

March 28, 2014

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0127

Title: Logistics Capability Assistance Tool (LCAT)

Form Number(s): FEMA Form 008-0-1; FEMA Form 008-0-2; FEMA Form 008-0-3

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 Logistics Capability Assistance Tool (LCAT) is tailored for use by states to self-assess their current disaster logistics readiness, identify areas for targeted improvement, and develop a roadmap to both mitigate weaknesses and further enhance strengths. The LCAT is authorized by Public Law 109-295, Department of Homeland Security Appropriations Act, 2007, Title VI of the Post-Katrina Emergency Reform Act of 2006 Sections 636 and 637 (6 U.S.C. §636 and 637).

In the wake of Hurricane Katrina, disaster logistics and resource management emerged as critical areas for improvement across all levels of government. The Lessons Learned

Report (pg. 44), Chapter 4, September, 2006 from Hurricane Katrina called out the need for "...a modern, flexible, and transparent logistics system." In addition, the report recommended future enhancements to situational awareness and reporting, better planning and control functions, clearer mission assignments and execution, and improved communications and transparency among all stakeholders, in order to ensure catastrophic disaster response effectiveness. The Post Katrina Emergency Management Reform Act (PKEMRA) conferees recognized these logistics shortfalls and provided direction for the Department of Homeland Security and FEMA to take corrective actions both internally to the Department and externally - with partner agencies, state and local governments, and the private sector.

A critical component to the broader Congressional directive was improvement of end to end logistics capabilities, and in March 2008, FEMA initiated a program to help satisfy a mandate issued through PKEMRA Conference Report 109-699, which instructed the Agency to "...develop a demonstration program with regional and local governments in the formation of innovative public and private logistical partnerships and centers to improve readiness, increase response capacity, and maximize the management and impact of homeland security resources." In order to meet this Congressional intent, FEMA Logistics Management worked directly with state emergency managers, FEMA regional officers, and local emergency responders to develop, validate, and implement solutions to benefit the states. The LCAT is fully Section 508 (of the Rehabilitation Act of 1973) compliant.

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 LCAT is a maturity model that was developed by the states for the states. Eight States and FEMA Regions partnered with Logistics Management Headquarters (LM – HQ) to build an effective tool for states to increase readiness. The information is intended for states to use to continuously improve their plans and operations.

The LCAT is tailored for use by states to assess their current disaster logistics readiness, identify areas for targeted improvement, and develop a roadmap to both mitigate weaknesses and further enhance strengths. The tool has been developed from the perspective of state logisticians for their benefit. The LCAT responses to questions within the LCAT are, and will remain, confidential and will not be shared with any other states or agencies. The LCAT can also be used by states, locals, and tribal entities for regular self-assessments.

LCAT Briefing – The briefing is attended by the same State participant that attends the Logistics Capability Assistance Tool session. The briefing orients the audience to the history, development, purpose and benefits of the Logistics Capability Assistance Tool

are explained to the audience (Region/State/Local). This briefing helps the audience to understand the tool, the way in which it was built and the variety of ways in which it will benefit the State/Local governments.

The state emergency management agency attends the self-assessment session and serves as the ultimate authority in answering each discussion question. The results are used by the state, local, or tribal government to baseline its logistics readiness and continue to build its logistics program.

State Content Guide (formerly State & local Self-Assessment and Instructions), FEMA Form 008-0-1 – The Logistics Capability Assistance Tool features 130 survey-style questions, which are grouped into subcategories within each of five functional areas. Participants respond to each question by identifying where the state fits along a range of five capability levels, from Static to Synchronized. Capability levels are defined below:

- **Static** – State has not yet developed and/or implemented a viable strategy within the functional area.
- **Functional** – State has implemented informal plans or processes, but Standard Operating Procedures (SOPs) have not been defined or adopted.
- **Horizontal Integration** – State has developed and implemented formalized, integrated SOPs across the state emergency management organization.
- **External Collaboration** – State has coordinated plans and SOPs with other state, local/tribal, and external partner agencies, organizations, and private vendors.
- **Synchronized** – All local, state, federal, and private partners have fully integrated and synchronized plans, procedures, and operations. All plans and SOPs have been documented and exercised regularly with all participants. State has demonstrated mastery of this capability.

