

January 15, 2021

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0073

Title: National Urban Search and Rescue Response System

**Form Number(s): FEMA Form 089-0-10, FEMA Form 089-0-11,
FEMA Form 089-0-12, FEMA Form 089-0-14, FEMA Form 089-0-15,
FEMA Form 089-0-26.**

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.

The Robert T. Stafford Act, Section 327 and 44 CFR Part 208 implements the National Urban Search and Rescue System (US&R), 6 U.S.C. 722, 42 U.S.C. 5144, 5149, 5170b (a)(3)(B), and 5197(c), by which FEMA provides specialized lifesaving assistance during major disaster or emergencies that the President declares under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5121 through 5207. US&R operational activities include locating, extracting and providing on-site medical treatment to victims trapped in collapsed structures. Because this is a

cooperative agreement, the National US&R System is subject to compliance with the Uniform Grant Guidance (OMB Circular), 2 CFR Part 200 and in addition, The Government Performance and Results Modernization Act of 2010 (GPRA) gives provision for systematically holding Federal agencies accountable for achieving program goals. This is accomplished by measuring program performance against those goals, reporting publicly on their progress, improving Federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction.

Each Sponsoring Agency must comply with the OMB Circular, Subpart F, 2 CFR Part – Audit Requirements. All Federal grantees that receive an aggregate amount of \$750,000 or more of Federal funding must have an independent auditor perform a single or program-specific audit for that year. To ensure proper monitoring is being conducted on all Sponsoring Agencies, collection of program, administrative and financial information required by these forms is necessary.

The information collection activity is the collection of program and administrative information from 28 established US&R Sponsoring Agencies relating to the Readiness and Response Cooperative Agreement awards. This information includes a narrative statement that FEMA uses to evaluate a grantees’ proposed use of funds, progress reports to monitor overall progress on managing FEMA Cooperative Agreements, amendment requests used to consider changing the scope or extending the time or the performance period of a particular readiness cooperative agreement, as described in Question 2 below.

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.

Narrative Statement Workbook (FEMA Form 089-0-10 A-I): This document is a supplement to the SF-424 and 424A – Application for Federal Assistance. The Narrative Statement form provides a standardized form for each of the 28 US&R Sponsoring Agencies (grantees) to use when applying for readiness cooperative agreement funding each fiscal year. FEMA uses narrative statements to evaluate a grantee’s proposed use of funds and is a requirement in order to receive Federal funding. Examples of information a grantee needs to provide FEMA for readiness and response cooperative agreements are descriptions of the types of eligible activities the grantee will undertake and a plan for expending and monitoring funds. Sponsoring Agencies make this information available to FEMA when the funding opportunity announcement is open. Please note: While each of the 28 Sponsoring Agencies are required to “apply” for each readiness cooperative

agreement, this is a closed solicitation with only those 28 Sponsoring Agencies within the National US&R Response System.

Semi-Annual Performance Reports (FEMA Form 089-0-11): FEMA program management staff use progress/performance reports to monitor overall progress on managing FEMA grant programs. The questions on this form are specific to the US&R System and glean necessary qualitative and quantitative information from each of the Task Force Sponsoring Agencies twice a year.

Amendment Form (FEMA Form 089-0-12): Grantees that want FEMA to consider changing the budget or extending the performance period of a grant/cooperative agreement must request such changes or extensions in writing. FEMA uses this information to validate proper use of funds by the US&R Sponsoring Agencies, consistent within the cooperative agreement scope of work and in accordance with applicable laws and guidance. This type of information is provided to FEMA only when the grantee is requesting this type of action for a particular cooperative agreement.

Self-Evaluations (FEMA Form 089-0-14): The Task Force Self-Evaluations serve as Phase I of the US&R System's Readiness Assessment Program and precedes the Administrative Readiness Evaluations, which are conducted each year to ensure all Task Forces are ready to deploy to an incident when are activated. This information provides leadership with appropriate information to determine if a given Task Force is appropriately prepared for deployment.

Task Force Deployment Data (FEMA Form 089-0-15): To prepare for an incident outside the continental United States (OCONUS), or a scenario where alternative transportation may be required, the US&R Branch requires each Task Force to report weights and cubes of their cache, as well as hazardous materials to provide to appropriate loadmasters, etc., for possible air/sea transport.

