

August 5, 2015

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0131

**Title: Threat and Hazard Identification and Risk Assessment (THIRA)
– State Preparedness Report (SPR) Unified Reporting Tool**

**Form Number(s): FEMA Form 008-0-19 (THIRA); FEMA Form 008-0-
20 (SPR); FEMA Form 008-0-23**

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.

This package is a revision to the collection originally approved as the State Preparedness Report, OMB Control Number: 1660-0131. FEMA changed the name of the collection to the THIRA/SPR Unified Reporting Tool to reflect more accurately the information and method of collection. The *Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA)*, as amended by the *Implementing Recommendations of the 9/11 Commission Act of 2007*, established an annual requirement for the 56 states and territories to submit a State Preparedness Report (SPR). State and territories submit the SPR annually. The legislation requires a report on current capability levels and a description of targeted

capability levels from all states and territories receiving non-disaster preparedness grant funds administered by the Department of Homeland Security. Each report must also include a discussion of the extent to which target capabilities identified in the applicable State homeland security plan and other applicable plans are unmet, and an assessment of resources needed to meet the preparedness priorities established under PKEMRA Section 646(e), including: (i) an estimate of the amount of expenditures required to attain the preparedness priorities; and (ii) the extent to which the use of Federal assistance during the preceding fiscal year achieved the preparedness priorities. To meet this requirement, states and territories first identify capability targets through the Threat and Hazard Identification and Risk Assessment (THIRA) and then assess against these targets in the SPR. It is also important to note that completing the THIRA/SPR and THIRA only are allowable expenses under the grant awards.

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.

This collection effort is a revision of the original collection effort approved by OMB in 2012, titled State Preparedness Report (OMB Number 1660-0131). No form numbers were originally assigned because the original collection tool was online. The assessment goal and the information collected remains the same but FEMA has adapted how it collects the information in the following ways: (1) The original method of collection proved to be an additional burden to the user because of technology issues associated with the online tool. The Excel tool replaced the online tool to ease user burden when the existing online system failed, (2) the respondents originally included only 56 states and territorial governments, but now also include Urban Areas and Tribal Governments, and (3) as is explained herein, the information collected is broken down between the THIRA and SPR to provide a more accurate overall assessment. The information collected enables state, local, and tribal jurisdictions, along with the Federal Government, to understand the risks these entities face from threats and hazards, to estimate the capabilities and resources they need to manage those risks, to assess their current capability levels against their targeted capability levels, and to identify gaps between their current capabilities and the capabilities they need. This information characterizes the first two components of the National Preparedness System: Identifying and Assessing Risk, and Estimating Capability Requirements. It serves as a foundation for the remainder of the National Preparedness System, and thus represents the first steps of the nation's process for achieving its National Preparedness Goal of a secure and resilient nation.

The information collection consists of two major steps. Respondents first complete a THIRA by establishing capability targets based on their jurisdiction's own threats and hazards and estimating the resources needed to meet the capability targets. Respondents then estimate their current capability levels against those targets in the SPR. Together,

the two steps enable respondents to identify their capabilities and capability gaps and prioritize the building and sustaining of capabilities.

The assessment is structured by the 31 core capabilities from the 2011 National Preparedness Goal, and therefore states and territories provide information on their current capability levels and capability gaps in each core capability. States and territories gather the information and complete the THIRA following Comprehensive Preparedness Guide (CPG) 201, Second Edition. States and territories typically rely on subject matter expertise of emergency management personnel, homeland security personnel, and other stakeholders to complete the THIRA and SPR.

This revised collection is designed to standardize the submission method for states and territories, and to meet public law requirements. The information serves as the primary source of data on the preparedness capabilities of all of the states and territories. The information is summarized in the National Preparedness Report (NPR), as required by *Presidential Policy Directive 8: National Preparedness* (PPD-8). The NPR is an annual report to the President that summarizes national progress in building, sustaining, and delivering the 31 core capabilities outlined in the National Preparedness Goal.

