

July 27, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0046

**Title: FEMA/EMI Independent Study Course Enrollment and Test
Answer Sheet**

Form Number(s): FEMA Form 064-0-9

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.

FEMA’s Emergency Management Institute (EMI) provides a wide variety of training to emergency management personnel throughout the country. The EMI Independent Study (IS) Program is part of the FEMA training program authorized under the Robert T. Stafford Disaster Relief and Emergency Act, 42 U.S.C 5121-5207, Public Law 93-288 as amended. These courses are offered online by the Emergency Management Institute (EMI). The IS Program provides valuable training to Federal, State, local and Tribal emergency management personnel and the general citizenry of the United States without having to attend a resident course at EMI, or at a State-sponsored course. The National Incident Management System (NIMS) is our nation’s incident management system. Homeland Security Presidential Directive 5, “Management of Domestic Incidents” requires the adoption of NIMS by all Federal departments and agencies. This directive

also requires that Federal preparedness assistance funding for States, Territories, local jurisdictions and Tribal entities be dependent on being NIMS compliance.

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.

FEMA Form 064-0-9 EMI Independent Study Course Enrollment Application is an online process used by those persons wishing to take an independent study course. The student will review the coursework and take a final examination to gauge the level of understanding achieved from the material presented. Successfully completing a course results in a certificate being generated for the individual and this can be applied towards continuing education credits and college credit. Those persons who wish to submit the final exam via paper will have their certificate mailed to them. FEMA will report student completion data, when appropriate, to State Training Officers (STO).

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.

An electronic version of FEMA Form 064-0-9 is accessible from FEMA's, EMI IS program training website at <http://training.fema.gov/IS/> and the student then selects the answer sheet based on the course they took. Data entered is encrypted and uploaded into a database (Student Application and Registration Records). The electronic version of FEMA form 064-0-9 reduces burden on students because they are able to select course information, enroll and test online.

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.

There is no duplication efforts involved with this data collection. Information collected is for approval and credit for the specific independent study course and is not available 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.

There is no 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.

The IS program is one method for distribution of basic emergency management training to professionals and volunteers in emergency management, as well as awareness training for the general public. If enrollment in FEMA's Independent Study program was not available, those wishing to take required emergency management training courses would have to travel to a training site at increased cost to the respondent. Also, the ability to attend courses would be affected as the classroom instruction locations, dates and time may not match with the capability of those wishing to participate in training.

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 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.

There is no requirement for 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.

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

There is no requirement for 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.

There is no survey connected to this collection.

(f) Requiring the use of a statistical data classification that has not

been reviewed and approved by OMB.

There is no requirement for the use of statistical data classification.

(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 not supported by statute or regulation.

(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 is no requirement to submit proprietary trade secrets 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 May 5, 2010, Volume 75 pp 24730. 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 July 27, 2010, Volume 75 pp 43995. No comments were. 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.

Consultation with Federal, State, Local, and Tribal Emergency Management officials occurs annually at the EMI-hosted National Training and Exercise Conference. Any comments received concerning the course enrollment process and materials presented are addressed and appropriate changes are made.

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.

Throughout the daily use of the document by students any comments or questions regarding the collection of information and all issues related to the coursework are received via phone or e-mail at Independent.Study@dhs.com. All comments are evaluated to better serve the persons using the on-line training.

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

There is no payment or gift to respondents for this data collection.

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

The collection of data is in compliance with the Privacy Act of 1974. A Privacy Impact Assessment (PIA) for the Application and Registration Records for Training and Exercise Programs was completed on September 22, 2009 and is currently being reviewed by DHS and FEMA Privacy Offices. Also, an approved System of Records Notice (SORN) was published for the Independent Study system on October 5, 2004.

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 a sensitive nature involved with this data collection.

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.

It is estimated that 1,682,231 respondents representing persons of all occupations who would participate in the training, doing so electronically. Each respondent will take an estimated 4 courses and the burden to provide the information will average .5 hours (30 minutes) per response. The total annual hour burden will be $1,682,231 \times 4 \times .5 \text{ hours} = 3,364,462 \text{ hours}$.

