August 25, 2017

Supporting Statement for

Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0135**

**Title: Staffing for Adequate Fire and Emergency Response (SAFER) Grants**

**Form Number(s): FEMA Form 080-0-4,** Staffing for Adequate Fire and Emergency Response (General Questions All Applicants); **FEMA Form 080-0-4a**, Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative); **FEMA Form 080-0-4b**, Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative); **FEMA Form 087-0-0-2,** Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form

# 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.**

Information sought under this submission will comprise the applications for the Staffing for Adequate Fire and Emergency Response (SAFER) grants. The authorizing legislation allows FEMA to fund fire department activities in as many as two different areas. The authority for the Staffing for Adequate Fire and Emergency Response (SAFER) grant program is derived from the *Federal Fire Prevention and Control Act of 1974*, as amended (15 U.S.C. 2201 et seq.). The information collected is grant application information which is necessary to assess the needs of the applicants as well as the benefits to be obtained from the use of funds. The information collected through the program’s application is the minimum necessary to evaluate grant applications and is necessary for FEMA to comply with mandates delineated in the law.

**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 uses this information to ensure that FEMA’s responsibilities under the law can be fulfilled, accurately and efficiently. The information will also be used to objectively evaluate each of the anticipated applicants to determine which of the applicants’ proposals in each of the activities are the closest to the established program priorities.

The SAFER program provides funding for the hiring of new firefighters and the recruitment and retention of volunteer firefighters. The SAFER grant’s objectives are to provide funding directly to fire departments for the purpose of increasing the number of firefighters, to help communities meet industry minimum standards and attain 24-hour staffing to provide adequate protection from fire and fire-related hazards, and to fulfill traditional missions of fire departments that antedate the creation of the FEMA grant funds. SAFER grant funds are available in two activities: Hiring Firefighters and Recruitment and Retention of Volunteer Firefighters.

**Staffing for Adequate Fire and Emergency Response (SAFER) Grants**

**FEMA Form 080-0-4, Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants)** – This form is used to obtain general information regarding the applicant such as name, address, banking information, contact information, and type of organization. It also includes questions regarding the general characteristics of the applicant’s community such as zoning and population protected. Finally, it obtains information regarding the staffing levels and needs of the applicant, the number of firefighters, both full and part-time, and the number and types of incidents to which the department responds.

**FEMA Form 080-0-4a, Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative)** – This form obtains information from the applicant regarding their staffing status, their current response rates, their projected response rates if awarded as well as the staffing level on their first-out engine. Applicants also provide a narrative with detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, the policies and practices of the applicant regarding minority recruitment, the applicants ability to maintain the staffing hired by the grant and the applicant’s policies and practices regarding their allowance of their paid members to volunteer as a firefighter in other jurisdiction during their days off.

**FEMA Form 080-0-4b, Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)** – This form obtains information from the applicant regarding their current staffing levels, the turnover in volunteers, their success in recruiting new volunteers, their ideal staffing levels, and their projected results if awarded. The second part is the narrative where the applicant provides detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, and the policies and practices of the applicant regarding minority recruitment.

**FEMA Form 087-0-0-2, Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form** – This form obtains information used for monitoring a grant award such as project updates, milestones accomplished, or possible problems. This form also serves as a formal request for funds for SAFER grant recipients.

**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.**

The information is collected via a web-based application through the FEMA Integrated Security and Access Control System, for these grant programs. Guidance on how to complete these forms can be found on the FEMA website at <http://www.fema.gov/firegrants> and applications can be accessed on the following FEMA website <https://portal.fema.gov/famsVuWeb/home>. The SAFER guidance documents can be found in the SAFER documents page and include SAFER Notice of Funding Opportunity, SAFER Application Checklist, SAFER Evaluation Sheet – Hiring Applications, and SAFER Evaluation Sheet - Recruitment and Retention Fire Departments.

**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 U.S. Fire Administration has an incident reporting system that is used to compile fire-related statistics. The system, the National Fire Incident Reporting System (NFIRS), is approved under OMB No.1660-0069 and participation in it is completely voluntary. The NFIRS is a fire incident collection instrument and does not involve a fire department’s fiscal concerns or operational needs; therefore, there is little information that would overlap our collection which is primarily financially and operationally based. NFIRS, based on its voluntary nature, is not an accurate accounting of all of the functions performed on a yearly basis by a grant applicant. Due to this incomplete data, basing a grant application on the information available in the NFIRS would incorrectly restrict awards to deserving respondents. But, to the extent possible, the information in NFIRS will be used for those applicants that have participated in the past in lieu of requiring those applicants to resubmit the same 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.**

