

October 15, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0030

**Title: Request for the Site Inspection, Landowners
Authorization/Ingress/Egress Agreement**

Form Number(s): FEMA Forms 010-0-9, 010-0-10

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.

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.

42 U.S.C 5174, the Robert T. Stafford Disaster Relief and Emergency Assistance Act authorizes the President to provide mobile homes and other readily fabricated dwellings to eligible applicants who require temporary housing as a result of a major disaster. Title 44 CFR Part 206.117 provides the requirements for disaster-related housing needs of individuals and households who are eligible for temporary housing assistance. The information collected provides the information necessary to determine the feasibility of the site for placement of temporary housing and so that FEMA can have access to place the temporary housing unit as well as retrieve it at the end of the use.

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 010-0-9 is used by FEMA to ensure the feasibility of potential sites for temporary housing units. And that these sites will accommodate a temporary housing unit, and comply with local, State and Federal guidelines and regulations regarding the placement of the unit. The form documents that the necessary infrastructure required to support a temporary housing unit is in place.

FEMA Form 010-0-10 is used by FEMA to ensure a landowner, if other than the applicant receiving the unit, will allow the unit to be placed on the property. This form also verifies that routes of ingress and egress to and from the property are maintained, and that necessary actions to make ingress and egress possible are documented for completion and that FEMA has a 30-day timeframe upon termination of the temporary housing agreement to facilitate removal.

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.

These forms are available via the FEMA Intranet Website at http://online.fema.net/mgmt_records/forms.shtm and can be downloaded for use. The forms are completed via paper as the forms require original signatures. Consideration is currently underway to convert this to an electronic data collection including the ability to accept electronic signatures. The next steps are to develop a working group to investigate the action and to determine if funding is available to move forward on this initiative.

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 here is not duplicated elsewhere and is unique to each site.

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 to 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 this collection of information did not occur, FEMA would not be able to meet the requirements set forth in regulations requiring FEMA to provide temporary housing to those affected by disasters.

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 to report information 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 to provide a response in less than 30-days.

c. Requiring respondents to submit more than an original and two copies of any document.

Respondents are not required 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.

FEMA does not require respondents to retain 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 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 of statistical data classification involved with 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 in statute or regulation necessary 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 June 7, 2010, Volume 75 pp 32199. 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 September 10, 2010, Volume 75 pp 55339. 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.

There are no consultations with persons outside the agency on this collection. The process of inspecting a site for placement of a temporary housing unit is as simplified as possible to determine that the infrastructure is in place and that FEMA can place and remove the unit.

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.

Individuals are in generally in direct contact with FEMA at the time of the site inspection and can provide any comments or concerns to the inspector. If the individual is not able to be at the site at the time of the inspection, the inspector leaves a card with contact information for any follow-up necessary. Questions or comments are specific to the individual's own unique inspection and are resolved directly with the individual. Also,

when the individual is notified that there will be a unit assigned to them, any questions or comments received are resolved at that point.

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

There is no payment or gifts given to respondents.

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

There is no assurance of confidentiality provided to respondents. A Privacy Threshold Analysis has been completed and is under review by the FEMA Privacy office.

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 asked.

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 5,000 individuals will complete FEMA Form 010-0-9. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 hours.

It is estimated that 5,000 individuals will complete FEMA Form 010-0-10. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 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
Individuals or households	FEMA Form 010-0-9 / Request for the Site Inspection	5,000	1	5,000	0.17	850	\$28.00	\$23,800
Individuals or households	FEMA Form 010-0-10 / Landowner's Authorization Ingress-Egress Agreement	5,000	1	5,000	0.17	850	\$28.00	\$23,800
Total		5,000		10,000		1700		\$47,600

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

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 x 1.4 multiplier = \$28.00 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents All Occupations is estimated to be \$47,600 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. **Operation and Maintenance and purchase of services component.** These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

b. **Capital and Start-up-Cost** should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no annual capital, start-up, maintenance or operation 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 [Describe]	
Staff Salaries* 30 of Disaster Assistance Reservists (C-grade level 2) employees spending approximately 100% of time annually performing site inspections and approving sites for unit installation for this data collection. $49,436 \times 1.4 = 69,210 \times 30 = 2,076,300$	\$2,076,300
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 30 airline tickets @ \$900 round trip x 6 = \$162,000; car rentals @ \$1000 per month x 30 x 6 = \$180,000; Hotels 30 x 30 nights x 6 x \$150 per night = \$810,000	\$1,152,000
Printing [20,000 x .06 per page = \$1,200]	\$1,200.00
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$3,229,500

* 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.

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 Form 010-0-9 / Request for the Site Inspection				19,512	850	-18,662
FEMA Form 010-0-10 / Landowner's Authorization Ingress-Egress Agreement				19,512	850	-18,662
Total(s)				39,024	1,700	-37,324

Explain:

For FEMA Form 010-0-9 the total Annual Hour Burden has decreased from 19,512 to 850, a reduction of 18,662 hours. There is now a decrease for this collection because at the time of the last submission, the burden was calculated based on the increased activity resulting from Hurricanes Katrina and Rita and now responses are estimated at a lower number that reflects the expected activity.

For FEMA Form 010-0-10, the total Annual Hour Burden has decreased from 19,512 to 850, a reduction of 18,662 hours. There is now a decrease for this collection because at the time of the last submission, the burden was calculated based on the increased activity resulting from Hurricanes Katrina and Rita and now responses are estimated at a lower number that reflects the expected activity. There has been no change in the information being collected.

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 Form 010-0-9 / Request for the Site Inspection				\$367,606.08	\$23,800	-\$343,806.08
FEMA Form 010-0-10 / Landowner's Authorization Ingress-Egress Agreement				\$490,531.68	\$23,800	-\$466,731.68
Total(s)				\$858,137.76	\$47,600	-\$810,537.76

Explain: For FEMA Form 010-0-9, the total Annual Cost Burden has decreased from \$367,606.08 to \$47,600, a reduction of \$343,806.08. There is now a decrease for this collection because at the time of the last submission, the burden was calculated based on the increased activity resulting from Hurricanes Katrina and Rita and now responses are estimated at a lower number that reflects the expected activity.

For FEMA Form 010-0-10, the total Annual Cost Burden has decreased from \$490,531.68 to \$23,800, a reduction of \$466,731.68. There is now a decrease for this collection because at the time of the last submission, the burden was calculated based on the increased activity resulting from Hurricanes Katrina and Rita and now responses are estimated at a lower number that reflects the expected activity.

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.

This information collection 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.

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.

The collection of information does not employ statistical methods.