

June 14, 2018

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0140

Title: Integrated Public Alert and Warning Systems (IPAWS) Memorandum of Agreement Applications

Form Number(s): FEMA Form 007-0-25; FEMA Form 007-0-26

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.**

Public Law 114-143, The IPAWS Modernization Act of 2015, and Presidential Executive Order 13407, require FEMA to implement the public alert and warning system to disseminate timely and effective warnings to people in situations of war, terrorist attack, natural disaster, or other hazards to public safety and wellbeing. The Integrated Public Alert and Warning System (IPAWS) is the Department of Homeland Security's (DHS) response to the Executive Order. The Stafford Act (U.S.C. Title 42, Chapter 68, Subchapter II) requires that FEMA make IPAWS available to Federal, State, and local agencies for the purpose of providing warning to governmental authorities and the civilian population in areas endangered by disasters. The information collected is used to create a Memorandum of Agreement (MOA) with FEMA that establishes regulations regarding the management, operations, and security of a connection

between Federal, State, territorial, tribal and local alerting authorities and IPAWS-OPEN (Open Platform for Emergency Notifications).

- 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.**

IPAWS Memorandum of Agreement Application, FEMA Form 007-0-25:

The information collected is utilized by FEMA to identify the identity of the alerting authority and the software being used to connect to IPAWS-OPEN. The information is only shared with FEMA OCIO in order to generate a digital certificate for the County/State/local alerting authority which authenticates the user and the software to connect with IPAWS-OPEN and deliver life-saving public alerts and warnings within their jurisdiction.

IPAWS Memorandum of Agreement Application for Tribes, FEMA Form 007-0-26:

The information collected is utilized by FEMA to identify the identity of the alerting authority and the software being used to connect to IPAWS-OPEN. The information is only shared with FEMA OCIO in order to generate a digital certificate for the tribal alerting authority which authenticates the user and the software to connect with IPAWS-OPEN and deliver life-saving public alerts and warnings within their jurisdiction.

- 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.**

Collection of information may involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, including electronic submission of responses. Data may be entered directly by respondents using an online version of this form, a fillable pdf, or as a hand written, scanned and emailed or mailed hard copy of this form. Respondents may be contacted via phone or email by data collectors if submitted data is incomplete or unclear. Upon collection of information, data collectors enter information into a secure database for FEMA's immediate access. While this database is accessible online, only the FEMA IPAWS Program Management Office PMO and the data collectors have access.

- 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 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.**

The information collected does not have an impact on small businesses or 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 requested is required to provide FEMA with required information to issue a digital certificate for the alerting authority and its software that authenticates the user's identity to establish secure access to IPAWS-OPEN. Failure to obtain this information will negatively impact the number of jurisdictions that can access IPAWS-OPEN and their ability to warn the American people in a timely manner of emergencies that may be a threat to life and property.

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.

(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.

The special circumstances contained in item 7 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 June 21, 2018 at 83 FR 28857. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on October 15, 2018 at 83 FR 519787. 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.

Potential changes to the data elements and form instructions would be in response to feedback about current public alert and warning systems gained in IPAWS Outreach activities across the IPAWS stakeholder and user community. IPAWS stakeholders include local and state public safety officials, vendors of public alert and warning systems, private sector communications system owners and as of June 2018, over 1,000 State, local, territorial, tribal and other Federal authorities currently registered as IPAWS users. Since the previous collection approval, the IPAWS Program Management Office has not received any feedback to prompt changes in forms 007-0-25 or 007-0-26.

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.

Since the completion of the MOA application is conducted by email correspondence and orally, consultation with respondents occurs throughout the course of the data collection. Consultations with respondents take place approximately once per year per respondent.

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) for this collection was approved by DHS in August 2015 and is set to expire in August 2018. The program office responsible for this collection is currently working on the PTA renewal. The PTA renewal was submitted to the FEMA Privacy Office on June 8, 2018.

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 required for this collection of information.

- 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.**

FEMA Form 007-0-25, IPAWS Memorandum of Agreement Application. All States, Counties, and Local alerting authorities may participate in obtaining access to the IPAWS Open Platform for Emergency Notification (IPAWS-OPEN). FEMA has estimated that an annual average of 150 State or local governments will participate by submitting the IPAWS Application for Memorandum for Agreement. FEMA estimated it will receive one response per respondent for an annual total of 150 responses (150 respondents x 1 response per respondent = 150 responses). FEMA estimated it will take 1 hour to review and complete FEMA Form 007-0-25. Therefore, the resulting total annual burden is estimated to be 150 responses x 1 hour = 150 burden hours.

FEMA 007-0-26 Form, IPAWS Memorandum of Agreement Application for Tribes. All Tribal alerting authorities may participate in obtaining access to the IPAWS Open Platform for Emergency Notification (IPAWS-OPEN). EMA has estimated that an annual average of 10 Tribal governments will participate by submitting the IPAWS Application for Memorandum for Agreement. FEMA estimated it will receive one response per respondent for an annual total of 10 responses (10 respondents x 1 response per respondent = 10 responses). FEMA estimated it will take 1 hour to review and complete FEMA Form 007-0-26. Therefore, the resulting total annual burden is estimated to be 10 responses x 1 hour = 10 burden hours.

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

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

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	IPAWS Memorandum of Agreement Application / FEMA Form 007-0-25	150	1	150	1 hour	150	\$50.94	\$7,641.00
State, Local or Tribal Government	IPAWS Memorandum of Agreement Application for Tribal Governments / FEMA Form 007-0-26	10	1	10	1 hour	10	\$50.94	\$509.4
Total		160		160		160		\$8,150.4

• 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) the wage rate category for Emergency Management Director is estimated to be (\$34.89 x 1.46) \$50.94¹ per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Emergency Managements Director is estimated to be 160 hours x \$50.94 = \$8,150.4 annually.

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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:

¹ May 2017 National Occupational Employment and Wage Rates, National File (xls), Emergency Management Directors, (OCC Code: 11-9161, Mean Hourly Wage of \$34.89). Accessed and downloaded May 17, 2018. <https://www.bls.gov/oes/current/oes119161.htm>

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 recordkeeping, 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.

Annual Cost to the Federal Government	
Item	Cost (\$)
Staff Salaries* [One GS 11, Step 6, (DC) employee spending approximately 100% of time annually managing the MOA applications 1 GS11 @ 100% * 1.46 loaded rate = \$79,377 * 1.46 = 115,890.42	\$115,890.42
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel [travel cost includes cost for airfare]	
Printing	
Other	
Total	\$115,890.42

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

Staff Salaries*: One GS 11 step 6 employee spending approximately 100% of their time annually to review, coordinate, and assure quality control [\$79,377.00 x 100% = \$79,377.00 x 1.46 = \$115,890.42]

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
IPAWS Memorandum of Agreement Application / FEMA Form 007-0-25				150	150	0
IPAWS Memorandum of Agreement Application for Tribal Governments / FEMA Form 007-0-26				10	10	0
Total(s)				160	160	0

Explain:

There are no changes to the annual hour burden previously reported, as there has been no change to the information being collected. As a result, the annual hour burden remains the same.

Itemized Changes in Annual Cost Burden

Explain:

There is no cost burden for this collection.

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.