

March 21, 2014

Supporting Statement for Paperwork Reduction Act Submissions

Title: Request for Federal Assistance Form – How to Process Mission Assignments in Federal Disaster Operations

OMB Control Number: 1660-0047

Form Number(s): FEMA Form 010-0-7; FEMA Form 010-0-8

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.

Under Section 653 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq), FEMA is authorized to provide assistance to States based on needs before, during and after a disaster has impacted the state. Information collected explains which State(s) require assistance, what needs to be accomplished, details any resource shortfalls, and explains what assistance is required to meet these needs. Title 44 CFR Part 206.5 provides the mechanism by which FEMA collects the information necessary to determine what resources are needed and if a mission assignment is appropriate.

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 Form 010-0-7 (Resource Request Form (RRF), (formally named Action Request Form, ARF) – This form is completed when States make a request for assistance to respond to a disaster. The form provides acknowledgement that the tasks are beyond the capability of the state to respond to as well as documents the type of assistance required. FEMA utilizes this information to determine that the assistance requested is the result of a disaster, not a pre-existing condition and that the type of response is appropriate.

FEMA Form 010-0-8 (Mission Assignment) – This form provides verification of the mission function to define the work to be performed, documents the start and end dates of the assignment as well as provides an estimated cost. FEMA uses this information to evaluate the assignment, identifies the financial requirements related to the mission assignment and to obligate the funds that are requested.

Training – Training provided to the respondents allows for updates to the mission assignment process to be fully explained and how to complete the forms.

Key stakeholders in the Federal request process include: the Requestor; State Approving Official (SAO); Other Federal Agencies (OFAs); FEMA Operations Section, Logistics Section Ordering Unit, Finance & Admin Section Procurement Unit and the Planning Section Resources Unit. The intent is to document existing resource request practices and share them with stakeholders in an effort to standardize actions and improve efficiency and effectiveness in filling, tracking, and reporting the status of RRFs. A second goal is to enable untrained, incoming staff to quickly comprehend the Federal request process and tracking tools in place to facilitate effective and efficient request tracking.

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.

FEMA Form 010-0-7 (Resource Request Form) – The Resource Request Form (RRF) is utilized by FEMA State and Federal partners as an ordering form to request resources from FEMA. The RRF is initiated in an automated system, WebEOC. WebEOC is a web-e enabled Incident Management System (ICS) and complies with ICS/ National Incident Management System (NIMS/PrepCAST) / Emergency Support Function (ESF) structures. On May 1, 2013, WebEOC became FEMA’s Official Crisis Management System. WebEOC contains a suite of status boards patterned after FEMA and ICS forms. One of the primary Core Boards of WebEOC is the Resource Request Board. WebEOC Resource Request process allows Other Federal Agencies (OFAs), all States, Territories and Tribal users with a FEMA WebEOC account the ability to create, sign, submit and track a Resource Request directly online with FEMA.

OFAs, States, Territories and Tribes that choose not to use WebEOC to submit requests will use the Resource Request Form (RRF) to submit requests to FEMA using their normal process (fax, e-mail, orally, in person, or by the telephone, etc.). The email address and fax number used will be determined by recipients in FEMA.

FEMA Form 010-0-8 (Mission Assignment) – The Mission Assignment (MA) Form is an electronic form housed in FEMA’s Enterprise Coordination and Approvals Processing System (eCAPS). eCAPS provides electronic coordination and approval of the Requisition and Commitment for Services and Supplies (FEMA Form 40-1) and MA during disaster activations. eCaps is located at the MA Form is an electronic version of the Resource Request Form 010-0-7, utilizing the same information gathered from the original signed version RRF. eCAPS is used to process the mission assignment which is tied into FEMA’s financial system for funding commitment and authorization.

More detailed explanations are in the attached, “Resource Request WebEOC Process Module”, “Enterprise Coordination and Approvals Processing System (eCAPS) Quick Reference Guide, version V300”, “Preparing an Electronic Mission Assignment (MA) eCAPS Training Manual”, and “MA Mission Assignment Process Overview”.

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.

