

February 25, 2011

## **Supporting Statement for Paperwork Reduction Act Submissions**

**Title: Request for Federal Assistance Form – How to Process Mission Assignments in Federal Disaster Operations**

**OMB Control Number: 1660-0047**

**Form Number(s): FEMA Forms 010-0-7 (formerly 90-136) and 010-0-8 (formerly 90-129)**

### **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 (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.**

Under Section 653 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq), FEMA is authorized to provide assistance to States based on needs before, during and after a disaster has impacted the state. Information collected explains which State(s) require assistance, what needs to be accomplished, details any resource shortfalls, and explains what assistance is required to meet these needs. Title 44 CFR Part 206.5 provides the mechanism by which FEMA collects the information necessary to determine what resources are needed and if a mission assignment is appropriate.

**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:**  
**a) how the information will be shared, if applicable, and for what programmatic purpose.**

**FEMA Form 010-0-7 (Action Request Form)** – This form is completed when States make a request for assistance to respond to a disaster. The form provides acknowledgement that the tasks are beyond the capability of the state to respond to as well as documents the type of assistance required. FEMA utilizes this information to determine that the assistance requested is the result of a disaster, not a pre-existing condition and that the type of response is appropriate.

**FEMA Form 010-0-8 (Mission Assignment)** – This form provides verification of the mission function to define the work to be performed, documents the start and end dates of the assignment as well as provides an estimated cost. FEMA uses this information to evaluate the assignment, identifies the financial requirements related to the mission assignment and to obligate the funds that are requested.

**Training** – Training provided to the respondents allows for updates to the mission assignment process to be fully explained and how to complete the forms.

**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.**

**FEMA Form 010-0-7 (Action Request Form)** – The Action Request Form (ARF) is utilized by FEMA State and Federal partners as an ordering form to request resources from FEMA. The ARF is in a PDF format that can be emailed, scanned, or printed for use. In order for the action to be committed for resources, signatures from those with the authority to commit the State or Federal agency must be attained prior to FEMA acting on the request. The current signature process still requires a hard copy and an original signature. Efforts are being made to use information technology to automate the collection of information for the ARF that would include electronic signatures.

**FEMA Form 010-0-8 (Mission Assignment)** – The Mission Assignment (MA) Form is an electronic form housed in FEMA’s Enterprise Coordination and Approvals Processing System (eCAPS), eCAPS provides electronic coordination and approval of the Requisition and Commitment for Services and Supplies (FEMA Form 40-1) and MA during disaster activations. The MA Form is an electronic version of the Action Request Form utilizing the same information gathered from the original signed version ARF. eCAPS is used to process the mission assignment which is tied into FEMA’s financial

system for funding commitment and authorization. If eCAPS, is not available a verbal commitment can take place of the mission assignment for expediency.

**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.**

The information and signatures required for FEMA form 010-0-8 (MA) are in compliance with 44 CFR 206.208 regulations (copy attached). FEMA would not be in compliance with this regulation if the information is not collected. FEMA would not be able to utilize the resources of other Federal Agencies to best respond to the needs of states during disaster in a timely and efficient manner. FEMA is authorized to task other agencies to assist during disasters where their regulations do not authorize such. FEMA is coordinating agency during a disaster and is tasked to operate as the central hub – without the MA we could not do this.

**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.**

**(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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information 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 August 27, 2010, 75 FR 52770. 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 November 24, 2010, 75 FR 71718. 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 Emergency Support Functions Leadership Group (ESFLG) comprised of other Federal agencies meets quarterly throughout the year to discuss the resources necessary and available to meet the needs of states during times of disasters. Discussions regarding the mission assignment function are routinely occurring during these meetings.

**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 Mission Assignment Manager Monthly conference call provides an open forum among Regional Mission Assignment Managers and program offices. This forum provides ample opportunities for feedback on internal items such as the Mission Assignment Standard Operating Procedures and the overall mission assignment process.

**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.**

A Privacy Threshold Analysis (PTA) has been completed by the program office and is being reviewed by the FEMA Privacy Office to determine if a Privacy Impact Analysis (PIA) is required, since August 31, 2010. The PTA is still currently being reviewed by the FEMA Privacy Office. This information remains the same as of December 2010.

**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 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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

FEMA has estimated that approximately 10 States will complete the FEMA Form 010-0-7 (Action Request Form). Each form is estimated to take 20 minutes to complete. The total annual burden is estimated to be  $10 \times 640 = 6,400 \times 20$  minutes per response = 2,133 burden hours.