FEMA and other Federal departments and agencies use THIRA and SPR information to inform and prioritize their preparedness programs and activities. FEMA relies on the information in its Strategic Plan, 2014-2018, to assess Agency-wide Performance Goals in support of Strategic Priority 1: Be Survivor-Centric in Mission and Program Delivery and Strategic Priority 3: Posture and Build Capability for Catastrophic Disasters. Additionally, FEMA's National Training and Education Division (NTED) uses the information to identify and address the nation's greatest training needs. In 2014, FEMA shared SPR information with over 20 Federal preparedness partners, and thus the information is widely used across the Federal preparedness community.

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 online tool previously used was slow to respond when too many users were online at the same time. Additionally, using the tool and dealing with response times increased user burden. As a result, FEMA provided respondents the option of using an Excel tool to complete the SPR. Most respondents opted for that option and found it less burdensome. When the online tool was taken offline, FEMA immediately adapted its collection tool to be a Microsoft Excel-based tool titled the Unified THIRA/SPR Reporting Tool (URT) to ensure the PKEMRA requirements could be met in a timely fashion. Microsoft Excel is an easily accessible and well-understood program, and therefore the URT eases the burden of providing the THIRA and SPR assessment data to FEMA, and simplifies the process by guiding users through each step of the assessment.

FEMA plans to continue its successful and effective use of the Excel-based tool and does not plan to fix the online collection tool originally approved. In 2014 the URT further reduced user burden by incorporating an import functionality that allows users to import their data from their previous submission and update for the current year. This URT FEMA Form numbers are: THIRA-SPR Unified Reporting Tool, FEMA Form 008-0-19 (for the THIRA portion) and FEMA Form 008-0-20 for the SPR portion and FEMA Form 008-0-23 for participation in the after action calls.

FEMA Federal Preparedness Coordinators email the URT to the respondents annually. States, territories and tribes then fulfill their requirement by completing and submitting their URT to their FEMA Federal Preparedness Coordinator via email, and FEMA stores the information on its shared drives.

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 other 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.

FEMA would be unable to properly meet the *PKEMRA*-mandated requirement to produce the State Preparedness Report without this revised collection of information. The *PKEMRA*-mandated requirement to produce the Catastrophic Resource Report would also be hindered, as the report includes THIRA and SPR information. Additionally, the Federal preparedness community would lose the main source of data that provides an annual understanding of the states', territories', urban areas' and tribes' current preparedness levels, including an understanding of how prepared states, territories, urban areas, and tribes are for real-world events. The National Preparedness Report, a PPD-8 requirement, would lose one of its main inputs. FEMA's Strategic Plan would lose information it is using to assess Agency-wide Performance Goals in support of Strategic Priority 1: "Be Survivor-Centric in Mission and Program Delivery," and Strategic Priority 3: "Posture and Build Capability for Catastrophic Disasters."

States, territories, urban areas and tribes would not have a systematic process for obtaining the information required in the foundational steps of the National Preparedness

System, and the nation would therefore be unable to follow that organized process for achieving the National Preparedness Goal.

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

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

(a) Requiring respondents to report information to the agency more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

(c) Requiring respondents to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on May 29, 2015, 80 FR 30696. One request for a copy of the proposed information collection was received by the public, and a draft of the proposed information collection was subsequently forwarded to the requester. The Agency responded to this comment and provided the most up-to-date copy of the proposed information collection to the requester.

A 30-day Federal Register Notice inviting public comments was published on August 5, 2015, 80 FR 46594. 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.

In 2010, FEMA convened a Reporting Requirements Working Group (RRWG), to conduct an exhaustive accounting of all information required of outside sources, including state and local jurisdictions. The findings of the RRWG indicated that the information gained through this collection represents the sole source of state preparedness data that is necessary to answer the *PKEMRA* mandate and to authorize the State Preparedness Report.

In 2013, FEMA again conducted an analysis to reduce FEMA's preparedness grant reporting requirements. This effort was initiated due to a request from the National Emergency Management Association, and FEMA consulted with the Centers for Disease Control and Prevention and the Department of Health and Human Services to conduct the analysis. FEMA consolidated grant reporting requirements and implemented these changes in 2014.

