

## **Changes to Collection OMB No. 1660-0087**

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

Change to collection name

**The former name of the collection was “National Incident Management System Compliance Assistance Support Tool (NIMSCAST)”. The new name is “PrepCAST (Preparedness Comprehensive Assessment Support Tool)”**

**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.**

**The section was updated to better reflect the requirements of HSPD-8 and now includes 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.”**

**Also, the following section better clarifies the information collected: “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.**

**This question has been updated to more efficiently respond to the question. The following is the new response:**

**“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.”**

**The following is what was replaced:**

**“NIMSCAST facilitates and reports State, Territory, tribal and local jurisdictions’ compliance with the NIMS. The NIMSCAST allows incident management authorities and resource managers to assess their current capabilities as well as to determine what additional measures should be taken and what resources are needed to effectively implement the NIMS nationwide.**

**The FY 2008 NIMSCAST reflects the Compliance Objectives (implementation activities) and metrics released to the State, territorial, tribal, and local governments in February 2008. All NIMSCAST data is organized by the seven components or chapters of the NIMS document. These data elements involve readiness metrics and related elements that support the national preparedness goal including standards for preparedness assessments and strategies, and a system for assessing the Nation’s overall preparedness to respond to major events, especially those involving acts of terrorism. Information collected from NIMSCAST in FY 2008 will also be used to help determine eligibility for federal preparedness assistance through grants, contracts, or other activities.**

**In addition to the end uses of NIMSCAST stated above, the instrument provides additional management tools necessary to strengthen incident management programs at the department, agency or jurisdiction level by specifically:**

- 1. Providing a comprehensive incident management program review;**
- 2. Helping define and/or redefine the incident management baseline for strategic planning to correct deficiencies and achieve required capabilities;**

3. **Providing program orientation for new staff members or leadership;**
4. **Serving as justification for budget, staff and resources requests; and**

**Assisting in the development of plans to deal with deficiencies.”**

**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 answer to this question is simplified; there is no change to the answer that replaces the scope of the previous answer.**

**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.**

**The answer to this question is simplified; there is no change to the answer that replaces the scope of the previous answer.**

**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.**

**Updated with new publication information:**

**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.**

**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.**

**Updated to read as follows:**

**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.**

**Updated from:**

**FEMA's IMSI developed the NIMSCAST in consultation with incident managers and other strategic emergency management stakeholders at all levels of government. Such input resulted in the identification and incorporation of best practices in NIMS and a representation of a core set of metrics, doctrine, concepts, principles, terminology, and organizational processes to enable effective, efficient, and collaborative incident management at all levels. Prior to the development of the NIMSCAST, data collection that articulated NIMS compliance at the State and local levels was not undertaken.**

**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.**

**Updated to read as follows:**

**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.**

**Updated from:**

**FEMA's strategic alliances with Federal, State, local, and tribal governments involve frequent consultation with officials and subject-matter experts with responsibilities over emergency management-related issues on a routine basis. Respondents from all jurisdictions have been made aware of the NIMS requirements and have been consulted in the development of NIMSCAST through meetings, conferences, FEMA websites, news releases, fact sheets, and publication of HSPD-5 and HSPD-8. Unstructured comments and suggestions were taken into consideration in the development of the questionnaire at every step of the process, and a field test using nine volunteer incident managers was conducted for the purpose of validating data elements, clarity of instructions, and frequency of response.**

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

**Updated to read as follows:**

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

**Updated from:**

**No assurance of confidentiality has been provided, and full disclosure as to the uses of the information (i.e. assistance eligibility, readiness evaluation) has been explained in detail. Respondents from all jurisdictions have been notified of the mandatory compliance with the NIMS if federal preparedness assistance is sought, and consequently, the resulting ineligibility from not providing this information.**

**NIMSCAST is a permission-based system with all users being invited to participate by the next higher level (i.e. state-county-city). The tool requires respondents' registration (User ID –email address- and Password). Each jurisdiction will have its own individual secured password and will be able to access its own information. States will have access to both statewide and localities information, while federal respondents will have access to their own agency information. Authorized personnel from FEMA'S IMSI will have complete access to the entire database. The data collected will be stored in an in-house server operated by authorized FEMA personnel.**

