

June 2, 2015

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660-0030**

**Title: Manufactured Housing Operations Forms**

**Form Number(s): FEMA Form 010-0-9; FEMA Form 010-0-10; FEMA Form 009-0-130; FEMA Form 009-0-136; FEMA Form 009-0-138**

### **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 Robert T. Stafford Disaster Relief and Emergency Assistance Act authorizes the President to provide mobile homes and other readily fabricated dwellings to eligible applicants who require temporary housing as a result of a major disaster (42 U.S.C § 5174). Requirements for disaster-related housing needs of individuals and households who are eligible for temporary housing assistance may be found at Title 44 CFR Part 206.117. The information collected provides the information necessary to determine the feasibility of the site for placement of temporary housing. The information will also provide FEMA with access to place the temporary housing unit as well as retrieve it at the end of the use.

**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 010-0-9, Request for the Site Inspection** – is used by FEMA to ensure the feasibility of potential sites for temporary housing units. This form will also provide FEMA with the ability to determine whether these sites will accommodate a temporary housing unit, and comply with local, State and Federal guidelines and regulations regarding the placement of the unit. The form documents that the necessary infrastructure required to support a temporary housing unit is in place.

**FEMA Form 010-0-10, Landowner’s Authorization Ingress / Egress Agreement** – is used by FEMA to ensure a landowner, if other than the applicant receiving the unit, will allow the unit to be placed on the property. This form also verifies that routes of ingress and egress to and from the property are maintained, that necessary actions to make ingress and egress possible are documented for completion, and that FEMA has a 30-day timeframe upon termination of the temporary housing agreement to facilitate removal.

**FEMA Form 009-0-138, Manufactured Housing Unit Inspection Report** – is used by FEMA to document the condition of the unit and contents during each transaction that occurs for temporary housing. This form is intended to be used anytime a manufactured housing unit (U.S. Department of Housing and Urban Development (HUD) or other) is transferred in the property transfer system of record, the Housing Operations Management Enterprise System (HOMES), including delivery to and receipt from the disaster survivor.

**FEMA Form 009-0-136, Unit Installation Work Order** – is used to issue and track individual work orders against a contract for installing Manufactured Housing Units.

**FEMA Form 009-0-130, Maintenance Work Order** – is used to initiate work (cost incurred to the government), in particular perform maintenance on a manufactured housing unit (HUD or otherwise).

The title of this collection has been changed from “Request for the Site Inspection, Landowners Authorization/Ingress/Egress Agreement” to “Manufactured Housing Operations Forms”. The title was updated to include the new forms added to the collection.

**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.**

These forms are available for download and use via the FEMA Intranet Website at [http://online.fema.net/mgmt\\_records/forms.shtm](http://online.fema.net/mgmt_records/forms.shtm). The forms must be completed via paper because the forms require original signatures. The fiscal environment makes hardware acquisition and software development for in-person electronic signature difficult; using downloadable online forms is an economically viable alternative. FEMA will continue to use paper forms to collect information. The forms will be completed by FEMA employees and contractors who will collect the applicant's information and signature; and then provided the applicant with a carbon copy on site.

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

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

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

This information collection does not have an impact on small businesses or other small entities.

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

If this collection of information did not occur, FEMA would not be able to provide temporary housing to those affected by disasters as required.

**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 February 9, 2015, 80 FR 7005. No comments were received. See attached copy of the published notice included in this package.

A Correction 60-day Federal Register Notice was published on February 18, 2015, 80 FR 8677. FEMA inadvertently listed the e-mail address for the Records Management Division as [FEMA-Information-Collections-anagement@fema.dhs.gov](mailto:FEMA-Information-Collections-anagement@fema.dhs.gov). It should be [FEMA-Information-Collections-Management@fema.dhs.gov](mailto:FEMA-Information-Collections-Management@fema.dhs.gov).

A 30-day Federal Register Notice inviting public comments was published on May 15, 2015, 80 FR 27994. 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.**

There are no consultations with persons outside the agency on this collection. The process of inspecting a site for placement of a temporary housing unit is as simplified as possible to determine that the infrastructure is in place and that FEMA can place and remove the unit.

**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.**

Individuals are generally in direct contact with FEMA at the time of the site inspection and can provide any comments or concerns to the inspector. If the individual is not able to be at the site at the time of the inspection, the inspector leaves a card with contact information for any follow-up, if necessary. Questions or comments are specific to the individual's own unique inspection and are resolved directly with the individual. Also, when the individual is notified that there will be a unit assigned to them, any questions or comments received are resolved at that point.

**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 April 30, 2015.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-027 – National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules, approved by

DHS on June 29, 2012 and an existing System of Records Notice (SORN), DHS/ALL-008 – Department of Homeland Security Accounts Receivable System of Records, April 30, 2013, 78 FR 25282.

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 a 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.**

It is estimated that 5,000 individuals will complete **FEMA Form 010-0-9**. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 hours.

It is estimated that 5,000 individuals will complete **FEMA Form 010-0-10**. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 hours.

It is estimated that 5,000 individuals will complete **FEMA Form 009-0-138**. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 hours.

It is estimated that 5,000 individuals will complete **FEMA Form 009-0-136**. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 hours.

