

SUPPORTING STATEMENT FOR
DHS OIG Audit of FEMA's Assistance to Firefighters Grant Program
OMB Control No.: 1601-NEW
COLLECTION INSTRUMENT(S):
1. AFG Grant Collection Instrument
2. SAFER Hiring Grant Collection Instrument
3. SAFER Recruitment and Retention Grant Collection Instrument

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.

This information collection is mandatory for grantees selected in a random sample of fiscal year 2010 to fiscal year 2012 Assistance to Firefighter (AFG) grants and Staffing for Adequate Fire and Emergency Response (SAFER) grants.

The Department of Homeland Security's (DHS) Office of Inspector General (OIG) is conducting an audit to determine whether the Federal Emergency Management Agency's (FEMA) oversight and monitoring of Assistance to Firefighter Grant Program recipients ensures that grantees comply with grant requirements and guidance precluding waste, fraud, and abuse of grant funds.

The DHS OIG will use the data collected to determine whether FEMA's current monitoring and grant management efforts comply with Federal regulations, as well as FEMA's Assistance to Firefighter Grant Program requirements. The DHS OIG will make recommendations to FEMA to address any programmatic challenges identified during the audit.

The *Inspector General Act of 1978*, as amended, stipulates that Inspectors General conduct and supervise audits to provide a means for keeping the head of the establishment and the Congress fully and currently informed about problems and deficiencies relating to the administration of such programs and operations and the necessity for and progress of corrective action. In addition, as such, they have access to all records, reports, audits, reviews, documents, papers, recommendations, or other material that relate to programs and operations with respect to which that Inspector General has responsibilities under this Act.

Additionally, financial and programmatic monitoring requirements are set forth in 44 CFR Part 13, *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Government* or 2 CFR Part 215, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education*,

Hospitals, and Other Non-Profit Organizations. Per FEMA grant guidance and grant award letters, grant recipients are required to conform to either 44 CFR Part 13 or 2 CFR Part 215. Both regulations stipulate that records must be retained for three years after submission of the final expenditure report for the grant.

Finally, both 44 CFR Part 13.43 and 2 CFR Part 215.53 provide the Inspector General the right of timely and unrestricted access to any records of recipients that are pertinent to the awards, in order to make audits, examinations, excerpts, transcripts and copies of such documents.

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.

The collection information will be used by the DHS OIG to conduct an audit of FEMA's oversight and management of the Assistance to Firefighters Grant Program – specifically the Assistance to Firefighters (AFG) and Staffing for Adequate Fire and Emergency Response (SAFER) sub-programs. This information will be used to respond to the audit's objective, which is to determine the extent to which Assistance to Firefighter grant recipients comply with grant requirements and guidance precluding waste, fraud, and abuse of grant funds.

The information will be requested in an email sent to each grantee's point of contact information in FEMA's eGrant database. DHS Forms 530, 531, and 532 detail the information being collected from each grantee. Each attachment is specific to the type of grant awarded. The email will have one attachment specific to the grant awarded.

A cover email (attachment 5d) provides guidance for submitting the requested information.

Once the information is collected from the grantee, the DHS OIG will analyze this information based on established criteria to determine if grantees complied with these criteria to preclude waste, fraud, and abuse of grant funds. The information will also be used to determine if FEMA provided adequate oversight and monitoring of these grant programs.

This results of this analysis will be presented in two audit reports – one for AFG grants and one for SAFER grants. These reports will include recommendations to FEMA based on the results of the analysis.

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 preferred submission method for collection of this information will be via electronic mail. However, regular mail options for hard copies or scanned copies on electronic media will be available should the grantee not have access to the internet.

An email will be sent to the grantee with the appropriate form for the type of grant attached. The email (see attachment 5d) provides guidance to the grantee on how to respond to this request.

A specific form will be sent for each the three types of grants in the sample – AFG (DHS Form 532), SAFER Hiring (DHS Form 530), or SAFER Recruitment and Retention (DHS Form 531). Each form has questions and document requests specific to that type of grant.

Each form requests documents that may be available on the internet. If information is available on the internet (for example, grantee procurement policies) and the grantee provides this location of this information, the DHS OIG will download this information from the website.

The burden has been reduced on the grantee because the DHS OIG is only requesting information the grantee is required to retain and does not normally submit to FEMA including items such as invoices for items/services purchased, written procurement policies and proof of payment to vendors for items/services purchased.