The results from the self-assessment are proprietary to the state, local, and tribal governments and remain confidential and secure within the Federal Emergency Management Agency, (FEMA). Individual state results are not shared within FEMA Logistics Management, across FEMA directorates, with other FEMA Regions, or externally. FEMA does not track individual state results but rather uses results anonymously within the Agency to build and strengthen existing continuous improvement programs inside FEMA and to establish ongoing federal assistance programs intended to systematically bolster state logistics process maturity.

Currently, there are three types of LCAT Question Sets: State, Local, and Tribal and a Facilitator Guide.

State Content Guide, FEMA Form 008-0-1 – This is used during a facilitated LCAT session to a State Government entity. The questions in this content guide are worded

specifically towards our State partners to assess the disaster response logistics capabilities.

Local Content Guide, FEMA Form 008-0-2 – This is used during a facilitated LCAT session to a Local Government entity. The questions in this content guide are worded specifically towards our Local government partners to assess the disaster response logistics capabilities.

Tribal Content Guide, FEMA Form 008-0-3 – This is used during a facilitated LCAT session to a Tribal Government entity. The questions in this content guide are worded specifically towards our Tribal government partners to assess the disaster response logistics capabilities.

Facilitator Guide – This is used by the government employee or facilitator as an instruction manual on how to facilitate a successful LCAT. This guide does not pose a burden to the public as it is an internal mechanism.

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.

As a method of presenting the questions, the LCAT team built a stand-alone, Java-based applet which displays the categories, questions, answers, and results by reading information collected and stored in extensible markup language (XML) format. The LCAT executable file (.MSI format) and XML files are provided via CD-ROM to States as part of the read-ahead package (package includes a workbook which includes the questions in narrative form). Instructions are included in the package, and States can utilize the LCAT.msi file on any standard Microsoft Windows operating system.

At the conclusion of the session the XML results file is stored on a secure Iron Key flash drive and States maintain a copy of it for their internal usage. FEMA does not have any LCAT results or outcomes without the explicit permission of the State.

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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 Logistics Capability Assistance Tool is a standardized means for states to learn about best practices among other states, baseline their own capabilities, and ultimately achieve measurable improvements to current processes. Tangible outcomes of the state sessions have included the following:

- Air Mobility Command (AMC) representatives at territory sessions resulted in development of Territorial Air Evacuation Plans
- Enabled utility companies and state emergency management agency to coordinate on fuel requirements to ensure crews have resources to repair downed power lines
- Led to states pre-scripting EMAC requests
- Provided justification for states to use state funding to hire full-time logistics staff
- Use for State(s) to attain EMAP Accreditation

Without the interaction achieved through the LCAT sessions and the standardized means FEMA Region Logistics personnel now have for engaging directly with states in an open, honest forum setting, these tangible improvements would not have been achieved.

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.

This information collection is conducted in a manner consistent with the guidelines in 5CFR 1320.5(d) (2).

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 December 9, 2013, 78 FR 73872. 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 March 28, 2014, 79 FR 17558. 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.

During the development phase, we met with the United States Army Corps of Engineers, Defense Logistics Agency, United States Northern Command, the cities of San Diego, Los Angeles, and other local jurisdictional representatives from states such as Alabama and North Carolina. We have also met with the Red Cross and Salvation Army, and private sector providers such as Landstar and Lipsey to obtain their views on LCAT. We met with the Senior Advisor for National Tribal Affairs (SANTA) for Tribal government version. We have incorporated the input and feedback from these organizations into

development and refinement of the tool. After each LCAT session, feedback is welcomed from each entity.

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 met with 8 states and incorporated the input and feedback from these organizations into development and refinement of the tool. FEMA does not consult with the respondents on any set time schedule. Should a state, local, or tribal entity elect to participate in the fully voluntary program, the LCAT team facilitates the session and captures the answers and comments. It is up to the entity to decide when and if they ever invite FEMA to an LCAT session. Following the initial session, the state, local, or tribal entity may choose to conduct their own self-assessments (and not provide FEMA with the results) or may invite FEMA back to facilitate a follow-up session whenever they are ready to do so. This is completely at the discretion of the emergency management office, and scheduling is conducted through the respective agency and is confirmed by the associated FEMA Region. At each session, the LCAT notes any feedback from the state, local, or tribal entity and incorporates these revisions into the tool. This fiscal year, one state began to use the tool without the help of FEMA to conduct their own self-assessments in their local jurisdictions using the Local Question Set.

