

June 19, 2018

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 –NW0106

Title: National Catastrophic Resource Catalog

Form Number(s): FEMA Form 035-0-1

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 of 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.

In accordance with the Federal Fire Prevention And Control Act Of 1974, (Public Law 93–498) [As Amended Through P.L. 112–239, Enacted January 2, 2013] The US Fire Administration (USFA) provides technical assistance and training to State and local fire service officials to establish nationwide and State mutual aid systems for dealing with national emergencies that include threat assessment and equipment deployment strategies; means of collecting asset and resource information to provide accurate and timely data for regional deployment; and are consistent with the National Response Framework.

The USFA will coordinate with the local Fire and Emergency Services to establish a National Catastrophic Resource Catalog (NCRC), via a data collection form. The form will contain information on their assets and resources. The USFA, at the Federal level, will assess existing systems, compacts, and agreements that support the response mechanism to the catastrophic event. The results will determine if or when the States and Federal government resources are or will become overwhelmed. By measuring resource requests to resource orders filled, a sufficient gap or lapse in resource availability will become apparent, then using various strategic options, FEMA leadership will use the information available in the NCRC to meet the response resource needs.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

The Emergency Support Function 4-Structural Firefighting and/or the Emergency Services Group Supervisor staff within the National Response Coordination Center will monitor resource capacities which support catastrophic events and deplete State and Federal fire and emergency services resources. The data within the NCRC will be integrated to geographical information system (GIS) to identify the closest and most qualified resources available to support the catastrophic event, as shared with FEMA leadership.

The purpose of the data is to aid in supporting disaster response operations, not statistical analysis. The information will be submitted to the geo-spatial staff for map overlay, pinpointing a fire department's/organization's location on the map, which can be used to establish that location's relevance to the area impacted by the event and the establishing the priority for deployments.

Fire and Emergency Services are those core capabilities that deal with lifesaving and life sustaining activities. This data collection focuses on the Response Mission Area and includes seven core capabilities: Operational Coordination, Environmental Response/Health and Safety, Mass Care, Mass Search and Rescue Operations, Public Health, Health Care and Emergency Medical Services and Operational Communications. These core capabilities are defined in the Department of Homeland Security, National Preparedness Goal, 2nd Edition, September 2015.

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.

A fire department/agency can access the form on-line at <https://www.usfa.fema.gov/data/> or request the form by sending an email to fema-usfa-ersb@fema.dhs.gov. The completed form can be returned using fema-usfa-ersb@fema.dhs.gov or sent by fax (301) 447-1860.

Instructions for completing the form are provided in addition to a cover letter.

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, 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.

By not obtaining a voluntary commitment from respondent(s), the USFA will not have the known data and resources to pre-plan and develop a solution to provide sufficient emergency resources to successfully save lives and protect property through the sustainment of response operations.

Additionally, without this collection of information, it would severely limit USFA's ability to provide critical information to senior FEMA/USFA leadership.

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 March 29, 2018, 83 FR 13496. FEMA received 4 anonymous public comments that were not relevant to the information collection.

A 30-day Federal Register Notice inviting public comments was published on September 5, 2018, 83 FR 45133. 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.

A National Firefighter Deployment Strategy Stakeholder Meeting was held January 29 and 30, 2013 at the Hyatt Fairfax at Fair Lakes in Fairfax, Virginia. The purpose of the

meeting was to provide participants with background information about the initiative, provide an opportunity to ask questions, clarify understanding, and begin a dialogue about ways that participant organizations can become part of the team on this opportunity for complementing existing mobilization systems to meet disaster survivor needs and customer expectations. Representatives from the following organizations were present: National Emergency Management Association, National Volunteer Fire Council, National Fire Protection Association, International Association of Fire Chiefs and Metro Chiefs.

This initial data collection phase of the NCRC is designed to take advantage of the multiple disciplines and capabilities within the fire service and identify National Incident Management System (NIMS) typed resources and qualified personnel then incorporate that data into a geo-spatial map.

There is no course of action to disclose any of the information collected. The reports will be reviewed within the USFA and submitted to FEMA Leadership to support decision making activities during a disaster.

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.

Based on guidance and a need for current and accurate data, the USFA will establish a three-year process to contact respondents directly to validate the data, allow for comments to the data collection process, and provide updates regarding the program and clarity of guidance.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A Privacy Threshold Analysis (PTA) was approved by the DHS Privacy Office on August 17, 2017.

The NCRC is a non-privacy sensitive collection because it will not collect information pertaining to individuals. The information collected from each organization is limited to organization name, organization phone number, organization mailing address, and organization email address. FEMA will not collect any PII or other information pertaining to

individuals.

No Privacy Impact Assessment (PIA) or System of Records Notice (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.

The USFA National Fire Department Registry currently has 27,211 registrants. FEMA assumes that departments that have two or more stations (8,392) form the pool of potential respondents to the questionnaire. Of the total 8,392 potential respondents, FEMA anticipates that in year 1, the response rate will be 85 percent. This response rate provides for 7,133 responses from fire departments with 2 or more stations that will complete the initial questionnaire using FEMA Form 035-0-1. (8,392 departments with at least 2 stations x 0.85 response rate = 7,133.2 respondents).

