

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-NEW

Title: Level 1 Assessment and Level 3 Evaluations for the Center for Domestic Preparedness (CDP)

Form Number(s):

Level 1 Assessment Form, FEMA Form 092-0-2

Level 3 Evaluation Form for Students, FEMA Form 092-0-2A

Level 3 Evaluation Form for Instructors, FEMA Form 092-0-2B

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.

Section 1204 of the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, 121 Stat. 266, (codified at 6 U.S.C. § 1102), authorizes the Secretary of Homeland Security to establish, operate, and maintain a National Domestic Preparedness Consortium (NDPC) within the Department of Homeland Security. Section 1204 specifically recognizes the Federal Emergency Management Agency (FEMA’s) Center for Domestic Preparedness (CDP) in

Anniston, Alabama as a component of the NDPC, with a statutory mandate to “identify, develop, test, and deliver training to State, local, and Tribal emergency response providers, provide on-site and mobile training at the performance and management and planning levels, and facilitate the delivery of training by the training partners of the Department.” In accordance with those Congressional mandates, the CDP offers courses and programs that are delivered on-campus at the CDP facility and throughout the Nation in coordination with State, local, and Tribal emergency response jurisdictions, as well as other training partners of the Department of Homeland Security. The collection of applicant information necessary to register for courses and to receive reimbursement for travel for those courses is necessary to meet the Congressional mandates.

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.

The CDP will utilize the Kirkpatrick Four Levels of Evaluation (Susan Croes-WWW.Masterminds-ink.com). In order to assess training effectiveness, Donald Kirkpatrick developed a four level model of evaluation. Level 1 evaluation assesses the students perception of training, level 2 is the cognitive assessment (tests/examinations) of the student learning (change in behavior), level 3 assesses the transfer of learning to the student’s work environment, and level 4 assesses the return on investment of the training program. This supporting statement includes the collection of level 1 and level 3 evaluation data.

The first measures how participants react to training. It collects information regarding the student’s perceptions of the training. This level produces data regarding whether the student liked the training and if it was relevant to their work. It is theorized the negative reactions reduce the possibility of effective learning.

- a. Level 1 Assessment Form, FEMA Form 092-0-2: The Level 1 instrument will be used to survey the Center for Domestic Preparedness (CDP) students’ enrolled in CDP courses. The survey will collect information regarding the increase of knowledge and skills the student acquires after taking a CDP course. It will also collect information regarding the quality of instruction and the increase in confidence the student has acquired from the training. There will also be questions regarding the training facility and services. The data will be analyzed to enable revision of curriculum, instruction and other services provided by the CDP.

Level 3 evaluations collect data on whether the training has been transferred back the participant work. This assessment represents the truest evaluation of the program’s effectiveness.

- b. Level 3 Evaluation Form for Students, FEMA Form 092-0-2A: This form will be used to measure the degree to which the course material affected the performance of the student in their professional employment. The data will be used to assess the validity and relativity of the course material as it relates to the actual performance of duties. The data will be analyzed to enable revision of curriculum, instruction and other services provided by the CDP.
- c. Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B: This form will be used to measure the degree to which the course material affected the performance of the student in their professional employment. The data will be used to assess the validity and relativity of the course material as it relates to the actual performance of duties. The data will be analyzed to enable revision of curriculum, instruction and other services provided by the CDP.

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.

- a. Level 1 Assessment Form —The Level 1 instrument will be will be a paper-based collection and distributed to the students at the completion of the course and collected in the course as well. The use of any form of information technology is not feasible for this assessment, as computer access is not currently available for on and off site course deliveries.
- b. Level 3 Evaluation Form for Students — This form will be an electronic survey instrument sent to the student approximately six months following the student’s completion of a CDP course. A reminder email will be sent to the student approximately one to two weeks before the six month evaluation is due. This email will describe the importance of completion of the assessment instrument and will provide information for assessing the instrument using the student’s CDP account. The form will be available at the following website address: www.cdp.dhs.gov. The electronic format for this assessment was determined to be the least burdensome, as users can access, complete and submit the instruments at their convenience with minimal effort. Students without email access will receive forms and information utilizing regular postal mail.
- c. Level 3 Evaluation Form for Supervisors — This form will be an electronic survey instrument sent to the student’s Supervisor approximately six months following the student’s completion of a CDP course. A reminder email will be sent to the supervisor approximately one to two weeks before the six month

evaluation is due. This email will describe the importance of completion of the assessment instrument and will provide information on completing and submitting the form for analysis. The form will be sent directly to the supervisor using their email or physical address. Electronic format for this assessment was determined to be the least burdensome, as users can access, complete and submit the instruments at their convenience with minimal effort. Supervisors without email access will receive forms and information utilizing regular postal mail

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.

