

May 26, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NEW

Title: FEMA’s Grants Reporting Tool (GRT)

Form Number(s):

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.

The Grants Reporting Tool (GRT) is a web-based reporting system designed to help State Administrative Agencies (SAAs) meet all reporting requirements as identified in the grant guidance of FEMA’s portfolio of preparedness grants sponsored by the FEMA’s Grant Programs Directorate (GPD).

Title 44 CFR, Part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Government establishes uniform administrative rules for Federal grants and cooperative agreements and sub-awards to State, local and Indian tribal governments. FEMA has determined that in order to have consistent implementation of FEMA grant administration policies, to reduce duplicative and tedious data entry, to more effectively

measure preparedness gains, and to streamline application submission and management for Grantees, Regions, State and local partners, it is necessary to automate the reporting processes.

The [Homeland Security Presidential Directive \(HSPD-8\)](#) related to “[National Preparedness](#)” authorizes the federal government to [deliver Federal preparedness awards to the States](#). Applicants must apply the funds to the highest [priority preparedness requirements at the appropriate level of government](#). [Federal preparedness assistance](#) is based upon the [adoption of Statewide comprehensive all-hazards preparedness strategies, consistent with the national preparedness goal](#). HSPD-8 authorizes the [Secretary](#) to [review and approve strategies submitted by the States](#) and establishes the requirement that applicants must have adopted [approved Statewide strategies](#) in order to receive [Federal](#) grant funds. Grantees use the GRT to submit their strategies and associated investment justifications. Further, HSPD-8 authorizes [Federal departments and agencies](#) to [develop appropriate mechanisms to ensure rapid obligation and disbursement of funds from their programs to the States](#), such as the GRT. HSPD-8 mandates [Federal departments and agencies report annually on the obligation, expenditure status, and the use of funds associated with Federal preparedness assistance programs](#).

The [Homeland Security Presidential Directive \(HSPD-5\)](#) related to the “[Management of Domestic Incidents](#)” gives the [Secretary](#) the authority to gather [information related to domestic incidents](#) and mandates the [Secretary provide standardized, quantitative reports on the readiness and preparedness of the Nation -- at all levels of government -- to prevent, prepare for, respond to, and recover from domestic incidents](#).

Lastly, Section 430 of the Homeland Security Act of 2002, as amended (6 U.S.C. 238), authorized the Office for Domestic Preparedness (ODP, which was transferred to FEMA by the Post Katrina Emergency Management Reform Act of 2006, Public Law 109-295) to have [primary responsibility for national preparedness, including directing and supervising terrorism preparedness grant programs for emergency response providers and incorporating the Strategy priorities into planning guidance on an agency level for the overall national preparedness efforts](#). FEMA/ODP (now FEMA) was authorized to [develop a process for receiving meaningful input from State and local government to assist the development of the national strategy for combating terrorism and other homeland security activities](#). Finally, the Act authorized FEMA/ODP to provide [an estimate of expenditures for homeland security activities by State and local governments for the prior fiscal year and the current fiscal year](#).

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 GRT supports the information collection needs of each grant program processed with the system. Depending on the grant program that the grantee is applying for, the grantee navigates a set of screens customized to that program. The information submitted by grant recipients, enables FEMA to evaluate projects, monitor ongoing performance, manage the flow of federal funds, and appropriately close-out grants or cooperative agreements, when all work is completed. The use of GRT’s electronic submission modules expedites and streamlines the

grantee reporting process while providing FEMA an organized, searchable database of project progress data.

FEMA Form 089-1, HSGP Investment Justification (IJ) – Submitted with the application for HSGP only, this document provides narrative detail on proposed activities (Investments) that will be accomplished with grant funds. These “Investment Justifications” must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and how grant funds will thereafter provide enhancements to overall homeland security preparedness. The gathering and completion of the information activity for this tool is currently in the OMB process for approval under OMB Control Number 1660-NEW (HSGP) (ICR Reference No. 201004-1660-008), only the uploading of information into the GRT is requested for the GRT collection burden.

