

March 28, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0046

Title: FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet

Form Number(s): FEMA Form 064-0-9

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.

FEMA’s Emergency Management Institute (EMI) provides a wide variety of training to emergency management personnel throughout the country. The EMI Independent Study (IS) Program is part of the FEMA training program authorized under the Robert T. Stafford Disaster Relief and Emergency Act, 42 U.S.C 5121-5207, Public Law 93-288 as amended. These courses are offered online by EMI. The IS Program provides valuable training to Federal, State, local and Tribal emergency management personnel and the general citizenry of the United States without having to attend a resident course at EMI, or at a State-sponsored course. The National Incident Management System (NIMS) is our nation’s incident management system. Homeland Security Presidential Directive 5, “Management of Domestic Incidents” requires the adoption of NIMS by all Federal departments and agencies. This directive also requires that Federal preparedness

assistance funding for States, Territories, local jurisdictions and Tribal entities be dependent on being NIMS compliant.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Form 064-0-9, EMI Independent Study Course Enrollment Application and Test Answer Sheet is an online process used by those persons wishing to take an independent study course. The student will review the coursework and take a final examination to gauge the level of knowledge gain achieved from the material presented. Successfully completing a course results in a certificate being generated for the individual. This may be applied towards continuing education credits and college credit. FEMA reports student completion data, when appropriate, to State Training Officers (STO).

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.

An electronic version of FEMA Form 064-0-9 is accessible from FEMA's EMI IS program training website at <http://training.fema.gov/IS/>. The student selects the answer sheet accompanying the course. Data entered is encrypted and uploaded into a database (Student Application and Registration Records). The electronic version of FEMA form 064-0-9 reduces burden on students because they are able to select course information, enroll and test online.

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 duplication of efforts involved with this data collection. Information collected is for approval and credit for the specific independent study course and is not available 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.

There is no 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.

The IS program is the online distance learning methodology for distribution of basic emergency management training to professionals and volunteers in emergency management, as well as awareness training for the general public. If enrollment in FEMA's IS program was not available, those wishing to take required emergency management training courses would have to travel to a training site at increased cost to the respondent. In addition, course availability would be limited to on site delivery, resulting in a dramatic enrollment reduction and creating an obstacle to the training mission.

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.

There is no requirement for 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.

There is no requirement for respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it. It is a completely self-directed process.

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

There is no requirement for 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.

There is no requirement for 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.

There is no survey connected to this collection that does not satisfy validity and reliability requirements related directly to training.

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

There is no requirement for the use of statistical data classification that has not been reviewed and approved.

(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.

There is no pledge of confidentiality not supported by 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.

There is no requirement to submit proprietary trade secrets 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 January 19, 2017, 82 FR 6595. FEMA received one public comment suggesting that the response time should be higher than .5 hours. The online course associated with this form uses a multiple choice format and varies in size from 10 to over 50 questions. Due to this difference, the time needed to complete a final exam varies greatly. Based on our most recent data, .5 hours is the mean time for a final exam completion, and FEMA believes that this is an accurate number for calculating the public burden associated with this form.

A 30-day Federal Register Notice inviting public comments was published on March 27, 2017, 82 FR 15230. 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.

Consultation with Federal, State, Local, and Tribal Emergency Management officials occurs annually at the EMI-hosted National Training and Exercise Conference. Any comments received concerning the course enrollment process and materials presented are addressed and appropriate changes are made.

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.

Ongoing daily online use of the training program by students provides constant opportunity for comment or questions regarding the collection of information. Issues related to the coursework are received via phone or e-mail at Independent.Study@dhs.com. All comments are evaluated to better serve the target audience.

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

There is no payment or gift to respondents for this data 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) form was approved on March 23, 2017.

The EMI Independent Study Course Enrollment Application is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA, DHS/FEMA/PIA 016 – Application and Registration Records for Training and Exercise Programs (ARRTEP), March 3, 2011. The SORN coverage for this collection is DHS/FEMA-011, Training and Exercise Programs, 80 FR 3241, January 22, 2015.

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 involved with this data collection.

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

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

It is estimated that 689,980 respondents representing persons of all occupations would participate in the training electronically. Each respondent will take an estimated 3 courses and the burden to provide the information will average .5 hours (30 minutes) per response. The total annual hour burden will be $689,980 \times 3 \times .5 \text{ hours} = 1,034,970 \text{ hours}$.

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

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

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, local or Tribal Government; Business or other for-profit; Not-for-profit institutions; Individuals or households; farms	FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)	689,980	3	2,069,940	0.5 (30 minutes)	1,034,970	\$24.36	\$25,211,869

• 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 (https://www.bls.gov/oes/current/oes_nat.htm) the wage rate category for All Occupations is estimated to be \$17.40 per hour x the wage rate multiplier of 1.4 = \$24.36. Therefore, the estimated burden hour cost to respondents (all occupations) is estimated to be \$25,211,869 annually (1,034,970 hours x \$24.36).

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 annual capital, start-up, and operation or maintenance costs associated with this 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 [%25 of Independent Study Program contract]	\$127,022
Staff Salaries* [1 of GS 12, step 1 employees spending approximately 65% of time annually(description)...managing the IS training program including verifying class completion and credit awarding for this data collection \$77,490 x 1.4 x 65% = \$70,516]; [1 of GS 14, step 1 employees spending approximately 35% of time annually managing the information database (i.e. performing a comprehensive review and consolidation of duplicate accounts, maintaining and updating organizational information) for this data collection \$108,887 x 1.4 x 35% = \$53,355]	\$ 123,871
Facilities [cost for renting, overhead, ect. for data collection activity]	0
Computer Hardware and Software [cost of equipment specifically for program annual lifecycle]	\$5,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$5,000
Total	\$260,893

* 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
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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
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)	0	0	0	4,297,492	1,034,970	-3,262,522

Explain:

The previous OMB submission for this form (2013) was incorrectly calculated. The correct calculation is shown above in question 12.

Because the last OMB package was incorrectly calculated, there is a decrease in the burden estimate for this collection of -3,262,522 burden hours.

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
FEMA/EMI Independent Study Course Enrollment and Test Answer Sheet / FEMA Form 064-0-9 (Electronic)				\$100,518,338	\$25,211,869	-75,306,469

Explain:

The decrease cost burden for FEMA Form 064-0-9 is due to previous cost figures being incorrectly calculated. The previous figures artificially inflated the cost of this form due to a simple multiplication error. These figures have been reexamined and the correct figures are now being used.

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.

There are no outline plans for tabulation and publication of data 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.

This collection does not seek approval to not display the expiration date for OMB approval.

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.