

**2019 Supporting Statement for OMB 0596-0025**  
Annual Wildfire Summary Report (AWSR)

**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.**

Laws, Regulations, and Statutes

- 16 USC 2101 - Cooperative Forestry Assistance Act of 1978

The Cooperative Forestry Assistance Act of 1978 (16 USC 2101) requires the Forest Service to collect annual wildfire information from state and private firefighting organizations. The Annual Wildfire Report shows information on wildfire occurrence on state and private land. Collection of this information enables the US Forest Service to provide timely, substantive information to Congress about the effectiveness of state and local firefighting agencies that request annual funding from the Forest Service State and Private Forestry Cooperative Fire Program. The program supplements the funding of state and local firefighting organizations.

The Annual Wildfire Report form (FS-3100-8) is used by State Foresters to report wildfire statistics to the Forest Service.

- 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.**

- a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

The Annual Wildfire Report form (FS-3100-8) is used by State Foresters to report wildfire statistics to the Forest Service. The statistics include the numbers of fires and acres burned on State and private land by cause, such as lightning, campfires, smoking, debris burning, arson, equipment, railroads, children, and miscellaneous activities. This form also collects information on numbers of fires and acres burned by size classes. Fire size classes are Class A (.25 acres or less), Class B (0.26 to 9 acres), Class C (10 to 99 acres), Class D (100 to 299 acres), Class E (300 to 999 acres), Class F (1000 to 4999 acres), and Class G (5000 acres or more).

- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

The information is submitted by State fire or forestry officials in all 50 states,

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plus American Samoa, Northern Mariana Islands, Guam, Puerto Rico, and the Virgin Islands in January for the previous calendar year.

**c. What will this information be used for - provide ALL uses?**

The information is used by:

- Forest Service State and Private Forestry staff to request annual funding for the cooperative Fire Protection Program, and is one of several factors considered in calculating funding allocations.
- Geographic Coordination Centers (regional dispatch centers) across the country to display annual wildfire occurrence trends and make informed decisions on firefighting resource acquisition and placement.
- State foresters to see where their wildfire suppression workload is concentrated, which helps determine the fire departments that have the greatest needs for Federal fire funding.
- The Forest Service to track trends in fire causes and help support state activities in fire prevention to target particular causes.
- The Forest Service Washington Office staff to produce an annual summary report, Wildland Fire Statistics, which is available to local, state, and federal agencies, as well as the public.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

The information is collected from State foresters and entered directly into the Annual Wildfire Summary Report application database through an electronic version of form FS-3100-8. The State foresters obtain the information from firefighting organizations throughout the state through various means (electronic submission, postcard, e-mails, letters, etc.).

**e. How frequently will the information be collected?**

The data is collected once a year from all 50 states, plus American Samoa, Northern Mariana Islands, Guam, Puerto Rico, and the Virgin Islands in January for the previous calendar year.

**f. Will the information be shared with any other organizations inside or outside USDA or the government?**

The information is shared with:

- Geographic Coordination Centers (regional dispatch centers) across the country to display annual wildfire occurrence trends and make informed decisions on firefighting resource acquisition and placement.
- State foresters to see where their wildfire suppression workload is

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concentrated, which helps determine the fire departments that have the greatest needs for Federal fire funding.

- In a report to Congress compiled by Forest Service Washington Office staff. The Wildland Fire Statistics Summary Report is available to local, state, and federal agencies, as well as the public.

#### **g. If this is an ongoing collection, how have the collection requirements changed over time?**

Collection requirements have not changed over time.

#### **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 database has been established that the States can access via the internet to enter information electronically into FS-3100-8. The information resides in a password protected database accessible to approved Forest Service and State officials.

Any State organization that is unable to access the system electronically may submit the data in either a spreadsheet or word document directly to the regional Forest Service Cooperative Fire Specialists or Washington Office of the Forest Service for entry into the system.

#### **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 or available from any other sources, as it is only available if collected directly from State agencies. Without submission of this data there would not be state-wide summaries of wildfire data that includes information about the source of wildfire ignition. This information is essential for determining program effectiveness and areas of concern. Additionally, this is the only data set that produces nationally consistent data that is then able to be used for budget and program planning, as well as for program assessment, evaluation and research of program trends. Without nationally consistent data it is not possible to make relevant and accurate comparisons between different states or regions.

#### **5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of this information does not impact small businesses or other small entities.

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

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Without this information collection, the Forest Service would be unable to assess the effectiveness of their State and Private Forestry Cooperative Fire program. The information must be collected annually in order to conduct program planning, make appropriate budgetary adjustments, and to evaluate program effectiveness, which would not be possible if data were not collected annually.

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

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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; or**
- **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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6. If states are unable to meet the annual due date (January 15), an extension is granted to allow more time to respond.

#### **8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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 request for comment was published in the Federal Register Notice for this

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information collection in Volume 84, page 37234 on July 31, 2019. Two comments were received. One commenter indicated that the information collection appeared to be necessary, but recommended use of an electronic form to enable data collection, which is an option available to submit the information. The second submission also supported continued collection of the information, with the commenter opening their comment by saying "I support the extension of this activity." One additional quote from the comment notes that "[t]his survey does not intrude on anyones privacy and it has a net benefit on the country as a whole but also these state and local agencies that it is important to keep it in practice."

**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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Consultation was completed with representatives of the National Association of State Foresters (NASF) regarding ongoing collection of information, as the information is used on behalf of State Foresters when implementing funding and program delivery to the States. NASF supports continued collection of information through AWSR so that it may be used for program evaluation, implementation and funding allocation. Neither the Fire Director of the NASF, nor state personnel consulted expressed any concerns about continuing collection of the data.

**9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.**

No payments or gifts are provided to respondents.

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

Due to the public nature of the information, no assurance of confidentiality is provided to respondents.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

No questions of a sensitive nature are asked.

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**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Annual Wildfire Report	FS-3100-8	56	1	56	0.5 hour	28

- **Record keeping burden:**

There is no additional record keeping burden placed upon the respondents in association with this information collection, and states may retain information regarding wildland fire statistics in whatever format and systems they prefer prior to entry into the Annual Wildfire Summary Report.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
State Foresters complete form	28 hours	\$24.42	\$683.76

\* Estimated hourly wage estimate is from Bureau of Labor Statistics, National Compensation Survey for state and local government workers, May 2018, available at [http://www.bls.gov/oes/current/naics3\\_999000.htm](http://www.bls.gov/oes/current/naics3_999000.htm). The wage per hour is \$27.57.

**13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (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) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

**14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

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**The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable:**

<b>Federal Employee Labor Cost</b>	<b>Estimated Annual Hours</b>	<b>Average cost per hour</b>	<b>Estimated Labor cost to Federal Government</b>
9 Regional Specialists (GS-12)*	2	\$30.90	\$61.80
Program Specialist (GS-12)*	8	\$30.90	\$247.20
Database Hosting			10,000.00
Total			\$10,309.00

\* Estimated hourly wage is approximated from OPM 2016 Federal Salary Table.  
([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf))

Additionally, the annual cost to host the AWSR electronic database submission system is approximately \$10,000. The AWSR system is housed as a subcomponent of several system applications, which represents a cost savings for each individual system. Hosting the AWSR system separately would have involved a more significant financial investment.

In conclusion, the estimated total cost to the government is \$10,309.00

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

This is an extension and there is no change.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

A summary report will be produced and submitted to Congress. The report will also be available to the public.

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

The valid OMB control number and expiration date will be displayed on all information collection instruments, and on the electronic database submission webpage.

**18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.

Final support statement.