

November 6, 2013

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

**OMB Control Number: 1660 – NW78**

**Title: Staffing for Adequate Fire and Emergency Response (General Questions All Applicants)**

**Form Number(s): FEMA Form 080-0-4**, Staffing for Adequate Fire and Emergency Response (General Questions All Applicants); **FEMA Form 080-0-4a**, Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative); **FEMA Form 080-0-4b**, Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)

### **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.**

Information sought under this submission will comprise the applications for the Staffing for Adequate Fire and Emergency Response (SAFER) grants. The authorizing legislation allows FEMA to fund fire department activities in as many as two different areas. The authority for Staffing for Adequate Fire and Emergency Response (SAFER) is derived from 15 U.S.C. 2229a et seq. The information collected is grant application information

which is necessary to assess the needs of the applicants as well as the benefits to be obtained from the use of funds. The information collected through the program's application is the minimum necessary to evaluate grant applications and is necessary for FEMA to comply with mandates delineated in the law. SAFER applications were previously collected under ICR No. 1660-0054. It is now necessary for SAFER to have its own, new collection in order to differentiate it from other grant programs.

**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 uses this information to ensure that FEMA's responsibilities under the legislation can be fulfilled, accurately and efficiently. The information will also be used to objectively evaluate each of the anticipated applicants to determine which of the applicants' proposals in each of the activities are the closest to the established program priorities.

The SAFER program provides funding for the hiring of new firefighters and the recruitment and retention of volunteer firefighters. The SAFER objective is to provide funding directly to fire departments for the purpose of increasing the number of firefighters to help communities meet industry minimum standards and attain 24-hour staffing to provide adequate protection from fire and fire-related hazards, and to fulfill traditional missions of fire departments that antedate the creation of the FEMA grant funds are available in two activities: Hiring Firefighters and Recruitment and Retention of Volunteer Firefighters.

### **Staffing for Adequate Fire and Emergency Response (SAFER) Grants**

**FEMA Form 080-0-4 Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants)** – This form is used to obtain general information regarding the applicant such as name, address, banking information, contact information, and type of organization. It also includes questions regarding the general characteristics of the applicant's community such as zoning and population protected. Finally, it obtains information regarding the staffing levels and needs of the applicant, the number of firefighters, both full and part-time, and the number and types of incidents the department responds to.

**FEMA Form 080-0-4a, Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative)** – This form obtains information from the applicant regarding their staffing status, their current response rates, their projected response rates if awarded as well as the staffing level on their first-out engine. Applicants also provide a narrative with detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, the policies and practices of the applicant regarding

minority recruitment, the applicants ability to maintain the staffing hired by the grant and the applicant's policies and practices regarding their allowance of their paid members to volunteer as a firefighter in other jurisdiction during their days off.

**FEMA Form 080-0-4b, Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)** – This form obtains information from the applicant regarding their current staffing levels, the turnover in volunteers, their success in recruiting new volunteers, their ideal staffing levels, and their projected results if awarded. The second part is the narrative where the applicant provides detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, and the policies and practices of the applicant regarding minority recruitment.

**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 information is collected via a web-based application through the FEMA Integrated Security and Access Control System, for these grant programs. Paper forms are available in the event an applicant cannot submit their information through the FEMA AFG web application, but any eligible applications submitted in paper, will be converted into the electronic format in order to be consistent in the evaluation process. Instructions and guidance on how to complete these forms can be found on the FEMA website at <http://www.firegrantsupport.com/afg/guidance/> and applications can be accessed on the following FEMA website <https://portal.fema.gov/famsVuWeb/home>.

**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 U.S. Fire Administration has an incident reporting system that is used to compile fire-related statistics. The system is called National Fire Incident Reporting System (NFIRS), is approved under OMB No.1660-0069 and participation in it is completely voluntary. The NFIRS is a fire incident collection instrument and does not involve a fire department's fiscal concerns or operational needs; therefore, there is little information that would overlap our collection which is primarily financially and operationally based. NFIRS, based on its voluntary nature, is not an accurate accounting of all of the functions performed on a yearly basis by a grant applicant. Due to this incomplete data, basing a grant application on the information available in the NFIRS would incorrectly restrict awards to deserving respondents. But, to the extent possible, the information in NFIRS will be used for those applicants that have participated in the past in lieu of requiring those applicants to resubmit the same 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.**

If the information collection is not conducted, there would be no basis under which the applications for assistance could be evaluated, thus funds available for the programs' purposes cannot be awarded and the benefits of the activities associated with each of the grant purposes would not be achieved. The information is also necessary to assess the financial needs of the applicants as well as the projected benefits obtained from the use of the grant funds.