FEMA has estimated that approximately 10 States will complete the FEMA Form 010-0-7 (Mission Assignment). Each form is estimated to take 3 minutes to complete. The total annual burden is estimated to be  $10 \times 320 = 3,200 \times 3$  minutes per response = 160 burden hours.

Training – It is estimated that 10 Financial Managers will attend 2 training sessions a year, and that each session will last for 8 hours. The annual hour burden for training will be 10 x 2 x 8 hours = 160 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 estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.**

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	FEMA Form 010-0-7 / Action Request Form	10	640	6,400	20 minutes	2,133	\$56.69	\$120,919.77
State, local or Tribal Government	FEMA Form 010-0-8 / Mission Assignment	10	320	3,200	3 minutes	160	\$56.69	\$9,070.40
State, local or Tribal Government	Training / No Form	10	2	20	8 hours	160	\$56.69	\$9,070.40
<b>Total</b>		<b>10</b>		<b>9,620</b>		<b>2,453</b>		<b>\$139,060.57</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 website ([www.bls.gov](http://www.bls.gov)) the wage rate category for State Financial Managers is estimated to be (\$40.09 x 1.4 =) \$56.59 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents State Financial Managers is estimated to \$139,060.57 annually.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

There are no operation and maintenance, or capital and start-up costs associated with this the collection of information.

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]	N/A
Staff Salaries [ Four GS 12 step 1 employees spending approximately 5 % of time annually processing information for this data collection] $\$74,872 \times 5\% \times 1.4 \times 5$ employees = \$14,974	\$14,974
Facilities [cost for renting, overhead, ect. for data collection activity]	N/A
Computer Hardware and Software [cost of equipment annual lifecycle]	N/A
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	N/A
Travel 3 persons traveling 3 times a year = $\$1,500 \times 3 = \$4,500$	\$4,500
Printing [number of data collection instruments annually]	N/A
Postage [annual number of data collection instruments x postage]	N/A
Other [Training conducted in regions on the mission assignment process] 3 GS 12 Step 1 employees spending 2% of their time conducting the training: $\$74,872 \times 2\% \times 1.4 \times 3$ employees = \$6,289	\$6,289
<b>Total</b>	<b>\$25,763</b>

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping hour and cost burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

*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
Action Request Form / FEMA Form 010-0-7				196	2,133	+1,937
FEMA Form 010-0-8 / Mission Assignment				653	160	-493
Training / No Form				896	160	-736
<b>Total(s)</b>				<b>1,745</b>	<b>2,453</b>	<b>+708</b>

**Explain:**

FEMA Form 010-0-7 has an adjustment increase in the number of annual hours burden due to the increased in estimate of the number of Action Request Forms received during disaster annually. This increase has resulted from State’s filing more requests to issues that arise from a disaster. The prior hour burden was 196 hours, and the new hour burden is 2,133 for an increase of 1,937 hours.

FEMA Form 010-0-8 has an adjustment decrease due to the better estimation of the number of Action Request Forms that actually result in an approval for a Mission Assignment during a disaster. The prior annual hour burden was 653 hours; the requested annual hour burden is 160 hours resulting in a decrease of 493 hours.

The training has also had an adjustment decrease due to the better estimation of the number of States affected by disaster declarations in a year. The new estimate is 160 hours and the previous estimate was 896 hours, a decrease of 736 hours.

There has been no change to 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 010-0-7 / Action Request Form				\$22,979	\$120,919.77	+\$97,940.77
FEMA Form 010-0-8 / Mission Assignment				\$6,897	\$9,070.40	+\$2,173.40
Training / No Form				\$31,530.55	\$9,070.40	-\$22,460.15
<b>Total(s)</b>				<b>\$61,406.55</b>	<b>\$139,060.57</b>	<b>+\$77,654.02</b>



***Explain:***

For FEMA Form 010-0-7, there is an adjustment increase in the annual cost burden due to the application of the 1.4 multiplier to the wage rate and due to the increase in the number of responses. The current approved cost is \$22,979; the requested cost is \$120,919.77 resulting in an increase of \$97,940.77.

For FEMA Form 010-0-8, there is an adjustment increase in the annual cost burden due to the application of the 1.4 multiplier to the wage rate and a decrease due to the reduction in the number of responses. The current approved cost is \$6,897; the requested cost is \$9,070.40 resulting in an increase of \$2,173.40.

The training, there is an adjustment decrease in the annual cost burden due to the lower estimate of the number of state respondents participating in the training even after taking into account the application of the 1.4 multiplier. The current approved cost is \$31,530.55; the requested cost is \$9,070.40 resulting in a decrease of \$22,460.15.

**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 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.**

There is no statistical methodology involved in this collection.