

**July 23, 2009**

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660-0098**

**Title: Citizen Corps Council Registration**

**Form Number(s): FEMA Form 646**

**This had no form number upon last submission to OMB.**

### **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**

**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.**

**PLEASE NOTE: All changes are detailed in Question 15 (below).**

FEMA/CPD anticipates two responses per year from approximately 2388 Citizen Corps Councils/ Local Citizen Corps Program Managers, 56 State Citizen Corps Program

Managers and 3315 CERT programs/ CERT Program Managers. It is estimated that the registration form can be completed within one hour, resulting in an annual hourly burden of 11,518 hours. See Table A.12.

**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
State, local or Tribal Government	FEMA Form-646, Citizen Corps Council Registration	5759	2	1	11,518	22.40	\$258,003.20
<b>Total</b>		<b>5759</b>			<b>11,518</b>		<b>\$258,003.20</b>

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

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 Office and Administrative Support Occupations is estimated to be \$16.00 per hour, and 22.40 at the fully loaded wage rate, therefore, the estimated burden hour cost to Citizen Corps / CERT respondents is estimated to be \$258,003.20 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.

**Annual Cost Burden to Respondents or Record-keepers**

<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost</b> (investments in overhead, equipment and other one-time expenditures)	<b>*Annual Operations and Maintenance Cost</b> (such as recordkeeping, technical/professional services, ect.)	<b>Annual Non-Labor Cost</b> (expenditures on training, travel and other resources)	<b>Total Annual Cost to Respondents</b>
	0	0	0	0
<b>Total</b>	0	0	0	0

There is no annual cost burden to respondents or record-keepers for 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. Costs are updated to more accurately reflect those associated with this collection.**

**Annual Cost to the Federal Government**

<b>Item</b>	<b>Cost (\$)</b>
Contract Costs General IT O&M already covered under ongoing contract	50,000.00
Staff Salaries 1 GS 11, step1 employees spending approximately 15 % of time annually to review and follow up on submissions for this data collection ([60,989 x .15 =9148.35.] x 1.4=12,807.69)	12,807.69
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
<b>Total</b>	<b>\$62,807.69</b>

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

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
FEMA Form 646, Citizen Corps Council Registration				167	11,518	+11,351
<b>Total(s)</b>				<b>167</b>	<b>11,518</b>	<b>+11,351</b>

**Explain: There has been a significant increase in the number of Citizen Corps Councils and CERT programs since the 2006 OMB approval for this collection. Estimated number of respondents in 2006 was 500 (encompassing both Councils and CERTs) and today, there are 5,759 currently registered Councils / CERTs. In addition, the revised registration will be updated twice annually versus the previous expectation of only one submission per year.**

Itemized Changes in Annual Cost Burden
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Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 646, Citizen Corps Council Registration				0	\$258,003.20	+\$258,003.20
<b>Total(s)</b>				0	\$258,003.20	+\$258,003.20

**Explain: There has been a significant increase in the number of Citizen Corps Councils and CERT programs since the 2006 OMB approval for this collection. Estimated number of respondents in 2006 was 500 (encompassing both Councils and CERTs) and today, there are 5,759 currently registered Councils / CERTs. In addition, the revised registration will be updated twice annually versus the previous expectation of only one submission per year. This is also an increase in the cost of 0 in the last supporting statement submitted for this collection.**

**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.**

There are no outline plans for tabulation and publication of data 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.**

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”. This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable" Question #3 in the supporting statement justifies the non-use of information technology.

## **B. Collections of Information Employing Statistical Methods.**

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

There is no statistical methodology involved in this collection.