In years 2 and 3 of this collection cycle, USFA will contact approximately 33 percent of the original respondents on a rotating basis to supply updates to the original response data. This will ensure that USFA has the most up-to-date information regarding the participating departments. However, USFA will accept updates at any time. Over the

three-year collection cycle, the average annual number of responses will be 3,947.¹ FEMA assumes that it will receive 30 percent, or 1,184 responses from State, Local, and Tribal governments' fire departments and 70 percent, or 2,763 will be from not for profit firefighting departments. The estimate is based on the distribution of types of departments in the USFA National Fire Department Registry.² Over the collection period, the average time to fill-out or update the form is estimated to be approximately 7 minutes per response.³

Using the estimated average burden of 7 minutes per response and 3,947 responses, the total annual hour burden is 439 hours, of which 132 hours will be attributable to State/Local/Tribal governments (career departments) and 307 hours will be attributable to not for profit institutions (volunteer departments).

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.

This request for approval does not cover more than one form.

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.

¹ The calculation for the average number of responses is based on a 3-year simple average of USFA's estimates that the number of respondents in year 1 will be 7,133 and 2,354 in years 2 and 3. $(7,133 + 2,354 + 2,354 = 11,841 \div 3 \text{ years} = 3,947)$.

² The Registry shows that 30 percent of the fire departments have career or mostly career firefighters. Generally, career departments are part of State, Local, and Tribal governments. The remaining 70 percent of the fire departments in the registry have volunteer or mostly volunteer firefighters and qualify under IRS guidelines as not-for-profit institutions. See <https://www.irs.gov/charities-non-profits/other-non-profits/volunteer-fire-companies>. Accessed and downloaded February 14, 2018.

Calculations: $(3,947 \text{ departments} \times 0.30 = 1,184.1 \text{ government departments; rounded} = 1,184)$; $(3,947 \text{ departments} \times 0.70 = 2,762.9 \text{ not for profit departments; rounded} = 2,763)$.

³ The calculation for the average burden per response is based on a 3-year simple average of USFA's estimates that the burden in year 1 will be 10 minutes (0.1667 hour) and 5 minutes each in years 2 and 3. $(10 \text{ minutes} + 5 \text{ minutes} + 5 \text{ minutes} = 20 \text{ minutes} \div 3 \text{ years} = 6.67 \text{ minutes; rounded} = 7 \text{ minutes})$.

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	National Catastrophic Resource Catalog (Career Dept.) / FEMA Form 035-0-1	1,184	1	1,184	0.1112 (7minutes)	132	\$54.08	\$7,118.68
Not-for-profit institutions	National Catastrophic Resource Catalog (Volunteer Dept.) / FEMA Form 035-0-1	2,763	1	2,763	0.1112 (7 minutes)	307	\$54.08	\$16,610.26
Total		3,947		3,947		439		\$23,728.94

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 (BLS)⁴ the wage rate category First-Line Supervisors of Firefighting and Prevention Workers is estimated to be \$37.04/hr × 1.46^{5 6} wage rate multiplier = \$54.08/hr. A total of 3,947 responses are expected, which will take an estimated 439 hours to complete. Therefore, the estimated burden hour cost to all respondents is estimated to be \$23,728.94 annually. (\$51.08 x 439 hours = \$23,728.94).

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

⁴ May 2016 National Occupational Employment and Wage Rates, National File (xls), First-Line Supervisors of Firefighting and Prevention Workers (SO Code: 33-1021, Average, Column Title: H_Mean). Accessed and downloaded January 18, 2018. <https://www.bls.gov/oes/tables.htm>.

⁵ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 17, 2017. Accessed and downloaded January 18, 2018. <https://www.bls.gov/news.release/eccec.t01.htm>.

⁶ 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 multiplier x hourly wage rate = fully-loaded hourly wage).

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 to respondents associated with this information collection. USFA expects to receive all responses electronically.

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 [No contract work]	\$ -
Staff Salaries [1 GS 13, Step 3 employee in Washington, DC spending approximately 50% of 2,080 hours (1,040 hours) annually to manage the program, collect data, update the database, analyze the data, prepare reports and contact emergency response organizations for the data collection multiplied by 1.46 wage multiplier.] (\$103,435 x 0.50 = \$51,717.50 x 1.46 = \$75,507.55) [1 GS 14, Step 8 employee in Washington, DC spending approximately 5% of 2,080 hours (104 hours) annually to provide oversight of the program, verify the reports, provide/approve program improvements for the data collection multiplied by 1.46 wage multiplier.] (\$141,328 x 0.05 = \$7,066.40 x 1.46 = \$10,316.94)	\$ 85,824.49
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	\$ -
Total	\$ 85,824.49

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

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently)	Program Change (New)	Difference	Adjustment (hours currently on OMB)	Adjustment (New)	Difference

	on OMB Inventory)			Inventory)		
National Catastrophic Resource Catalog (NCRC) / FEMA Form 035-0-1	0	439	+439			
Total(s)	0	439	+439			

Explain:

For the NCRC, the previously approved burden hours were 0 as this is a new collection and the current estimated annual average hour burden is 439 hours. Therefore, the burden hours are positive program changes.

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
National Catastrophic Resource Catalog (Career Dept.) / FEMA Form 035-0-1	\$0	\$0	\$0			
Total(s)	\$0	\$0	\$0			

Explain:

For the National Catastrophic Resource Catalog, the annual cost burden to respondents is \$0 therefore, there are no program changes.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no outline plans for tabulation and publication of data for this information collection.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This collection does not seek approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

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.