

September 15, 2011

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0106

Title: Integrated Public Alert and Warning Systems (IPAWS) Inventory

Form Number(s): FEMA Form 142-1-1/ IPAWS Inventory

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.

Presidential Executive Order 13407 establishes the policy for an effective, reliable, integrated, flexible, and comprehensive system to alert and warn the American people in situations of war, terrorist attack, natural disaster, or other hazards to public safety and well being. The Integrated Public Alert and Warning System (IPAWS) is the Department of Homeland Security's (DHS) response to the Executive Order. The Executive Order requires that DHS establish an inventory of public alert and warning resources, capabilities, and the degree of integration at the Federal, State, Territorial, Tribal and Local levels of government. The information collected will consist of the communication systems being used for emergency alert and warnings at Emergency Operations Centers (EOCs). In order to conform to the Executive Order, the Federal Emergency Management Agency (FEMA) is estimating collecting from 1,932 respondents per year with an effort to reach all Federal, State, Territorial, Tribal and Local EOCs within three years. This information will help FEMA identify the capabilities for public alert and warning currently in use, current gaps, and desired capabilities for inclusion into IPAWS.

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 has begun identifying the public alert and warning capabilities of Emergency Operations Centers (EOCs) in order to facilitate IPAWS integration with all the existing resources. The information collection covers public alert and warning systems currently in operation. The accumulation of data received will be compiled into a comprehensive

and cohesive report as directed by Executive Order 13407, Public Alert and Warning System. The data will be analyzed once collected from all EOC's to determine the capability gaps of public alert and warning systems that are used by the President to warn the American people in situations of war, terrorist attack, natural disaster, or other hazards to public safety and well-being.

FEMA will not to generalize from the data collected separately in years 1, 2 or 3, recognizing that the 1,932 EOC's selected for contact annually do not represent a statistically valid sample of all EOC's. For that same reason, reporting on data derived from Years 1, 2 or 3 are not be compared as equivalent samples. The final reporting after Year 3 (or once all EOC's have been contacted) is the sole reporting based on this ICR that can be considered representative of all EOCs.

In addition, FEMA will use the information collected to integrate various alert and warning systems into IPAWS. The information will be used by the IPAWS staff as inputs to a final IPAWS national architecture report. A draft IPAWS national architecture has been developed and will be reviewed for refinement based on the finding of this data collection.

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 collection of information is done 100 % through electronic submission. Respondents are contacted via phone by data collectors and data is collected via phone or an in-person interview. Upon collection of information, data collectors enter information into a secure database for FEMA's immediate access. While this database is accessible online, only the FEMA IPAWS PMO and the data collectors have access. At no time will information be entered directly by respondents.

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.

The information collected does not have an impact on small businesses or 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 requested is required to provide the President and Congress with an accurate representation of the public alert and warning system currently available. Failure to obtain this information will negatively impact IPAWS and the ability to warn the American people in a timely manner of emergencies that may be a threat to life and property.

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 June 6, 2011, Volume 76 pp 32367. 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 August 31, 2011, Volume 76 pp 54245. 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.

Comments on the current form have been received from emergency management personnel throughout the country during the course of the data collection. Some of the changes to the data elements and form instructions are in response to that feedback, such as eliminating redundant questions or rewording questions to clarify the type of information being requested. For example, "List other systems this system is similar to." is being eliminated as all systems are discussed during the data collection, so we would already have the list of similar systems.

Additionally the IPAWS engineering team was consulted to ensure that the questions address information needed for the development of IPAWS. Questions were added to or deleted from the original form in response to their input. For example, since the system engineering has evolved to determine that IPAWS will be a web-accessed system, the question "What is your Internet type?" has been added to help determine if the location will be able to access IPAWS.

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.

Since the inventory is conducted orally, consultation with respondents occurs throughout the course of the data collection. Through feedback from the respondents the data

collectors determined that the question “How is information transmitted?” was unclear. That question was then split into two more focused questions: “How is the alert, call, etc. initiated?” and “What devices transmit or receive the alert, call, etc.?”

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 1-20-11 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 September, 2011.

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 for this collection of information.

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 1,932 Emergency Managers will complete the FEMA Form 142-1-1. Each respondent will only complete the form once and each response will require 3 hours (180 minutes) to complete the form. The total annual hour burden is $1,932 \times 3 \text{ hours} = 5,796 \text{ hours}$.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local and Tribal Government	FEMA Form 142-1-1/IPAWS Inventory	1,932	1	3 Hrs. (180 min.)	5,796	\$38.30	\$221,986.80
Total		1,932			5,796		\$221,986.80

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Emergency Management Specialist is estimated to be (\$27.36 x 1.4) \$38.30 per hour including the wage rate multiplier, therefore, the burden hour cost to respondents Emergency Management Specialists is estimated to be 5,796 hours x \$38.30 = \$221,986.80 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.)

There are no recordkeeping, 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

Item	Cost (\$)
Contract Costs: IPAWS Contract No. GS-23F-0137K	\$2,194,074.00
Staff Salaries* [One GS 13, Step 6,(DC) employee spending approximately 100% of time annually managing the IPAWS Inventory and Evaluation effort \$103,872 x 1.4= \$145,420.80	\$145,420.13
Facilities	
Computer Hardware and Software [electronics purchased to process inventory]	
Equipment Maintenance	
Travel [travel cost include cost for airfare]	\$120,376.02
Printing	
Postage [\$1.25 postage x packages sent to 480 Tribal liaisons]	\$600.00
Other	
Total	\$2,460,470.10

*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 142-1-1/				9,660	5,796	-3,864

IPAWS Inventory						
Total(s)				9,660	5,796	-3,864

For FEMA Form 142-1-1, the previously approved burden hours were 9,660; the current estimated annual hour burden is 5,796, resulting in a decrease (adjustment) of 3,864 hours. The burden time has decreased from 5 hours to 3 hours per respondent due to the removal of redundant questions and extraneous questioning outside of the scope of IPAWS.

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 142-1-1/ IPAWS Inventory				\$234,352	0	-\$234,352
Total(s)				\$234,352	0	-\$234,352

For FEMA Form 142-1-1, the previously approved cost burden was \$234,352.00; the current estimated annual cost burden is \$0, resulting in a decrease (adjustment) of -\$234,352. The cost of \$0 is correction from the previous approval. This is a decrease in cost from the previous 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.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this information collection.