Initial Strategy Implementation Plan (ISIP) – Through the ISIP, the State Administrative Agency (SAA) will report planned expenditures within 45 days of the newly awarded grants. The SAA is responsible for the submission of the ISIP report to FEMA. Submission of the ISIP satisfies the programmatic reporting requirements identified in the FEMA preparedness grant program guidance to ensure legal and prudent use of federal funds. All funds provided to the SAA through these grant programs must be accounted for and linked to one or more projects. This, in turn, must support specific goals and objectives in the State Homeland Security Strategy (SHSS) and where appropriate, the Urban Area Security Strategies (UASS) and Regional Transit Security Strategies. The ISIP data is submitted electronically in a FEMA-sponsored system, the Grants Reporting Tool (GRT).

Biannual Strategy Implementation Report (BSIR) – The BSIR serves as the reporting format for the Semiannual Progress Report, formerly known as the Categorical Assistance Progress Report (CAPR). The SAA/Direct Tribal Grantee (DTG) is responsible for providing FEMA with BSIR reports to account for grant funding. The BSIRs are due within 30 days of the end of the reporting periods (June 30 and December 31), for the life of the award. A close-out BSIR is due 120 days after the end date of the award period. The submission of a completed BSIR satisfies programmatic reporting requirements as outlined in the grant program guidance to ensure legal and prudent use of federal funds. All funds provided to the SAA through these grant programs must be accounted for and linked to one or more projects. This, in turn, must support specific goals and objectives in the State Homeland Security Strategy and where appropriate, the Urban Area Homeland Security Strategy, and Regional Transit Security Strategy, as detailed in the special conditions of the grant award. The BSIR data is submitted electronically in a FEMA-sponsored system, the Grants Reporting Tool (GRT).

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.

Grantees must use the FEMA-sponsored Grants Reporting Tool (GRT) to submit the HSGP Investment Justification (IJ), Initial Strategy Implementation Plan (ISIP), and Biannual

Strategy Implementation Report (BSIR) to report on funds awarded. The GRT provides grantees the ability to electronically create and submit these data collection requirements. The GRT homepage is (<https://www.reporting.odp.dhs.gov/>). The GRT is used to capture FEMA's annual award and biannual grant reporting data. The GRT was designed to help the SAA and Direct Tribal Grantees (DTGs) meet all reporting requirements identified by DHS FEMA's Grant Program Directorate (GPD) as well as to streamline the reporting process for grantees. This system was developed in response to customer feedback concerning difficulties using other means of providing progress report data, such as uploading paper-based Microsoft Excel spreadsheets to www.grants.gov. The IJ Submission Module is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines.

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.

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.

If FEMA could not request and obtain this information, FEMA could not exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

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.

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

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

There are no requirements for respondents to prepare a written response to this 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 are no requirements for a respondent to submit more than an original and two copies of any document.

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

Records must be retained for three years after close-out. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.

(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.

There is no statistical survey involved with this data collection.

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

There is no use for statistical data classification in this data collection.

(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 are no requirements 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 November 17, 2009, Vol. 74, No. 220, pp. 59216. 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 February 24, 2010, Vol. 75, Number 36, pp. 8388. 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 has various stakeholder meetings with representative grantees, sub-grantees, and key Federal partners through regular program-specific conferences and workshops. These meetings will continue to take place, throughout the lifecycle of the GRT in order to gain feedback on the reporting elements and data requirements for this system.

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.

FEMA consults with Federal, State, local, tribal partners on a regular basis. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Participants offer comments and suggestions about their reporting practices at annual feedback sessions conducted during the Grant Programs Directorate (GPD) National Conference.

FEMA staff review and adjudicate all comments, questions, and inquiries, received through various stakeholder outreach efforts. This feedback has impacted versions of the Grants Reporting Tool (GRT). In fact, the GRT was originally created due to feedback received from grantees requesting a tool to assist in creating statutorily mandated Investment Justifications (IJs). Ongoing customer feedback has led to streamlining of the IJ, a specific module housed in the GRT, as well as other enhancements which have been incorporated in subsequent software versions of the GRT.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

The DHS Privacy Office approved the Privacy Impact Assessment (PIA) for this information collection on July 14, 2009.

