

March 30, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NEW

Title: FEMA Preparedness Grants: Regional Catastrophic Preparedness Grant Program (RCPGP)

Form Number(s): FEMA Form# 089-19, FEMA Form# 089-26, FEMA Form# 089-17

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 purpose of the **Regional Catastrophic Preparedness Grant Program (RCPGP)** is to enhance catastrophic incident preparedness in Tier 1 and selected Tier 2 Urban Areas. RCPGP is intended to support coordination of regional all-hazard planning for catastrophic events, including the development of integrated planning communities, plans, protocols, and procedures to manage a catastrophic event. RCPGP provides a framework for enhancing the Nation’s security and resilience for catastrophic events through fixing shortcomings in existing plans, building regional planning processes and planning communities, and linking operational needs identified in catastrophic event plans to resource allocation.

The collection of information for the RCPGP is mandated by Title III of the *Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009* (P.L. 110-329). This program was created under the general grant and cooperative agreement making powers of the Secretary under 6 USC §112(b)(2).

The sources of information that FEMA is collecting are State, local, and tribal partners seeking RCPGP funding. The nature of the collected data illustrates partners' familiarity with the national preparedness architecture (i.e. Federal Investment Strategy) as identified in Homeland Security Presidential Directive (HSPD)-8 and identifies how elements of this architecture have been incorporated into their regional/state/local planning, operations, and investments.

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.

All information is to be used to produce improved catastrophic plans and planning processes by the states and local jurisdictions involved. Specifically, the plans and planning must address shortcomings in existing plans to address regional catastrophic planning issues, including the establishment of a regional network of plans to address catastrophic events. Plans will include a process for establishing an incident command structure and will also identify roles and responsibilities for each organization. Additionally, plans should be developed that identify detailed resource, personnel, and asset allocations in order to execute strategic objectives and translate strategic priorities into operational execution. These plans should apply existing capabilities and assist in assessing gaps in needed capabilities.

The plans and planning must also establish the simplest achievable processes, networks, and communities that can successfully accomplish planning, preparedness, data exchange, and operational resource and asset management among regional planning partners. The plans and planning must also result in collaborative planning that will organize actions among the Urban Areas and include participating governments and non-governmental entities to accomplish operational objectives, achieve unity of effort, and employ specific capabilities within a given time and space. Planning activities within this program will identify capability requirements (shortfalls) among grantees that establish requirements for resource allocation. These requirements will consider the needs of all grantees, including those of host communities or states that would expect to receive and provide support for evacuees from a catastrophically affected Urban Area.

The resulting plans and planning, and all information pertaining thereto, will consequently be made available by the states and local jurisdictions involved to any other state or local jurisdiction that requests it for purposes of their own regional catastrophic planning.

FEMA Form 089-19, RCPGP Investment Justification Template - Submitted with the application, this document provides narrative detail on proposed investments. These Investment Justifications must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA.

FEMA Form 089-26, RCPGP (Sample) Detailed Project Plan Template - Applicants must submit a detailed project plan for each proposed project. The initial project plan is expected to be a best estimate of the tasks and time required to complete the proposed projects. It must include all major milestones and tasks, and must account for all project and program deliverables, although it is understood that task specifics and dates may change and evolve over time.

Regional Catastrophic Planning Team (RCPT) Charter Guidelines – As part of the RCPGP, the Regional Catastrophic Planning Team (RCPT) for each site must establish a formal governance structure and develop a charter (or other standard operating procedure (SOP) document). The RCPT Charter provides an overview of the governance structure of the RCPT. This governance structure is essential to ensure that the RCPGP is not subsumed under the existing Urban Areas Security Initiative (UASI) Nonprofit Security Grant Program (NSGP) structure but remains separate and distinct. Each site is required to submit an updated copy of the RCPT Charter to DHS as part of the FY 2009 Grant Application Package (or other existing SOP document).

FEMA Form 089-17, RCPT Membership List – This form includes a detailed listing of all members that are a part of the applicants Regional Catastrophic Planning Team (RCPT) including their name, title, jurisdiction, agency represented, and discipline and is submitted as part of the grant application package. This form is used to ensure all required entities, specified in the Guidance and Application Kit is involved in the RCPT.

