

July 24, 2009

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660-0099**

**Title: Citizen Corps Individual Registration**

**Form Number(s): FEMA Form 646-0**

### 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 in January 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 Individual Registration online form allows for members of the public to receive national programmatic updates (including information such as safety tips, upcoming preparedness demonstrations and training opportunities) and the opportunity to get involved in local organizations and events. Through this registration process, FEMA is supporting the general safety needs of citizens and the goal of preparing the nation to respond to disasters of all kinds.

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**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 information is voluntarily submitted by an individual through an online registration process at [www.citizencorps.gov](http://www.citizencorps.gov). Specifically, <http://citizencorps.gov/cc/addSubscribers.do> is the site where this collection is held prior to approval. The information is stored in a database on the website and is accessible by FEMA personnel and Citizen Corps Council program managers for the main purpose of providing important local emergency management information and volunteer opportunities to the requestor.

**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.**

This is a 100% electronic collection. This information is collected through an electronic-online registration form. No paper forms are used.

**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 FEMA would collect is not available elsewhere. Individuals registering through this process are expressing specific interest in Citizen Corps and its affiliated programs and activities.

**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 impact small businesses or other small entities as the primary purpose of this collection is to gain information about individuals in order to provide them with resources and opportunities based on his/her profile and request.

**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 nationwide would be greatly compromised. This registration process allows FEMA and Citizen Corps partners and programs to provide critical information to the public on safety information, upcoming preparedness demonstrations and training opportunities, and the opportunity to get involved in local organizations and events.

**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. FEMA/CPD collects information voluntarily from individuals seeking information about Citizen Corps programs and activities.

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

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

There is no requirement for respondents to submit more than an original and two copies of any document. FEMA/CPD is requesting only one document submitted once.

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

**(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.**

FEMA/CPD is not collecting information in connection with a statistical survey.

**(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

FEMA/CPD is not requiring the use of a statistical data classification 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.**

FEMA/CPD is not instituting 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.

**(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.**

FEMA/CPD is not requiring respondents to submit proprietary trade secret, or other confidential information

**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. 40212. 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 individual registration process with Citizen Corps Council and CERT points of contact from state and local jurisdictions across the country.

**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.**

Feedback from Citizen Corps and CERT points of contact from across the country supports the interest in from the public to have a process to register for additional information and opportunities to get involved in community preparedness.

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

Individual 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.**

There is no assurance of confidentiality provided to respondents.

**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 questions of a sensitive nature.

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

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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.

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
Individuals or households	Citizen Corps Individual Registration /FEMA Form 646-0	20,000	1	5 minutes (.08 hours)	1,600	27.38	43,808.00
<b>Total</b>		<b>20,000</b>			<b>1,600</b>		<b>43,808.00</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 Individuals or households is estimated to be \$19.56 per hour, and 27.38 at the fully loaded wage rate, therefore, the estimated burden hour cost to Citizen Corps respondents for this collection is estimated to be \$43,808.00 annually.

**The last OMB inventory for this collection was for 40,000 respondents at 5 minutes each and 3333 burden hours. This request is also for 5 minutes but for half of the respondents. Based on results of previous annual collections 40,000 was not reached.**

**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>
Citizen Corps Individual Registration				
<b>Total</b>	0	0	0	0

There is no annual cost burden to respondents or record-keepers.

**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	5,000.00
Staff Salaries* 1 GS 11 employee at step 1, spending approximately 2% of time annually to review and follow up on submissions for this data collection. $([60,989 \times .02 = 1219.78] \times 1.4 = 1707.69)$	1,707.69
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>\$ 6,707.69</b>

\* Note: The "Avg. Hourly Wage Rate" for each respondent 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 a 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
Citizen Corps Individual Registration /FEMA Form 646-0				3333	1600	-1733
<b>Total(s)</b>				<b>3333</b>	<b>1600</b>	<b>-1733</b>

**Explain: The last OMB inventory for this collection was for 40,000 respondents at 5 minutes each and 3333 burden hours. This request is also for 5 minutes but for half of the respondents. Based on results of previous annual collections 40,000 was not reached. Additionally, there is no expected growth in the number of annual individual registrations, and 20,000 is the approximate annual return we expect for each of the next three years.**

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
Citizen Corps Individual Registration /FEMA Form 646-0				0	\$43,808.00	+ \$43,808.00
<b>Total(s)</b>				<b>0</b>	<b>\$43,808.00</b>	<b>+\$43,808.00</b>

**Explain: This is the wage rate cost and it was not reported in the last supporting statement. The last supporting statement for this collection listed no cost burden . This determination has found that there is one this time and it is seen as a positive adjustment from the previous of zero dollars.**



**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"

## **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**