**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.**

**Updated to read as follows:**

**There are no questions of a sensitive nature required in this data collection.**

**Updated from:**

**Although there are no questions related to sensitive personal or identifiable information, the type of information being collected through NIMSCAST may be considered sensitive for security reasons. The collection seeks to collect critical infrastructure information that may include security plans, vulnerability assessment reviews and other types of sensitive data with potential implications under the Freedom of Information Act (FOIA). Accordingly, the agency will exert extreme caution on the release of information per protections that may be allowed under**

**laws governing release of this type of information (i.e. FOIA exemption 3--the Homeland Security Act, Section 214, "Protection of Voluntarily Shared Critical Infrastructure" and other related statutes.**

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**Note that the first 3 sections are the new responses, followed by the prior responses. The hour burden per response has increased from 2.4 hours to 5 hours for the NIMSCAST tool due to new questions added which requires more time to gather information for reporting. Chart also combines the respondents into the category if State, Local or Tribal" rather than separating each out. The wage rate category also now reflects the modifier.**

**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
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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) / No Form Number	3926	1	5 hours	19,630	40.04	\$785,985
State, local or tribal government	State Preparedness Report (SPR) / No Form Number	56	1	83 hours	4,648	40.04	\$186,106
<b>Total</b>					<b>24,278</b>		<b>\$972,091</b>

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 “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.

**Prior Response:**

Data Collection Activity/Instrument	No. of respondents	Frequency of responses	Hour burden per response	Annual responses	Total annual hour burden
NIMSCAST					
States and Territories	56	1	2.4	56	134.4
Local Government	3,225	1	2.4	3,225	7,740
Tribal Government	560		2.4	560	560
<b>TOTAL</b>	<b>3,841</b>	<b>1</b>		<b>3,841</b>	<b>9,218</b>

FEMA has estimated a total of 56 states and territories that will respond to the NIMSCAST data collection. It is estimated that State/Territories will take approximately 2.4 hours to complete the NIMSCAST. Furthermore, it is estimated that Local and tribal governments will take approximately 2.4 hours to complete the NIMSCAST. Within the 56 states and territories there will be 3,225 Local and 560 Tribal total responses. The estimated annual burden for this collection totals 9,218 hours based on 3,841 responses

Respondents to the NIMSCAST will consist of state emergency managers, Homeland Security officials, police, fire and medical personnel, and incident managers of other organizations that typically handle emergency management issues. There will be three categories of jurisdictions and/or organizations comprised of: a) 56 states/territories; b) 3,225 locals; and c) 560 federally-recognized Indian tribes.

**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 2. Annual Cost to Respondents for Hour Burden.**

Data Collection Activity/Instrument	Respondent's Occupational Category	Median Wage (\$)	Total Annual Hour Burden (hour)	Total Annual Cost Burden (\$)
		(F)	(E)	(G) = (FxE)
NIMSCAST	13-1061 Emergency Management Specialists	\$22.79	9,218	\$210,078.22

The annual cost to respondents is calculated based on 9218 hours of annual burden completed by State emergency management specialists with a median wage of \$22.79 per hour for a total burden of \$210,078.22.



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 following is the new data and explanation, which updates the previous data:**

**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	
<b>Total</b>	<b>\$846,572</b>

**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](http://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.

**The following is the updated information that details the changes made to burden and replaces the prior change to burden data:**

*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.

<b>Itemized Changes in Annual Burden Hours</b>						
<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 Incident Management System Compliance Assistance Support Tool (NIMSCAST) / No Form Number				9,218	19,630	+10,412
State Preparedness Report (SPR) / No Form Number	0	4,648	+4,648			
<b>Total(s)</b>	<b>0</b>	<b>4,648</b>	<b>+4,648</b>	<b>9,218</b>	<b>19,630</b>	<b>+10,412</b>

**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.**

<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 Incident Management System				\$210,078.22	\$785,985	+\$575,906.78

Compliance Assistance Support Tool (NIMSCAST) / No Form Number						
State Preparedness Report (SPR) / No Form Number	\$0	\$186,106	+\$186,106			
<b>Total(s)</b>	<b>\$0</b>	<b>\$186,106</b>	<b>+\$186,106</b>	<b>\$210,078.22</b>	<b>\$785,985.00</b>	<b>+\$575,906.78</b>

***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.**