This is a course evaluation meant to give feedback to CDP that can potentially improve the course material, delivery and effectiveness. Without this data, it would be difficult to determine the need for improvements, degree of student satisfaction, and instructor capability for each course delivery.

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.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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 April 29, 2011, Volume 76, Number 83, pp. 24038. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August, 23, 2011, Volume 76, Number 163, pp. 52672]. No comments were received.

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.

In preparation of the forms and instructions, CDP contractor for Information Technology, the CDP contractor for Curriculum delivery, and the CDP contractor for Student Services were consulted regarding instrument format, content, delivery and submission.

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.

Consultation with those from whom information is to be obtained is continuous, as representatives from the Student Services department talk directly to first responders and receivers in “Meet and Greet” sessions held every Tuesday evening in the Lodging area. Reports of these meetings are developed and distributed to various departments for new course development, technology changes and needs assessment projects,. These consultations are conducted by CDP Student Services contractors and CDP Information Technology who will manage the electronic delivery and acceptance of the respondent’s submission. Comments regarding the forms and instructions will be directed to CDP Analysis and Evaluation contractor for future modifications of the instruments.

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) was submitted to the FEMA Privacy office on 12-29-10 in order to determine if a Privacy Impact Analysis (PIA) for this collection is needed to also be forwarded to the FEMA Privacy Office for review. The PTA status is under review as of March, 2012.

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 required in 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 anticipated that 52,000 State, local or Tribal government respondents will complete Level 1 Assessment Form. Each respondent will only complete the form once and each response will require 0.25 (15 minutes) hours to complete the form. The total annual hour burden is $52,000 \times 0.25 \text{ hours} = 13,000 \text{ annual hours}$.

It is anticipated that 13,000 healthcare professional and technical respondents will complete Level 1 Assessment Form. Each respondent will only complete the form once and each response will require 0.25 (15 minutes) hours to complete the form. The total annual hour burden is $13,000 \times 0.25 \text{ hours} = 3,250 \text{ annual hours}$

It is anticipated that 1,500 State, local or Tribal government respondents will complete Level 3 Evaluation Form for Students. Each respondent will only complete the form once and each response will require 0.25 hours (15 minutes) to complete the form. The total annual hour burden is $1500 \times .25 \text{ hours} = 375 \text{ annual hours}$.

It is anticipated that 2,000 healthcare professional and technical respondents will complete Level 3 Evaluation Form for Students. Each respondent will only complete the form once and each response will require 0.25 (15 minutes) hours to complete the form. The total annual hour burden is $2,000 \times 0.25 \text{ hours} = 500 \text{ annual hours}$

It is anticipated that 1,500 State, local or tribal government Respondents will complete Level 3 Evaluation Form for Supervisors. Each respondent will only complete the form once and each response will require 0.25 hours (15 minutes) to complete the form. The total annual hour burden is $1,500 \times 0.25 \text{ hours} = 375 \text{ annual hours}$.

It is anticipated that 2,000 healthcare professional and technical respondents will complete Level 3 Evaluation Form for Supervisors. Each respondent will only complete the form once and each response will require 0.25 hours (15 minutes) to complete the form. The total annual hour burden is $2,000 \times 0.25 \text{ hours} = 500 \text{ annual hours}$.

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
State, local or Tribal government	Level 1 Assessment Form, FEMA Form 092-0-2	52,000	1	52,000	15 minutes (.25 hours)	13,000	\$34.33	\$446,290.00
Healthcare Professionals and Technical	Level 1 Assessment Form, FEMA Form 092-0-2	13,000	1	13,000	15 minutes (.25 hours)	3,250	\$44.52	\$144,690.00
State, local or Tribal government	Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	1,500	1	1,500	15 minutes (.25 hours)	375	\$34.33	\$12,873.75
Healthcare Professionals and Technical	Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	2,000	1	2,000	15 minutes (.25 hours)	500	\$44.52	\$22,260.00
State, local or Tribal government	Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	1,500	1	1,500	15 minutes (.25 hours)	375	\$34.33	12,873.75
Healthcare Professionals and Technical	Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	2,000	1	2,000	15 minutes (.25 hours)	500	\$44.52	\$22,260.00
Total		72,000				18,000		\$661,247.50

- 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.

