

December 11, 2013

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NW81

Title: Preparedness Message Framing Research

Form Number(s): FEMA Form 008-0-17, and 008-0-18

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.

Federal Emergency Management Agency’s (FEMA) Citizen Corps program acts under the authority of Executive Order No. 13254, “Establishing the USA Freedom Corps.” Citizen Corps’ mission is to bring together government and community leaders to involve citizens in all-hazard emergency preparedness and resilience. FEMA’s Individual and Community Preparedness Division (ICPD) directs this effort. ICPD will utilize this collection to study and track the progress of public service programs by seeking information from members of the public regarding the effectiveness of disaster preparedness messages. This collection of information is necessary to ensure effectiveness and value of awareness and education campaigns, disaster messaging and other associated outreach efforts.

Previous FEMA research through the Household Survey indicates that the public is only slightly more prepared to respond to disasters than it was five years ago; despite years of specific, targeted messaging campaigns around how to become prepared and why it is an important step to take. As result, FEMA and its stakeholders must reevaluate and revamp its approach to preparedness messaging, rather than its traditional approach of focusing solely on the individual taking specific actions and having multiple messaging platforms.

FEMA's Individual and Community Preparedness Division is seeking to conduct focus groups as part of a formative research plan for developing new messages to motivate and guide the public to prepare for disasters. These focus groups will also aid in the establishment of an overarching national preparedness messaging framework.

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 goal of this qualitative research is to gain insights to how to best frame preparedness messaging to effectively encourage and motivate the public to prepare themselves and their families for a disaster. Overall, this research will investigate from various perspectives how to best communicate with the public the relevant steps that will ensure they are ready for a disaster. These perspectives will probe:

- Overall understanding of the terms associated with preparedness communication
 - Disaster
 - Preparedness
 - Emergency
- General concern and attitudes
 - Area specific hazards and risks
 - Concern or worry about specific hazards and risks
 - Plan for taking steps
- Reactions to hazard specific message concepts
- Effective channels for communication

ICPD will conduct a series of focus groups with members of the public across six cities. City selection will be determined by potential exposure to specific hazards. Participants will be individuals who report they are willing to prepare and have given some thought to making preparations for a disaster. As part of each 90-minute focus group, participants will be exposed to three unique message concepts and calls to action in order to stimulate discussion and gain insights on the topics and ideas that are most motivating to behavior change. The ideal size for each focus group is 12 participants. Participants will be recruited through a professional focus group recruitment firm and asked a series of screening questions to ensure they meet the above qualifications.

FEMA Form 008-0-17, Focus Group Moderator Guide - A tool used by the facilitator to moderate the focus group.

FEMA Form 008-0-18, Participant Recruit / Screener – A telephone survey script to recruit participants for the focus groups.

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 focus groups will be digitally recorded to allow for transcription and report writing.

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.

Comparable data are not currently being collected as this is a targeted effort to understand individuals' reaction to a specific group of thematic messaging appeals. Additionally, ICPD will be coordinating with other agencies and departments in and outside FEMA to create a cohesive and applicable set of messages and framework that can be used with a wide range of preparedness outreach efforts.

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.

ICPD currently plans for only this data collection effort to help with the development of messages by identifying the most salient messaging frameworks and techniques. However, in future, there may be a need for additional data collection efforts to ensure the continued effectiveness and impact of these messages on the public. Any such proposed information collection will be cleared in accordance with PRA requirements.

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 60-day Federal Register Notice inviting public comments was published on August 29, 2013, volume 78, number 168, page 53465. There were no comments received for this collection of information.

A 30-day Federal Register Notice inviting public comments was published on December 9, 2013, volume 78, number 236, page 73873. 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.

ICPD has consulted with Gallup on the design and methodologies for this data collection. Gallup has been conducting research for more than 70 years. Recommendations on frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported came from their experience as well as industry best practices.

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.

Gallup regularly consults with members of the public in designing and delivering research instruments.

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

Focus groups require 90 minutes to explore topics thoroughly, which may seem daunting to many individuals. Industry research has indicated incentives are necessary to both encourage agreement to participate, and also to elicit the most detailed and rich responses during the discussion groups. Consequently, an incentive will be offered to each participant. The incentive will range between \$100 and \$150 depending on the location of the focus group.

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

Focus group participants will be identified by first name only. No personal identifiers will be collected.

A Privacy Threshold Analysis (PTA) was completed for this collection and forwarded to the FEMA Privacy Office for review on March 25, 2013. The PTA is still currently being reviewed. The status of this information remains the same as of May 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 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 has estimated that approximately 2,880 respondents will complete the **FEMA Form 008-0-18**. There will be approximately 1 response for a total of 2,880. Each form is estimated to take .05 hours (3 minutes) to complete. The total annual burden is estimated to be 2,880 responses x .05 hours per response = 144 burden hours.

FEMA has estimated that approximately 480 respondents will complete the **FEMA Form 008-0-17**. There will be approximately 1 response for a total of 480. Each focus group is estimated to take 1.5 hours (90 minutes) to complete. The total annual burden is estimated to be 1,260 responses x 1.5 hours (90 minutes) per response = 720 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.

Activity	No. of Respondents	Responses per Respondent	Hours per Response	Total Responses	Total Hour Burden
Recruit/Screeners	2880 (average 5 calls to obtain one participant, will recruit 12 per group)	1	3 minutes average per completed screener	2880	2880 x avg. 3 minutes= 8640 minutes (144 hours)
Focus Group discussion	480 (48 groups of average 10 participants each)	1	1.5	480	480 x 1.5 hours = 720 hours
TOTAL				3,360	864 hours

- 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

The annualized cost to respondents was estimated to be the burden hours estimate multiplied by the median hourly wage estimate (*Source: Occupational Employment Statistics (OES), BLS*). The median wage estimate (\$16.27) used for the purpose of this calculation is for all occupations combined.

Type of Respondent	Total Burden Hours	Avg. Hourly Wage Rate* ¹	Total Respondent Costs
General Working Population	864	\$22.78	\$19,681.92

* Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier added to the median wage to reflect a fully-loaded wage rate.

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.)

¹ <http://www.bls.gov/news.release/ocwage.htm>

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 [Qual. data collection, analysis, and reporting]	\$230,000
Staff Salaries [(25% of GS 14, step 5, annually + 25% of GS 13, step 1, annually) x 1.4 fully loaded employee multiplier]	\$73,000
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	\$23,000
Printing	0
Postage	0
Other Direct Costs [Recruitment, rentals, food, incentives, etc for 48 focus groups in 6 cities]	\$275,000
Total	\$601,000

* 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.

Explain:

This is a first time data collection effort, so there are no program changes or adjustments.

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.

Current plans are to publish findings from this study. Additional discussions will determine if the results will be submitted for publications in journals.

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.