

Supporting Statement for Paperwork Reduction Act

7/14/10

OMB Control Number: 1660-0032

Title: U.S. Fire Administration's National Fire Academy Evaluation Collection

Form Number(s): FEMA Form 064-0-4, FEMA Form 064-0-5, FEMA Form 064-0-10.

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.

To complete the supporting statement, type in your responses in the white space below each question. Your responses should be full and complete and provide sufficient information to help the OMB desk officer to understand what you are planning to do and why and how the Agency/Federal Government will benefit from and use the information you will be obtaining or soliciting.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary (give details as to why this information is being collected). 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.

Through Public Law 93-498 the United States Fire Administration's (USFA) National Fire Academy (NFA) is congressionally mandated to provide training and education to the

Nation's fire service and emergency response personnel. The state-of-the-art programs offered by the NFA serve as models of excellence, and State and local fire service agencies rely heavily on the NFA curriculum to train their personnel. To maintain the high standards of these programs, it is critical that courses be evaluated after students have had the opportunity to apply the knowledge and skills gained.

2. (1) Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, (2) indicate the actual use the agency has made of the information received from the current collection. If applicable, provide a detailed description of how the information will be shared and for what programmatic purpose.

FF 064-0-5 *End of Course Evaluation*. Students who attend NFA- sponsored traditional classroom based training are asked to complete this evaluation form of the class and instruction they received.

FF 064-0-4 *Distance Learning Evaluation*. The NFA Distance Learning Course Evaluation Form is a newly designed instrument that is intended to support the collection of student feedback from the NFA's learning management system, NFAOnline. NFAOnline currently hosts 40 individual Distance Learning training courses. This collection of data regarding evaluation of the class and instruction they received also includes such information as NFA student demographics, course content and effectiveness of the training on student work performance is available for on-line learners.

In order to establish a baseline for this data collection effort, the most current student course completion data will be used as a basis to help determine the number of respondents. This assumes that every student completing an NFAOnline course will submit an evaluation form. This will assess several elements of the training, including: (1) the student's reaction to, satisfaction with, and applicability of the Web-Based content; and (2) the online training environment/resources and tools. Additionally, it will (3) provide an open-ended comments field that students can use to suggest future training needs.

FF 064-0-10 *USFA Conference/Symposium*. USFA collects information after the conference via this form to determine what the fire and emergency services sector leaders find as useful, relevant, and job enhancing, and the extent to which respondents feel the information gained would be important to their communities and organizations. It evaluates USFA conferences and symposia. This form will be utilized on an annual basis for four of USFA programs: the Executive Fire Officer Program (EFOP) Symposium; the Fire and Emergency Services Higher Education (FESHE) conference; the Training Resources and Data Exchange (TRADE) conference; the Prevention Advocacy Resources and Data Exchange (PARADE) conference. These annual data collections provide information related to what the fire and emergency services sector leaders find as useful, relevant, and job enhancing. In addition, these data collections provide a measure of the extent to

which respondents feel the information gained would be important to their communities and organizations. It provides USFA with an index of stakeholder representation critical to improving programs and initiatives.

There are several ways in which the data obtained from this data collection will be used. For example,

- (1) Training specialist staff determine the effectiveness of NFA training in advancing the skills of trainees and the resulting benefit to his/her organization;
- (2) Instructional staff determine appropriate methodologies and delivery modes for NFA training; and
- (3) USFA/NFA management staff examine the success of NFA training in achieving its strategic goals to support the Agency's performance measurement process – serving as a budget performance measure.

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.

- FF 064-0-5 *End of Course Evaluation* includes both electronic and automated methods. The form is made available as an online, (www.nfaonline.dhs.gov), in electronic form for use by students attending on-campus course deliveries. Each classroom/computer lab computer desk top displays an evaluation icon that allows students to access, complete and submit their responses online. The data from these submissions is processed using an MS SQL 2000 database and both the data and subsequent reports resulting from these submissions are available in real time for users with access credentials. These access credentials include a user identification and secure password. For off-campus use at state and local training locations FF 064-0-5 is available in an optical scannable paper format. Students are asked to complete the form by marking potential response categories with either a pen or a pencil. The forms are then scanned using a self-feeding electronic scanner, and the reports generated from the scanned data are distributed electronically via e-mail and web posting. Over time, NFA staff will work with states and local training institutions to determine their ability to use online electronic resources.
- FF 064-0-4 *Distance Learning Evaluation*. Survey activity is fully grounded (100%) in electronic and automated methods. NFAOnline (www.nfaonline.dhs.gov) currently hosts 40 individual Distance Learning training courses. Once the student completes an NFA Online Distance Learning course, he/she will be directed from the learning management system through an URL to the USFA Web-Farm where the NFA Distance Learning Course Evaluation Form

will populate. The data from these submissions will be processed using an MS SQL 2000 database and the subsequent reports resulting from these submissions will be available for review by training and instructional systems specialists and USFA/NFA managers.