Preparedness Comprehensive Assessment Support Tool (PrepCAST) formerly known as the National Incident Management System Compliance Assistance Support Tool (NIMSCAST) – PrepCAST facilitates and reports State, Territory, tribal and local jurisdictions' compliance with the National Incident Management System (NIMS). PrepCAST 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 State Preparedness Report provides information on the readiness of states to respond to disaster situations. The capability based data in this report is used in conjunction with other data to create documents such as the National Preparedness Report. This collection activity is approved under OMB Control Number 1660-0087.

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 data collection tools in this collection are either MS-Word documents or Excel spreadsheets which the applicant attaches to their application when applying for the RCPGP via www.grants.gov. Eligible applicants must apply for funding through this portal accessible on the internet.

The FEMA Form 089-19, RCPGP Investment Justification (IJ) is completed in MS-Word (completed using provided template). However, grant applicants must submit their IJ as an attachment when applying for the RCPGP via www.grants.gov.

FEMA requires the submission of a detailed project plan (Form 089-26, RCPGP (Sample) Detailed Project Plan Template) for each proposed project. This is a Sample Project Plan in MS Excel format that will be provided to demonstrate the details required and may be used as a template. The applicant completes and then attached electronically to their application via www.grants.gov.

FEMA RCPT Charter Guidelines requires that the respondent provide a formal governance structure and develop a charter. The respondent can submit their RCPT Charter Guidelines in MS Word format with the requested information, as an attachment to the application completed on the www.grants.gov website.

FEMA Form 089-17, RCPT Membership List, requires that the respondent provide a detailed listing of all members. The respondent can complete the form and submit the membership list in Excel format with the requested information, as an attachment to the application completed on the www.grants.gov website.

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 were not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements. If FEMA were not able to collect programmatic information, the grant could not be responsibly implemented, maintained, or reported upon.

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.

DHS, FEMA and/or Congressionally mandated standards for quarterly financial and program reporting could require the agency to request more frequent reporting from recipients, with a consistent pattern of non-compliance with grant administration practices, for a defined period of time. Notice is given to the recipient prior to requesting more frequent reporting as permitted in the Common Rule on grants. Historically, less than one percent of grant recipients require more frequent reporting over the life of the grant.

(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. 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, which ever 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, Volume 74, Number 220, pp. 59209. 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 March 17, 2010, Volume 75, Number 51, pp. 12770. 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 meets with the State of California and the State of New York representatives, as well as individual grantees, through regular program-specific hotwash/after action conferences. Additionally, teleconferences and e-mail communications are also used. During the grant guidance process in past years, FEMA met and consulted directly with grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements.

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 the information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements

that FEMA uses. Specific to RCPGP, FEMA HQ and FEMA Regions speak regularly with RCPGP grantees on information reporting requirements and other financial and programmatic matters.

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.

FEMA has estimated that approximately 10 respondents will complete the **FEMA Form 089-19** (RCPGP Investment Justification Template). Each form is estimated to take 120 hours to complete. The total annual burden is estimated to be 10 responses x 120 hours per response = 1,200 hours.

FEMA has estimated that approximately 10 respondents will complete the **FEMA Form 089-26** (RCPGP (Sample) Detailed Project Plan Template). Each document is estimated to take 40 hours to complete. The total annual burden is estimated to be 10 responses x 40 hours per response = 400 hours.

FEMA has estimated that approximately 10 respondents will complete the **Regional Catastrophic Planning Team (RCPT) Charter Guidelines**. Each document is estimated to take 16 hours to complete. The total annual burden is estimated to be 10 responses x 16 hours per response = 160 hours.

FEMA has estimated that approximately 10 respondents will complete the **FEMA Form 089-17 (RCPT Membership List)**. Each form is estimated to take 0.2 hour to complete. The total annual burden is estimated to be 10 responses x 0.2 hours per response = 2 hours.

