

May 24, 2016

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0098

Title: Citizen Corps Council Registration

Form Number(s): FEMA Form 008-0-25

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.

Executive Order 13254 (CFR 67, No. 22, p. 4869) provides for the collection of this information. Specifically, Citizen Corps was launched as a Presidential Initiative, Executive Order 13254, on January 29, 2002 with a mission to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds.

In order to fulfill its mission, the Federal Emergency Management Agency (FEMA) Individual and Community Preparedness Division (ICPD) will collect information from Citizen Corps Councils and Community Emergency Response Team Programs through the Citizen Corps Council online registration form. The Citizen Corps Council registration form will allow FEMA and State personnel to ensure that prospective Councils/Community Emergency Response Team (CERTs) have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned

to the Council, and will provide an efficient way to track the effectiveness of the nationwide network of Councils and CERT programs

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 Citizen Corps Council registration form is available on-line at <http://www.citizencorps.fema.gov/>. New CERT programs register at <http://www.citizencorps.fema.gov/cc/CertRegWizard.do>. New Councils register at <http://www.citizencorps.fema.gov/cc/CouncilRegWizard.do>. FEMA and state government personnel use this process to ensure that prospective Councils/CERT programs have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council/CERT program, and efficiently track the effectiveness of the nationwide network of Councils and CERT programs. These Councils will allow Citizen Corps to fulfill its mission of making communities safer by regularizing and coordinating activities between Citizen Corps and community groups active in educating, training, and coordinating volunteers in crime prevention, disaster preparedness, mitigation, response, public health, and safety issues.

FEMA Form 008-0-25, Citizen Corps Registration Form –The Citizen Corps Council registration form allows Citizen Corps Councils and CERT Programs to describe their mission, collaborative structure, and activities supporting community resilience. Data collected indicates, at a national, regional and state level, how local grassroots programs help to prepare communities and individuals. This information is required to link members of the public who are interested in getting prepared with organizations in their community that can help. This information is also required to report on the status of programs and their progress.

The current registration form was changed since the last OMB approval. FEMA Individual and Community Preparedness Division (ICPD) did not add any questions, nor change the scope of any of the questions. However, ICPD did change the front end/landing page of the collection tool to make it easier to understand and to make the user interface more intuitive and user friendly. The previous format proved confusing for users, and required them to click through more screens to get to where they wanted to go. In the updated system, it's much easier and less time-consuming for users to get to where they need to go, and it streamlines the users' experience, which ultimately reduces their reporting burden. The resources for download and tutorial videos were removed because they either no longer worked or were no longer relevant.

OMB information, inadvertently removed from the interim registration form was and is publicly available here:

- CERT: <https://www.fema.gov/cert-program-registration-information>

- Citizen Corps: <http://www.ready.gov/citizen-corpscouncil-login/council-registration>

This information was inadvertently removed from the form because prior to the update, there was an entire website, www.citizencorps.gov, that hosted all the Citizen Corps and CERT content (including the OMB information) and all registration requirements were in a single, integrated site. However, FEMA shut down the www.citizencorps.gov website migrating its content to www.fema.gov or to www.ready.gov. Because of this, the OMB information was included on all those respective webpages. The Citizen Corps registration system still exists, but is no longer part of a larger Citizen Corps website. This OMB information that was omitted on the interim form is included on the revision on the last page.

There are 12 proposed new questions for the current form update. These questions are listed on the Narrative of Changes, and are also inserted on the form screen shots. No **Forms Revision Chart** has been included because it would not be possible to compare the old and new versions due to major formatting changes. The added questions do not request different information but offer additional options in multi-option questions to better access CERT and Citizen Corps programs and their current needs. Because they merely allow for increased optional responses, there is no additional burden to respondents.

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.

Requested information will be submitted through an electronic registration page at <http://www.citizencorps.fema.gov/>. This is a 100% electronic collection.

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

The information that Citizen Corps collects is not available elsewhere. The Citizen Corps/CERT registration collects information unique to the Citizen Corps programmatic mission of government collaboration with community leaders in emergency preparedness, response, and recovery planning, education, training, exercises, and volunteer programs. Because the Citizen Corps Council / CERT points of contact are uniquely assigned by jurisdiction, there is no other source for this information.

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.

Without the collection of information as requested, FEMA's responsibilities to support community preparedness and resilience would be greatly compromised. This registration process provides critical information to measure the nation's progress on community preparedness, allows communication to occur directly with dedicated state and local leaders/points of contact, and gives FEMA essential feedback on local activities and needed technical assistance.