FEMA Form 092-0-2:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Protective Services for Federal State and Local is estimated to be \$24.52 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$34.33, therefore, the estimated burden hour cost to respondents from the Protective Services is estimated to be 52,000 hours x \$34.33 = \$446,290.00 annually.

FEMA Form 092-0-2:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the mean wage rate category for Healthcare Providers and Technical occupations in Federal, State and Local industry is estimated to be \$31.80 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$44.52, therefore, the estimated burden hour cost to respondents in this category is estimated to be 13,000 hours x \$44.52 = \$144,690.00 annually.

FEMA Form 092-0-2A:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Protective Services for Federal State and Local is estimated to be \$24.52 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$34.33, therefore, the estimated burden hour cost to respondents from the Protective Services is estimated to be 1,500 hours x \$34.33= \$12,873.75 annually.

FEMA Form 092-0-2A:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the mean wage rate category for Healthcare Providers and Technical occupations in Federal, State and Local industry is estimated to be \$31.80 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$44.52, therefore, the estimated burden hour cost to respondents in this category is estimated to be 2,000 hours x \$44.52= \$22,260.00 annually.

FEMA Form 092-0-2B:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Protective Services for Federal State and Local is estimated to be \$24.52 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$34.33, therefore, the estimated burden hour cost to respondents from the Protective Services is estimated to be 1,500 hours x \$34.33= \$12,873.75 annually.

FEMA Form 092-0-2B:

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the mean wage rate category for Healthcare Providers and Technical

occupations in Federal, State and Local industry is estimated to be \$31.80 per hour and multiplied by 1.4, the “Avg. Hourly Wage Rate” would be \$44.52, therefore, the estimated burden hour cost to respondents in this category is estimated to be 2,000 hours x \$44.52= \$22,260.00 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 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.

Annual Cost to the Federal Government

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: Contractor cost to process and review the Level 1 Assessment Form: (65,000 reviews) 3,250 hours of review time at \$69.69 per hour = \$226,492.50.	
Contractor cost to process, compile and analyze data from the Level 3 Evaluation for Students is (3,500 reviews) 408 hours of review time at \$69.69 per hour =	

28,433.52. Contractor cost to process, compile and analyze data from the Level 3 Evaluation for Supervisors is (3,500 reviews) 292 hours of review time x \$69.69 per hour = \$20,349.48. Therefore, 226,492.50+ 21,433.52 + 20,349.48 = \$268,275.50.		
	\$268,275.50	
Staff Salaries* [1 GS 14 step 4 employee (Anniston, AL) spending approximately 20% of time annually to review, coordinate, and assure quality control. \$106,358 x 20% = \$21,271.6 x 1.4 = \$29,780.24	\$29,780.24	
Computer Hardware and Software \$1,044.00 [cost of equipment annual lifecycle]	\$1,044.00	
Scantron Hardware and Software training	1,295.00	
Printing Level 1 Assessment Form [65,000 annually at \$.06 per page x 2 pages = \$7,800.00	\$7,800.00	
Total	\$308,194.74	
* 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
Level 1 Assessment	0	13,000	+13,000			

Form, FEMA Form 092-0-2						
Level 1 Assessment Form, FEMA Form 092-0-2	0	3,250	+3,250			
Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	0	375	+375			
Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	0	500	+500			
Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	0	375	+375			
Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	0	500	+500			
Total(s)	0	18,000	+18,000			

Explain: This is a new information collection with no previous listing on the OMB Inventory, therefore, all values entered are positive differences and 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
Level 1 Assessment Form, FEMA Form 092-0-2	0	\$446,290.00	+\$446,290.00			
Level 1 Assessment Form, FEMA Form 092-0-2	0	\$144,690.00	+\$144,690.00			
Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	0	\$12,873.75	+\$12,873.75			

Level 3 Evaluation Form for Students, FEMA Form 092-0-2A	0	\$22,260.00	+\$22,260.00			
Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	0	12,873.75	+12,873.75			
Level 3 Evaluation Form for Supervisors, FEMA Form 092-0-2B	0	\$22,260.00	+\$22,260.00			
Total(s)	0	\$661,247.50	+\$661,247.50			

Explain: This is a new information collection with no previous listing on the OMB Inventory.

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.