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

The DHS OIG is only requesting supporting documentation that is required to be retained by the grantee but not normally submitted to FEMA during the grant life cycle. Supporting documentation will include items such as invoices for items/services purchased, written procurement policies, and proof of payment to vendors for items/services purchased.

Grantees do not and are not required to submit items such as invoices for items/services purchased, written procurement policies, and proof of payment to vendors for items/services purchased to FEMA in order to request funds.

All other grant documentation is maintained in FEMA's grants management database and will be retrieved from that database.

The information in this database is not sufficient to determine if grants funds were spent appropriately without waste, fraud, or abuse of grant funds.

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 burden.

There is no impact to small businesses or other entities for this request.

The DHS OIG is only requesting supporting documentation that is required to be retained by the grantee but not normally submitted to FEMA during the grant life cycle. Supporting documentation will include items such as invoices for items/services purchased, written procurement policies, and proof of payment to vendors for items/services purchased.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The scope of this audit (FYs 2010 through 2012) includes approximately \$2 billion of grant awards under the SAFER and AFG program. Without a statistically valid sample, the DHS OIG will not be able to project its results across this population and provide FEMA with a valid assessment of its oversight and management of these two grant programs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- Requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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; or

- 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.

None of these special circumstances are applicable.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required by 5 C.F.R. § 1320.8(d), comments on the information collection activities as part of this study was solicited through publication of a 60 Day Notice in the Federal Register on October 2, 2014, 79 FR 59500. No comments were received. A 30 Day Notice in the Federal Register was published on December 19, 2014, 79 FR 75825. No comments were received.

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

No payment or gift will be made to respondents as a part of this data collection request.

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

These grant awards are public record and the information being requested is only that which is associated with grant record retention requirements as documented above in #1.

There is no assurance of confidentiality provided to the respondents.

11. Provide additional justification for any questions 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 person's from whom the information is requested, and any steps to be taken to obtain their consent.

The data request does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. 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.
- 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.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14

We are requesting information from 556 entities. Support Document B shows the total sample to be 648 however; the team will conduct sites visits for 92 grantees in the sample. It is not feasible to conduct site visits to all 648 entities given resource constraints and isolated grantee locations.

Per FEMA grant guidance and grant award letters, grant recipients are required to conform to either 44 CFR Part 13, *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Government* or 2 CFR Part 215, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations*.

Both regulations stipulate that records must be retained for three years after submission of the final expenditure report for the grant.

As a result, we anticipate it should take no longer than two hours for respondents to gather the requested documentation. The total entities multiplied by two hours each yields a 1,134 total annual hour burden.

Our respondents will be a combination of volunteers and full-time paid firefighters. According to the U.S. Bureau of Labor Statistics, the 2012 median pay for firefighters is \$21.75 per hour (<http://www.bls.gov/ooh/Protective-Service/Firefighters.htm>). We averaged the hourly pay (\$21.75) and volunteer pay (\$0), which provides an average hourly wage of \$10.88. We multiplied the average hourly wage by 1,134 hours. This provides an annualized cost estimate of \$12,337.92.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Firefighter	AFG Form	324	1	1	2	648	\$10.88	\$7050.24
Firefighter	SAFER Hiring Form	135	1	1	2	270	\$10.88	\$2937.6
Firefighter	SAFER Recruitment and Retention Form	97	1	1	2	194	\$10.88	\$2110.72
Total		556	1	556	2	1,112	\$10.88	\$12098.56

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the 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. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and

software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.

Because grantees are required to maintain grant records for three years after the submission of their final expenditure report, the total annual cost burden is \$0 (not including the burden identified in question 12)

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 not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is no burden over and above standard project costs.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

This is a new 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.

The OIG will collect and analyze data for publication in two audit reports in early 2015.

No complex analytical techniques will be used.

Data collection requests will be sent to grantees immediately upon OMB approval with a collection end date of no earlier than 30 days after the request is sent to the grantees. The anticipated end date of this information collection is _____.

Analysis of this information will be completed in late 2014; two draft reports are anticipated to be issued to FEMA in early 2015 with final reports issued approximately 60 days after the draft reports are issued.

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

The DHS OIG is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

The DHS OIG does not have exceptions to the certification statement identified in Item 19 of OMB 83-I