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 10, 2016, 81 FR 7137. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on April 27, 2016, 81 FR 24844. 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.

FEMA/ICPD regularly requests feedback from respondents, including Citizen Corps Council and CERT program managers, on the information collection process and data required for submission. Recommendations to clarify information fields and streamline the process were recently accepted and updates are made on a regular basis.

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 Individual and Community Preparedness Division (ICPD) staff members routinely interact with Citizen Corps and CERT program managers from all 56 states and territories and request their input on the registration system. ICPD also hosts conference calls and webinars and engages in email correspondence concerning enhancements to the registration process for Citizen Corps Councils and CERT programs. For example, ICPD received feedback from multiple state and local stakeholders that the registration process took too long to complete and that some questions on the form are unclear. ICPD

requested and recently accepted recommendations to clarify information fields and streamline the process. ICPD also shares information about updates to the registration process, which are made on a regular basis.

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 March 31, 2015.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA 029 – Citizen Corps Program, approved by DHS on June 28, 2013. The existing System of Record Notice (SORN) is DHS/FEMA-006 - Citizen Corps Program published in the Federal Register on July 22, 2013 at 78 FR 43890.

There are no assurances of confidentiality provided to the respondents for this information collection.

FEMA Form 008-0-25 clearly indicates information that will be displayed publicly and information that will remain only accessible to the respondent and state, regional and national users for the purposes of internal tracking and reporting.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of sensitive nature.

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

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on

respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

FEMA/ICPD anticipates at least one response per year from approximately 1250 Citizen Corps Councils/ Local Citizen Corps Program Managers, and 2650 CERT programs/ CERT Program Managers. It is estimated that the registration form can be completed within one hour, resulting in an annual hourly burden of 3900 hours total. See Table A.12.

(56 State Citizen Corps Program Managers may spend an hour per week verifying information and approving or denying new registrants, but states are not the respondents for this collection).

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	Citizen Corps Council Registration / FEMA Form 008-0-25	3,900	1	3,900	1 hour	3,900	\$23.91	\$93,249.00
Total		3,900		3,900		3,900		\$93,249.00

• 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 (http://www.bls.gov/oes/current/oes_nat.htm) the wage rate category for Office and

Administrative Support Occupations is estimated to be \$17.08 per hour, and \$23.91 at the fully loaded wage rate, therefore, the estimated burden hour cost to Citizen Corps / CERT respondents is estimated to be **\$93,249.00** 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.)

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 which 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 the Federal Government

Item	Cost (\$)
Contract Costs General IT O&M already covered under ongoing contract	\$360,000
Staff Salaries* 1 GS 13 (\$89,000 salary) employees spending approximately 15 % (\$13,350 x 1.4 benefits = \$18,690) of time annually to review and follow up on submissions for this data collection	\$18,690
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	
Total	\$378,690

* 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
Citizen Corps Council Registration / FEMA Form 008-0-25				7,500	3,900	-3,600
Total(s)				7,500	3,900	-3,600

Explain:

There was an increase in the number of Citizen Corps Councils and CERT Programs since the 2012 OMB approval for this collection as a result of the continued expansion of both programs to new communities throughout the country. Currently there are

approximately 3,900 Councils and CERT programs (with an average growth rate of 25 per year for Councils and 200 per year for CERT programs) that will update their information in the Citizen Corps Council registration system. Despite the increase in Citizen Corps CERT programs since 2012, there is a net loss in burden hours because data was previously collected twice annually and now is only collected once annually.

Also, the current registration form was changed since the last OMB approval. In the interim change (between 2012 and 2015) FEMA Individual and Community Preparedness Division (ICPD) did not add any questions, nor change the scope of any of the questions. However, ICPD did change the front end/landing page of the collection tool to make it easier to understand and to make the user interface more intuitive and user friendly. The previous format proved confusing for users, and required them to click through more screens to get to where they wanted to go. In the updated system, it's much easier and less time-consuming for users to get to where they need to go, and it streamlines the users' experience, which ultimately reduces their reporting burden. The resources for download and tutorial videos were removed because they either no longer worked or were no longer relevant.

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Itemized Changes in Annual Cost Burden

Explain:

There is no cost burden for this collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data is collected annually from respondents. FEMA/ICPD will export data once a year, likely in September, for a national report published in spring of the following calendar year. Data is imported into an analysis tool, and analyzed to present national level annual findings in key mission areas and a report on the progress of Citizen Corps Councils and CERT programs from the previous year. This information will be included in FEMA's annual National Preparedness Report and there will also be programmatic reports made publicly available through FEMA's public website.

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.