

January 14, 2021

**Supporting Statement for
Paperwork Reduction Act Submissions**

OMB Control Number: 1660 – 0134 (and moving a survey from Generic Clearance, 1660-0130)

Title: Preparedness Activity Registration and Feedback

Form Number(s):

FEMA Form 008-0-8 (Preparedness Activity Registration)

FEMA Form 519-0-11 (Preparedness Activity Feedback Form)

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. 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.

As part of 6 U.S.C. Sec. 313 and 314, and the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Section 611 (42 U.S.C. 5196), the mission of the Federal Emergency Management Agency (FEMA) is to reduce the loss of life and property and protect the Nation from all hazards by leading and supporting the Nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation. FEMA’s Individual and Community Preparedness Division (ICPD) supports the FEMA Mission by connecting individuals, organizations, and communities with research and tools to build and sustain capabilities to prepare for any

disaster or emergency. The Division conducts research to better understand effective preparedness actions and ways to motivate the public to take those actions. ICPD develops and shares preparedness resources and coordinates comprehensive disaster preparedness initiatives that empower communities to prepare for, protect against, respond to, and recover from a disaster. This mission is achieved through close coordination with the FEMA Regions and working relationships with Federal, State, local, and Tribal agencies. This includes working with nongovernmental partners from all sectors both nationally through neighborhood-based community groups.

This collection will allow ICPD to gather the following information from the public via web form(s):

- Feedback: general feedback on the effectiveness of national FEMA preparedness programs and initiatives and website user experience
- Activity Details: information regarding the type, size and location of preparedness activities hosted by members of the public and community organizers
- POC Information: for registration within the site and follow-on communication, if needed
- Future Engagement Requests: allow for the public to enroll in the ICPD newsletter or other public communications
- Publication Ordering: submitting requests to the FEMA publication warehouse to have materials shipped directly to members of the public

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.

To fulfill its mission FEMA's Individual and Community Preparedness Division (ICPD) collects information from individuals and organizations by the Preparedness Activity Registration Form and the Preparedness Activity Feedback Form located within a public website (called the "Preparedness Portal"). This collection facilitates FEMA's ability to assess its progress for the following programs:

- Ready 2 Help (www.ready.gov/game)
- You Are the Help Until Help Arrives (www.ready.gov/until-help-arrives)
- Event Registration (www.ready.gov/prepare) (includes Prepareathon events)
- Collections where ICPD partners with other National Preparedness Directorate (NPD) offices

As new programs or initiatives are created, ICPD will leverage the pre-approved questions in the question bank provided for this collection. Known future activities include:

- Community-Based Organization Continuity and Resilience Training
- Website User Experience Feedback

ICPD uses this information to inform the continuous improvement of the programs and the Division’s outreach. Further, the information allows the Division to analyze seasonal trends in preparedness across the variety of programs. Raw data is not shared outside of the database; only results of the data assessment is shared. The data is used for internal reports as well as public-facing talking points.

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

The information is collected via web forms; there is no downloadable form. Any portion of the collection that is associated with PII (Name, Phone, Email, Address) is only collected in the “gated” side of the site secured by username and password. To reduce burden, ICPD collects information without requiring a login, whenever possible.

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

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

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

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

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

Without the collection of information as requested, FEMA's responsibility for administering comprehensive preparedness training would not be possible. This registration process provides critical information to measure participation in preparedness activities and gives FEMA feedback on progress toward its mission to enhance nationwide resilience.

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.

The only instances where this would occur are:

- The respondent voluntarily provides feedback repeatedly. This is not a requirement on the site.
- The respondent is hosting more than one type of training event or activity and would like to report all instances.

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

There is no written response. All responses are electronic via the website. All participation is voluntary.

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

FEMA/ICPD does not request copies of any documents.

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

FEMA/ICPD is not requiring respondents to retain records.

(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.

No statistical surveys are requested.

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

FEMA/ICPD is not 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.

FEMA/ICPD is not requiring a pledge of confidentiality that is not supported by authority established in statute or regulation.

(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.

FEMA/ICPD is not requiring respondents to submit proprietary trade secret, 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 [November 8, 2019, 84 FR 60403](#). **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on [January 17, 2020, 85 FR 3066](#). **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/ICPD regularly consults with State and local emergency management staff to obtain views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, and data elements collected.

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.

ICPD staff meet monthly or as needed with State and local emergency management staff to obtain input. Additionally, a portion of this collection is specifically to gather feedback.

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 on (insert date). A PIA for this collection (select: was or was not) determined to be needed and has been forwarded to the FEMA Privacy Office for review.~~

This collection was previously titled America's PrepareAthon! National Day of Action Registration and was collected through a web portal. This portal is covered by the DHS Web Portal PIA, DHS/ALL/PIA-015 Department of Homeland Security Web Portals June 15, 2009 and the GITAARS SORN DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) November 27, 2012, 77 FR 70792.

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.

