

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0058

Title: Fire Management Assistance Grant Program

Form Number(s): FEMA Form 078-0-2; FEMA Form 078-0-1; FEMA Form 089-0-24

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 information collected is required for Fire Management Assistance Grant Program (FMAGP) eligibility determinations, grants management, and compliance with other Federal laws and regulations. The FMAGP was established under Section 420 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42, U.S.C. 5187, as amended by § 303 of the Disaster Mitigation Act of 2000, and authorizes the President to provide assistance to any State or local government for the mitigation, management, and control of any fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster. 44 CFR Part 204 specifies the information collections necessary to facilitate the provision of assistance under the FMAGP.

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 information collection is used by both FEMA Regional and State staff to facilitate the declaration request and grant administration processes of FMAGP, as well as end of year internal reporting of overall declaration requests and estimated grant outlays. The following information collections are used:

FEMA-State Agreement and Amendment - Federal assistance under the Stafford Act must be provided in accordance with the FEMA State Agreement for the FMAG Program. The State Governor and the Regional Director must sign the Agreement, which contains the necessary terms and conditions consistent with the provisions of applicable laws, executive orders, and regulations, and specifies the type and extent of Federal assistance to be provided. The Agreement is an annual agreement applicable only for the calendar year in which it is signed and is required each year. Failure to provide a signed agreement will result in a denial of grant benefits.

FEMA Form 089-0-24, Request for Fire Management Assistance Subgrant, is used by State, local and tribal governments to state their interest in applying for sub-grants under an approved fire management assistance grant. The form provides essential sub-grantee contact information and is required upon each approval of a fire management assistance declaration.

FEMA Form 078-0-1, Request for a Fire Management Assistance Declaration is used by the State to provide information in support of its request for a fire management assistance declaration. This form must be completed by the Governor or Governor's Authorized Representative (GAR) and forwarded to the appropriate FEMA Regional Director for review and transmittal to FEMA headquarters. Follow-up information may be furnished by the State or requested by FEMA after the initial request has been received. For example, if the extent or threat of the fire is vaguely stated in the FF 078-0-1, FEMA may need to request additional information about the fire in the initial request to make an eligibility determination. This information is provided upon each approval of a fire management assistance declaration.

FEMA Form 078-0-2, Principal Advisor's Report, is used by States to provide FEMA with technical assessment of a fire or fire complex for which the State is requesting a fire management assistance declaration. FEMA will review all information submitted in the State's request along with the Principal Advisor's assessment and Regional summary and will render a determination.

A State Administrative Plan for the FMAG Program must be developed annually by the State for the administration of fire management assistance grants. The plan describes the

procedures for the administration of FMAGP, designates the State agency to serve as Grantee, and ensures State compliance with the provisions of law and regulation applicable to fire management assistance grants. The plan also identifies staffing functions, the sources of staff to fill these functions, and the management and oversight responsibilities of each. In addition, the plan describes the procedures to notify potential applicants of the availability of the program, assist FEMA in determining applicant eligibility, review Project Worksheets (PWs) (from Information Collection OMB No. 1660-0017), process payment of subgrants, close-out grants, and audit and reconcile subgrants.

Training Sessions are provided primarily for Regional staff and State officials who administer the FMAG Program for the purpose of instructing and updating attendees on the laws, regulations, policies, and process that govern the program, as well as to discuss any program issues. These training sessions are not required to participate in the Fire Management Assistance Grant Program but are offered on a once-yearly basis at the request of the respondents.

Appeals – When a State's request for a fire management assistance declaration is denied, the Governor of a State or GAR may appeal the decision in writing. The State may submit a one-time request for reconsideration in writing, with additional information, to the Director of FEMA's Recovery Division. The appeal must be submitted within 30 days of the date of the letter denying the State's/Indian tribal government's request. A time extension of 30 days may be granted by the Director if the Governor or GAR submits a written request for a time extension within the 30-day period. The information provided through the appeal process is reviewed for consideration of the reversal of a denial.

Similarly, applicants may appeal any cost or eligibility determination under an approved declaration within 60 days after receipt of the notice of the action that is being appealed. The request must be submitted in writing to FEMA through the Grantee in accordance with the appeal procedures. Appeals usually consist of a letter briefly describing the reason for the appeal and any new supporting documentation the State or applicant submits to FEMA for review.

Duplication of Benefits – Applicants are required to notify FEMA of all benefits, actual or anticipated, received from other sources for the same loss for which they are applying to FEMA for assistance. Notification can be accomplished in a letter, accompanied by supporting documentation. This notification is a requirement for each grant request made and occurs upon each approval of a fire management assistance declaration.