The information and signatures required for FEMA Form 010-0-8 (MA) are in compliance with 44 CFR 206.208 regulations (copy attached). FEMA would not be in compliance with this regulation if the information is not collected. FEMA would not be able to utilize the resources of other Federal Agencies to best respond to the needs of states during disaster in a timely and efficient manner. FEMA is authorized to task other agencies to assist during disasters where their regulations do not authorize such. FEMA is coordinating agency during a disaster and is tasked to operate as the central hub – without the MA we could not do this.

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.**
- (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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information 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 November 18, 2013, 78 FR 69100. 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 February 18, 2014, 79 FR 9252. 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.

The Emergency Support Functions Leadership Group (ESFLG) comprised of other Federal agencies meets quarterly throughout the year to discuss the resources necessary and available to meet the needs of States during times of disasters. Discussions regarding the mission assignment function are routinely occurring during these meetings.

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 Mission Assignment Manager Monthly conference call provides an open forum among Regional Mission Assignment Managers and program offices. This forum provides ample opportunities for feedback on internal items such as the Mission Assignment Standard Operating Procedures and the overall mission assignment process.

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 February 21, 2014.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-023: Enterprise Coordination and Approval Processing System (eCAPS). The PIA is being updated and is currently under review with DHS Privacy. No System of Records Notice (SORN) is required for this collection at this time. The current updates do not impact the collection in any manner.

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 has estimated that approximately 10 States will complete the FEMA Form 010-0-7 (Resource Request Form). Each form is estimated to take 20 minutes to complete. The total annual burden is estimated to be $10 \times 640 = 6,400 \times 20$ minutes per response = 2,133 burden hours.

FEMA has estimated that approximately 10 States will complete the FEMA Form 010-0-7 (Mission Assignment). Each form is estimated to take 3 minutes to complete. The total annual burden is estimated to be $10 \times 320 = 3,200 \times 3$ minutes per response = 160 burden hours.

Training – It is estimated that 10 Financial Managers will attend 2 training sessions a year, and that each session will last for 8 hours. The annual hour burden for training will be $10 \times 2 \times 8$ hours = 160 burden hours

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost

State, local or Tribal Government	FEMA Form 010-0-7 / Resource Request Form	10	640	6,400	20 minutes	2,133	\$56.69	\$120,919.77
State, local or Tribal Government	FEMA Form 010-0-8 / Mission Assignment	10	320	3,200	3 minutes	160	\$56.69	\$9,070.40
State, local or Tribal Government	Training / No Form	10	2	20	8 hours	160	\$56.69	\$9,070.40
Total		10		9,620		2,453		\$139,060.57

• 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 Financial Managers is estimated to be (\$40.09 x 1.4 =) \$56.59 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents State Financial Managers is estimated to \$139,060.57 annually.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 operation and maintenance, or capital and start-up costs associated with this the collection of information.

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]	
Staff Salaries [Four GS 12 step 1 employees spending approximately 5 % of time annually processing information for this data collection] $\$74,872 \times 5\% \times 1.4 \times 5 \text{ employees} = \$14,974$ $5 \times \$74,872 = \$374,360 \times 1.4 = \$524,104 \times 5\% = \$26,205.20$	\$26,205.20
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 3 persons traveling 3 times a year = $\$1,500 \times 3 = \$4,500$	\$4,500
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other [Training conducted in regions on the mission assignment process] 3 GS 12 Step 1 employees spending 2% of their time conducting the training: $\$74,872 \times 2\% \times 1.4 \times 3 \text{ employees} = \$6,289$	\$6,289
Total	\$36,994.20

* 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
Resource Request Form / FEMA Form 010-0-7				2,133	2,133	0
FEMA Form 010-0-8 / Mission Assignment				160	160	0
Training / No Form				160	160	0
Total(s)				2,453	2,453	0

Explain:

Some revisions were made to improve FEMA Forms 010-0-7 and 010-0-8. However, there have been no changes to the information being collected or to the annual burden for this collection.

The changes to the Action Request Form and Mission Assignment form are intended to keep the forms in line with and follow new Agency processes and practices. These changes reflect FEMA Leadership vision and strategic direction.

The renaming of the Action Request Form to Resource Request Form follows FEMA Doctrine and nomenclature to include. The intent of the form has always been for users to utilize as the formal tool to request Federal resources to support disaster response needs.

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.