FEMA consulted with over 20 Federal agencies and departments in 2014 to discuss the utility and availability of the information collected, and to share the information so it could be used throughout the Federal Government. Through this effort, FEMA confirmed that other departments and agencies do not have similar data. This effort is ongoing and there is an increasing demand from other departments and agencies to view and use the information gained through this collection.

FEMA also frequently engages with state and local emergency managers who provide the information in this collection to ensure that it captures useful information while reducing the burden as much as possible. FEMA fully explains these activities in item 8(c) below.

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 developed the current SPR methodology in 2010 and 2011 through consultations with state representatives who respond to this information collection. FEMA conducted numerous site visits to state governments throughout the U.S. to discuss this collection and to solicit input for ways to improve the survey while reducing burden. FEMA used the findings from these visits to develop the agenda for a national workshop of state governments, with open invitation to all respondents. This workshop further discussed the collection and specific design considerations. FEMA developed this collection (format, methodology) directly from the input of the respondents themselves.

FEMA holds annual after-action calls every January with all state and local jurisdictions who complete the THIRA/SPR. FEMA uses this after-action process to gather feedback on the utility of the information and on how the burden can be further reduced. Participation in these calls is voluntary. Participants in the calls are asked to include their time participating in these calls when they respond to questions about hour burden. In 2015, FEMA collected feedback from all 56 states and territories through this process.

Additionally, FEMA engages with representatives who provide the information several other times each year. Each of these engagements are included in the respondent hour burden estimate. Some examples of these engagements are provided below:

- FEMA conducts Technical Assistance (TA) each year to train stakeholders on the methodology and collection tool. This training eases burden on stakeholders who provide this information. FEMA provided over ten in-person TA sessions in 2013 and five in-person TA sessions in 2014 throughout the U.S. Additionally, FEMA provides TA via webinar as an alternative to the in-person sessions. In 2014, FEMA provided over 15 webinars on THIRA and SPR.
- FEMA organizes monthly conference calls with every FEMA Region to answer any questions state and local stakeholders may have as they complete the THIRA and SPR process. Participation in the calls is voluntary. In 2013 and 2014, FEMA organized these monthly calls for the final three months before submissions were due to FEMA.
- In August 2014, FEMA held an in-person feedback session in Washington, DC with a group of five state and local emergency managers to collect feedback on how to improve the SPR assessment.

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

There is no offer of monetary or material value for this information collection.

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 approved by the DHS Privacy Office on June 1, 2015.

FEMA recommends that this is a privacy sensitive ICR because it collects basic contact information. Since the information collected is entered into an internal FEMA SharePoint site, FEMA recommends that this ICR be covered by the DHS/ALL/PIA-037 - DHS SharePoint and Collaboration Sites PIA; and DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) SORN (November 27, 2012, 77 FR 70792).

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.

To determine the annual burden, FEMA calculated burden hours separately for jurisdictions completing both the THIRA/SPR and those only completing the THIRA. FEMA summed the burden associated with all jurisdictions completing the THIRA/SPR and those just completing the THIRA to calculate the total burden.

FEMA requires 56 states and territories to complete the THIRA/SPR and 38 urban areas and 29 tribal nations to complete the THIRA. FEMA based the number of urban areas and tribal nations on the number of jurisdictions receiving 2014 Urban Areas Security Initiative (UASI) and Tribal Homeland Security Grant Program (THSGP) grants.

To calculate the average burden per response to the THIRA/SPR portion of the data collection, FEMA calculated the annual hour burden based on the responses provided by the state and territories during the 2013 annual after-action calls. FEMA received 39 responses to the question “Approximately how many total man-hours did it take to complete the THIRA and SPR, including time spent on technical assistance and participation in after-action calls?”

