

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0108

Title: National Emergency Family Registry and Locator System

Form Number(s): 528-2

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 (give details as to why this information is being collected). 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.**

After Hurricane Katrina, displaced individuals experienced numerous difficulties in reuniting with family and household members. As a consequence, Congress mandated that FEMA establish the National Emergency Family Registry and Locator System (NEFRLS) in the Post-Katrina Emergency Management Reform Act (PKEMRA), *Pub. L. 109-295, section 689c*. PKEMRA, *Pub. L. 109-295, section 689c* is the legal basis for FEMA to provide a National Emergency Family Registry and Locator System (NEFRLS) to allow adults (including medical patients) that have been displaced by a Presidentially declared disaster or emergency to voluntarily register by submitting personal information to be entered into a database that could be used by others to help reunify them with their families. Children who are traveling with their families during a Presidentially declared disaster can be listed in NEFRLS. NEFRLS allows up to 7 family members to be registered and listed so that family members or friends can search for them. This ability to list children within NEFRLS is only to indicate what family members are actually together and safe and does not take the place of an alternate child searching national database that is the property of a non-profit organization (National Center for Missing and Exploited Children).

- 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 purpose of information collection is to (1) respond to the mandate established by Congress via PKEMRA, (2) enable FEMA to more effectively respond to Presidentially declared disasters, (3) empower the agencies disaster response capabilities by creating a system that would enable the public / “displaced individuals” to voluntarily register pertinent information into NEFRLS to facilitate the reunification of their family and/or household members. Those seeking to find “displaced persons” are deemed (*searchers*) while those seeking to be found are titled *displaced individuals*.

The registrant can register in one of two ways during a disaster. The first is the NEFRLS 800 number by which an operator at one of FEMA's National Processing Service Centers (NPSCs) will take their information over the phone. The second option is via the internet through www.FEMA.gov or directly at <https://egateway.fema.gov/inter/nefrls/home.htm>. Once a registrant has contacted FEMA NEFRLS either via the website or telephonically, a standard NEFRLS Privacy Act Statement is either viewable or read to the registrant. After acknowledgement of the Privacy Act statement, the registrant provides Personally Identifiable Information (PII) to NEFRLS including, among other things, pre-disaster and optional current location information. Once this PII is provided, the registrant is sent to a third party for identity authentication. If the registrant successfully answers 3 of the 4 multiple choice questions unique to their identity, the registrant may setup an account accessible by username and password. If the registrant decides not to setup a username and password to access their account, the registrant will need to go through the identity authentication process each time to access their account.

- 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.**

Information is collected directly from individuals in one of two ways: (1) electronically (via the Internet) by individuals (who have been displaced as a result of a Presidentially declared disaster or emergency or who are searching for displaced family or friends) who voluntarily register into the system or (2) through an 800 number where individuals voluntarily call and provide a call center representative with the authorization to enter their information into the electronic system. Information from the third party authentication service is provided electronically directly from the service.

It is anticipated that approximately 75% of the respondents will do so electronically over the Internet and 25% will do so via the toll-free 800 registration number. The searching process is also done over the Internet or through the NEFRLS 800 number. It is anticipated that approximately 75% of the respondents will do so electronically over the Internet and 25% will do so via the toll-free 800 registration number. The website is <https://egateway.fema.gov/inter/nefrls/home.htm>.

- 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.**

There is no similar information contained in NEFRLS that can be deemed duplicative. Registrants can create unique usernames and passwords which are authenticated into the system upon this criterion. Upon development of the NEFRLS system it was intentionally created to not duplicate information. Doing so, would complicate the business process and prevent NEFRLS from meeting their mission requirements.

- 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.**

Congress mandated that FEMA establish the NEFRLS. As authorized by the PKEMRA, *Pub. L. 109-295, section 689c*, FEMA has the primary responsibility to establish NEFRLS to help reunify families separated after an emergency or major disaster declared by the President as defined in the Robert T. Stafford Act. Without this collection (1) Congress could have a perception that FEMA is ignoring the mandate, (2) would impact the Federal Government's ability to provide one type of reunification services, and (3) potentially impact "displaced persons" ability to reunite with family members.

- 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, 80 FR 60397, inviting public comments was published on October 6, 2015. There was one comment received for this collection of information. The comment period ended December, 7 2015. FEMA addressed the comments as follows:

1. Comment submitted by Jeffrey Newbold.

- a) "Shelters are not jails, the evacuees come and go after arriving, often without the knowledge of the shelter managers. Therefore using the Safe and Well program is but a small way of contacting evacuees."
- b) "Some will intentionally hide their identity for a myriad of reasons. (abusive spouse, warrants, debts, don't want the government to know where they are, no legal citizens)"
- c) "There is no single collection point for several states to share data of missing persons after a catastrophic event that covers several states."
- d) "In Texas and other larger western states the travel times are considerable, so would like to have vehicles able to have reports of who is on board said vehicles."
- e) "Integration with other local (state level) software solutions via API such as WebEOC is a must."
- f) "One system at the federal level - this should replace NSS or integrate into it (single sign on)."

FEMA Response: NEFRLS, as mandated by Congress, is intended to be a system that survivors and people searching for them can use voluntarily on an individual basis. It was not intended to be a comprehensive data collection tool for responders and/or governments or to be inclusive of all disaster survivors but only those who voluntarily choose to register. NEFRLS is not an evacuation tracking tool that can be used to create manifests. FEMA has developed the National Mass Evacuation Tracking System (NMETS) that is available to States at no charge which can perform this function. Information about NMETS can be found at this link <http://www.fema.gov/individual-assistance-national-mass-evacuation-tracking-system>. FEMA routinely explores options to increase interoperability and data

sharing where applicable. FEMA always appreciates feedback from members of the emergency management community.

