

**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**

### **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.**

Executive Order 13254 (CFR 67, No. 22, p. 4869) provides for the collection of this information. Specifically, Citizen Corps was launched as a Presidential Initiative, Executive Order 13254, *Establishing the USA Freedom Corps*, on January 29, 2002 with a mission to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds. The Citizen Corps Council Registration Form will allow FEMA and State personnel to ensure that prospective Councils/CERTs have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council, and will provide an efficient way to track the effectiveness of the nationwide network of Councils and CERTs.

**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.**

The Citizen Corps Council Registration Form is available on-line at <http://www.citizencorps.gov>. Specifically it can be found here: <http://www.citizencorps.gov/cc/addCouncil.do>. FEMA and State personnel use this process to ensure that prospective Councils/CERTs have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council, and will provide an efficient way to track the effectiveness of the nationwide network of Councils and CERTs. These Councils will allow Citizen Corps to fulfill its mission of making communities safer by regularizing and coordinating activities between Citizen Corps and community groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues. Citizen Corps is the Federal Emergency Management Agency's grassroots strategy to strengthen collaboration between government and community leaders from all sectors to engage the full community in preparedness, planning, mitigation, response, and recovery. The Community Emergency Response Team Program offers training that prepares people to help themselves, their families and their neighbors in the event of a disaster in their community. The Citizen Corps Council and Community Emergency Response Team registries support the mission of FEMA's Community Preparedness Division and Citizen Corps, to help achieve greater community resiliency nationwide.

FEMA's Community Preparedness Division is collecting this information from state, local, tribal and territorial Councils' and Community Emergency Response Teams so that they can submit profiles via the national website. Their information constitutes a participation directory. Approved registration of a Council or Community Emergency Response Team program allows them to be recognized as official entities; become eligible for Citizen Corps Program grant funding; allows for the coordination of preparedness and emergency management activities among other groups associated with Citizen Corps; promote their local Councils to the public and become a part of the Citizen Corps national directory of Councils; receive important updates and message from the national office.

**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.**

Requested information will be submitted through an electronic registration page at <http://www.citizencorps.gov/cc/addCouncil.do>. It is a 100% electronic collection.

**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.**

The information that Citizen Corps would collect is not available elsewhere. The Citizen Corps/CERT registration collects information unique to the Citizen Corps programmatic mission of government collaboration with community leaders in emergency preparedness, response, and recovery planning, education, training, exercises, and volunteer programs. Because the Citizen Corps Council / CERT points of contact are uniquely assigned by jurisdiction, there is no other source for this information.

**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.**

Citizen Corps' collection of information will not have an impact on small businesses or other small entities as the potential Councils will be drawn from community-wide groups.

**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 the collection of information as requested, FEMA responsibilities to support community preparedness and resilience would be greatly compromised. This registration process provides critical information to measure the nation's progress on the Community Preparedness and Participation Target Capability, to communicate directly with dedicated state and local leaders/points of contact, and to receive feedback on local activities and needed technical assistance.

**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. Citizen Corps will collect information when a state, local, or tribal group seeks recognition as a Citizen Corps Council/CERT and no more than twice annually thereafter. There are 2 responses per year. The initial response is the first response and will be updated once more that year. Additional years will also have two responses as updates to their information, leaving only two responses in any year.

**(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

FEMA/CPD is not instituting such requirements.

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

FEMA/CPD is requesting one copy of all documents.

**(d) Requiring respondents to retain records, other than health,**

**medical, government contract, grant-in-aid, or tax records for more than three years.**

FEMA/CPD is not making such a request.

**(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.**  
No statistical surveys are requested.

**(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**  
FEMA/CPD is making no such requirement.

**(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.**  
No pledge of confidentiality is requested.

**(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.**  
No such information is requested.

## **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 August 11, 2009, Volume 74, Number 153, pp. 40214. 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.**

FEMA/CPD has discussed the revised Council / CERT registration process with Citizen Corps and CERT points of contact from all 56 states and territories to obtain their views on the data collection fields and the frequency of collection.

**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.**

The Director of FEMA Community Preparedness Division has spoken with Citizen Corps and CERT points of contact from all 56 states and territories through conference call, regional Homeland Security Summits, and the National Leadership Forum concerning the revised registration process for Citizen Corps Councils and CERTs.

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

Citizen Corps Council registrants will not receive payments or gifts.

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

FEMA/CPD will not collect sensitive or proprietary information. If an organization requests confidentiality, we will comply with applicable privacy regulations.

**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.**

FEMA/CPD is not requesting such information.

**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.**

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. There are 2 responses per year. The initial response is the first response

and will be updated once more that year. Additional years will also have two responses as updates to their information, leaving only two responses in any year. 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	5,759	2	1	11,518	\$22.40	\$258,003.20
<b>Total</b>		<b>5,759</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**

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

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.

**Annual Cost to the Federal Government**

Item	Cost (\$)
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 ( $60,989 \times .15 = 9148.35$ ) 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.

<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>
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.**

<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>



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.