- FF 064-0-10 *USFA Conference/Symposium Form* is a 100% paper based survey instrument available in an optical scannable paper format for use during annual conference/symposium events conducted on campus at the National Emergency Training Center location. Conference/symposium participants are asked to complete the form by marking potential response categories with either a pen or a pencil.

Therefore this is overall 89.93% electronic. The respondent breakdown is as follows: A total of: 49,100 electronic of 54,600 (89.93% electronic) and 5,500 paper of 54,600 (10.07% paper).

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 collected by forms FF 064-0-5 End of Course Evaluation, FF 064-0-4 Distance Learning Evaluation, and FF 064-0-10 USFA Conference/Symposium is not available elsewhere. FEMA only collects the information via this collection.

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.

These information collections do 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 these data collections are not conducted, the USFA/NFA will be limited in its abilities to carry out requirements set forth in statute to provide effective training and education for the Nation's fire and emergency response community.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

(a) Requiring respondents to report information to the agency more often than quarterly.

(b) 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.

(d) 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.

(f) 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.

(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.

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 May 27th, 2010, Vol. 75, No. 102, pp. 29777. 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 August, 9th, 2010, Vol. 75, No. 152, pp. 47824)]. 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.

The USFA's NFA is currently in the last year of a 5-year contract with Synthesis, Inc., to provide onsite evaluation services. As such, contracted personnel provide expert assistance in the formulation of questionnaires/data collection instruments which NFA and other divisions within the USFA use to evaluate their training and education programs. Evaluation Center staff also develop reporting formats used to display the results of the data analysis and routinely prepare reports in conjunction with individual training courses.

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 NFA consults with its residential student population on a regular basis regarding course evaluations. The Superintendent holds a "Superintendent's Lunch" with class representatives during every resident class delivery cycle. This luncheon provides the opportunity for the Superintendent and class representatives to discuss issues concerning training development, course delivery and course evaluation, including NFA's increased use of the Internet to provide self-paced online deliveries. The Superintendent also visits each class during every delivery cycle and provides an open forum for any issues the students and instructors want to discuss. The increased availability of NFA online classes is frequently discussed at these class meetings, and that while student input is anecdotal, it is largely consistent: students want and appreciate the opportunity to take self-paced courses for Continuing Educational Credits. Also, open-ended feedback solicited from the forms in this collection including the *Conference/Symposium Form* provide continuous consultative feedback as well.

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

There are no payments or gifts to respondents for these data collections.

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

There is no pledge of confidentiality in these collections that is not supported by authority established in statute or regulation for this data collection. A PTA was submitted to FEMA Privacy on 4/15/2010. A PIA will be submitted if determined required.

Since the recordkeeping system contains personal information about the program participants, the security of this information is maintained through administrative and technological controls. Administratively, student data use is restricted to authorized employees who must access such information in their normal duties. Release of individual student information must be requested in writing by the individual or with his or her written approval. A privacy act statement is present on each form to ensure each applicant that the confidentiality of information provided will be maintained. A Privacy Impact Assessment is currently being reviewed for the collection of this information. An approved SORN (Student Application and Registration (SARRS)) was previously approved on October 5, 2004 at Volume 69 FR 59609 and is currently being reviewed by DHS for any necessary updates. The SARRS SORN is being updated and will require its own PIA.

11. Provide additional justification for any questions 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 a sensitive nature required in these data collections.

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. 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.

- FF 064-0-5 *End of Course Evaluation* (Formerly FEMA Form 95-20)- NFA currently uses one data collection form for all traditional on and off campus course offerings. Thus the number of respondents (14,000) was estimated by summing the numbers of registrations for the courses on-campus (9,000) and off-

campus (5,000) based on NFA Admission’s averaged data from the last 5 years. The hour burden estimate for both paper and electronic form is 15 minutes. The hour burden for the paper form has been estimated utilizing the agency’s observation of the students filling out the currently approved course evaluation form during the previous years. The hour burden for the electronic form has been estimated by informal usability tests of the web form system using the current version of the End-of-Course form. There are two channels of NFA course offerings which include both on-campus and off-campus locations. One End of Course evaluation form (FF 064-0-5) is used to evaluate these traditional classroom based course deliveries.