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 sensitive nature.

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 GRT is an existing electronic reporting system that is used by the 56 states and territories (plus thousands of sub-grantees) receiving FEMA preparedness grant funds. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden to collect the necessary information is estimated to be 2,492 additional burden hours.

The hour's burden for the FEMA Form 089-1, HSGP Investment Justification represents only the burden to upload the information into the GRT system. The hour burden calculations to gather and complete the collection activity is currently in the OMB process for approval under OMB Control Number 1660-NEW (HSGP), (ICR Reference No. 201004-1660-008).

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	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State, Local or Tribal Government	Initial Strategy Implementation Plan (ISIP)	56	1	56	8 hrs.	448	\$32.20	\$14,425.60
State, Local or Tribal Government	Biannual Strategy Implementation Report (BSIR)	56	2	112	15.25 hrs.	1,708	\$32.20	\$54,997.60
State, Local or Tribal Government	FEMA Form 089- 1 / HSGP Investment Justification (IJ)	56	1	56	6 hrs.	336	\$32.20	\$10,819.20
Total		56				2,492		\$80,242.40

*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 Web site (www.bls.gov) the wage rate category for State Representatives is estimated to be \$23.00 per hour; in addition, a 1.4 multiplier for benefits has been included, resulting in a total wage rate of \$32.20 for completing and submitting the FEMA grant information to FEMA for review and approval. Therefore, the estimated total burden hour cost to State Representatives is estimated to \$80,242.40 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 record keeping, capital, start-up or maintenance costs associated with this information 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.

The total cost to FEMA is \$3,521,528.02. Approximately 1 staff member with an estimated grade level of GS-13 reviews and analyzes the information collected by the GRT.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs There are three contracts that support this effort and the costs are: System Hosting and Helpdesk Services \$1,609,000.00 This contract is with K2 Share, LLC in support of hosting, helpdesk services and maintenance of the various grant systems utilized by the Grant Programs Directorate (GPD). System Testing \$800,000.00 This contract is with MasterKey Consulting Company in support of system testing and reporting for the Grants Reporting Tool, utilized by GPD. System Development \$1,000,000.00 This contract is with Booz Allen Hamilton in support of the continued development of the Grants Reporting Tool utilized by GPD. Total: \$3,409,000.00	\$3,409,000.00
Staff Salaries [1 GS-13 employee(s) spending approximately 90% of time annually for this administrative and financial data collection] $= 1 \times \$86,927.00 = \$86,927.00 \times 1.4 = \$121,697.80 \times .90 = \$109,528.02$	\$109,528.02
Facilities [cost for renting, overhead, ect. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel \$3,000	\$3,000.00
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$3,521,528.02

*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).

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
Initial Strategy Implementation Plan (ISIP)	0	448	+448			
Biannual Strategy Implementation Report (BSIR)	0	1,708	+1,708			
HSGP Investment Justification (IJ) / FEMA Form 089-1	0	336	+336			
Total(s)	0	2,492	+2,492			

***Explain:** This is a new collection that was not previously on the OMB inventory. Therefore, the burden hours are positive program changes.*

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
Initial Strategy Implementation Plan (ISIP)	0	\$14,425.60	+\$14,425.60			
Biannual Strategy Implementation Report (BSIR)	0	\$54,997.60	+\$54,997.60			
HSGP Investment Justification (IJ) / FEMA Form 089-1	0	\$10,819.20	+\$10,819.20			
Total(s)	0	\$80,242.40	+\$80,242.40			

***Explain:** This collection has not previously been approved for use by OMB and there was no previous Annual Cost Burden.*

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.

FEMA does not intend to employ the use of statistics or the publication thereof 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.

FEMA will display the expiration date for OMB approval of this information collection.

**18. Explain each exception to the certification statement identified in Item 19
“Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.