FEMA verified the data through calls to five states in May 2015. The time burden estimate accounts for the time it takes the respondents to gather and provide the information, work with stakeholders within their jurisdiction to gather and verify information, fill in the form, attend technical assistance sessions, and for participation in the after-action calls. FEMA removed outliers and averaged the estimates to determine the annual respondent time burden of THIRA/SPR development, and then estimated how these costs break down between personnel costs, contracting costs, and non-labor costs. Because data on these cost breakouts was not available for THIRA/SPR development, FEMA estimated the breakout based on grant awards for the development of Hazard Mitigation Plans, which are similar to THIRA/SPRs in that they are preparedness planning documents. This estimate yielded a cost breakout of 23 percent personnel, 66 percent contracting, and 11 percent non-labor.¹ FEMA then assumed that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$45.33, would develop the THIRA/SPR. To calculate the respondent cost burden, FEMA multiplied the hours burden estimate by the Urban and Regional Planner loaded wage rate.

FEMA followed a similar procedure to calculate the average burden per response to the just the THIRA portion of the data collection. FEMA used UASI and THSGP grant proposals and after-action call data to estimate the percentage of the THIRA/SPR development costs that are associated with just the THIRA development. FEMA determined that approximately 52 percent of the THIRA/SPR costs are associated with completing just the THIRA. Using this estimate, FEMA determined 52 percent of the total THIRA/SPR costs, then estimated how these costs break down between personnel costs, contracting costs, and non-labor costs, using the method described above. FEMA assumed that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$45.33, would develop the THIRA. To calculate hour burden, FEMA divided the percentage of costs attributed to personnel (23 percent) by the Urban and Regional Planner loaded wage rate.

Annual hour burdens for the THIRA, SPR, and THIRA/SPR After Action Conference Calls script portions of the collection are as follows:

¹ The cost breakout estimate followed the methodology described in *Supporting Statement for Paperwork Reduction Act Submissions, OMB Control Number 1660-0062, State/Local/Tribal Hazard Mitigation Plans*, http://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr-201312-1660-004.

- THIRA/SPR: 56 states and territories complete the THIRA/SPR annually. Based on after-action call data, FEMA estimates average THIRA/SPR development costs per response at \$154,713 of which \$35,584 (23 percent) is for personnel. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an average burden per SPR of 784 hours (rounded to the nearest hour). The total annual THIRA/SPR hours burden is therefore 784 hours times 56, or 43,904 hours. This estimate includes the time it takes the respondents to gather and provide the information, work with stakeholders within their jurisdiction to gather and verify information, fill in the form, and attend technical assistance sessions.
- Only THIRA: FEMA estimates that 67 Urban Areas and tribal jurisdictions complete only the THIRAs annually. Based on grant applications and after-action call data, FEMA estimates average THIRA development costs per response at \$80,677, of which \$18,556 (23 percent) is for personnel. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an average burden per THIRA of 408 hours (rounded to the nearest hour). The total annual hour burden for jurisdictions only completing the THIRA is therefore 408 hours times 67, or 27,336 hours. This estimate includes the time it takes the respondents to gather and provide the information, work with stakeholders within their jurisdiction to gather and verify information, fill in the form, and attend technical assistance sessions.
- FEMA requests that respondents participate in an after action conference calls. This call adds one hour per participant to the estimate 56 participants from States and territories at 1 hour each for a total of 56 hours. FEMA also requests that the respondents from urban areas and tribal governments participate in an after action conference call. This call adds one hour per participant to the estimate 67 participants at 1 hour each for a total of 67 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.

The THIRA, FEMA Form No. 008-0-19, and SPR, FEMA Form No. 008-0-20, are separate forms but respondents complete them simultaneously for the 56 states and territories. The tribal governments and urban areas only complete the THIRA. FEMA describes the hour burden in the charts below. Additionally, FEMA uses FEMA Form No 008-0-23 as a script to ask questions about the collection during after-action calls with respondents. Participation in the calls and answering the questions are voluntary, but the total estimate includes time spent participating.