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 forms utilized in this collection are available electronically through the FEMA Internet website at https://portalapps.fema.net/apps/employee_tools/forms/FEMA%20Forms/Forms/AllItems.aspx and allow for entry of data and/or printing of the forms to complete. Other information collection methods require free-form creation of responses. The information supplied requires original signatures and cannot be transmitted electronically. Most often the information/data is initially submitted verbally then sent followed by hardcopy. The required information and data is typically obtained real-time in the field where a fire is burning. Because this process uses information/data obtained verbally this reduces the need for electronic gathering and submission with the exception of the hard copy signatures.

FEMA Form 078-0-2 is completed only by professionally educated and trained foresters working for the U.S. Forest Service or Bureau of Land Management. If there are questions on the data or information submitted on the report, the Principal Advisor is contacted by telephone by a Regional Watch Officer or a Regional Administrator for clarification. Because an uncontrolled fire may change rapidly, the data and information are only good for a short period of time and it is expected that the data will be modified on an as needed basis via telephone.

FEMA Form 078-0-1 is completed only by the Governor of a State or their authorized representative, (Governors Authorized Representative). The sources for the information vary by State and may include each State's Forest Managers, Emergency Management, and response personnel who are on the scene of a wildfire. Local Meteorologists may be used to provide current and expected weather information. Because the source(s) of information for each State are different, the information may change rapidly if the fire characteristics change. The form is completed by knowledgeable staff in the State or Tribal government, step-by-step instructions for completing the form are being developed.

The information required on FEMA Form 089-0-24, Request for a Fire Management Assistance Subgrant, resides with the Agency completing the form. Requesters are only required to submit their name, address, county, State, zip code, and contact information.

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 collected is requested for a fire declaration or grant application to receive reimbursement for expenses for fire suppression and related services that are unique to a specific fire on a specific date. For that reason, the requested data/information is not available or 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.

The information collection activities requested are required to receive a benefit and designed to assist both FEMA and the State in making an FMAG declaration decision, and for managing the operation and administration of the FMAG Program. Without the collection of this information, declaration decisions could not be made and funds for fire suppression and related activities would not be eligible for Federal-State matching funds. Also, FEMA and the State would be unable to effectively and efficiently deliver assistance to eligible applicants authorized by the Stafford Act.

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 requires applicants to report information more than quarterly when instances of unexpected events or a new FMAGP declaration requires a separate submission of an Amendment to the FEMA-State Agreement for the FMAG Program.

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

FEMA does not require a written response in fewer than 30 days for any information collected under the FMAG Program.

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

There are no requirements 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 are no requirements 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.

FEMA does not conduct statistical surveys for the FMAGP

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

There are no requirements for the use of statistical data classification for FMAGP.

(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 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.

The FMAGP does not require applicants to provide any information of proprietary trade secret or 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 October 12, 2017, Volume 82 FR 47562. **55 comments related to the Grants Program were received.**

A 30-day Federal Register Notice inviting public comments was published on [\[January 26, 2018, 83 FR 3763\]](#) **No comments were received.**

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 communicates with State Emergency Managers and Foresters and discusses various program aspects, including the information being collected. This was done during a FMAGP Workshop held in Boise, Idaho June 20-23, 2017. During this workshop

possible revisions to program forms was discussed and FEMA may make changes to the information collections in the future as a result of the feedback.

FEMA coordinates with representatives of the U.S. Forest Service, and the United States Department of Agriculture via meetings and conference calls regarding the FMAGP information requested/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.

FEMA holds monthly conference calls with Regional program managers and staff, and FEMA Regions and Headquarters personnel have meetings in which FEMA Regional Offices, State Emergency Offices, and FEMA State Forestry Departments discuss various aspects of the program. This was done specifically during a FMAGP Workshop held in Boise, Idaho on June 20-23, 2017.

Additionally, FEMA Regional staff hold briefings and training sessions via conference call or occasionally in person for States for fire declarations to provide an overview of the program and the application process. Regional Offices communicate regularly with States and other Federal Agencies who collect the information.

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 approved on September 6, 2017. This collection is covered under DHS/FEMA/PIA-013 Grant Management Programs.

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 including questions related to sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private.

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 1.4 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.

FEMA estimates that approximately 25 respondents will complete the **FEMA-State Agreement and Amendment**. There will be approximately 4 responses per respondent for a total of 100 responses. Each form is estimated to take 0.4 hours (24 minutes) to complete. The total annual burden is estimated to be 100 responses x 0.4 hours (24 minutes) per response = 40 burden hours.

FEMA estimates that approximately 25 respondents will complete the **State Administrative Plan for Fire Management Assistance**. There will be approximately 1 response per respondent for a total of 25 responses. Each form is estimated to take 8 hours to complete. The total annual burden is estimated to be 25 responses x 8 hours per response = 200 burden hours.

FEMA estimates that approximately 25 respondents will complete the **FEMA Form 078-0-1**. There will be approximately 4 responses per respondent for a total of 100 responses. Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 100 responses x 1 hour per response = 100 burden hours.

FEMA estimates that approximately 25 respondents will complete the **FEMA Form 089-0-24**. There will be approximately 4 responses per respondent for a total of 100 responses. Each form is estimated to take 0.3 hours (18 minutes) to complete. The total annual burden is estimated to be 100 responses x 0.3 hours (18 minutes) per response = 30 burden hours.

