:

The burden hours for the NIMSCAST module of the PrepCAST collection tool have increased due to the addition of questions added to allow the tool to measure the 11 new NIMS implementation Activities. The burden hours for the SPR reflect the addition of this collection tool and its associated burden hours to the PrepCAST collection and were not part at the time of the last OMB approval. The new hours reported in the “Adjustment” section are due to the addition of more local governments reporting information; the subtotal of this (425 hours) is added to the 23,853 under the “Program Change” column for a total addition of 19,630 burden hours to the NIMSCAST tool.

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
National Incident Management System Compliance Assistance Support Tool (NIMSCAST) / No Form Number	\$210,078.22	\$768,968	+\$558,889.78		\$17,017	+\$17,017
State Preparedness Report (SPR) / No Form Number	\$0	\$186,106	+\$186,106			
Total(s)	\$0	\$955,074	+\$744,995.78		\$17,017	+\$17,017

Explain:

The annual cost burden for the NIMSCAST collection tool has increased due to the increased estimated hour burden per response resulting from additional questions, the increase in the number of respondents, and also due to the loaded wage rate now calculated for all collections. The annual cost burden for the SPR reflects the addition of this collection tool and its associated cost to the PrepCAST collection and was not part at the time of the last OMB approval. The new cost reported in the “Adjustment” section are due to the addition of more local governments reporting information; the subtotal of this (\$17,017) is added to the \$768,968 under the “Program Change” column for a total addition of \$785,985 to the cost burden for the NIMSCAST tool.

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.

This information collection will not be published for statistical purposes.

17. If seeking approval not to 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 “Certification for Paperwork Reduction Act Submissions”.

B. Collections of Information Employing Statistical Methods.

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION