

June 27, 2018

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0131

**Title: Threat and Hazard Identification and Risk Assessment (THIRA)
– Stakeholder Preparedness Review (SPR) Reporting Tool**

Form Number(s): FEMA Forms 008-0-19 (THIRA), 008-0-20 and 008-0-23

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.

This package is a revision to the collection titled THIRA/SPR, OMB Control Number: 1660-0131. Although initially titled the State Preparedness Report, FEMA changed the name of the collection to the THIRA/SPR Unified Reporting Tool to more accurately reflect the information and method of collection. The *Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA)*, as amended by the *Implementing Recommendations of the 9/11 Commission Act of 2007*, established an annual requirement for the 56 states and

territories to submit a State Preparedness Report (SPR). Because this reporting now includes states, territories, urban areas, and tribes, FEMA has revised the name of the report as the Stakeholder Preparedness Review (SPR). States, territories, urban areas and tribes receiving non-disaster preparedness grant funds administered by the Department of Homeland Security submit the SPR annually, and this encompasses the requirements of the State Preparedness Report while also reflecting the updated reporting needs. The legislation requires a report on current capability levels and a description of targeted capability levels from all states, territories, urban areas and tribes receiving non-disaster preparedness grant funds administered by the Department of Homeland Security. Each report must also include a discussion of the extent to which target capabilities identified in the applicable State homeland security plan and other applicable plans are unmet, and an assessment of resources needed to meet the preparedness priorities established under PKEMRA Section 646(e), including: (i) an estimate of the amount of expenditures required to attain the preparedness priorities; and (ii) the extent to which the use of Federal assistance during the preceding fiscal year achieved the preparedness priorities. To meet this requirement, states, territories, tribes, and urban areas first identify capability targets through the THIRA and then assess against these targets in the SPR. Through the SPR, these jurisdictions estimate their current capabilities, identify and describe gaps between current capabilities and targets, indicate their intended approach for addressing gaps in the future, and report on the impact of Federal grant dollars in building and sustaining capabilities. It is also important to note that completing the THIRA and SPR are allowable expenses under the grant awards.

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.

This collection renewal's assessment goal and the information collected information remain the same but with an adapted platform for the collection tool from Excel to online forms available to respondents from the Max.gov web portal. This change was made because the prior method was more cumbersome for the respondents and for FEMA. The information collected enables state, territory, local, and tribal jurisdictions, along with the Federal Government, to understand the risks these entities face from threats and hazards, to estimate the capabilities and resources they need to manage those risks, to assess their current capability levels against their targeted capability levels, and to identify gaps between their current capabilities and the capabilities they need. This information characterizes the first two components of the National Preparedness System: Identifying and Assessing Risk, and Estimating Capability Requirements. It serves as a foundation for the remainder of the National Preparedness System, and thus represents the first steps of the nation's process for achieving its National Preparedness Goal of a secure and resilient nation.

The information collection consists of two major steps. Respondents first complete a THIRA by establishing capability targets based on their jurisdiction's own threats and hazards. Respondents then estimate their current capability levels against those targets in the SPR. Together, the two steps enable respondents to identify their capabilities and capability gaps and prioritize the building and sustaining of capabilities.

The assessment is structured by the 32 core capabilities from the 2015 National Preparedness Goal, and therefore states, territories, and urban areas provide information on their current capability levels and capability gaps in each core capability; tribes complete the THIRA and SPR processes only for ten of the core capabilities. States, territories, tribes, and urban areas gather the information and complete the THIRA following Comprehensive Preparedness Guide (CPG) 201, Second Edition. States, territories, tribes, and urban areas typically rely on subject matter expertise of emergency management personnel, homeland security personnel, and other stakeholders to complete the THIRA and SPR.

This revised collection is designed to standardize the submission method for states, territories, tribes, and urban areas, and to meet public law requirements. The information serves as the primary source of data on the preparedness capabilities of all of the states and territories. The information is summarized in the National Preparedness Report, as required by *Presidential Policy Directive 8: National Preparedness* (PPD-8). The National Preparedness Report is an annual report to the President that summarizes national progress in building, sustaining, and delivering the 32 core capabilities outlined in the National Preparedness Goal.

FEMA and other Federal departments and agencies use THIRA and SPR information to inform and prioritize their preparedness programs and activities. FEMA relies on the information in its Strategic Plan, 2014-2018, to assess Agency-wide Performance Goals in support of Strategic Priority 1: Be Survivor-Centric in Mission and Program Delivery and Strategic Priority 3: Posture and Build Capability for Catastrophic Disasters. Additionally, FEMA's National Training and Education Division (NTED) uses the information to identify and address the nation's greatest training needs. Since 2016, FEMA has shared SPR information with over 50 Federal preparedness partners, and thus the information is widely used across the Federal preparedness community.

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 revised online forms for this collection provide respondents with an easier and streamlined means to ensure the PKEMRA-required requirements could be met in a

timely fashion. FEMA is utilizing the Max.gov web portal to enable respondents to access the online forms. Max.gov is a government-wide collaborative web portal to which most respondents already have access (and those who do not can create online accounts). The link to access FEMA Forms 008-0-19 and 008-0-20 can be found at: <https://community.max.gov/pages/viewpage.action?pageId=1007649351>. This is the Max.gov web portal. Through the online process respondents can easily log in and respond to each jurisdiction's applicable questions. FEMA NPAD then exports the entered data into Excel Spreadsheets that are stored on the FEMA Share Drive.

For the After-Action questions pursuant to FEMA Form 008-0-23, questions will be provided to respondents by sending them a copy of FEMA Form 008-0-23. Once respondents receive the form, FEMA will schedule regional after action calls where respondents will have an opportunity to verbally respond to the questions. If respondents prefer to answer the questions independently, they can use the form for that purpose and email it back to FEMA's NPAD office. Responding to these after-action questions is voluntary and intended to give respondents an opportunity to provide input and feedback for improvements.

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

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

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

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

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

FEMA would be unable to properly meet the *PKEMRA*-mandated requirement to produce the SPR without this revised collection of information. The *PKEMRA*-mandated requirement to produce the Catastrophic Resource Report would also be hindered, as the report includes THIRA and SPR information. Additionally, the Federal preparedness community would lose the main source of data that provides an annual understanding of the states', territories', urban areas' and tribes' current preparedness levels, including an understanding of how prepared states, territories, urban areas, and tribes are for real-world events. The National Preparedness Report, a PPD-8 requirement, would lose one of

its main inputs. FEMA's Strategic Plan would lose information it is using to assess Agency-wide Performance Goals in support of Strategic Priority 1: "Be Survivor-Centric in Mission and Program Delivery," and Strategic Priority 3: "Posture and Build Capability for Catastrophic Disasters."

States, territories, urban areas, and tribes would not have a systematic process for obtaining the information required in the foundational steps of the National Preparedness System, and the nation would therefore be unable to follow that organized process for achieving the National Preparedness Goal.

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

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

- (a) 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.**
- (c) Requiring 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.**
- (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.**
- (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.**

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 March 13, 2018, 83 FR 10864. FEMA received a total of 17 public comments, 11 were anonymous public comments that were not relevant to the information collection. Three commenters suggested that FEMA use the Tribal Consultation process for information collection 1660-0131. Two commenters stated that FEMA should not be placing additional unfunded requirements for Tribes to participate in the Tribal Homeland Security Grant Program (THSGP). One commenter stated that a Tribe should not be charged for FEMA's help and should be able to obtain help without any penalties. Two commenters stated that the Federal Government has a trust responsibility to meet its treaty obligations to all Tribes by providing for base level capability and capacities. FEMA responded to each comment accordingly. FEMA's response to these comments are uploaded in ROCIS.

A 30-day Federal Register Notice inviting public comments was published on July 17, 2018, 83 FR 33237. 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.

In 2010, FEMA convened a Reporting Requirements Working Group (RRWG), to conduct an exhaustive accounting of all information required of outside sources, including state and local jurisdictions. The findings of the RRWG indicated that the information gained through this collection represents the sole source of state preparedness data that is necessary to answer the *PKEMRA* mandate and to authorize the State Preparedness Report.

In 2013, FEMA again conducted an analysis to reduce FEMA's preparedness grant reporting requirements. This effort was initiated due to a request from the National Emergency Management Association, and FEMA consulted with the Centers for Disease Control and Prevention and the Department of Health and Human Services to conduct the analysis. FEMA consolidated grant reporting requirements and implemented these changes in 2014.

FEMA consulted with over 20 Federal agencies and departments in 2014 to discuss the utility and availability of the information collected, and to share the information so it

could be used throughout the Federal Government. Through this effort, FEMA confirmed that other departments and agencies do not have similar data. This effort is ongoing and there is an increasing demand from other departments and agencies to view and use the information gained through this collection. Since 2016, FEMA has shared SPR information with over 50 Federal preparedness partners, and thus the information is widely used across the Federal preparedness community.

In 2017, FEMA consulted with over 150 State, Territorial, Urban Area, and Tribal representatives from over 70 jurisdictions during its technical assistance workshops. Representatives were presented with multiple options for changing the process and were given the opportunity to recommend any changes they felt would improve the process. After this primary engagement, approximately 20 of those jurisdictions opted to continue to participate in the development of the improved methodology. Many of the new changes were adopted directly from stakeholder recommendations.

FEMA also frequently engages with state and local emergency managers who provide the information in this collection to ensure that it captures useful information while reducing the burden as much as possible. FEMA fully explains these activities in item 8(c) below.

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 developed the original SPR methodology in 2010 and 2011 through consultations with state representatives who respond to this information collection. FEMA conducted numerous site visits to state governments throughout the U.S. to discuss this collection and to solicit input for ways to improve the survey while reducing burden. FEMA used the findings from these visits to develop the agenda for a national workshop of state governments, with open invitation to all respondents. This workshop further discussed the collection and specific design considerations. FEMA developed this collection (format, methodology) directly from the input of the respondents themselves.

FEMA holds annual after-action calls every February with all state, territory, tribal, and urban area jurisdictions who complete the THIRA/SPR. FEMA uses this after-action process to gather feedback on the utility of the information and on how the burden can be further reduced. Participation in these calls is voluntary. Participants in the calls are asked to include their time participating in these calls when they respond to questions about hour burden. In 2017, FEMA collected feedback from 38 states and territories through this process.

Additionally, FEMA engages with representatives who provide the information several other times each year. Each of these engagements are included in the respondent hour burden estimate. Some examples of these engagements are provided below:

- FEMA conducts Technical Assistance (TA) each year to train stakeholders on the methodology and collection tool. This training eases burden on stakeholders who provide this information. FEMA provided three in-person TA sessions, spread throughout the U.S, in 2017, paying for jurisdiction's travel expenses. Additionally, FEMA provides TA via webinar as an alternative to the in-person sessions. In 2017, FEMA provided 15 webinars on THIRA and SPR.
- FEMA organizes monthly conference calls with every FEMA Region to answer any questions state and local stakeholders may have as they complete the THIRA and SPR process. Participation in the calls is voluntary.
- In August 2014, FEMA held an in-person feedback session in Washington, DC with a group of five state and local emergency managers to collect feedback on how to improve the SPR assessment.
- In 2017, FEMA consulted with over 150 State, Territorial, Urban Area, and Tribal representatives from over 70 jurisdictions during its technical assistance workshops. Representatives were presented with multiple options for changing the process and were given the opportunity to recommend any changes they felt would improve the process. After this primary engagement, approximately 20 of those jurisdictions opted to continue to participate in the development of the improved methodology. Many of the new changes were adopted directly from stakeholder recommendations.

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) Form was sent to the FEMA Privacy Office on February 13, 2018 for review and is pending.

Respondents will be assured that all sensitive information will be protected to the greatest extent allowed by law.

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.

To determine the annual burden, FEMA used the approved 2015 burden estimates as the baseline and used jurisdictional estimations of the change in level of effort between the current and prior year's assessment to update the burden estimates. FEMA calculated burden hours separately for jurisdictions completing both the THIRA/SPR and those only completing the THIRA. FEMA summed the burden associated with all jurisdictions completing the THIRA/SPR and those just completing the THIRA to calculate the total burden.

FEMA requires 56 states and territories and 33 urban areas to complete the THIRA/SPR, and 24 tribal nations to complete only the THIRA/SPR for a select number of core capabilities. FEMA based the number of urban areas and tribal nations on the number of jurisdictions receiving 2017 Urban Areas Security Initiative (UASI) and Tribal Homeland Security Grant Program (THSGP) grants. In 2018, urban areas will be required to complete the SPR for the first time. Tribes will be required to complete the THIRA and SPR, but only for ten core capabilities (those historically most closely aligned with THSGP expenditures).

To determine how the burden of the updated THIRA/SPR differs from the previous assessment, FEMA asked two jurisdictions to estimate the change in burden. Because jurisdictions estimated that their burden would change after the process was fully implemented, FEMA averaged the change in burden over three years. Taken together, the change in average burden for completing the THIRA/SPR is an annual burden increase of 10.83 percent for a single jurisdiction.

In addition to these changes to the burden hours, FEMA also updated its 2015 calculations by:

- Urban areas are now expected to complete an SPR, in addition to a THIRA

- Tribes are now expected to complete the THIRA and SPR, but only for a select number of core capabilities
- The loaded wage rate was updated to \$51.28

Accordingly, annual hour burdens for the THIRA, SPR, and THIRA/SPR After Action Conference Calls script portions of the collection are as follows:

- **THIRA/SPR:** 56 states and territories and 33 urban areas complete the THIRA/SPR annually, for a total of 89 jurisdictions total. Based on estimates from jurisdictions, FEMA estimates the average burden per THIRA/SPR to be 784 hours (2015 baseline estimate) X 1.1083 (representing estimated increase in burden of 10.83 percent) = 869 hours (rounded to the nearest hour). FEMA estimates that 24 tribal jurisdictions will complete the THIRA/SPR annually, but for 10 of the 32 core capabilities. The total annual THIRA/SPR hours burden for states, territories, and urban areas is therefore 869 hours multiplied by 89 jurisdictions, for 77,341 hours. FEMA estimates the average burden per THIRA/SPR to be 261 hours for tribes (2015 baseline estimate) X 1.1083 (representing estimated increase in burden of 10.83 percent) = 290 hours (rounded to the nearest hour). The total annual THIRA/SPR hours burden for tribes is therefore 290 hours multiplied by 24 jurisdictions, for 6,960 hours. This brings the grand total across all jurisdiction types to 84,301 hours.
- This estimate includes the time it takes the respondents to gather and provide the information, work with stakeholders within their jurisdiction to gather and verify information, fill in the form, and attend technical assistance sessions
- FEMA requests that respondents participate in an after action conference calls. This call adds one hour per participant to the estimate 56 participants from States and territories at 1 hour each for a total of 56 hours. FEMA also requests that the respondents from urban areas and tribal governments participate in an after action conference call. This call adds one hour per participant to the estimated 113 participants at 1 hour each for a total of 113 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.

The THIRA, FEMA Form No. 008-0-19, and SPR, FEMA Form No. 008-0-20, are separate forms but respondents complete them simultaneously for the 56 states and territories, all Urban Areas receiving UASI funding, and all tribal governments receiving THSGP funding. FEMA describes the hour burden in the charts below. Additionally, FEMA uses FEMA Form No 008-0-23 as a script to ask questions about the collection during after-action calls with respondents. Participation in the calls and answering the questions are voluntary, but the total estimate includes time spent participating.

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.

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
Tribal Government	THIRA / FEMA Form 008-0-19	24	1	24	290 hours*	6,960	\$51.28	\$356,908.80
Urban Areas	THIRA - SPR / FEMA Form 008-0-20	33	1	33	869 hours	28,677	\$51.28	\$1,470,556.56
State or Territory	THIRA - SPR / FEMA Form 008-0-20	56	1	56	869 hours	48,664	\$51.28	\$2,495,489.92
State, Local and Tribal Government	THIRA/ SPR After Action Conference Call / FEMA Form 008-0-23	113 (same as the participants above, no additional participants)	1	113 (again, same as the participants above)	1 hour	113	\$51.28	\$5,794.64
Total		113		113		84,414		\$4,328,749.92

• Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate. ¹

¹ The per hour benefits multiplier is calculated by dividing total compensation for all workers (\$34.90, March 17, 2017) by wages and salaries for all workers (\$23.87, March 17, 2017), which yields a per hour benefits multiplier. For March 17, 2017, the multiplier is 1.46. ($\$34.90 \div \$23.87 = 1.4620863$). Fully-loaded wage rates are calculated by multiplying the per hour benefits multiplier by the applicable wage rate from the applicable National Occupational Employment and Wage Rates report. (1.46 per hour benefits

- Note: The THIRA-SPR Unified Reporting Tool burden hours for the Homeland Security Grant Program (HSGP) (OMB Collection 1660-0125) and the Tribal Homeland Grant Program (THSGP) (OMB Collection 1660-0113) has been accounted for in this collection.

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS)² website the wage rate category for Urban and Regional Planners is estimated to be \$51.28 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Urban and Regional Planners is estimated to be \$4,328,749.92 annually.

*THIRA and SPR Forms, 008-0-19 and 008-0-20 are done together so the burden hours are calculated together. Tribal governments are only required to complete one-third of the form so the burden for tribal governments is 290 hours (for both forms together for the portion they are required to complete) while the burden for all other respondents is 869 hours.

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 capital and start-up costs associated with this information collection. To determine operation and maintenance costs, FEMA calculated for the THIRA/SPR and information collection for all jurisdiction types. FEMA summed the costs associated with the THIRA and SPR to calculate the total costs. Participation in after action calls is included with each estimate.

multiplier x hourly wage rate = fully-loaded hourly wage)

² May 2016 National Occupational Employment and Wage Rates, National File (xls), Urban and Regional Planners (OCC Code: 19-3051, Mean Hourly Wage of \$35.12). Accessed and downloaded February 28, 2018. <https://www.bls.gov/oes/2016/May/oes193051.htm>

Annual Cost Burden to Respondents or Record Keepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
THIRA/SPR (states, territories, urban areas)	0	11,380,786	1,896,768	13,277,554
THIRA/SPR (tribes)	0	\$1,024,176	170,688	\$1,194,864
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
Total	\$ -	\$ 12,404,962.00	\$ 2,067,456.00	\$ 14,472,418.00

Note: The chart calculates the aggregated individual costs for all respondents. The total nationwide cost to respondents and record keepers (including operations/maintenance and non-labor costs) is **\$13,277,554 + \$1,194,864**, which equals **\$14,472,418**. See explanation below.

Explain:

To calculate the average maintenance costs per response to the THIRA/SPR, FEMA used the estimated burden hours and loaded wage rate to determine the personnel costs, and used estimates of how total costs break out between personnel, contracting, and non-labor to determine these other costs. Because data on these cost breakouts is not available for THIRA/SPR development, FEMA estimated the breakout based on grant awards for the development of Hazard Mitigation Plans, which are similar to THIRA/SPRs in that they are preparedness planning documents. This estimate yielded a cost breakout of 23 percent personnel, 66 percent contracting, and 11 percent non-labor.³

Multiplying the 869 average burden hours per response by the loaded wage rate of \$51.28 yields a total personnel cost of \$44,562.32. Using the cost breakouts stated above, dividing \$44,562 by 0.23 yields \$193,749, representing the average THIRA/SPR development cost per response. Accordingly, contracting costs (\$127,874) represent the Annual Operations and Maintenance costs, and non-labor (\$21,312) costs represent the Annual Non-Labor costs, totaling \$149,186 (rounded). Multiplying this by 89 state, territory, and UASI THIRA/SPR respondents gives a total annual maintenance cost of **\$13,277,554** for those jurisdiction types.

FEMA followed the same procedure to calculate the average maintenance costs per response to the THIRA/SPR data collection for tribes. Multiplying 290 average burden hours per response by the loaded wage rate of \$51.28 yields a total personnel cost of

³ The cost breakout estimate followed the methodology described in *Supporting Statement for Paperwork Reduction Act Submissions, OMB Control Number 1660-0062, State/Local/Tribal Hazard Mitigation Plans*, http://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr-201312-1660-004.

\$14,871.20. Using the cost breakouts stated above, dividing \$14,871 by 0.23 yields \$64,657, representing the average THIRA development cost per response. Accordingly, contracting costs (\$42,674) represent the Annual Operations and Maintenance costs, and non-labor (\$7,112) represent the Annual Non-Labor costs, totaling \$49,786 (rounded). Multiplying this by 24 tribal respondents gives a total annual maintenance cost of **\$1,194,864** (rounded).

The total cost to respondents and record keepers (including operations/maintenance and non-labor costs) is **\$13,277,554 + \$1,194,864**, which equals **\$14,472,418**.

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.

Staff Salaries* (one GS 14, Step 3; one GS 13, step 2, one GS 12, Step 1, and one GS 11, step 1 employees spending approximately 100 % of time annually and one GS 9, Step 1 employee spending approximately 50% of time annually) to manage the methodology, development of the tool, lead the analysis, provide technical assistant, manage contractors, provide data and analysis to FEMA and other federal government stakeholders who can use the data to support their mission.	
1 GS-14, Step 3 salary is \$122,230 Breakdown = \$122,230 x 1.46 = \$178,455.80 1 GS-13, Step 3 salary is \$103,435 Breakdown = \$103,435 x 1.46 = \$151,015.10 1 GS-12, Step 1 salary is \$81,548 Breakdown = \$81,548 x 1.46 = \$119,060.08 1 GS-11, Step 1 salary is \$68,036	
Breakdown = \$68,036 x 1.46 = \$99,332.56 1 GS-9, Step 1 salary is \$56,233 Breakdown = \$56,233 x 1.46 x 0.5 = \$41,050.09	\$588,913.63
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$375,000
Travel	\$150,000
Total	\$ 2,648,063.63

* Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate. Rates depicted are based on 2018 General Schedule scale.

Explain:

FEMA’s National Preparedness Directorate holds one contract supporting the THIRA/SPR (among other tasks). These contracts support the development of the Unified Reporting Tool and user guide, development of technical assistance materials, analysis of THIRA and SPR results, help desk support, and the development of outreach materials.

FEMA employs four full-time federal employees at the GS-14, Step 3, GS-13, Step 2, GS-12, step 1, and GS-11, Step 1 levels. Additionally FEMA employees with part-time responsibilities at the GS-9, Step 1 levels. Employees manage the THIRA/SPR-related work, including the development of the tools, data collection and analysis, providing technical assistance, conducting stakeholder engagement, and revising policy/doctrine.

FEMA uses contractors to assist with the development and deployment of the collection instrument that FEMA uses to collect the information. FEMA also uses contractors to analyze the data collected by the system and to develop summary reports. FEMA provides most training via webinar, but requires some travel to train respondents on the information collection and to provide ad hoc technical assistance.

