#### 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.

Laws, Regulations, and Statutes:

- Public Law 106-508 (Federal Property Services and Administrative Assistance Act of 1949, as amended), December 29, 2000
- 16 USC 2101-2114 (Cooperative Forestry Assistance act of 1978, as amended)

The Federal Property Services and Administrative Assistance Act of 1949 and the Cooperative Forestry Assistance Act of 1978, as amended, authorize the Forest Service to loan federally owned property to state cooperators to use in fighting fires and providing emergency services.

Established in 1956 in cooperation with state forestry agencies, the Federal Excess Personal Property (FEPP) program administers the loan of Forest Service Fire and Aviation Management fire-control stock to states.

The FEPP program provides Forest Service officials with updated information on the condition of property loaned to state and territory cooperators. The information provided by cooperators to the Forest Service includes condition of property loaned, current location of property, description of property, and any additional relevant details.

The Forest Service Federal Excess Property Management Information System (FEPMIS) database allows the Forest Service to collect this information electronically, as well as managing inventory. Access to the database is limited to those with access authorized by Forest Service Management Officers working in the Fire and Aviation staff.

- 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.
  - a. What information will be collected reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

The following information will be collected via the FEPMIS database:

 Property details, including, manufacturer, model, year of manufacture, date of acquisition, Federal property identification number, serial number, condition of property, location of property, and users of property

- Requests for property
- Items excess to Federal agency needs
- Reports of excess (when property is no longer needed or usable within the state agency)
- Change of Status (to request modification or cannibalization of property, or to report, lost, stolen, or damaged property items)
- Inventory management; verification and certification of property location; and item details and status
- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

The information collected from employees of participating state agencies granted access to the database.

Access requested through state foresters to Forest Service property management officers. Only authorized recipients of Federal Excess Personal Property (FEPP) are granted access to the Forest Service Federal Excess Property Management Information System (FEPMIS).

#### c. What will this information be used for - provide ALL uses?

The collected information is used to manage FEPP from acquisition to disposal.

In addition, this information is used to allow access to states for reporting changes in property information at the user level. A Forest Service property technician verifies and loads the collected information into the National Finance Center's (NFC) Property Management Information System (PMIS/PROP).

This information is used to create transfer forms (SF-122 and AD-107), disposal documents (SF-120 and AD-112), and inventory certification reports.

The collected information is stored and retained according to the Forest Service records retention period for file code 6410 (per FSH 6209.11, 41, part 08):

- Excess and Surplus (Includes correspondence and forms relating to the declaration of personal property as excess and surplus and the acquisition of excess personal property.) (N1-95-88-2) – Retention Period is 3 years after file closed.
- Records and Inventory (Includes inventories of accountable personal property such as AD-112, Report of Unserviceable, Lost or Damaged Property, AD-113, Fiscal Inventory Report For The Period Ending and

PMIS/Property Report #350.) (N1-95-88-2) – Retention Period is 5 years after file closed.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

Information is collected via an electronic database (FEPMIS) that requires Forest Service approved user names and passwords. Generation of official forms occurs when users enter pertinent data and the Forest Service Property Management Officer approves the request. Several screens require entry of mandatory information prior to submission to the Forest Service for approval. There are no other options for reporting this data.

e. How frequently will the information be collected?

It is estimated that 100 respondents will provide 54 responses each, for a total of 5,400 responses annually.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

No

g. If this is an ongoing collection, how have the collection requirements changed over time?

The same requirements have existed for 55 years. Changes have occurred in the technology used, but the collection parameters remain the same.

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.

All information collected involves the use of the FEPMIS database. This enables state cooperators to inform Forest Service officials of the condition of, current location of, description of, and any additional relevant details concerning property loaned to these cooperators. This is accomplished by simply keying in the appropriate information into the appropriate screen in the database. The technology also manages inventory, certification, form generation, and reporting. The use of the database considerably reduces the burden on State cooperators as well as Forest Service property management officers. The Internet-based system generates clear and concise documentation.

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 Forest Service has no other database or collection method that allows state cooperators access to view property information or the status of property. FEPMIS works with PMIS/PROP, identifying the status of property, preventing duplication of changes or request.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This program does not impact any small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Inventory management by the Forest Service is a huge undertaking. The current FEPP program has over 34 thousand Federal inventory items with an acquisition value of over 1 billion dollars.

Previously, if a state agency made a change to a property item, an e-mail or fax was transmitted to the appropriate Forest Service office. If the e-mail or fax was not received, for whatever reason, the Forest Service did not record the property information. Often, identification of incorrect property information did not occur until an official inventory was performed (biennially).

The FEPP is a substantial inventory and is managed much easier and more efficiently using an electronic database (such as FEPMIS) that provides needed information with the click of a button. The FEPMIS database has saved substantial time and money for both state agencies and the Forest Service.

If FEPMIS were to not be used; the chances of Federal property being lost and/or misidentified increases dramatically. Lost FEPP is lost money to the Federal government.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
  - Requiring respondents to report information to the agency more often than quarterly;

Acquisition and disposal of property items occurs daily, therefore, it is in the best interest of the Federal government to track actions as they occur.

 Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

There are no written response requirements. Updates and actions are keyed into the database as changes to the status of property occur.

- Requiring respondents to submit more than an original and two copies of any document; Not applicable
- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

The Forest Service owned database automatically retains the records as outlined in Forest Service Handbook 6209.11 – Records Management, file code 6410. Respondents are not required by the Forest Service to retain any records.