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
(Urban Areas) or Tribal Government	THIRA / FEMA Form 008-0-19	67	1	67	408 hours	27,336	\$45.33	\$1,239,140.88
State or Territory	THIRA - SPR / FEMA Form 008-0-20	56	1	56	784 hours	43,904	\$45.33	\$1,990,168.32
State, Local and Tribal Government	THIRA/ SPR After Action Conference Call / FEMA Form 008-0-23	123 (same as the participants above, no additional participants)	1	123 (again, same as the participants above)	1 hours	123	\$45.33	\$5,575.59
Total		123		123		71,363		\$3,234,884.79

- Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.
- Note: The THIRA-SPR Unified Reporting Tool burden hours for the Homeland Security Grant Program (HSGP) (OMB Collection 1660-0125) and the Tribal Homeland Grant Program (THSGP) (OMB Collection 1660-0113) has been accounted for in this collection.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Urban and Regional Planners is estimated to be \$45.33 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Urban and Regional Planners is estimated to be \$3,234,884.79 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 capital and start-up costs associated with this information collection. To determine operation and maintenance costs, FEMA calculated separately for the THIRA/SPR and only THIRA information collection. FEMA summed the costs associated with the THIRA and SPR to calculate the total costs. Participation in after action calls is included with each estimate (THIRA/SPR and THIRA only)

Annual Cost Burden to Respondents or Record Keepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
THIRA/SPR	0	102,110	17018	\$ 119,128.00
THIRA only	0	53247	8874	\$ 62,121.00
				\$ -
				\$ -
				\$ -
				\$ -
Total	\$ -	\$ 155,357.00	\$ 25,892.00	\$ 181,249.00

Note: The chart calculates the individual costs for each respondent. The total nationwide cost to respondents and record keepers (including operations/maintenance and non-labor costs) is \$6,671,168 + \$4,162,107, which equals \$10,833,275. See explanation below.

Explain:

To calculate the average maintenance costs per response to the THIRA/SPR, FEMA used 2013 THIRA/SPR after-action call data. As described above, FEMA estimated an annual cost with developing a THIRA/SPR at \$154,713, with 23 percent of the cost for personnel, 66 percent for contracting, and 11 percent for non-labor. Contracting (\$102,110) costs represent the Annual Operations and Maintenance costs, and non-labor (\$17,018) costs represent the Annual Non-Labor costs, totaling \$119,128 (rounded). Multiplying this by 56 THIRA/SPR respondents gives a total annual maintenance cost of \$6,671,168.

FEMA followed the same procedure to calculate the average maintenance costs per response to the THIRA data collection. FEMA used 2013 THIRA/SPR after-action call data to estimate THIRA only development costs. As described above, FEMA estimated an annual cost with developing a THIRA at \$80,677 with 23 percent of the cost for personnel, 66 percent for contracting, and 11 percent for non-labor. Contracting (\$53,247) costs represent the Annual Operations and Maintenance costs and non-labor (\$8,874) costs represent the Annual Non-Labor costs, totaling \$62,121. Multiplying this by 67 THIRA only respondents gives a total annual maintenance cost of **\$4,162,107**.

The total cost to respondents and record keepers (including operations/maintenance and non-labor costs) is **\$6,671,168 + \$4,162,107**, which equals **\$10,833,275**.

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 [FEMA includes THIRA/SPR support as a task under one of its Preparedness Assessment and Reporting contracts]	\$ 1,665
Staff Salaries* (one GS 13, Step 5; one GS 14, Step 3; one GS 9, Step 2 employees spending approximately 100 % of time annually and one GS 12, Step 1; one GS 11, Step 1 spending approximately 50% of time annually) to manage the methodology, development of the tool, lead the analysis, provide technical assistant, manage contractors, provide data and analysis to FEMA and other federal government stakeholders who can use the data to support their mission. 1 GS-13, Step 5 salary is \$102,932 Breakdown = \$102,932 x 1.4 = \$144,104.80 1 GS-14, Step3 salary is \$114,480 Breakdown = \$114,480 x 1.4 = \$160,272 1 GS-9, Step 2 salary is \$54,423 Breakdown = \$54,423 x 1.4 = \$76,192.20 1 GS-12, Step 1 salary is \$76,378 Breakdown = \$76,378 x 1.4x 0.5 = \$53,464.60 1 GS-11, Step 1 salary is \$63,722 Breakdown = \$63,722 x 1.4x 0.5 = \$44,605.40	\$ 448
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	\$40,000
Total	\$ 2,154

* Note: The

"Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

Explain:

FEMA's National Preparedness Directorate holds two contracts supporting the THIRA/SPR (among other tasks). These contracts supports the development of the Unified Reporting Tool and user guide, development of technical assistance materials,

analysis of THIRA and SPR results, help desk support, and the development of outreach materials.