**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 7(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 60 day Federal Register Notice, inviting public comments, was published on July 9, 2013, volume 78, number 131, Page 41072. There were no comments received for this collection of information.

A 30 day Federal Register Notice, inviting public comments, was published on September 24, 2013, volume 78, number 185, Page 58549. There were no comments received for this collection of information.

**(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 consults on a regular basis with a panel of subject matter experts from national and international fire service organizations. It is FEMA's intention to have each application evaluated to determine which applications are most consistent with the SAFER Grant funding priorities. The initial scores are combined later with the scores of the applications after they receive peer review evaluations by a panel of subject-matter experts. The experts are representatives from the nine major fire service organizations that are nominated by their respective organizations to provide advice and recommendations regarding the implementation of the SAFER grant program. The nine organizations are:

- Congressional Fire Services Institute (CFSI);
- International Association of Arson Investigators (IAAI);
- International Association of Fire Chiefs (IAFC);
- International Association of Firefighters (IAFF);
- International Society of Fire Service Instructors (ISFSI);
- National Association of State Fire Marshals (NASFM);
- National Fire Protection Association (NFPA);
- National Volunteer Fire Council (NVFC); and
- North American Fire Training Directors (NAFTD).

**(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.**

Annually FEMA consults the panel reviewers concerning the relevance of the information collected versus the burden of collecting the information for submission. The peer reviewers are made up of applicants, grant writers, and other interested parties who are extensively involved with the fire service.

**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.**

PTA was submitted to the DHS Privacy Office on April 23, 2013.

**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. 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.**

*The AFG program office conducted a survey in 2013 to determine a more accurate burden rate for each collection included in this request. The information provided below incorporates the results of that survey.*

*The Staffing for Adequate Fire and Emergency Response (SAFER) has three components. There is the SAFER general questionnaire (FEMA Form 080-4), the Hiring of Firefighters questionnaire (FEMA Form 080-4a), and the Recruitment and Retention of Volunteer Firefighters questionnaire (FEMA Form 080-4b). For a complete application submission either the Hiring of Firefighters questionnaire or the Recruitment and Retention of Volunteer Firefighters questionnaire are required with the SAFER general questionnaire.*

**FEMA Form 080-0-4** – It has been estimated to take fire departments of state, local, or tribal governments an average of 9 hours to gather the information and complete the SAFER general questionnaire required for all applicants. It has been estimated to take nonprofit organizations an average of 2 hours to gather the information and complete the SAFER general questionnaire because some of the questions are not applicable to nonprofit organizations. It has been estimated that 1,570 local fire departments and 30 Not-for-profit institutions will submit one application, for a total of 1,600 respondents. Each respondent will complete one SAFER general questionnaire annually. The total estimated number of burden hours for fire departments is 14,130. The total estimated number of burden hours for nonprofit institutions is 60. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

**FEMA Form 080-0-4a** – It has been estimated to take fire departments of state, local, or tribal governments an average of 7.5 hours to complete the SAFER hiring of firefighters questionnaire. Approximately 1,000 Local fire departments will submit one questionnaire annually. The total estimated number of burden hours for nonprofit institutions is 7,500. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

**FEMA Form 080-0-4b** – It has been estimated to take nonprofit institutions an average of 7.5 hours to complete the SAFER recruitment and retention of volunteer firefighters questionnaire. Approximately 570 local fire departments and 30 Not-for-profit institutions will submit one questionnaire annually for a total of 600 respondents. The total estimated number of burden hours for fire departments is 4,275. The total estimated number of burden hours for nonprofit institutions is 225. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

**(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.**

Annual Hour Burden

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name/ Form Number	No. of Respondents	No. of Response per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State, Local, or Tribal Government	FF 080-0-4 Staffing for Adequate Fire and Emergency Response (General Questions All Applicants)	1,570	1	9.0	14,130	\$48.47	\$76,098.
Not-for-Profit Institutions	FF 080-0-4 Staffing for Adequate Fire and Emergency Response (General Questions All Applicants)	30	1	2.0	60	\$46.31	\$1,389.
State, Local, or Tribal Government	FF 080-0-4a Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative)	1,000	1	7.5	7,500	\$48.47	\$48,470.
State, Local, or Tribal Government	FF 080-0-4b Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)	570	1	7.5	4,275	\$48.47	\$27,628.
Not-for-Profit Institutions	FF 080-0-4b Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)	30	1	7.5	225	\$46.31	\$1,389.
		<b>3,200</b>			<b>26,190</b>		<b>\$154,974.</b>