Vehicle Support Unit Purchase/Replacement/Disposal Justification (FEMA Form 089-0-26): To be used when a US&R Task Force intends to purchase, replace and/or dispose of a vehicle involving the US&R Cooperative Agreement funds. This ensures all information is received from the task force before an action to purchase, replace, or dispose of a vehicle is approved by the US&R Branch. Provides for greater accountability and oversight of these major purchases under the Cooperative Agreement

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FEMA uses Grants.gov to provide the 28 US&R Sponsoring Agencies with all the forms and information necessary to submit their budget narrative for approval each cooperative agreement year. The US&R Task Forces are required to submit the Narrative Statement Workbook (FEMA Form 089-0-10-A), Semi-Annual Performance Reports (FEMA Form 089-0-11), and Amendment Form (FEMA Form 089-0-12) as an attachment through the Non-Disaster Grants System (NDGrants), which is managed and maintained by the FEMA Grant Programs Directorate. The Self Evaluation form (FEMA Form 089-0-14), Task Force Deployment Data (FEMA Form 089-0-15), and the Vehicle Support Unit Purchase/Replacement/Disposal Justification (FEMA Form 089-0-26) are submitted in accordance with current guidance.

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

The information collection required from the US&R Sponsoring Agencies is specific to the FEMA Cooperative Agreement program for US&R. There is no other US&R cooperative agreement program in FEMA that is required to collect information similar to that which is requested by this collection.

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.

Collection of information does not impact 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 uses the standard set forth in Federal Regulations, OMB standard grant administration procedures, and related data elements to manage grants and cooperative agreements. If FEMA did not request and obtain this information, FEMA could not comply with Federal Regulations. The collection of this information by FEMA is to exercise comprehensive financial management, to ensure that grantees are making efficient and effective use of Federal funds, and to maintain readiness and response standards. The information and data that FEMA seeks through this collection is the least amount that is necessary.

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.**

Quarterly financial and program reporting are the standards for the US&R Cooperative Agreements. (Program progress reports are required semi-annually.) However, a situation could arise due to the concern of a grantee and whether they are compliant with the appropriate Federal Regulations in performance of managing a cooperative agreement. In this situation, FEMA may determine that more frequent reports are necessary.

If a recipient demonstrates a consistent pattern of non-compliance with the administrative requirements set forth in the Federal Regulations, FEMA would consider requiring more frequent reporting as permitted in 2 CFR Part 200.327, Financial Reporting, for more effective monitoring of the Federal award.

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

Respondents are not required to prepare a written response in fewer than 30 days.

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

There are no requirements to submit more than an original and two copies of any document. Submissions are made through automated systems or through email with the option to use electronic signatures.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

Respondents are not required to retain records for more than three years from the date of submission of their final expenditure report, as outlined in 2 CFR Part 200.333, Retention Requirements for Records, (with a few exceptions (as outlined in 2 CFR Part 200.333, a-f)).

(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.

This collection does not involve a statistical survey.

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

This collection does not require statistical data classification.

(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.

This collection does not require a pledge of confidentiality that is not supported by authority established in statute or regulations.

(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.

This collection does not require respondents to submit proprietary trade secrets, or other 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 1, 2018, 83 FR 49407. **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on December 28, 2018, 83 FR 67329. **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 consults with the National Urban Search and Rescue Response System Strategic Group and US&R Advisory Organization, including its Finance Subgroups, on a regular basis. These consultations involve discussions as to the nature of the information that FEMA needs to manage the cooperative agreements. These subgroups are comprised of federal, state, and local officials, as well as representatives of labor organizations, some of whose members serve on Task Forces.

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.

The information being collected is obtained from Sponsoring Agencies of the National US&R Response System. Each of the Sponsoring Agencies have experience with Cooperative Agreement administrative and financial reporting data collection element requirements in 2 CFR Part 200. Consultation with FEMA, Sponsoring Agencies and teams with data collection requirements are provided as necessary. To ensure each collection tool is as efficient and streamlined as possible, FEMA US&R consults with representatives of the 28 Task Forces and members of the Finance Subgroup. The Finance Subgroup is comprised of 9 members, all Task Force members who have extensive involvement in grant management within their respective Sponsoring Agencies.

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 on May 16, 2018. FEMA has removed individual staff member name fields from Form 089-0-10. All PII now collected by Form 089-0-10 is properly assessed in DHS/FEMA/PIA-013. There is currently no need to update DHS/FEMA/PIA-013. DHS determined that no SORN coverage is required. There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of 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.

FEMA's National Urban Search and Rescue Response System is currently comprised of 28 Sponsoring Agencies which are required to submit approximately 15 burden hours (each Sponsoring Agency) to prepare for the collection of financial, program and administrative information for US&R Sponsoring Agencies relating to readiness and response Cooperative Agreement awards. (15 hours per Sponsoring Agency x 28 = 420 hours)

The Narrative Statement Workbook (FEMA Form 089-0-10) is completed once annually by 28 grantees with an average burden per response of 4 hours and the total annual burden is 112 hours.