If the information collection is not conducted, there would be no basis under which the applications for assistance could be evaluated, thus funds available for the programs’ purposes cannot be awarded and the benefits of the activities associated with each of the grant purposes would not be achieved. The information is also necessary to assess the financial needs of the applicants as well as the projected benefits obtained from the use of the grant funds.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

1. **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.**

1. **Requiring respondents to submit more than an original and two**

**copies of any document.**

1. **Requiring respondents to retain records, other than health,**

**medical, government contract, grant-in-aid, or tax records for more than three years**.

1. **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(a) thru 7(h) 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 May 12, 2017, 82 FR 22150. FEMA received two positive comments supporting FEMA’s effort to continue SAFER grants for both fire departments and the communities they serve, but one provided a caveat to streamline the process. FEMA’s response is that the Program Office is working towards this goal. FEMA received one comment that application material were difficult to locate at this time. FEMA’s response is that the materials are only available during the application period, applicants are notified well ahead of time through the Notice of Funding Opportunity of these dates.

A 30-day Federal Register Notice inviting public comments was published on July 25, 2017, 82 FR 34548. 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.**

As required by law, FEMA consults on a regular basis with a panel of subject matter experts from national fire service organizations. It is FEMA’s intention to have each application evaluated to determine which applications are most consistent with the SAFER Grant funding priorities. The initial scores are combined later with the scores of the applications after they receive peer review evaluations by a panel of subject-matter experts. The experts are representatives from the nine major fire service organizations that are nominated by their respective organizations to provide advice and recommendations regarding the implementation of the SAFER grant program. The nine organizations are:

· Congressional Fire Services Institute (CFSI);

· International Association of Arson Investigators (IAAI);

· International Association of Fire Chiefs (IAFC);

· International Association of Firefighters (IAFF);

· International Society of Fire Service Instructors (ISFSI);

· National Association of State Fire Marshals (NASFM);

· National Fire Protection Association (NFPA);

· National Volunteer Fire Council (NVFC); and

· North American Fire Training Directors (NAFTD).

 **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.**

Annually FEMA consults the panel reviewers concerning the relevance of the information collected versus the burden of collecting the information for submission. The peer reviewers are made up of applicants, grant writers, and other interested parties who are extensively involved with the fire service.

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

There is no offer of monetary or material value for this information 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) was completed by FEMA and adjudicated by the DHS Privacy Office on July 31, 2017.

The Staffing for Adequate Fire and Emergency Response (SAFER) Grants is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. These forms are covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015. Note each associated FEMA form has its separate adjudicated PTA form. No SORN coverage is required.

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.

**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.**

The FEMA Assistance to Firefighters Grant program office, which manages and administers the SAFER program, conducted a survey in 2013 to determine a more accurate burden rate for each collection included in this request. The information provided below incorporates the results of that survey. There have been no substantial changes since then to substantiate a change in burden hours. The AFG program office used the total submissions during the 2016 application cycle to estimate the number and type of respondents for each form.

SAFER grant application has three components. There is the SAFER general questionnaire (FEMA Form 080-0-4), the Hiring of Firefighters questionnaire (FEMA Form 080-0-4a), and the Recruitment and Retention of Volunteer Firefighters questionnaire (FEMA Form 080-0-4b). For a complete application submission either the Hiring of Firefighters questionnaire or the Recruitment and Retention of Volunteer Firefighters questionnaire are required with the SAFER general questionnaire.

SAFER grant recipients are required to complete the SAFER Quarterly Reports and Payment Request (FEMA Form 087-0-0-2) in order to received funding and satisfy grant monitoring requirements.

**FEMA Form 080-0-4** – It has been estimated to take fire departments of state, local, or tribal governments an average of 9 hours to gather the information and complete the SAFER general questionnaire required for all applicants. It has been estimated to take nonprofit organizations an average of 2 hours to gather the information and complete the SAFER general questionnaire because some of the questions are not applicable to nonprofit organizations. It has been estimated that 1,023 local fire departments and 32 not-for-profit institutions will submit one application, for a total of 1,055 respondents. Each respondent will complete one SAFER general questionnaire annually. The total estimated number of burden hours for fire departments is 9,207. The total estimated number of burden hours for nonprofit institutions is 64. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

**FEMA Form 080-0-4a** – It has been estimated to take fire departments of state, local, or tribal governments an average of 7.5 hours to complete the SAFER hiring of firefighters questionnaire. Approximately 617 Local fire departments will submit one questionnaire annually. The total estimated number of burden hours for fire departments of state, local, or tribal governments is 4,628. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms. There are not any not-for-profit respondents.

