

October 18, 2017

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 - 0029**

**Title: Approval and Coordination of Requirements to Use the NETC  
for Extracurricular and Training Activities**

**Form Number(s): FEMA Form 119-17-1 and FEMA Form 119-17-2**

### **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. 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.**

The National Emergency Training Center (NETC) is a Federal Emergency Management Agency (FEMA) facility, which houses all FEMA employees at headquarters, regions, field establishments, and other individuals and organizations authorized to use the facilities. The responsibilities, procedures, and potential fees charged for using the National Emergency Training Center (NETC) facilities are identified in accordance with the Federal Emergency Management Agency’s (FEMA) NETC SOP Number 119-3, Facility Utilization and Expenses at the National Emergency Training Center, dated 24 June 2015. The NETC provides training and educational programs in emergency

response, preparedness, fire prevention and control, disaster response, and long-term disaster recovery. The principal purpose of FEMA Form 119-17-1, Request for Housing Accommodations, is to request housing at the NETC. The principal purpose of FEMA Form 119-17-2, Request for Use of NETC Facilities, is to conduct official business at the NETC.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5121-5207, authorizes the President to establish a program of disaster preparedness that utilizes services of all appropriate agencies and includes training and exercises. Section 611 of the Stafford Act (42 U.S.C. 5196) directs that the FEMA may conduct training for the purpose of emergency preparedness.

**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 program office must write, email, or telephone a request to determine if housing is available. If housing is available, the program office must follow up by completing FEMA Form 119-17-1, Request for Housing Accommodations. The form provides the names, purchase order number, gender, and disability status so that NETC can coordinate housing for contract instructors and attendees of the conference/meeting scheduled. The form also identifies if lodging fees need to be collected from the conference/training attendees.

The policy of USFA is to also accommodate other training activities on a space-available basis at the Emmitsburg campus. Special groups must write, email, or telephone a request to determine availability of the facilities. If space is available, the contact person for the special group must follow up by completing FEMA Form 119-17-2, Request for Use of NETC Facilities. The form provides information that enables NETC to assign classrooms, schedule equipment, and other facility services.

**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 Form 119-17-1 is produced via an electronic micro-purchasing system, and the information is automatically downloaded into the admissions system, which is used to

assign housing. All other requests for housing applies FEMA Form 119-17-1 in hard copy or faxed. This Form is provided online for completion.

FEMA Form 119-17-2 is produced in print form as well and provided online for completion.

FEMA Form 119-17-1 and FEMA Form 119-17-2 are available online at <https://intranet.fema.net/org/ms/ocao/orm/Pages/Forms.aspx>. The forms can be downloaded for use and returned via e-mail to [merril.sollenberger@fema.dhs.gov](mailto:merril.sollenberger@fema.dhs.gov). Forms are also returned via fax to (301) 447-1052, and can be mailed to NETC, 16825 South Seton Avenue, Emmitsburg, MD 21727, as established upon communication with requestors and the point of contact from the office of the Director of NETC MOSS.

**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 efforts involved with this data collection. The Housing Request Form is used to capture general information about contractors, contractor instructors, guests, special group participants, and all others who may request lodging at NETC. Students do not provide the same information on the other forms when requesting training. The purpose for this collection is for creating a reservation for lodging only.

**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 to small business or other small entities for this data collection.

**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 information is collected when housing accommodations and training activities are conducted at NETC as authorized.

**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 this information 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 in fewer than 30 days after receipt of this collection.

**(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 1 original 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 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 statistical survey involved with this data collection.

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

There is no requirement to use a statistical data classification not 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.**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation required for this data collection.

**(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 secret, or other confidential information that the agency cannot demonstrate procedures to protect the 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 February 6, 2017, 82 FR 9388. FEMA received one request for a copy of the proposed information collection by the public. The Agency responded to this comment and provided the most up-to-date copy of the proposed information collection to the requester. The public comment is uploaded in ROCIS.

A 30-day Federal Register Notice inviting public comments was published on April 26, 2017, 82 FR 19249. 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.**

The purpose of FEMA Form 119-17-1 and FEMA Form 119-17-2 are only used to request housing and use of NETC for official business. Consultation with NETC Staff and requestors is coordinated before submitting FEMA Form 119-17-1. To determine if housing is available, the requestor must write, email or telephone the facility to confirm space availability and follow-up with the request by submitting a FEMA Form 119-17-1. To assign classrooms, schedule equipment, and arrange for other services, requestors must follow up by completing FEMA Form 119-17-2.

**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.**

Consultations take place on occasion as a check to determine that information collected is clear and accurate.

**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 for this collection and forwarded to the FEMA Privacy Office for review on December 19, 2016. This PTA is still under review.

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 is one item of inquiry regarding special needs status included on FEMA Form 119-17-1 to ensure adequate accommodations are provided for those requestors in need.

