

October 12, 2010

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 – NEW**

**Title: FEMA Preparedness Grants: Intercity Bus Security Grant Program (IBSGP)**

**Form Number(s): FEMA Form# 089-8**

### 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 Intercity Bus Security Grant Program (IBSGP) is authorized by Section 1532, Title XV of the *Implementing Recommendations of the 9/11 Commission Act of 2007* Public Law 110-53 (6 U.S.C. §1182), mandates the Secretary to establish a grant program for eligible private operators providing transportation by an over-the-road bus for security improvements and that the Secretary shall determine the requirements for grant recipients, including application requirements. The IBSGP is also authorized by the *Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009* (Public Law 110-329).

The IBSGP is a Department of Homeland Security (DHS) grant program that focuses on infrastructure protection activities. The IBSGP provides funding to create a sustainable program for the protection of intercity bus systems and the traveling public from terrorism as

well as to assist operators of fixed-route intercity and charter bus services in obtaining the resources required to support security measures such as enhanced planning, facility security upgrades, and vehicle and driver protection. IBSGP is one program among a comprehensive set of measures authorized by Congress and implemented by the Administration to help strengthen the nation's critical infrastructure against risks associated with potential terrorist attacks.

**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 089-8, IBSGP Investment Justification Template** – Submitted with the application, this document provides narrative details 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. The data from the Investment Justification (IJ) is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers. The IBSGP uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. The highest scoring applications advance to the national review phase. The national review is comprised of a panel of officials from FEMA (headquarters and regions) and representatives of other federal stakeholders (e.g., Transportation Security Administration) and/or national associations (e.g., National Emergency Management Association). These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the respective grant programs.

**FEMA Form 024-0-1, Environmental and Historic Preservation (EHP) Environmental Screening Form (ESF)** - The Environmental and Historic Preservation Environmental Screening Form is a paper form used by FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to GPD for an Environmental and Historic Preservation (EHP) regulatory compliance review. This collection activity is currently in the OMB process for approval under ICR Reference No. 201003-1660-007.

**Semiannual Progress Report, formerly known as the Categorical Assistance Progress Report (CAPR)** – The Semiannual Progress Report provides programmatic information on the use of grant funding. The Report should also address performance measures and the activities identified in the Investment Justifications as necessary. In addition, the information provided in the reports will be used by the grantor agency to monitor grantee cash flow to ensure proper use of Federal funds. The reports are due within 30 days after the end of the reporting period (July 30 for the Reporting period of January 1 through June 30; and January 30 for the reporting period of July 1 through December 31). The Semiannual Progress Report is part of the U.S. Department of Justice (DOJ), Office for Justice Program (OJP) Grant Management System (GMS). OJP has received clearance from OMB for this collection activity under OJP OMB Number 1121-0243 which expires on August 31, 2012.

**Homeland Security Exercise and Evaluation Program (HSEEP) After-Action Report (AAR) and Improvement Plan (IP)** – The information contained within this report identifies areas where expectations for preparedness to respond to an emergency situation are met as well as areas where improvement is required. This information is used by the Secretary of Homeland Security and shared with heads of other Federal Departments including FEMA’s National Preparedness Directorate to allow for planning methods to increase levels of preparedness, establishing mechanisms for improved delivery of Federal preparedness assistance to State and local governments, and outlining actions to strengthen preparedness capabilities of Federal, State and local entities.

This initiative is managed by FEMA’s National Preparedness Directorate (NPD). Grant recipients must report on scheduled exercises and ensure that an HSEEP After-Action Report (AAR) and Improvement Plan (IP) are prepared for each exercise conducted with FEMA support. This information must be submitted to the FEMA within 60 days following completion of an exercise. There are two separate templates that support this data collection effort: (1) **Discussion-Based Exercise template**; 2) **Operations-Based Exercise template**. This collection activity is currently in the OMB process for approval under ICR Reference No. 201006-1660-001.

**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 Investment Justification (IJ) is completed in Microsoft Word. However, grant applicants must submit their IJ as an attachment when applying for the IBSGP via [www.grants.gov](http://www.grants.gov). Eligible applicants must apply for funding through this portal accessible on the internet.

**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 September 30, 2009, Vol. 74, No. 188, pp. 50232. 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. 8385. 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 both the American Bus Association (ABA) and the United Motorcoach Association (UMA) national associations that represent these entities, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. These consultations focus on the nature of information needed by FEMA to manage the grant programs.