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 as not privacy-sensitive by the DHS Privacy Office on September 6, 2013, a PIA nor a SORN are required for LCAT.

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 **State** Content Guide (FEMA Form 008-0-1), is a tool for use by the states. There are up to 10 voluntary respondents and the frequency of response is one time. The LCAT and the state responses to questions within the LCAT (Self-Assessment session) generally takes 12 hours to complete. FEMA has estimated that approximately 10 respondents will complete the self-assessment. Each self-assessment is estimated to take 12 hours to complete. The total annual burden is estimated to be 10 responses x 12 hours per response = 120 hours.

The **Local** Content Guide (FEMA Form 008-0-2), is a tool for use by the Local government entities. The LCAT and the Local responses to questions within the LCAT (Self-Assessment session) generally takes 12 hours to complete. FEMA has estimated that approximately 10 respondents will complete the self-assessment. Each self-assessment is estimated to take 12 hours to complete. The total annual burden is estimated to be 10 responses x 12 hours per response = 120 hours.

The **Tribal** Content Guide (FEMA Form 008-0-3), is a tool for use by the Local government entities. The LCAT and the Tribal responses to questions within the LCAT (Self-Assessment session) generally takes 12 hours to complete. FEMA has estimated that approximately 10 respondents will complete the self-assessment. Each self-assessment is estimated to take 12 hours to complete. The total annual burden is estimated to be 10 responses x 12 hours per response = 120 hours.

A state may receive the **LCAT Briefing** as a stand-alone agenda item in a separate conference or forum, which generally takes approximately 20 minutes to present. FEMA has estimated that approximately 11 respondents will receive the LCAT Briefing. Each

briefing is estimated to take 20 minutes (0.33) to complete. The total annual burden is estimated to be 11 responses x 20 minutes (0.33) per response = 3.3 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	LCAT Briefing / No Form	11	1	11	0.33 hour (20 minutes)	4	\$43.57	\$158.16
State, Local or Tribal Government	State Content Guide and Instructions / FEMA Form 008-0-1	10	1	10	12 hours	120	\$43.57	\$5,228.40
State, Local or Tribal Government	Local Content Guide / FEMA Form 008-0-2	10	1	10	12 hours	120	\$43.57	\$5,228.40
State, Local or Tribal Government	Tribal Content Guide / FEMA Form 008-0-3	10	1	10	12 hours	120	\$43.57	\$5,228.40
Total		41		41		364		\$15,843.36

- Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.
- Note: The annual burden hours rounded to be consistent with ROCIS.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Managers is estimated to be \$43.57 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Managers is estimated to be \$15,843.36 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

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]	
Staff Salaries* [12 each GS 13 , step 2 employees spending approximately 15% of time annually(description)..... for this data collection] [12 x 92,000 = 1,104,000 x .15 = \$165,600 x 1.4 = \$231,840]	\$231,840.00
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 [Travel costs include 1-2 people traveling for 1.5 day LCAT sessions to support session facilitation. Travel costs include airfare, hotel, meals and other expenses.] 10 trips x \$2,000/trip = \$20,000.00	\$20,000.00
Printing [Printing costs for LCAT workbooks, CDs, written communication.] 10 trips x \$0 per trip= \$0 [HQ has this capability in house. If Regions need these materials, we print them for them and use interoffice mail as a delivery means]	0
Postage Costs [LM – HQ send LCAT books to FEMA Regions and States for them to use for self-assessment and during sessions (if interoffice mail is not an option).] 10 x \$50 = \$500.00	\$500.00
Other	
Total	\$252,340.00

* 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
LCAT Briefing / No Form				3	4	1
State Content Guide and Instructions (formerly State & local Self-Assessment and Instructions) / FEMA Form 008-0-1				120	120	0
Local Content Guide / FEMA Form 008-0-2	0	120	+120			
Tribal Content Guide / FEMA Form 008-0-3	0	120	+120			
Total(s)	0	240	+240	123	124	1

Explain:

Since the last submission, the Local (FEMA Form 008-0-2) and Tribal (FEMA Form 008-0-3) Content Guides have been developed and implemented thus increasing the annual burden hours. These additional content guides are instrumental in executing a successful LCAT to be able to meet the needs of our customers, the State, local and Tribal government partners.

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.