\* 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](http://www.bls.gov)) the wage rate category for 1<sup>st</sup> Line Supervisor/Manager Firefighting and Prevention Worker is estimated to be \$48.47 per hour. The 1<sup>st</sup> Line Supervisor/Manager

Firefighting and Prevention Work is likely to be the positions of the state, local or tribal government respondent. The wage rate category for Environmental Scientists and Specialists is estimated to be \$46.31 per hour. The Environmental Scientists and Specialist is likely to be the position of the nonprofit institution respondent. These wage rates have been multiplied by 1.4 to determine the average hourly wage rate for the respondents for this request. The estimated burden hour cost to respondents is estimated to \$154,974 annually, when you multiply the average hourly wage rate by 26,190 total annual burden hours.

**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 record keeping, 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 (\$)
Contract Costs [Systems Engineering and Technical Assistance (SETA) Contract Costs. Information Systems Security Officer – The contractor is responsible for providing IT related services as it relates to the Certification and Accreditation (C&A), Plan of Actions and Milestones (POA&Ms), and security of the Assistance to Firefighters Grants System (AFG). Operations and Maintenance of the AFG supported by the IBM EADIS Contract Customer Service, Technical Assistance, Systems Access, Enterprise Operations Service, System Testing, and overhead]	\$1,566,129.00

Staff Salaries* [two hours per day of the Project Officer's time calculated at the GS-14 level, 49.22 per hour x 2 hrs. per day = 49.22 x 2 x 5 days a week x 52 weeks = 25,594.40 ]	\$25,594.40
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	
<b>Total</b>	<b>\$ 1,591,723.40</b>

\* 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
SAFER FEMA Form 080-0-4 (Local)	0	14,130	+14,130			
SAFER FEMA Form 080-4 (Not for Profit)	0	60	+60			
SAFER FEMA Form 080-0-4a (Local)	0	7,500	+7,500			
SAFER FEMA Form 080-0-4b (Local)	0	4,275	+4,275			
SAFER FEMA Form	0	225	+225			

080-0-4b (Not for Profit)						
		26,190	+26,190			

**Explain:**

There is a burden hour increase of 26,190 due to the separation of SAFER grant program collection from the AFG collection. These forms were previously assigned to as form number FF 080-7, FF 080-8, and FF 080-10. The FEMA form 080-7 was changed to 080-0-4. The FEMA form 080-8 has been changed to 080-0-4a. The FEMA form 080-10 has been changed to 080-0-4b.

This separation was necessary due to the fact that SAFER and AFG are authorized separately, and therefore have separate appropriations and are not contingent upon one another. Therefore, the AFG Grant Program could receive an appropriation while the SAFER Grant Program may not.

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
SAFER FEMA Form 080-0-4 (Local)	0	\$76,098.	+\$76,098.			
SAFER FEMA Form 080-0-4 (Not for Profit)	0	\$1,389	+\$1,389.			
SAFER FEMA Form 080-0-4a (Local)	0	\$48,470.	+\$48,470.			
SAFER FEMA Form 080-0-4b (Local)	0	\$27,628	+\$27,628.			
SAFER FEMA Form 080-0-4b (Not for Profit)	0	\$1,389.	+\$1,389.			
		<b>\$154,974.</b>	<b>+\$154,974.</b>			

**Explain:**

There is a burden cost increase of \$154,974. due to the separation of SAFER grant program collection from the AFG collection. These forms were previously assigned to as form number FF 080-7, FF 080-8, and FF 080-10. The FEMA form 080-7 was changed to 080-0-4. The FEMA form 080-8 has been changed to 080-0-4a. The FEMA form 080-10 has been changed to 080-0-4b.

This separation was necessary due to the fact that SAFER and AFG are authorized separately, and therefore have separate appropriations and are not contingent upon one another. Therefore, the AFG Grant Program could receive an appropriation while the SAFER Grant Program may not.

**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.**

This information collection will not be published for statistical purposes.

**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.**

There is no statistical survey methodology in this grant application, and no Part B is included.