

November 22, 2016

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0134

**Title: America's PrepareAthon! National Day of Action Event
Registration**

Form Number(s): FEMA Form 008-0-8

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.

As part of 6 U.S.C. Sec. 742 and Presidential Policy Directive 8 (PPD-8): National Preparedness, the President tasked the Secretary of Homeland Security to "coordinate a comprehensive campaign to build and sustain national preparedness, including public outreach and community-based and private-sector programs to enhance national resilience." The Federal Emergency Management Agency (FEMA) intends to conduct one (or more) National Day of Action, coordinated nationally by FEMA. Schools, businesses, faith-based organizations, governments at all levels, other community organizations, and families will participate in this National Day of Action by voluntarily taking part in a simultaneous multi-hazard drill and public education effort. These entities taking part in the National Day of Action register their planned events through this information collection effort. This collection was previously titled, "Community Drill

Day Registration and was OMB Control Number: 1660-NEW. It is now OMB Control Number 1660-0134.

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.

In order to fulfill its mission FEMA, Individual and Community Preparedness Division (ICPD) will collect information from individuals and organizations through the National Day of Action online registration.

FEMA will use this process to ensure that individual and organization registrants have the resources necessary to participate in preparedness activities.

FEMA Form 008-0-8, America's PrepareAthon! National Day of Action Registration – This form allows for individuals and organizations to describe their personal efforts or their organization's involvement in National Day of Action. Registrants can choose from a list of activities such as a drill and/or table top exercise. Data collected indicates, at a national, regional, state, and local level how individuals and organizations learned about the National Day of Action and why they are participating. The registration process will provide FEMA with valuable information about the public's participation in National Day of Action that will inform future outreach strategies related to participation in National Day of Action.

The current registration form was changed since the last OMB approval. FEMA Individual and Community Preparedness Division (ICPD) did update the name to America's PrepareAthon! because that is the registered name associated with this National Day of Action. FEMA 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. Current form is a first screen with Form name, FEMA Number, OMB Number, Burden Statement and Form Expiration Date. Now, when someone registers they need to enter their information and create a password—creates an account. Then they go to a next screen for entering event information. It's the same questions about the event as in 2013. What has changed is that instead of repeatedly needing to enter basic organizational information, the respondent from each organization only needs to log in for subsequent years and verify their information and then they can go into the screen for entering event information.

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.

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.

FEMA's Individual and Community Preparedness Division owns the America's PrepareAthon! website which has an online information collection process by which individuals and organizations submit information. Registration provides an individual or organization links to educational information and activities about preparedness and response related to specific hazards. Registrants will receive important updates and messages from FEMA. This registry supports the mission of FEMA's Individual and Community Preparedness Division, to help achieve greater community resiliency nationwide.

Requested information will be submitted through an electronic registration page on the FEMA website – www.community.fema.gov or the redirect link www.ready.gov/prepare. This is a 100% electronic collection. There is no downloadable form.

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

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

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

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

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

Without the collection of information as requested, FEMA's responsibility for administering Presidential Policy Directive 8 (PPD-8) would not be possible. This registration process provides critical information to measure participation in the America's PrepareAthon! National Day of Action and gives FEMA feedback on progress toward its mission to enhance nationwide resilience.

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.

FEMA/ICPD will collect information only once, when an individual or organization registers to participate in a National Day of Action.

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

FEMA/ICPD is not 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.

FEMA/ICPD is requesting one electronic copy of all documents.

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

FEMA/ICPD is not requiring respondents to retain records.

(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.

No statistical surveys are requested.

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

FEMA/ICPD is not 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.

FEMA/ICPD is not requiring a pledge of confidentiality that is not supported by authority established in statute or regulation.

(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.

FEMA/ICPD is not requiring respondents to submit proprietary trade secret, or other confidential information.

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 July 12, 2016, 81 FR 45172. 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 October 4, 2016, 81 FR 68443. 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 consults with state and local emergency management staff to obtain views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, and data elements collected.

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.

Individual and Community Preparedness meets monthly or as needed with state and local emergency management staff to obtain input. Additionally, the website portal for information collection has a feedback tool built in for registration process comments and criticisms.

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) for Community.FEMA.gov was completed and approved by DHS on June 22, 2016.

America's PrepareAthon! National Day of Action Registration website is a web portal. This portal is covered by the DHS Web Portal PIA, DHS/ALL/PIA-015 Department of Homeland Security Web Portals June 15, 2009 and the GITAARS SORN DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) 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 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 1 response per year from approximately 50,000 individuals and organizations. It is estimated that registration can be completed within 18 minutes,

resulting in an annual hourly burden of 15,000 hours total. (50,000 x .3 hour (18 mins.) = 15,000 annual hours) See Table A.1.

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.

Table A.1. Estimated Annualized Burden Hours and Costs

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or Households; Farms; Business or other for-profit; Federal Government; Not-for-profit Institutions; State, local or Tribal Government	National Day of Action Registration / FEMA Form 008-0-8	50,000	1	50,000	.3 hour (18 mins.)	15,000	\$32.52*	\$487,800
Total		50,000		50,000		15,000		\$487,800

*Note: The “Avg. Hourly Wage Rate” for each respondent includes a **1.4 multiplier** to reflect a fully-loaded wage rate. <http://www.bls.gov/news.release/ocwage.htm>

According to the U.S. Department of Labor, Bureau of Labor Statistics website (<http://www.bls.gov/news.release/ocwage.htm>) the mean wage rate category for all occupations is estimated to be \$23.23 per hour. FEMA multiplies this rate times 1.4 to obtain a fully loaded wage rate. That result is multiplied by 15,000 burden hours. Therefore, the estimated burden hour cost to registrants is estimated to be \$487,800.00 annually.

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

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

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

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs Full time contractor for Development	\$125,000
Staff Salaries* 1 GS-13, Step 5 (\$104,433) of time annually to review and follow up on submissions for this data collection. (at 30% \$31,330 x 1.4 benefits = \$43,862.00) to oversee process	\$43,862.00
Independent Validation and Verification (IV&V)	\$26,000
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Hosting (Operations & Maintenance) [annual cost]	\$62,500
Information System Security Officer (ISSO)	\$75,000
Printing [number of data collection instruments annually]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Other	
Total	\$332,362.00

* 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
National Day of Action Registration / FEMA Form 008-0-8				15,000	15,000	0
Total(s)				15,000	15,000	0

Explain:

There are no changes to the annual hour burden previously reported. However, there were a few changes to FEMA Form 008-0-8 to make it easier to understand and to make the user interface more intuitive and user friendly. There has been no change to the information being collected.

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 at the time of registration. FEMA/ICPD will export data after each National Day of Action. A national report published 3 months following the National Day of Action will be made available. Data is imported into an analysis tool, and analyzed to present national, regional and state level findings in participation in the

National Day of Action from the previous year. 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.