The Semi-Annual Performance Reports (FEMA Form 089-0-11) are completed semi-annually by 28 grantees with an average burden per response of 2 hours and the total annual burden is 112 hours.

Amendment Form (FEMA Form 089-0-12) are completed semi-annually on average (but vary, depending upon Task Forces' need) by 28 grantees with an average burden per response of 1 hour and the total annual burden is 56 hours.

The Self-Evaluations (FEMA Form 089-0-14) are completed once annually by 28 grantees with an average burden per response of 2 hours and the total annual burden is 56 hours.

The Task Force Deployment Data (FEMA Form 089-0-15) are completed once annually by 28 grantees with an average burden per response of 1 hour and the total annual burden is 28 hours.

Vehicle Support Unit Purchase/Replacement/Disposal Justification Form (FEMA Form 089-0-26) is completed as needed by 28 grantees, but for planning purposes every two years with an average burden per response of 2 hours. Annual burden is 28 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 1.46 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
State, Local or Tribal Government (US&R Task Forces)	FEMA Form 089-0-10, A thru I: Narrative Statement Workbook	28	1	28	4 hours	112	\$52.69	\$5,901.28
State, Local or Tribal Government (US&R Task Forces)	Semi-Annual Performance Report / FEMA Form 089-0-11	28	2	56	2 hours	112	\$52.69	\$5,901.28
State, Local or Tribal Government (US&R Task Forces)	Amendment Form / FEMA Form 089-0-12	28	2	56	1 hour	56	\$52.69	\$2,950.64
State, Local or Tribal Government (US&R Task Forces)	Self-Evaluations / FEMA Form 089-0-14	28	1	28	2 hours	56	\$52.69	\$2,950.64
State, Local or Tribal Government (US&R Task Forces)	Task Force Deployment Data / FEMA Form 089-0-15	28	1	28	1 hour	28	\$52.69	\$1,475.32

State, Local or Tribal Government (US&R Task Forces)	Vehicle Support Unit Purchase / Replacement / Disposal Justification Form / FEMA Form 089-0-26	14	1	14	2 hours	28	\$52.69	\$1, 475.32
Total		154		210		392		\$20,654.48

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-I

According to the U.S. Department of Labor, Bureau of Labor Statistics Occupational Employment and Wages, May 2016 Report (<https://www.bls.gov/oes/>) the wage rate category for Business and Financial Operations Occupations (13-0000) is estimated to be **\$36.09** per hour, Business and Financial Operations Occupations (13-0000) with the wage multiplier of 1.46 is **\$52.69**, therefore, the estimated burden hour cost to respondents in the position of Program/Grant Manager is estimated to **\$20,654.48** 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.

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
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
Total	\$ -	\$ -	\$ -	\$ -

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 (\$)
Contract Costs	\$0
Staff Salaries Two (2) GS 13 employees in Washington DC spending approximately 30% of time annually reviewing and analyzing information collected for this data collection (GS-13, Step 5 (Annual fully loaded rate \$156,885 = \$107,435*1.46) @ 30% = \$47,057 x 2 staff = \$94,114) and one (1) of GS 9 employee spending approximately 30% of time annually reviewing and analyzing information collected for this data collection (GS-9-5 (Annual fully loaded rate of \$90,962=\$62,303*1.46) @ 30% = \$27,289)	\$121,403
Facilities [cost of renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment and Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$121,403

* 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 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.

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

Explain: There are no changes to the annual burden hours for this collection

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
FEMA Form 089-0-10, A thru I: Narrative Statement Workbook				\$4,809	\$5,901	\$1,092
Semi-Annual Performance Report / FEMA Form 089-0-11				\$4,809	\$5,901	\$1,092
Amendment Form / FEMA Form 089-0-12				\$2,405	\$2,951	\$546
Self-Evaluations / FEMA Form 089-0-14				\$2,405	\$2,951	\$546
Task Force Deployment Data / FEMA Form 089-0-15				\$1,202	\$1,475	\$273
Vehicle Support Unit				\$1,202	\$1,475	\$273

Purchase / Replacement / Disposal Justification Form / FEMA Form 089-0-26						
Total	0	0	0	\$16,832	\$20,654	\$3,822

Explain: An increase in the annual cost burden of \$3,822 is due to an increase in the average hourly rate provided on www.bls.gov pertaining to Business and Financial Operations Occupations.

The Names of the staff members have been removed from the form. There are no additional 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.

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.

Adjust this sentence as necessary: This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.