FEMA employs three full-time federal employees at the GS-13, step 5; GS 14, Step 3 and GS 9, Step 2 levels. Additionally FEMA employees with part-time responsibilities at the GS 12, Step 1 and GS 11, Step 1 levels. Employees manage the THIRA/SPR-related work, including the development of the tools, data collection and analysis, providing technical assistance, conducting stakeholder engagement, and revising policy/doctrine. FEMA uses contractors to assist with the development and deployment of the collection instrument that FEMA uses to collect the information. FEMA also uses contractors to analyze the data collected by the system and to develop summary reports. FEMA provides most training via webinar, but requires some travel to train respondents on the information collection and to provide ad hoc technical assistance.

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.

The majority of the changes to the reported hour burden and cost burden associated with the information collection are due to changes to the method used to estimate burden, and not to changes in the information collection itself. The current burden estimates are based on reports from state and local jurisdictions on how they intend to use DHS preparedness grants to complete the information collection. These reports include respondents' estimates of how much funding they require to complete the information collection, and are likely significantly more accurate than prior estimates based on the number of questions in the data collection. The estimates based on grant funding also closely match estimates of burden that jurisdictions have provided verbally during the after-action calls conducted in January 2014, as described in section 8.c.

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
THIRA/SPR			0	3696	43904	40208
THIRA only	0	27336	27336			0
THIRA/SPR After Action Conference Calls	0	123	123			0
			0			0
			0			0
			0			0
			0			0
Total	0	27459	27459	3696	43904	40208

Explain:

This method yields a total hourly burden of 784 hours for each of the 56 States and territories that complete THIRA/SPR, for a total hourly burden of 43,904 hours for states and territories. The respondent burden for completing just the THIRA is 408 for each of the 67 urban areas and tribal governments, for a total burden of 27,336. Additionally, all 123 respondents are asked to participate in after action calls lasting one hour for a total burden of 123 hours. Combined, the total respondent hours for THIRA/SPR, THIRA only, and participation in after action calls are 71,363 hours. This is an increase of 67,667 hours over the 3696 hours currently on the OMB inventory. This increase accounts for the additional 67 urban areas and tribal governments, and includes the time it takes the respondents to gather and provide the information, work with stakeholders within their jurisdiction to gather and verify information, fill in the form, attend technical assistance sessions, and for participation in the after-action calls. Additionally, the estimate include time spent participating in after action calls.

The one program change that impacted the burden associated with the data collection is that FEMA now requires urban area and tribal jurisdictions to complete the THIRA as a condition of receiving preparedness grants. This increases the number of jurisdictions completing that part of the information collection by 67, and thus increases the total hours burden by 27,336 hours (67 jurisdictions times 408 hours per jurisdiction).

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
THIRA/SPR	\$ -		\$ -	\$ 9,857,960.00	\$ 8,663,928.00	\$ (1,194,032.00)
THIRA only	\$ -	\$ 5,405,359.00	\$ 5,405,359.00			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
Total	\$ -	\$ 5,405,359.00	\$ 5,405,359.00	\$ 9,857,960.00	\$ 8,663,928.00	\$ (1,194,032.00)

The new method used to estimate the cost burden yields a total cost of \$154,713 for each of the 56 jurisdictions that complete the THIRA/SPR. Participation in after action calls is included in each estimate (THIRA/SPR and THIRA only). This is a decrease of \$21,322 per respondent from the \$176,035 per respondent currently on the OMB inventory. The requirement that urban areas and tribes receiving DHS preparedness grants complete the THIRA imposes an estimated cost of \$80,677 per new jurisdiction (as calculated above), for a total of \$5,405,359 across the 67 jurisdictions. The total cost burden for THIRA/SPR and THIRA only is \$14,069,287. The total increase in cost burden is therefore \$4,211,327.

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.