**FEMA Form 080-0-4b** – It has been estimated to take fire departments of state, local, or tribal governments and nonprofit institutions an average of 7.5 hours to complete the SAFER recruitment and retention of volunteer firefighters questionnaire. Approximately 406 local fire departments and 32 not-for-profit institutions will submit one questionnaire annually for a total of 438 respondents. The total estimated number of burden hours for fire departments is 3,045. The total estimated number of burden hours for nonprofit institutions is 240. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

**FEMA Form 087-0-0-2** – It has been estimated to take fire departments of state, local, or tribal governments and nonprofit institutions an average of 1 hours to complete the SAFER Quarterly Reports and Payment Request. Approximately 210 local fire departments and 10 Not-for-profit institutions will submit four questionnaires annually for a total of 880 respondents. The total estimated number of burden hours for fire departments is 840. The total estimated number of burden hours for nonprofit institutions is 40. The estimate was determined by multiplying the estimated number of respondents by the average amount of time to complete the forms.

 **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 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.**

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| Estimated Annualized Burden Hours and Costs |
| **Type of Respondent** | **Form Name / Form Number** | **No. of Respon-dents** | **No. of Respon-ses per Respon-dent** | **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 | Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants) / FEMA Form 080-0-4 | 1023 | 1 | 1023 | 9 hrs. | 9,207 | $54.08 | $497,914.56 |
| Not-for-Profit Institutions | Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants) / FEMA Form 080-0-4 | 32 | 1 | 32 | 2 hrs. | 64 | $52.90 | $3,385.60 |
| State, Local or Tribal Government | Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4a | 617 | 1 | 617 | 7.5 hrs. | 4,627.5 | $54.08 | $250,255.20 |
| State, Local or Tribal Government | Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4b | 406 | 1 | 406 | 7.5 hrs. | 3,045 | $54.08 | $164,673.60 |
| Not-for-Profit Institutions | Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4b | 32 | 1 | 32 | 7.5 hrs. | 240 | $52.90 | $12,696.00 |
| State, Local or Tribal Government | Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form / FEMA Form 087-0-0-2 | 210 | 4 | 840 | 1 hr. | 840 | $54.08 | $45,427.20 |
| Not-for-Profit Institutions | Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form / FEMA Form 087-0-0-2 | 10 | 4 | 40 | 1 hr. | 40 | $52.90 | $2,116.00 |
| **Total** |   | **2,330** |   | **2,990** |   | **18,063.5** |   | **$976,468.16** |

 **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 ([www.bls.gov](http://www.bls.gov)) the wage rate category First-Line Supervisor/Manager of Fire Fighting and Prevention Workers is estimated to be $54.08 per hour including the wage rate multiplier of 1.46. The First-Line Supervisor/Manager of Fire Fighting and Prevention Workers category accurately represents the majority of State, Local or Tribal Government respondents. The wage rate category for Environmental Scientists and Specialists is estimated to be $52.90 per hour including the wage rage multiplier of 1.46. The Environmental Scientists and Specialists category accurately represents Not-for-profit institutions respondents. Approximately 20% of the applicants will be selected for a grant award. Those selected will be required to complete FEMA Form 087-0-0-2 SAFER Quarterly Reports and Payment Request as a stipulation of accepting the grant award. The estimated burden hour cost to respondents is $976,468.16 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.**

****\* Note: The “Salary Rate” includes a 1.46 multiplier to reflect a fully-loaded wage rate.

**The cost to the Federal Government is $1,666,213.82.**

 **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.*

*****Explain:***

There is a significant decrease in the number of respondents from 3,200 to 2,330. We attribute this decrease to a reduction in available funding, and, as a result, a reduction in the amount of awards granted. The decrease in respondents results in a 9,006.5 hour adjustment to the burden hours.

The FEMA Form 087-0-0-2, Quarterly Performance Report and Payment Request has been added to this ICR due to the requirement for grant recipients to complete this form during the grant cycle. There is a program increase of 880 burden hours due to the addition of this form.

Combining the program increase and adjusted decrease of results in a total decrease of 8,126.5 annual burden hours.

*****Explain:***

There is a significant decrease in the number of respondents from 3,200 to 2,330. We attribute this decrease to a reduction in available funding, and, as a result, a reduction in the amount of awards granted.

The FEMA Form 087-0-0-2, Quarterly Performance Report and Payment Request has been added to this ICR due to the requirement for grant recipients to complete this form during the grant cycle. There is a $47,543.20 [$45,427.20 + $2,116.00 = $47,543.20] cost burden increase due to the addition of this form.

There was a mistake on the currently approved ICR regarding the estimated burden cost. The total burden cost was miscalculated with a difference of $1,113,839.70. The total cost currently on OMB Inventory should be $1,268,813.70. This mistake has been corrected in this ICR. So what seems to be an increase of $820,774.16 is actually a decrease of $293,065.54 [$1,268,813.70 - $820,774.16 = $448,039.54 - $154,974.00 = $293,065.54].

The result is a cost burden of $975,748.16.

**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.