**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 on a regular basis with its bus operator stakeholders on a variety of issues. 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.

**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. A System of Records Notice (SORN) inviting public comments was published on August 7, 2009, Volume 74, Number 151, pp. 39705.

**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 Intercity Bus Security Grant Program (IBSGP) focuses on infrastructure protection activities and is one tool among a comprehensive set of measures authorized by Congress and implemented by the Administration to help strengthen the nation's critical infrastructure against risks associated with potential terrorist attacks. The burden to collect the necessary information has been estimated to be 280 total annual burden 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	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
Business or other for-profit	IBSGP Investment Justification Template, FEMA Form 089-8	56	1	56	5 hrs.	280	\$25.97	\$7,271.60
<b>Total</b>		<b>56</b>				<b>280</b>		<b>\$7,271.60</b>

\* Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics Web site ([www.bls.gov](http://www.bls.gov)) the wage rate category for Private Bus Transit System Representatives is estimated to be \$18.55 per hour; in addition, a 1.4 multiplier for benefits has been included, resulting in a total wage rate of \$25.97 for completing and submitting the FEMA grant information to FEMA for review and approval. Therefore, the estimated total burden hour cost to Private Bus Transit System Representatives is estimated to be \$7,271.60 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 Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate (\$)	Total Annual Respondent Cost (\$)
<b>Standard Forms</b>								
Business or other for-profit	Application for Federal Assistance / SF 424	56	1	56	0.75	42	\$25.97	\$1,090.74
Business or other for-profit	Budget Information - Non-Construction Programs / SF 424A	56	1	56	3	168	\$25.97	\$4,362.96

Business or other for-profit	Assurances - Non-Construction Programs / SF 424B	56	1	56	0.25	14	\$25.97	\$363.58
Business or other for-profit	Budget Information - Construction Programs / SF 424C	56	1	56	3	168	\$25.97	\$4,362.96
Business or other for-profit	Assurances - Construction Programs / SF 424D	56	1	56	0.25	14	\$25.97	\$363.58
Business or other for-profit	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9	\$25.97	\$242.87
Business or other for-profit	Direct Deposit Sign-Up Form / SF 1199A	56	1	56	0.167	9	\$25.97	\$242.87
Business or other for-profit	Federal Financial Report / SF 425	56	4	224	1.5	336	\$25.97	\$8,725.92
Business or other for-profit	Financial Status Report / Standard Form 269	56	4	224	0.5	112	\$25.97	\$2,908.64
<b>Total</b>				<b>616</b>		<b>761</b>		<b>\$19,755.48</b>
<b>Other Departments/ Agencies Data Collection Activities</b>								
Business or other for-profit	EHP - Environmental Screening Form / FEMA Form 024-0-1, FEMA OMB Number 1660-XXXX	56	1	56				
Business or other for-profit	Semiannual Progress Report, formerly known as the Categorical Assistance Progress Report (CAPR) / OJP	56	1	56				



	OMB control number 1121-0243							
Business or other for-profit	Homeland Security Exercise & Evaluation Program (HSEEP) After Action Report (AAR) and Improvement Plan (IP) / FEMA Form 091-0; FEMA OMB Number 1660-XXXX	56	1	56				
<b>Total</b>				<b>168</b>				

**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 \$960,627.44. Approximately 8 staff members with an estimated grade level of GS-13 review and analyze the information collected by the IBSGP.

### Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs There is one contract that supports this effort: The Grant Operations Support Contract. This contract supports the development of the programs & provide guidance/assistance to grantees, collect & review information, and the cost for this contract is: Grant Operations Support: \$376,478.00	\$376,478.00
*Staff Salaries [8 GS-13, step 1 employees spending approximately 60% of time annually for this administrative and financial data collection] $8 \times \$86,927.00 = \$695,416.00 \times 1.4 = \$973,582.40 \times .60 = \$584,149.44$	\$584,149.44
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	
<b>Total</b>	<b>\$960,627.44</b>

\* Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

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

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

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

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

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
IBSGP Investment Justification	0	280	+280			

Template, FEMA Form 089-8						
<b>Total(s)</b>	0	280	+280			

**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
IBSGP Investment Justification Template, FEMA Form 089-8	0	\$7,271.60	+\$7,271.60			
<b>Total(s)</b>	0	\$7,271.60	+\$7,271.60			

**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.