April 28, 2014

Supporting Statement for
Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0126

Title: FEMA Preparedness Grants: Emergency Management Performance Grant (EMPG)

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 Emergency Management Performance Grants (EMPG) assists state and local governments in enhancing and sustaining all-hazards emergency management capabilities. EMPG helps facilitate a national and regional all-hazards approach to emergency response, including the development of a comprehensive program of planning, training, and exercises that provides a foundation for effective and consistent response to any threatened or actual disaster or emergency, regardless of the cause.

Section 662 of the *Post-Katrina Emergency Management Reform Act of 2006* (6 U.S.C. §762), as amended by Section 201(b), Title II of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (P.L. 110-053), empowers the FEMA Administrator to continue implementation of an emergency management performance grants program to make grants to States to assist State, local, and tribal governments in preparing for all hazards.

Authorizing Language:
National Flood Insurance Act of 1968 (42 U.S.C. 4001 et seq.); *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (42 U.S.C. 5121 et seq.); *Earthquake Hazards Reduction Act of 1977* (42 U.S.C. 7701 et seq.); Reorganization Plan No. 3 of 1978 (5 U.S.C. App.); and, Section 662 of the *Post-Katrina Emergency Management Reform Act of 2006* (PKEMRA), Public Law 109-295, as amended, (6 U.S.C. § 762).

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.

EMPG Work Plan – This narrative document provides details, timeline, and milestones on proposed projects. The narrative must demonstrate how proposed projects address gaps, deficiencies, and capabilities in current programs and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. All EMPG applicants must submit a Work Plan that outlines the State's emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, proposed for the FY 2013 EMPG Program period of performance. In addition, the Work Plan must include a detailed budget-build (within the Budget Narrative section) that enumerates all expenses associated with project execution; including management and administration costs. The instructions for the EMPG Work Plan can be found in the EMPG Funding Opportunity Announcement.

Biannual Strategy Implementation Report (BSIR) **–** The SAA/Direct Tribal Grantee (DTG) is responsible for providing FEMA with BSIR reports to account for grant funding. The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR); and January 30 for the reporting period of July 1 through December 31 for the life of the award. A close-out BSIR is due 120 days after the end date of the award period. The submission of a completed BSIR satisfies programmatic reporting requirements as outlined in the grant program guidance to ensure legal and prudent use of federal funds. All funds provided to the SAA through these grant programs must be accounted for and linked to one or more projects. This, in turn, must support specific goals and objectives in the State Homeland Security Strategy and where appropriate, the Urban Area Homeland Security Strategy, and Regional Transit Security Strategy, as detailed in the special conditions of the grant award. The BSIR data is submitted electronically in a FEMA-sponsored system, the

Grants Reporting Tool (GRT). This collection activity is approved under OMB Control Number 1660-0117, which expires 11/30/2013.

State Preparedness Report (SPR) Submittal Section 652(c) of the Post-Katrina Emergency Management Reform Act of 2006 (Public Law 109-295), 6 U.S.C. §752(c), requires any State that receives Federal preparedness assistance to submit an SPR to FEMA. States submitted their most recent SPRs in December 2012 thus satisfying this requirement to receive funding under the FY 2013 EMPG Program. This collection activity is approved under OMB Control Number 1660-0131, which expires 8/31/2015.

Note: The Semiannual Progress Report, formerly known as the Categorical Assistance Progress Report (CAPR) tool is no longer used and since has been removed from this collection to reduce the redundancy in reporting. The burden for this tool was previously captured under OMB Collection 1121-0243.

Quarterly Performance Progress Reports (SF-PPR) EMPG Program Quarterly Performance Progress Reports must be submitted to the Regional Program Manager located at the FEMA regional office on a quarterly basis through the ND Grants system. This collection activity is approved under OMB Control Number 1660-0025, which expires on 11/30/2013. The Quarterly Performance Progress Reports must be based on the approved EMPG Program Work Plan and are due no later than 30 days after the end of the quarter, i.e., on January 31, April 30, July 31 and October 31. The Quarterly Performance Progress Report must be completed using the cover page of the SF-PPR (OMB Control Number: 0970-0334), available at http://www.na.fs.fed.us/fap/SF-PPR_Cover%20Sheet.pdf. Grantees are required to report quarterly on progress towards completing activities and projects approved in their Work Plans as well as progress made towards implementing performance measures as described in the Funding Opportunity Announcement Appendix B – FY 2013 EMPG Program Priorities.

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 EMPG Work Plan is completed in Microsoft Word. Grant applicants must submit their work plan as an attachment to the SF-424 (Application for Federal Assistance – Mandatory) when applying for the EMPG via www.grants.gov. Eligible applicants must apply for funding through this portal accessible on the internet.