It is estimated that 5,000 individuals will complete **FEMA Form 009-0-130**. Each individual will complete only one form and it is estimated that each form requires 10 minutes to complete. The total annual hour burden for this form is 5,000 x 10 minutes (.17 hour) = 850 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 |
| Individuals or Households                   | Request for the Site Inspection / FEMA Form 010-0-9                       | 5,000              | 1                               | 5,000                  | 0.17 (10 minutes)                   | 850                            | \$28.00               | \$23,800.00                  |
| Individuals or Households                   | Landowner's Authorization Ingress / Egress Agreement / FEMA Form 010-0-10 | 5,000              | 1                               | 5,000                  | 0.17 (10 minutes)                   | 850                            | \$28.00               | \$23,800.00                  |
| Business or other for-profit                | Manufactured Housing Unit Inspection Report / FEMA Form 009-0-138         | 5,000              | 1                               | 5,000                  | 0.17 (10 minutes)                   | 850                            | \$34.14               | \$29,019.00                  |

|                              |  |               |   |               |                   |              |         |                     |
|------------------------------|--|---------------|---|---------------|-------------------|--------------|---------|---------------------|
| Business or other for-profit | Unit Installation Work Order / FEMA Form 009-0-136 | 5,000         | 1 | 5,000         | 0.17 (10 minutes) | 850          | \$34.14 | \$29,019.00         |
| Business or other for-profit | Maintenance Work Order / FEMA Form 009-0-130       | 5,000         | 1 | 5,000         | 0.17 (10 minutes) | 850          | \$34.14 | \$29,019.00         |
| <b>Total</b>                 |  | <b>25,000</b> |   | <b>25,000</b> |                   | <b>4,250</b> |         | <b>\$134,657.00</b> |

• 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](http://www.bls.gov)) the wage rate category for **Individuals and Households** is estimated to be \$28.00 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents (Individuals and Households) is estimated to be \$47,600.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for **External Contractors** is estimated to be \$34.14 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents (Business and Financial Operations Specialists) is estimated to be \$87,057.00 annually.

The total estimated burden hour cost to respondents is estimated to be \$134,657.00 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* 30 of Disaster Assistance Reservists (C-grade level 2) employees spending approximately 100% of time annually performing site inspections and approving sites for unit installation for this data collection. $\$49,436 \times 1.4 = \$69,210 \times 30 = \$2,076,300$ | \$2,076,300        |
| Facilities [cost for renting, overhead, etc. for data collection activity]   |                    |
| Computer Hardware and Software [cost of equipment annual lifecycle]  |                    |
| Equipment Maintenance [cost of annual maintenance/service agreements for equipment]  |                    |
| Travel   |                    |
| Printing [number of data collection instruments annually]  |                    |
| Postage [annual number of data collection instruments x postage]   |                    |
| Other  |                    |
| <b>Total</b>   | <b>\$2,076,300</b> |

\* 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 |
| Request for the Site Inspection / FEMA Form 010-0-9                       |   |                      |               | 850   | 850              | 0          |
| Landowner's Authorization Ingress / Egress Agreement / FEMA Form 010-0-10 |   |                      |               | 850   | 850              | 0          |
| Manufactured Housing Unit Inspection Report / FEMA Form 009-0-138         | 0   | 850                  | +850          |   |                  |            |
| Unit Installation Work Order / FEMA Form 009-0-136                        | 0   | 850                  | +850          |   |                  |            |
| Maintenance Work Order / FEMA Form 009-0-130                              | 0   | 850                  | +850          |   |                  |            |
| <b>Total(s)</b>   | <b>0</b>  | <b>2,550</b>         | <b>+2,550</b> | <b>1,700</b>                                  | <b>1,700</b>     | <b>0</b>   |

**Explain:**

For FEMA Forms 010-0-9 and 010-0-10, there is no change in the annual hour burden for each form. However, the increase in burden hours was caused by the addition of three forms (FEMA Forms 009-0-138; 009-0-136; and 009-0-130) completed by contractors whereas the previous two forms are completed by individuals and households. The addition of three forms to this collection caused an increase in sample size or coverage.

| Itemized Changes in Annual Cost Burden                                    |  |                      |                      |  |                         |            |
|---|--|----------------------|----------------------|--|-------------------------|------------|
| Data collection Activity/Instrument                                       | Program Change (cost currently on OMB Inventory) | Program Change (New) | Difference           | Adjustment (cost currently on OMB Inventory) | Adjustment (New)        | Difference |
| Request for the Site Inspection / FEMA Form 010-0-9                       |  |                      |                      | \$23,800.0<br>0                              | \$23,800.0<br>0         | 0          |
| Landowner's Authorization Ingress / Egress Agreement / FEMA Form 010-0-10 |  |                      |                      | \$23,800.0<br>0                              | \$23,800.0<br>0         | 0          |
| Manufactured Housing Unit Inspection Report / FEMA Form 009-0-138         | 0  | \$29,019.00          | + \$29,019.00        |  |                         |            |
| Unit Installation Work Order / FEMA Form 009-0-136                        | 0  | \$29,019.00          | + \$29,019.00        |  |                         |            |
| Maintenance Work Order / FEMA Form 009-0-130                              | 0  | \$29,019.00          | + \$29,019.00        |  |                         |            |
| <b>Total(s)</b>   | <b>0</b>   | <b>\$87,057.00</b>   | <b>+ \$87,057.00</b> | <b>\$47,600.0<br/>0</b>                      | <b>\$47,600.0<br/>0</b> | <b>0</b>   |

***Explain:***

The annual cost burden increased for this collection as three new forms are added to the 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.