**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.**

**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 1.46<sup>1</sup> 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
Individuals or households; Business or other for-profit; Not-for-profit institutions; Farms; State, local or Tribal Government	Request for Housing Accommodations / FEMA Form 119-17-1	60	1	60	0.1 (6 minutes)	6	\$33.92	\$203.52
Individuals or households; Business or other for-profit; Not-for-profit institutions; Farms; State, local or Tribal Government	Request for Use of NETC Facilities / FEMA Form 119-17-2	60	1	60	0.1 (6 minutes)	6	\$33.92	\$203.52
<b>Total</b>		<b>60</b>		<b>120</b>		<b>12</b>		<b>\$407.04</b>

Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 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#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000)) the wage rate category for all occupations is estimated to be \$23.23 x 1.46= \$33.92 per hour including the wage rate

<sup>1</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, September 2016.” Available at <http://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed January 12, 2017. Calculated by dividing total compensation for all workers of \$34.15 by wages and salaries for all workers of \$23.42 per hour (yields a benefits multiplier of approximately 1.46 x wages).

multiplier, therefore, the estimated burden hour cost to respondents all occupations is estimated to be \$407.04 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.
- c. There is zero capital cost to respondents.

**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.**

There are costs for receipt, review and approval for the collection of information using FEMA Form 119-17-1, Request for Housing Accommodations. The completed form is received by a GS-09-07 and reviewed. The length of time for this review is 5 minutes at the expense of \$3.74 per form.  $\$30.72 \times 1.46 = \$44.85$  hourly rate  $\times (1/12 \text{ hours}) = \$3.74$ .

A GS-15-05 reviews and approves/disapproves the request. The length of time for this review is 5 minutes with an expense of \$8.46 per form.  $\$69.56 \times 1.46 = \$101.56$  hourly rate  $\times (1/12 \text{ hours}) = \$8.46$ .

$\$3.74 + \$8.46 = \$12.20$  cost per form

\$732 total cost for review and recordkeeping for FEMA Form 119-17-1.

There is a cost for the review and recordkeeping of FEMA Form 119-17-2.

This completed form is received by a GS 09-07 and reviewed for the requested support. The total cost for this review and recordkeeping for 60 forms reviewed at a rate of \$3.74 per review is \$224.40.

<b>Annual Cost Burden to Respondents or Record Keepers</b>				
<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)</b>	<b>*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)</b>	<b>Annual Non-Labor Cost (expenditures on training, travel and other resources)</b>	<b>Total Annual Cost to Record Keepers</b>
FEMA Form 119-17-1	0	\$732	0	\$732
FEMA Form 119-17-2	0	\$224.40	0	\$224.40
<b>Total</b>		<b>\$956.40</b>		<b>\$956.40</b>

**Note:** Due to rounding the total cost to the respondents is **\$956** which is the same as in ROCIS.

FEMA Form 119-17-1 is reviewed by the GS-9 and the GS-15 with an annual number of forms being 60. The GS-9's wage rate for the amount of time to review is \$3.74 and the GS-15's wage rate for the amount of time to review is \$8.46. The sum of these amounts is \$12.20. The Total cost for review is \$12.20x60(forms) = \$732.

FEMA Form 119-17-2 is reviewed only by the GS-9 at the wage rate of \$3.74. The Total cost for review is \$3.74x60=\$224.40.

<b>Annual Cost to the Federal Government</b>	
<b>Item</b>	<b>Cost (\$)</b>
Contractor WD Desk Clerk 99050 \$11.58/hr. data entry for FEMA Form 119-17-1: There is contract support as data entry for FEMA Form 119-17-1. A Desk Clerk enters the data into the Admission system at \$11.58 x (1/12 hour) = \$0.97 per form. 60 forms x .97 = \$58.20 total annually	\$58.20
Staff Salaries* 1 GS 9 Step 7 spending 5 minutes per form at \$44.85 per hour x (1/12) hours = \$3.74 x 120 forms = \$448.80 per year. 1 GS 15 Step 5 spending 5 minutes per form at \$101.56 per hour x (1/12) hours = \$8.46 x 60 forms = \$507.6 per year.	\$956.40
Facilities	\$0.00
Computer Hardware and Software	\$0.00
Equipment Maintenance	\$0.00
Travel	\$0.00
<b>Total</b>	<b>\$1,014.60</b>

\* Note: The "Salary Rate" includes a 1.46 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 a 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
Request for Housing Accommodations / FEMA Form 119-17-1				6	6	0
Request for Use of NETC Facilities / FEMA Form 119-17-2				6	6	0
<b>Total(s)</b>				<b>12</b>	<b>12</b>	<b>0</b>

**Explain:**

There are no changes to the annual hour burden previously reported and there has been no change to the information being collected. However, there has been a few minor edits to FEMA Form 119-17-1 and FEMA Form 119-17-2 to improve the forms.

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
Request for Housing Accommodations / FEMA Form 119-17-1 <b>and</b> Request for Use of NETC Facilities / FEMA Form 119-17-2				\$0	\$956.40	\$956.40
<b>Total(s)</b>				<b>\$0</b>	<b>\$956.40</b>	<b>\$956.40</b>

***Explain:***

The Annual Cost Burden for FEMA Form 119-17-1 and FEMA Form 119-17-2 is \$956. See question 13.

**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.