

December 14, 2011

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

**OMB Control Number: 1660 - New**

**Title: State Preparedness Report (SPR)**

**Form Number(s): None**

### **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.**

The *Post Katrina Emergency Management Reform Act of 2006 (PKEMRA)*, and as amended by the *Implementing Recommendations of the 9/11 Commission Act of 2007*, established an annual requirement for a State Preparedness Report (SPR). The SPR's contents are submitted 15 months after the date of enactment of the PKEMRA, and annually thereafter. A State receiving Federal preparedness assistance administered by the Department shall submit a report to the Administrator on the State's level of preparedness. Each report shall include an assessment of current capability levels and a description of target capability levels. Each report shall also include a discussion of the extent to which target capabilities identified in the applicable State homeland security plan and other applicable plans are unmet, and an assessment of resources needed to meet the preparedness priorities established under PKEMRA Section 646(e), including: (i) an estimate of the amount of expenditures required to attain the preparedness priorities; and

(ii) the extent to which the use of Federal assistance during the preceding fiscal year achieved the preparedness priorities.

This collection is currently authorized under OMB number 1660-0087, which is a combination of two data sets, the SPR and a NIMS compliance survey (NIMSCAST). Over time, the users for these two collections have become distinct with little to no overlap. As a result, separation of the SPR as its own collection will reduce burden and confusion for NIMSCAST users.

**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 nature of the information is a self-assessment of disaster preparedness, performed by each state and territory. The source of the information will be determined by each survey respondent, but will typically involve the subject matter expertise of emergency management personnel and other homeland security personnel.

This collection will be used to streamline and standardize information for submission, and meets public law requirements. The information will primarily be used to respond to the congressional mandate for the Federal Emergency Management Agency (FEMA) to conduct nationwide assessments of emergency preparedness in the form of the State Preparedness Report (SPR).

The information will be shared throughout FEMA, to inform other programs that rely on preparedness assessments to chart strategic direction. Two possible examples include the National Exercise Directorate, to draft a national exercise plan that addresses exercise deficiencies, and the Grant Programs Directorate, to conduct analyses on the alignment of grant funds to documented shortfalls.

Preparedness assessments obtained through the SPR information collection will be used to develop the first National Preparedness Report based on the National Preparedness Goal, as required by *Presidential Policy Directive 8: National Preparedness* (PPD-8). This report will be an all-of-Nation assessment of preparedness, including States' current capability levels and capability targets are accurately represented.

Most importantly, this information will allow states and local jurisdictions to effectively manage and track their emergency preparedness portfolio themselves. This includes support for drafting homeland security strategies and justification of grant and budget expenditures.

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overlap. As a result, separation of the SPR as its own collection will reduce burden and confusion for NIMSCAST users.

**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.**

This collection is a web-based survey that will be combined with the National Incident Management System Compliance Assessment Support Tool (NIMSCAST) on a single portal (with a single login) to reduce burden. Information collected using the SPR is electronically submitted to FEMA. Additionally, the tool provides states with the administrative option to create additional users throughout the state for the purposes of collecting subject matter input.

As the website for the SPR is currently under development, the URL at which it can be accessed has not yet been determined. For information on where to access the SPR, and on how to obtain a login (which is required to access the SPR), contact Everett Yuille, Management and Program Analyst, FEMA National Preparedness Assessments Division, 202-786-9457.

**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.**

In 2010, FEMA convened a Reporting Requirements Working Group (RRWG), to conduct an exhaustive accounting of all information required of outside sources, including state and local jurisdictions. The findings of the RRGW indicated that the information gained through this collection represents the sole source of state preparedness data that is necessary to answer the *PKEMRA* mandate and to authorize the State Preparedness Report. Therefore, this information 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.**

FEMA would be unable to meet the *PKEMRA*-mandated requirement to produce the State Preparedness Report without this collection of information. Other FEMA programs

that rely on preparedness assessments to chart strategic direction would lose the understanding of the states' and territories' current level of preparedness.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

- (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.**

**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 45-day emergency approved Federal Register Notice inviting public comments was published on September 22, 2011, Volume 76, Number 184, page 58818. There were no comments received for this information collection. See attached copy of the published notice included in this package. FEMA plans to follow this emergency request with the normal OMB process November 1, 2011.

