

January 22, 2013

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0098

Title: Citizen Corps Council Registration

Form Number(s): FEMA Form 646-0-10ONL

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.

Executive Order 13254 (CFR 67, No. 22, p. 4869) provides for the collection of this information. Specifically, Citizen Corps was launched as a Presidential Initiative, Executive Order 13254, on January 29, 2002 with a mission to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds.

In order to fulfill its mission, the Federal Emergency Management Agency (FEMA) Individual and Community Preparedness Division (ICPD) will collect information from Citizen Corps Councils and Community Emergency Response Teams through the Citizen Corps Council online registration form. The Citizen Corps Council registration form will allow FEMA and State personnel to ensure that prospective Councils/Community

Emergency Response Team (CERTs) have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council, and will provide an efficient way to track the effectiveness of the nationwide network of Councils and CERTs.

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 Citizen Corps Council registration form is available on-line at <http://www.citizencorps.gov>. FEMA and State personnel use this process to ensure that prospective Councils/CERTs have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council, and will provide an efficient way to track the effectiveness of the nationwide network of Councils and CERTs. These Councils will allow Citizen Corps to fulfill its mission of making communities safer by regularizing and coordinating activities between Citizen Corps and community groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues.

FEMA Form 646-0-10ONL, Citizen Corps Council Registration allows Citizen Corps Councils and CERT Programs to describe their mission, collaborative structure and activities supporting community resilience. Data collected indicates, at a national, regional and state level how local grassroots programs are helping to prepare communities and individuals. This information is required to link members of the public who are interested in getting prepared with organizations in their community that can help. This information is also required to report on the status of programs and their progress.

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.

Requested information will be submitted through an electronic registration page at <http://www.citizencorps.gov>. This is a 100% electronic collection.

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 information that Citizen Corps would collect is not available elsewhere. The Citizen Corps/CERT registration collects information unique to the Citizen Corps programmatic

mission of government collaboration with community leaders in emergency preparedness, response, and recovery planning, education, training, exercises, and volunteer programs. Because the Citizen Corps Council / CERT points of contact are uniquely assigned by jurisdiction, there is no other source for this information.

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.

Without the collection of information as requested, FEMA responsibilities to support community preparedness and resilience would be greatly compromised. This registration process provides critical information to measure the nation's progress on community preparedness, allows communication to occur directly with dedicated state and local leaders/points of contact, and gives FEMA essential feedback on local activities and needed technical assistance.

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.

FEMA/ICPD will collect information when a state, local, or tribal group seeks recognition as a Citizen Corps Council/CERT and twice annually thereafter.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

FEMA/ICPD is not 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.

FEMA/ICPD is requesting one copy of all documents.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

FEMA/ICPD is not 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.
No statistical surveys are requested.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

FEMA/ICPD is not 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.

FEMA/ICPD is not requiring a pledge of confidentiality that is not supported by authority established in statute or regulation.

(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.

FEMA/ICPD is not requiring respondents to submit proprietary trade secret, or other confidential information.

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 September 13, 2012, 77 FR 56663. 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 December 13, 2012, 77 FR 74199. 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.

Respondents (State and local government and non-governmental organizations) consult with FEMA/ICPD regularly to present feedback on the information collection process and data required for submission. Recommendations to clarify information fields and streamline the process were accepted and updates are made on an annual basis. Paid contract support (for ICPD Teracore Inc. provides program and office support and services) provides technical guidance, supports analysis of data and collects feedback in order to provide ICPD with recommendations for data collection enhancements.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Director of FEMA's Individual and Community Preparedness Division routinely speaks with Citizen Corps and CERT points of contact from all 56 states and territories during an in-person roundtable session occurring once a year. The Director also hosts conference calls, webinars and receives emails concerning the enhancements to the registration process for Citizen Corps Councils and CERTs. Recommendations to clarify information fields and streamline the process were accepted and updates are made on an annual basis. A majority of technical errors and glitches are addressed immediately and tracked in case of future re-occurrence.

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, other than remuneration of contractors or grantees.

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 completed by FEMA and adjudicated by the DHS Privacy Office on December 18, 2012. The final results of the PTA have been adjudicated as a privacy sensitive system. A Privacy Act Statement is required and is displayed on FEMA Form 646-0-10ONL.

It is recommended that a new Privacy Impact Assessment (PIA) be conducted, which FEMA is currently working on. The Information Technology (IT) system used in this collection is covered by an existing SORN (DHS/FEMA-006 - Citizen Corps Database,

73 Fed. Reg. 77785, December 19, 2008) that will be updated as part of the biennial review process.

There are no assurances of confidentiality provided to the respondents for this information collection.

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 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.

FEMA/ICPD anticipates two responses per year from approximately 1350 Citizen Corps Councils/ Local Citizen Corps Program Managers, and 2400 CERT programs/ CERT Program Managers. It is estimated that the registration form can be completed within one hour, resulting in an annual hourly burden of 7500 hours total. See Table A.12.

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, local or Tribal Government	Citizen Corps Council Registration / FEMA Form 646-0-10ONL	3,750	2	7,500	1 hour	7,500	\$25.90	\$194,250.00
Total		3,750		7,500		7,500		\$194,250.00

- Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Office and Administrative Support Occupations is estimated to be \$16.40 per hour, and \$25.90 at the fully loaded wage rate, therefore, the estimated burden hour cost to Citizen Corps / CERT respondents is estimated to be \$194,250.00 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:

- 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.**
- 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

Item	Cost (\$)
Contract Costs General IT O&M already covered under ongoing contract	\$360,000
Staff Salaries* 1 GS 9 (\$51,600 salary) employees spending approximately 15 % (\$7740 x 1.4 benefits = \$10,800) of time annually to review and follow up on submissions for this data collection and 1 GS 13 (\$89,000) (at 5% \$4450 x 1.4 benefits = \$6230) to oversee process	\$17,030
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$377,030

* 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
Citizen Corps Council Registration / FEMA Form 646-0-10ONL				11,518	7,500	-4,018
Total(s)				11,518	7,500	-4,018

Explain:

There was a decrease in the number of Citizen Corps Councils and CERT Programs since the 2009 OMB approval for this collection. Currently there are approximately 3,300 Councils and CERTs (with a growth rate of 100 per year for Councils and 300 per year for CERTs) that will update their information in the Citizen Corps Council registration. It is likely that a decrease in programs occurred due to program and staff turn-over and a decrease in available federal grant funding.

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
Citizen Corps Council Registration / FEMA Form 646-0-10ONL				\$258,003.20	0	-\$258,003.20
Total(s)				\$258,003.20	0	-\$258,003.20

Explain:

The cost of \$0 is a correction from the previous approval. The way cost is reported in this table is now changed as it comes from question 13 chart which has values of zero. Therefore negative costs are now reflected to account for a change in how cost was previously recorded.

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.

Data is collected twice a year from respondents. FEMA/ICPD will export data once a year, likely in September, for a national report published in spring of the following

calendar year. Data is imported into an analysis tool, and analyzed to present national level annual findings in key mission areas and a report on the progress of Citizen Corps Councils and CERT programs from the previous year.

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 collection.