It is estimated that 186,914 respondents representing persons of all occupations who would participate in the training and will complete the paper version for the course. Each respondent will take an estimated 4 courses and the burden to provide the information will average .75 hours (45 minutes) per response. The total annual hour burden will be $186,914 \times 4 \times .75 \text{ hours} = 560,742 \text{ hours}$.

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. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for "Avg. Hourly Wage Rate". 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.

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; Business or other for-profit; Not-for-profit institutions; Individuals or households; farms	FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)	1,682,231	4	6,728,924	0.5	3,364,462	\$28.45	\$95,718,944
State, local or Tribal Government; Business or	FEMA/EMI Independent Study Course Enrollment	186,914	4	747,656	0.75	560,742	\$28.45	\$15,953,110

other for-profit; Not-for-profit institutions; Individuals or households; farms	and Test Answer Sheet / FEMA Form 064-0-9 (Paper)						
Total		1,869,145		7,476,580		3,925,204	

- 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

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.4. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4, and the entry for the “Avg. Hourly Wage Rate” would be \$59.51.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for All Occupations is estimated to be \$20.32 per hour times the wage rate multiplier of 1.4 equals \$28.45, therefore, the estimated burden hour cost to respondents all occupations is estimated to be 3,925,204 hours times \$28.45 equals \$111,672,054 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:

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

There are no annual capital, start-up, operation or maintenance costs associated with this collection.

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [25% of Independent Study Program contract]	\$182,141
Staff Salaries* [#1 of GS 12, step1 employees spending approximately 65% of time annually(description)...managing the IS training program including verifying class completion and credit awarding for this data collection $74,872 \times 1.4 \times 65\% = \$68,164$; [1 of GS 14 , step 1 employees spending approximately 35% of time annually managing the information database (i.e. performing a comprehensive review and consolidation of duplicate accounts, maintaining and updating organizational information) for this data collection $105,211 \times 1.4 \times 35\% = \$51,553$]	\$ 119,717
Facilities [cost for renting, overhead, ect. for data collection activity]	0
Computer Hardware and Software [cost of equipment specifically for program annual lifecycle]	\$5,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$9,720
Travel	0
Printing [650,000]	\$180,000
Postage [117, 194 x .44 cent postage stamp]	\$52,823
Other	
Total	\$367,260

* Note: The “Salary Rate” includes a 1.4 multiplier to reflect a fully-loaded wage rate.

The contractor shall provide personnel with expertise to deliver effective customer service in managing the IS Program. Suitable standards for customer service in an educational environment shall be applied at all times when addressing IS students. The contractor shall provide general administrative support in all areas of the Independent Study Program. The contractor shall, at a minimum, perform the following:

- **Support to IS Web-Based Users.**
- **Implement and Maintain a Standard Operating Procedure (SOP).**
- **Routine Requests Response**
- **Application Processing.**

- **Key Data Entry.**
- **Professional Develop Series (PDS).**
- **Military Retirement Points**
- **Inventory Maintenance**
- **Distance Inventory Program (DIP) Management**
- **Reporting.**
- **Management Meetings**
- **Course Material Review and Accreditation**
- **ISP Marketing material**
- **Maintain IS Course List**
- **IS Program Presentations**
- **New Independent Study Database System and Technologies**

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

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
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)064-0-9	0	0	0	1,589,610	3,364,462	+ 1,774,852
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet /				264,936	560,742	+295,806

FEMA Form 064-0-9 (Paper)						
Total(s)	0	0	0	1,854,546	3,925,204	+2,070,658

Explain: The increase in the burden for both the electronic and paper versions of FEMA Form 064-0-9 is due to an increase in the number of persons taking advantage of on-line courses.

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
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)064-0-9				\$36,714,668	\$95,718,944	+\$59,004,276
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Paper)				\$4,079,408	\$15,953,110	+\$11,873,702
Total(s)	0	0	0	\$40,794,076	\$111,672,054	\$70,877,978

Explain: The increase in the cost burden for both the electronic and paper versions of FEMA Form 064-0-9 is due to the larger number of persons taking advantage of the on-line courses and from the inclusion of the 1.4 multiplier in the wage rate calculation.

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.

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.