Additionally, grant applicants must use the FEMA-sponsored Grants Reporting Tool (GRT) to submit data for their EMPG Biannual Strategy Implementation Report (BSIR) to report on funds awarded. The GRT provides grantees the ability to electronically create and submit their BSIRs throughout the life of the grant. The GRT homepage is (https://www.reporting.odp.dhs.gov/). The GRT is used to capture FEMA's annual award and biannual grant reporting data. The Department developed the GRT as a tool to streamline the reporting process for grantees. The module is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

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 FEMA could not request and obtain this information, FEMA could not exercise comprehensive financial and programmatic management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

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.

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

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

There are no requirements for respondents to prepare a written response to this 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.

There are no requirements for a respondent 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.

Records must be retained for three years after close-out. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period.

(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.

There is no statistical survey involved with this data collection.

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

There is no use for statistical data classification in this data collection.

(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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(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.

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this data collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on August 19, 2013, 78 FR 50432. 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 12, 2013, 78 FR 75574. 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.

FEMA meets with both the National Emergency Management Association (NEMA) and the International Association of Emergency Managers (IAEM) national associations that represent these entities, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. During the grant guidance development process in past years, FEMA meets and consults directly with grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements.

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 consults on a regular basis with Federal, State, local, tribal stakeholders on a variety of issues. In particular, on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements that FEMA uses.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on December 16, 2013.

The Privacy Impact Assessment (PIA) is covered under the DHS/FEMA/PIA-013 - Grant Management Programs, approved by DHS on July 14, 2009 and the existing System of Records Notice (SORN), is DHS/FEMA-004 Grant Management Information Files 74 FR 39705 approved by DHS on August 7, 2009.

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.

The Emergency Management Performance Grants (EMPG) is an existing grant program that uses the forms outlined in this collection. EMPG assists state and local governments in enhancing and sustaining all-hazards emergency management capabilities. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden to collect the necessary information is estimated to be 174 total 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 Respon-dents**	**No. of Respon-ses per Respon-dent**	**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	EMPG Work Plan	58	1	58	3 hrs.	174	$32.20	$5,603.00
Total		**58**		**58**		**174**		**$5,603.00**

- 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 State Representatives is estimated to be $23.00 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents State Representatives is estimated to be $5,603.00 annually.

The Standard Forms listed in the table below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF). Other data collection activities approved by OMB are also identified in the table below.

Type of Respondent	Form Name / Form Number	No. of Respon-dents	No. of Respon-ses per Respon-dent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
Emergency Management Performance Grants (EMPG) (97.042)								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	58	1	58	0.75	44	$32.20	$1,400.70
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A	58	1	58	3	174	$32.20	$5,602.80
State, Local or Tribal Government	Assurances - Non-Construction Programs / SF 424B	58	1	58	0.25	15	$32.20	$466.90
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	58	1	58	0.167	10	$32.20	$311.89
State, Local or Tribal Government	Direct Deposit Sign-Up Form / SF 1199A	58	1	58	0.167	10	$32.20	$311.89
State, Local or Tribal Government	Federal Financial Report / SF 425	58	4	232	1.5	348	$32.20	$11,205.60
State, Local or Tribal Government	Financial Status Report / Standard Form 269	58	4	232	0.5	116	$32.20	$3,735.20

Total				754		**717**		**$23,034.98**

Other Departments/ Agencies Data Collection Activities								
State, Local or Tribal Government	Biannual Strategy Implementation Report / No Form; FEMA OMB Number 1660-0117	58	2	116				
State, Local or Tribal Government	State Preparedness Report (SPR) / OMB Control Number 1660-0131	58	1	58				
State, Local or Tribal Government	Quarterly Performance Progress Reports (SF-PPR) / OMB Control Number 1660-0025	58	1	58				
Total				232				

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:

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.

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 **[Describe]**	$0
Staff Salaries* **[15 GS-13, step 1 employees spending approximately 20% of time annually for this administrative and financial data collection]** **15 x $86,927 = $1,303,905 x 1.4 = $1,825,467 x .20 = $362,093.40**	$362,093.40
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	
Total	**$362,093.40**

* 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**
EMPG Work Plan				174	174	0
Total(s)				**174**	**174**	**0**

Explain:

There are no changes to the annual hour burden previously reported and there has been no change to the information being collected.

Itemized Changes in Annual Cost Burden

Explain:

There is no cost burden for this collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

FEMA will display the expiration date for OMB approval of this information collection.

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

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.