- 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; Not applicable
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB; Not applicable
- 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; or
- 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.

Respondents do not provide any secret or confidential information. There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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 Federal Register Notice for this information collection was published on July 19, 2011, in Volume 76, page 42676. No comments received.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity 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 Forest Service consulted with the following three persons outside the Agency, to obtain their views on this information collection.

Randy Pogue randy.pogue@arkansas.govKent Priest Donald.Priest@forestry.alabama.gov

Darlene Bolser Darlene.bolser@oda.state.ok.us

Respondents all agreed that FEPMIS is easily accessible, they prefer to do data entry daily rather than weekly or monthly and the feel FEPMIS has made the management of FEPP property easier and more convenient than mailing or faxing documents. They feel that the inventory procedures provide clear information for them. They all concur that FEPMIS is necessary for the States' use.

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

There will not be any payment or gift to respondents

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

The database is User Id and Password protected. Information collected is not available to the public unless requested through the Forest Service, Washington Office/Regional/Area program managers. Records are of property information only and User Id set up does not require any information of personal or sensitive nature. Contact information for respondents is listed as work numbers and work e-mail addresses.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

None of the examples of information listed above will be collected in FEPMIS.

- 12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.
  - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.
    - a) Description of the collection activity
    - b) Corresponding form number (if applicable)
    - c) Number of respondents
    - d) Number of responses annually per respondent,
    - e) Total annual responses (columns c x d)
    - f) Estimated hours per response
    - g) Total annual burden hours (columns e x f)

Table 1 - Response Burden

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Data Entry – Transfer, Report of Excess, Report of lost/stolen/damaged equipment/ internal transfer	FEPMIS	100	54	5400	.10	540

- Record keeping burden should be addressed separately and should include columns for:
  - a) Description of record keeping activity:
  - b) Number of record keepers:
  - c) Annual hours per record keeper:
  - d) Total annual record keeping hours (columns b x c):

There are no requirements for record keeping.

• Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Table 3 - Estimated Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents	
Response	540	\$ 10.26	\$ 5,540.40	
Totals			\$ 5,540.40	

According to the Bureau of Labor statistical data for July 2011, found at <a href="http://www.bls.gov/news.release/pdf/realer.pdf">http://www.bls.gov/news.release/pdf/realer.pdf</a>. The average hourly salary for a general worker is \$10.26, which was used as the positions doing the data entry best fit into that category.

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (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) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital operation and maintenance costs.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

Employee labor and materials for developing, printing, storing forms

Employee labor and materials for developing computer systems, screens, or reports to support the collection

**Employee travel costs** 

Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information

Employee labor and materials for collecting the information

Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

Table 4 - Estimated Annual Cost to the Government

ACTION ITEM	PERSONNEL	GS/Step	HOURLY RATE*	HOURS	Cost to the Govt.
Employee Labor – Development of system/screens; collection of information; analyzing, evaluating, summarizing, and reporting; and, meetings, web design, conduct training, technical assistance, program reviews, and managing programs.	Program Manager	(1) GS-14/2	\$54.52	2080	\$113,401.60
Employee Labor – Collection of information;	9 Property	(1) GS 12/1	\$37.54	2,080	\$ 78,083.20
analyzing, evaluating, summarizing, and reporting; and, program reviews and	Management Officers	(3) GS 12/2	38.79	2,550	98,914.50
technical assistance		(4) GS 12/3	40.05	1,550	62,077.50
		(1) GS 13/7	53.57	1,600	85,712.00
Employee Labor – Collection of information;	9 Property Technicians	(2) GS 7/3	\$ 22.58	1,800	\$ 40,644.00
analyzing, evaluating, summarizing, and reporting; and, program reviews and		(1) GS 7/10	27.52	2,080	57,241.60
technical assistance		(2) GS 9/3	27.61	2,880	79,516.80
		(1) GS 9/6	30.20	350	10,570.00
		(1) GS 11/2	32.37	200	6,474.00
		(1) GS 11/5	35.50	2,080	73,840.00
		(1) GS 11/6	36.54	2,080	76,003.20
Office Supplies (paper, file cabinet, fax machine)					\$ 5,000.00

ACTION ITEM	PERSONNEL	GS/Step	HOURLY RATE*	HOURS	Cost to the Govt.
Travel Costs					\$ 57,000
Total Annual Cost to the Government					\$ 844,478.40

<sup>\*</sup> Taken from: <a href="http://www.opm.gov/oca/11tables/index.asp">http://www.opm.gov/oca/11tables/index.asp</a> - Cost to Government calculated as hourly wage multiplied by 1.3; Salary Table 2011-GS used, no locality pay incorporated into calculations, as listed positions are located throughout the United States. Assumption made that the 30 percent margin for other salary costs includes any increases in base pay due to locality differential.

#### 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.

There has been a significant reduction in burden. Now that the full implementation and testing of the FEPMIS system is complete, all record keeping requirements are now done electronically in the FEPMIS database. The previous burden for record retention of 6,525 hours, at a cost to respondents of \$111,698, has been removed from the requirements.

Due to the reported average hourly salary for a general worker has declined since the original request for this collection of information, the cost to respondents for reporting has dropped from \$8,537 to \$5,540.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Results will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Agency plans on displaying expiration date on initial data entry screen.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

No exceptions needed.

#### **B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.