**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.**

FEMA conducted a workshop with all respondents to discuss the specific design of the SPR. As a result of the workshop the response time and cost burden were reduced and there was a 20% improvement in the clarity of the reports, and a improved alignment of the SPRA data collection.

**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.**

FEMA conducted numerous site visits to State governments throughout the Nation to discuss this collection and to solicit input for ways to improve the survey while reducing burden. The findings from these visits were used to craft the agenda for a national workshop of State governments, with open invitation to all respondents. This workshop further discussed the collection and specific design considerations. The details of this collection (format, methodology) were built directly from the input of the respondents themselves.

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

There is no offer of monetary or material value for this information collection.

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

A Privacy Impact Assessment, subject Web Portals, was approved by the Department of Homeland Security on June 15, 2009 for this collection of information. The PIA is used to collection user ID and password information as an entry point to the State preparedness Report Survey. A System Of Records notice was also published on September 29, 2011, Volume 74, Number 187, page 49882

**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.

**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.**

This collection is expected to be completed by 56 States and territories monthly. The hour burden per response is 66 hours. Each respondent will complete the tool once annually therefore; 56 States and territories x 1 = 56 responses. The total burden hours is estimated to be 56 responses x 66 hours per response = 3,696 annual 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 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
State or	State	56	1	56	66	3,696	\$44.35	\$176,035

territory government	Preparedness Report Survey / No Form Number							
<b>Total</b>		<b>56</b>		<b>56</b>		<b>3,696</b>		<b>\$176,035</b>

- 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

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 and local government workers, management occupations, level 9” is estimated to be \$44.35 per hour, *including the wage rate multiplier*, therefore, the estimated burden hour cost to respondents (State and local government workers, management occupations, level 9) is estimated to be \$176,035 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.

**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.

**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 (\$)
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Contract Costs [Contract Personnel to provide operations and maintenance of SPR collection instrument]	\$332,000
Staff Salaries* [1 of GS 14 employees spending approximately 100% of time annually supporting the collection and analysis for this data collection]	\$96,572
Facilities [cost for renting, overhead, etc. for data collection activity]	\$200,000
Computer Hardware and Software [cost of equipment annual lifecycle]	\$500,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$500,000
Travel	\$110,000
Printing [number of data collection instruments annually]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Other	\$0
<b>Total</b>	<b>\$1,656,572</b>

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

Contractors are used to assist with the development of the web-based collection instrument that is used to collect the information. Contractors are also used to analyze the data collected by the system and to develop summary reports. The survey will be developed under the FEMA EADIS contract. While most training will be provided via web-based methods, some travel will be required to train personnel on the survey tool and to provide ad hoc technical assistance.

**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

State Preparedness Report Survey	4,648	3,696	-952			
<b>Total(s)</b>	<b>4,648</b>	<b>3,696</b>	<b>-952</b>			

***Explanation:***

A total of -4,648 burden hours have been previously approved under OMB No. 1660-0087, PrepCAST for the SPR. The SPR collection is being removed from the previously approved collection, because the users of the SPR have over time grown distinct from the users of the NIMSCAST. The separation of the SPR as its own collection has also been modified to decrease burden by -952 hours. As a result of the reduction in the SPR burden a 20% improvement in the clarity of the reports, and an improved alignment of SPR data collection with States' existing processes for grants applications and grants management.

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
State Preparedness Report Survey – burden costs	\$186,106	\$176,035	-\$10,071.			
<b>Total(s)</b>	<b>\$186,106</b>	<b>\$1,832,607</b>	<b>-\$10,071.</b>			

***Explanation:***

The reduction in wage rate (including the wage rate multiplier) used in determining the burden costs of the State Preparedness Report has increased by \$4.31 per hour since the last Information Collection Request in 2009 for SPR approved under OMB No. 1660-0087, PrepCAST. This increase is in accordance with the BLS website, and represents inflation increases. However due to the decrease in hours per response (-17 hours), the annual wage rate as also decreased by -\$10,071.

**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.**

There are no outline plans for tabulation and publication of data 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.**

This collection does not seek approval to not display the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19  
“Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

Statistical survey methodology is not applicable.

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

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS  
COLLECTION