- FF 064-0-4 *Distance Learning Evaluation* - The individual hour burden per response (by our estimates based on informal usability tests) is 6 minutes or .100 hours per response. It is estimated that the total annual burden will equate to 4,000 hours.
- FF 064-0-10 *USFA Conference/Symposium* – USFA annually conducts conferences/symposia supporting various programmatic initiatives. Typical annual attendance ranges from 400 to 600 participants. Based on this estimate the individual hour burden per response (estimates based on informal usability tests) is 9 minutes or .15 hours per response. It is estimated that the total annual burden will equate to 90 hours. After a full 12 month data collection cycle, the mortality factor will be known.

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	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate *	Total Annual Respondent Cost
State, local or tribal government	NFA Distance Learning Course Evaluation Form /	40,000	1	6 minutes (.10 hours)	4,000	\$22.28	\$89,120

	FEMA Form 064-0-4 (electronic)						
State, local or tribal government	NFA End of Course Evaluation Form / FEMA Form 064-0-5 (Formerly FEMA Form 95-20) (65% electronic/ 35% paper)	14,000	1	15 minutes (.25 hours)	3,500	\$22.28	\$77,980
State, local or tribal government	USFA Conference / Symposium Form / FEMA Form 064-0-1 (paper)	600	1	9 minutes (.15 hours)	90	\$22.28	\$2,005
Total		54,600			7,590 hours		\$169,105

- *Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.
- “Type of Respondent” should be entered exactly as chosen in Question 3 of the OMB Form 83-I

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Firefighters is estimated to be \$22.28 per hour including the wage rate multiplier.

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, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Total				

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 (Include survey development, implementation, analysis and reporting)	\$100,000.00
Staff Salaries (one GS 12/5 employee spending approximately 5% of time annually to provide contractual oversight for this data collection x 1.4 multiplier = 84,429 x .05 = 4,221.45 x 1.4 = 5,910.03)	\$5,910.03
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0.00
Computer Hardware and Software [cost of equipment annual lifecycle]	\$2,000.00
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0.00
Travel	\$0.00
Printing [number of data collection instruments annually]	\$0.00
Postage [annual number of data collection instruments x postage]	\$0.00
Other: Web Farm Services Contract	\$10,000.00
Total	\$117,910.03

* 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.

Definitions

Program changes should not be confused with adjustments.

i) Program change

A "**Program increase**" is an additional burden resulting from an action or directive of a branch of the Federal government (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).

ii) An "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 how (e.g., 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
NFA Distance Learning Course Evaluation Form / FEMA Form 064-0-4	0	4,000	+4,000			
NFA End of Course Evaluation Form / FEMA Form 064-0-5 (Formerly FEMA Form 95-20)						
USFA Conference / Symposium Form / FEMA Form 064-0-10	0	90	+90			
Total(s)	0	4,090	+4,090			

Explain: NFA Distance Learning Course Evaluation (FF 064-0-4) and USFA Conference/Symposium (FF 064-0-10) are new forms in this collection and no burden hours are on the current inventory for them. Therefore, all values these are now recorded

as positive differences. The NFA End of Course Evaluation Form / FEMA Form 064-0-5 (Formerly FEMA Form 95-20) has no change and is still at 3500 burden hours.

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
NFA Distance Learning Course Evaluation Form / FEMA Form 064-0-4	0	\$89,120	+\$89,120			
NFA End of Course Evaluation Form / FEMA Form 064-0-5 (Formerly FEMA Form 95-20)	\$65,800	\$77,980	+\$12,180.00			
USFA Conference / Symposium Form / FEMA Form 064-0-10	0	\$2,005	+\$2,005			
Total(s)	0	\$169,105	+\$103,305.00			

Explain: NFA Distance Learning Course Evaluation (FF 064-0-4) and USFA Conference/Symposium (FF 064-0-10) are new forms. Therefore, all values these are now recorded as cost burden increases. The NFA End of Course Evaluation Form / FEMA Form 064-0-5 (Formerly FEMA Form 95-20) has no change and is still at 3,500 burden hours, the same as the last submission, and it is only adjusted for current costs and the 1.4 wage rate multiplier which was not considered upon last submission resulting in an increase of +\$12,180.00 for FEMA Form 064-0-5. The hourly wage rate increased from \$18.80 in the last submission to 22.28 in this submission.

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.

These information collections will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

These information collections do 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.

No exceptions referenced above are sought for these collections.