FEMA estimates that approximately 25 respondents will complete the **FEMA Form 078-0-2**. There will be approximately 4 responses per respondent for a total of 100 responses. Each form is estimated to take 3 hours to complete. The total annual burden is estimated to be 100 responses x 3 hours per response = 300 burden hours.

FEMA estimates that approximately 3 respondents will complete the **Appeal Letter**. There will be approximately 1 response per respondent for a total of 3 responses. Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 3 responses x 1 hour per response = 3 burden hours.

FEMA estimates that approximately 25 respondents will complete the **Duplication of Benefits Letter**. There will be approximately 4 responses per respondent for a total of 100 responses. Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 100 responses x 1 hour per response = 100 burden hours.

FEMA has estimated that approximately 25 respondents will complete the **Training Sessions**. There will be approximately 1 response per respondent for a total of 25 responses. Each form is estimated to take 1.5 hours (90 minutes) to complete. The total annual burden is estimated to be 25 responses x 1.5 hours (90 minutes) per response = 37.5 burden hours.

Estimated Annualized Burden Hours and Costs								
Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.								
"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-1								
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	FEMA-State Agreement and Amendment	25	4	100	0.4 hours (24 minutes)	40	\$69.44	\$2,778
State, Local or Tribal Government	State Administrative Plan for FMAG	25	1	25	8 hours	200	\$69.44	\$13,888
State, Local or Tribal Government	Request for FMAG Declaration, FEMA Form 078-0-1	25	4	100	1 hour	100	\$69.44	\$6,944.00
State, Local or Tribal Government	Request for FMA Subgrant, FEMA Form 089-0-	25	4	100	0.3 hours (18 minutes)	30	\$69.44	\$2,083

	24							
State, Local or Tribal Government	Principal Advisor's Report, FEMA Form 078-0-2	25	4	100	3 hours	300	\$69.44	\$20,832
State, Local or Tribal Government	Appeal Letter	3	1	3	1 hour	3	\$69.44	\$208
State, Local or Tribal Government	Duplication of Benefits Letter	25	4	100	1 hour	100	\$69.44	\$6,944
State, Local or Tribal Government	Training Sessions	25	1	25	1.5 hours (90 minutes)	37.5	\$69.44	\$2,604
Total		178		553		810.5		\$56,281

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46. For example, a non-loaded BLS table wage rate of \$47.56 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$69.44. Round to the nearest cent following standard rounding rules (0-4 round down and 5-9 round up).

Using the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) May, 2016 Occupational Employment and Wages report an average hourly wage rate category for an Administrative Services Manager (SOC code 11-3011, NAICS code 561110) is estimated to be \$47.56. A manager was used as the title and hourly wage rate for a person who may complete these forms may vary by State. The hourly rate of \$47.56 was multiplied by the 1.46 Wage-rate category multiplier resulting in a \$69.44 per hourly rate. Total Annual Respondent Costs were computed by multiplying the Total Annual Burden (in hours) for each form, multiplied by the Avg. Hourly Wage Rate. The line items were added together to obtain the estimated total annualized burden costs. Therefore, the estimated burden hour cost to respondents for an Administrative Services Manager for all FMAG forms is \$56,281 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.

The numbers are based on the following methodology: In any given year, five FEMA regions will have one or more wildland fires that may result in an FMAG declaration. When one of those 5 regions has a declaration, the forms in this collection are completed and submitted. The wages for the staff who complete these forms is estimated to be a GS-13/Step 6. The time and dollar figures in the box below provide estimates of the time needed to provide responses to questions on the forms. The annual salary for a GS-13 in the Raleigh-Durham-Chapel Hill area from OPM website is \$103,564, with the fully loaded factor of 1.46 it comes to \$151,203.

Item	Cost (\$)
Contract Costs [Describe]	0
Staff Salaries [1 of GS-13 employee spending approximately 50% of time annually reviewing and making determinations for FMAGP requests (\$75,602), 1 of GS-13 employee spending approximately 5% of time reviewing reports (\$7,560), 2 of GS-13 employee spending approximately 10% of time training, \$15,120 x 2 (\$30,240), 1 of GS-13 employee spending approximately 1% of time auditing (\$1,512), and 1 of GS-13 employee spending approximately 5% of time reviewing appeals (\$7,560)] for a total of \$122,474 times 5 regions = \$612,370.	\$612,370
Facilities [cost for renting, overhead, etc. for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle]	0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
Printing [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	0
Total	\$612,370

* 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
			0			0
			0			0
			0			0
			0			0
			0			0
			0			0
			0			0
Total	0	0	0	0	0	0

Explain: No changes

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.

This collection does not seek exception to "Certification for Paperwork Reduction Act Submissions". This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable" Question #3 in the supporting statement justifies the non-use of information technology.