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	Annual 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	RCPGP Investment Justification Template, FEMA Form 089-19	10	1	10	120 hrs.	1,200	\$50.08	\$60,096.00
State, Local or Tribal Government	RCPGP (Sample) Detailed Project Plan Template, FEMA Form 089-26	10	1	10	40 hrs.	400	\$50.08	\$ 20,032.00
State, Local or Tribal Government	Regional Catastrophic Planning Team (RCPT) Charter Guidelines	10	1	10	16 hrs.	160	\$50.08	\$ 8,012.80
State, Local or Tribal Government	RCPT Membership List, FEMA Form 089-17	10	1	10	0.2 hr.	2	\$50.08	\$100.16
Total				40		1,762		\$ 88,240.96

* 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) the wage rate category for State Emergency Management Specialist is estimated to be \$35.77 per hour, adding in the wage rate multiplier equals a rate of \$50.08 for completing and submitting the FEMA grant information to FEMA for review and approval. Therefore, the estimated total burden hour cost to State Emergency Management Specialist is estimated to \$88,240.96 annually.

The Standard Forms listed in the table below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF). Other data collection activities approved by OMB are also identified in the table below.

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
Standard Forms								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	10	1	10	0.75 mins.	7.5	\$50.08	\$375.60
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A	10	1	10	3 hrs.	30	\$50.08	\$1,502.40
State, Local or Tribal Government	Assurances - Non-Construction Programs / SF 424B	10	1	10	0.25 mins.	2.5	\$50.08	\$125.20

State, Local or Tribal Government	Budget Information - Construction Programs / SF 424C	10	1	10	3 hrs.	30	\$50.08	\$1,502.40
State, Local or Tribal Government	Assurances - Construction Programs / SF 424D	10	1	10	0.25 mins.	2.5	\$50.08	\$125.20
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	10	1	10	0.25 mins.	2.5	\$50.08	\$125.20
State, Local or Tribal Government	Direct Deposit Sign-Up Form / SF 1199A	10	1	10	0.167 mins.	2	\$50.08	\$100.16
Total				70		761		\$3,856.16

**Other Departments/
Agencies Data Collection Activities**

State, Local or Tribal Government	Preparedness Comprehensive Assessment Support Tool (PrepCAST) formerly known as the National Incident Management System Compliance Assistance Support Tool (NIMSCAST) / No Form Number; FEMA OMB Number 1660-0087	10	1	10				
State, Local or Tribal Government	State Preparedness Report (SPR) / No Form Number; FEMA OMB Number 1660-0087	10	1	10				

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 \$1,075,365.50. Approximately 10 staff members with an estimated grade level of GS-13 review and analyze the information collected by these forms.

Annual Cost to the Federal Government

Item	Cost (\$)
There are 3 contracts that support this effort: The Technical Assistance and Program Development Contract, Grant Operations Support Contract, and the Grants Reporting Tool (GRT) Contract. These contracts support the development of the programs & provide guidance/assistance to grantees, collect & review information, and the cost for these contracts are as follow: Technical Assistance and Program Development: \$81,316.00 Grant Operations Support: \$40,658.00 Grants Reporting Tool (GRT): \$40,658.00 Total: \$162,632.00	\$162,632.00
*Staff Salaries [10 GS-13, step 1 employees spending approximately 75% of time annually for this administrative and financial data collection] $10 \times \$86,927.00 = \$869,270.00 \times 1.4 = \$1,216,978.00 \times .75 = \$912,733.50$	\$912,733.50
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	

Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$1,075,365.50

* **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
RCPGP Investment Justification Template, FEMA Form 089-19	0	1,200	+1,200			
RCPGP (Sample) Detailed Project Plan Template, FEMA Form 089-26	0	400	+400			
Regional Catastrophic Planning Team (RCPT) Charter Guidelines	0	160	+160			
RCPT Membership List, FEMA Form 089-17	0	2	+2			
Total(s)		1,762	+1,762			

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
RCPGP Investment Justification Template, FEMA Form 089-19	0	\$60,096.00	+\$ 60,096.00			
RCPGP (Sample) Detailed Project Plan Template, FEMA Form 089-26	0	\$20,032.00	+\$20,032.00			
Regional Catastrophic Planning Team (RCPT) Charter Guidelines	0	\$8,012.80	+\$8,012.80			
RCPT Membership List, FEMA Form 089-17	0	\$100.16	+\$100.16			
Total(s)		\$88,240.96	+\$ 88,240.96			

***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.