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.

The majority of the changes to the reported hour burden and cost burden associated with the information collection are due to changes in the number of respondents to the THIRA/SPR and to an increase in the number of questions being asked on the THIRA/SPR assessment. Previously, states and territories completed a THIRA/SPR, while urban areas and tribes completed only a THIRA. Now, states, territories, and urban areas complete THIRA/SPR in its entirety while tribes complete the THIRA/SPR but only for some of the core capabilities (hence completing the entire THIRA/SPR corresponds with a burden increase while completing it only for a subset of capabilities corresponds with a burden decrease). Further, as explained in 12a, FEMA used estimations of the change in level of effort between the current and prior year's assessment to update the burden estimates. This yielded an average increase in burden hours per jurisdiction of 10.83 percent. This increased burden hour estimate was used to generate the updated cost burdens, aided by cost breakouts outlined in question 13. Finally, the total number of jurisdictions required to complete a THIRA/SPR decreased slightly (from 123 to 113), resulting in a small decrease in burden.

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
THIRA/SPR	43904	77341	33437			0
THIRA/SPR (tribes)	27336	6,960	-20376			0
THIRA/SPR After Action Conference Calls	123	113	-10			0
			0			0
			0			0
			0			0
			0			0
Total	71363	84414	13051	0	0	0

Explain:

FEMA used the 2015 estimate of burden hours per jurisdiction as a baseline (784 hours) and updated this number based on jurisdictional estimates of the change in level of effort between the current and prior year’s assessment (increase of 10.83 percent). Accordingly, this yields a total hourly burden of 869 hours for each of the 56 states and territories that complete THIRA/SPR, along with the 33 urban areas that are now required to complete a THIRA/SPR, for a total of 77,341 hours. The respondent burden for tribes completing the THIRA/SPR is 290 hours for each of the 24 tribal jurisdictions, for a total burden of 6,960 hours. Additionally, all 113 respondents are asked to participate in after action calls lasting one hour for a total of 113 hours. Combined, the total respondent hours for THIRA/SPR, THIRA only, and participation in after action calls are 84,414 hours. This is an increase of 13,051 over the previous 71,363 hours currently on the OMB inventory. This increase accounts for urban areas now completing the entire THIRA/SPR (not only THIRA), an increase in the burden hours required for a single jurisdiction to complete the THIRA/SPR assessment, a decrease in reporting burden for tribes, and a decrease in the overall number of jurisdictions completing the THIRA/SPR.

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
THIRA/SPR	\$ 8,663,928.00	\$ 18,801,223.64	\$ 10,137,295.64			\$ -
THIRA only	\$ 5,405,359.00		\$ (5,405,359.00)			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
Total	\$ 14,069,287.00	\$ 18,801,223.64	\$ 4,731,936.64	\$ -	\$ -	\$ -

Explain:

To calculate the total cost for a single jurisdiction to complete the THIRA/SPR, FEMA first determined the average personnel cost (869 average burden hours multiplied by \$51.28 loaded wage rate) of \$44,562. Using the cost breakouts explained above, FEMA calculated the total cost burden for each jurisdiction (89 jurisdictions) completing a THIRA/SPR as \$193,749. This is an increase of \$39,036 per respondent completing the THIRA/SPR from the \$154,713 per respondent currently on the OMB inventory. The total costs for all states, territories, and urban areas completing the THIRA/SPR is therefore 17,243,661. Following the same process, the cost burden of for tribes completing the THIRA/SPR for a subset of the core capabilities is \$64,657. This is a decrease of \$16,020 from the \$80,677 per tribal respondent completing only the THIRA process on the OMB inventory. The total cost of all 24 tribes completing the THIRA/SPR for the subset of core capabilities is \$1,551,768. The cost of jurisdictions participating in the after action calls is \$5,794.64. Jurisdictions will no longer complete only the THIRA, so there is no longer any cost associated with this activity.

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.