- 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.**

FEMA frequently works with organizations outside of the agency, who serve in a partnership role. This includes Federal, State, local and Tribal governments and law enforcement authorities, or agencies, or other entities authorized to investigate and/or coordinate locating missing children and/or reuniting families to facilitate the reunification of families displaced due to a major disaster or emergency.

- 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.**

There are no consultations conducted related to NEFRLS. The statute does not authorize surveys or provide for the capture of any additional data than what the system is designed to collect.

A 30-day Federal Register Notice, 80 FR 79057, inviting public comments was published on December, 18 2015. There were no comment received for this collection of information. The comment period ended January, 19 2016.

- 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.**

The NEFRLS system has many secure mechanisms to assure the confidentiality of the respondents /registrants. (1) NEFRLS is built based on the security concept of role-based access control – where individual access rights are based on the job function and “need-to-know.” (2) NEFRLS is a FISMA system that is in compliance with the *DHS Sensitive Systems Policy Documents 4300 A* (based on *NIST 800-53 rev. 4* security controls) and has received their authorization to operate (ATO). (3) Each registrant may choose to create a unique username and password that is based on strong authentication policies per *DHS Sensitive Systems Policy Documents 4300 A*. Lastly, (4) secure sockets layer (SSL) encryption is used to protect the transfer of data. System data is hosted in a secure infrastructure with servers protected by controls such as the monitoring of audit logs, management of vulnerabilities, and escalation for any unauthorized data.

- 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.**

The NEFRLS system does not ask respondents /registrants 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. 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 number of respondents for NEFRLS Registration through the 1-800 number is estimated to be 14,000. It has been estimated that it takes approximately 15 minutes for an individual to complete a registration through calling the NEFRLS 1-800 number.

The number of respondents for NEFRLS Registration through the Internet is estimated to be 42,000. It has been estimated that it takes approximately 10 minutes for an individual to complete a registration through the NEFRLS website.

- 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. 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.**

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or households	NEFRLS Registration 800#/ FEMA Form 528-2	14,000	1	.25 (15 minutes)	3,500	\$22.71	\$ 79,485
Individuals or households	NEFRLS Registration Internet/ FEMA Form 528-2	42,000	1	.17 (10 minutes)	7,140	\$22.71	\$ 162,149
Totals		56,000			10,640	\$22.71	\$241,634

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all individuals is estimated to be \$22.71 (fully loaded with 1.4 multiplier) per hour, therefore, the estimated burden hour cost to respondents all individuals is estimated to \$241,634 annually.

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

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

- 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.**

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 Government

Item	Cost
Staff Salaries [8 agents per shift x \$35 overtime for 4 hours per shift per agent for 3 months]	\$109,760
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing	0
Postage	0
Other (software/hardware enhancements, misc. equipment, record retention)	1,100,000
Total+	\$1,209,760

Assumptions: 70% of Registration/ Search Intake on the 1-800 number will take place within 2 weeks. The remaining 30% of Registration/ Search Intake will be spread out through the remaining 10 weeks and will be completed by full time agents. This results in a level average of 8 agents per shift (2 – 12 hour shifts for 14 days and 1- 12- hour shift for 10 weeks and 4 hours of overtime per agent per shift – overtime costs are accounted for at \$35 per hour).

Cost to take Internet Electronic Registrations/Search Intake on the 1-800 number. Cost estimates are computed using overtime costs of \$35 per hour for 4 hours per shift per agent (based on NPSC rates) for an estimated total annual cost of \$109,760.

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 the 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
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Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
NEFRLS Registration 800#				7,000	3,500	-3,500
NEFRLS Registration Internet				1,167	7,140	+5,973
Total(s)				8,167	10,640	+2,473

Explanation:

The program office has concluded that there are no forms associated with this collection of information. (See NEFRLS screenshots)

There was an **adjustment** increase in burden hour per respondent from 10 minutes to 15 minutes when taking registration using the NEFRLS 1-800 number registration based on two NEFRLS call center drills conducted in July 2013 and August 2015. There also was an adjustment in the percentage of estimated callers to the 1-800 number from 75% of all registrations to 25% of all registrations from a total number of 42,000 respondents to 14,000. This resulted in a net decrease in burden minutes from 7,000 to 3,500 (-3,500 minutes).

There was an adjustment increase in burden hour per respondent from 5 minutes to 10 minutes for respondents using the internet registration. This increase in minutes is based on NEFRLS drills conducted in July 2013, December 2013 and August 2015. There also was an adjustment in the percentage of estimated internet registration from 25% of all registrations to 75% of all registrations from a total number of 14,000 respondents to 42,000. Therefore the adjustment increased from 1,167 to 7,140 burden hours (+5,973).

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
NEFRLS Registration 800#	0			\$139,440	\$79,485	-\$59,955
NEFRLS Registration Internet	0			\$23,240	\$162,149	+\$138,909
NEFRLS Search 800#	0			0	0	0
NEFRLS Search Internet	0			0	0	0
Total(s)	0			\$162,680	\$241,634	+\$78,954

Explanation:

Due to changes in burden estimates for and the percentage estimate of individuals registering/searching via the NEFRLS 1-800 number registration, the wage rate burden estimate has an **adjustment** decrease from \$139,440 to \$79,485. (-\$59,955).

Due to changes in burden estimates for and the percentage estimate of individuals registering/searching via NEFRLS Internet registration, the wage rate burden estimate has an **adjustment** increase from \$23,240 to \$162,149. (+\$138,909).

The program office has determined that the search engine for NEFRLS does not collect any new information and the wage rate burden estimate remains \$0.

- 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.