ICPD strives to keep registration for its preparedness programs easy and quick. Each preparedness activity registration has a basic point of contact and demographic questions. To tailor the information collection depending on which program each registration is focusing on, each registrant is required to answer only the questions taken from the question bank pertinent to the registrant's program. Because FEMA is using both FEMA Form 008-0-8 (Preparedness Activity Registration) and FEMA Form 519-0-11 (Preparedness Activity Feedback Form), the number of responses for this information collection increased from 50,000 to 86,115. The time to complete the registration decreased from 18 minutes (0.3 hour) to five minutes (or 0.08 hour). To reduce burden, each registration or feedback opportunity should not exceed 20 questions and take a maximum of five minutes to complete. FEMA estimates the total hourly burden for this information collection at 7,174 total hours.

For FEMA Form 008-0-8, "Preparedness Activity Web Collection," ICPD projects 5,511 hours. This estimate is based on a maximum of six variations of the survey (for three existing programs plus three planned programs). The estimated time burden is:

- 6 variations of survey x 11,482 respondents per variation = 68,892 respondents x 5 minutes ÷ 60 minutes per hour = 0.0833 hour to complete survey.
- 68,892 total responses x 0.0833 hour = 5,739, total annual burden hours for FEMA Form 008-0-8.

For FEMA Form 519-0-11, "Preparedness Activity Feedback Form," ICPD projects 1,378 hours. ICPD estimates that 25 percent of the 68,892 respondents to FEMA Form 008-0-8, or 17,223 respondents also will participate in an optional feedback survey (FEMA Form 519-0-11). This optional survey will take a maximum of 5 minutes to complete. The estimated time burden is:

- 68,892 respondents x 0.25 = 17,223 respondents x 5 minutes ÷ 60 minutes per hour = 0.0833 hour to complete feedback.
- 17,223 responses x 0.0833 hour = 1,435, total annual burden hours for FEMA Form 519-0-11.

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 information collection covers two forms, FEMA Form 008-0-8 and FEMA Form 519-0-11.

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
Individuals or Households; Farms; Business or other for-profit; Federal Government;	Preparedness Activity Web Collection / FEMA Form 008-0-8	68,892	1	68,892	0.0833 hour (5 mins.)	5,739	\$27.38	\$157,134

Not-for-profit Institutions; State, local or Tribal Government								
Same respondents	Preparedness Activity Feedback Form, FEMA Form 519-0-11	17,223	1	17,223	0.0833 hour (5 mins.)	1,435	\$27.38	\$39,290
Total		86,115		86,115		7,174		\$196,424

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$62.06.

According to the U.S. Department of Labor, Bureau of Labor Statistics website ², the wage rate category for Office and Administrative Support Occupations is estimated to be \$18.75/hr × 1.46 wage rate multiplier = \$27.38/hr³. Therefore, the estimated burden hour cost to respondents for all applicants is estimated to be \$196,424 annually. (\$27.38 x 7,174 hours = \$196,424, total annual respondent cost.)

The decreases in burden hours and in respondent costs from the last renewal resulted from FEMA’s surveying practice that limits the size of the survey variations to no more than 20 questions. That change effectively lowered the total annual burden hours from 15,000 to 7,174. The reduction in burden hours was offset slightly by an increase in the number of respondents from 50,000 to 86,115. There were no changes in the number of responses per respondent.

¹ 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 2019.” Available at http://www.bls.gov/news.release/archives/ecec_06182019.pdf. Accessed September 17, 2019. The wage multiplier is calculated by dividing total compensation for all workers of \$36.77 by wages and salaries for all workers of \$25.22 per hour yielding a benefits multiplier of approximately 1.46.

² May 2018 National Occupational Employment and Wage Rates, National File (xls), Office and Administrative Support Occupations (OCC Code: 43-0000, Average, Column Title: H_Mean). Accessed and downloaded September 17, 2019. <https://www.bls.gov/oes/tables.htm>.

³ Calculation: \$18.75 per hour x 1.46 per hour benefits multiplier = \$27.375; rounded to \$27.38 fully-loaded hourly wage.

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.

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 General IT O&M already covered under ongoing contract	\$4,000
Staff Salaries* 1 GS 13, step 5 employee in Washington, DC ¹ spending approximately 5 percent of time annually to review and follow up on submissions for this data collection. $(1 \times \$112,393 \times 0.05 \times 1.46^{(2)}) = \$8,204.69$, rounded to \$8,205)	\$8,205
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0

Travel	\$0
Printing [number of data collection instruments annually]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Other	\$0
Total	\$12,205

¹ Office of Personnel Management 2019 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB.aspx>. Accessed and downloaded September 17, 2019.

² Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.

The Federal costs associated with this information collection decreased since the last approval for two reasons. First, at the last approval in 2016, Preparedathon was a major campaign and involved contract support, as well as FEMA staff hours. Since 2016, FEMA transitioned this collection to a platform that involves less contract and Federal staff hours but still provides a platform for participants to register their preparedness activity participation.

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)	Program Change (New)	Difference	Adjustment (hours currently)	Adjustment (New)	Difference

	currently on OMB Inventory)			on OMB Inventory)		
Preparedness Activity Web Collection FEMA Form 008-0-8	15,000	5,739	-9,261			
Preparedness Activity Feedback Form FEMA Form 519-0-11	0	1,435	1,435			
Total	15,000	7,174	-7,826			

Explain: The decrease of 7,826 in burden hours from the last renewal resulted from FEMA’s surveying practice that limits the size of the survey variations to no more than 20 questions. That change effectively lowered the total annual burden hours from 15,000 to 7,174. The reduction in burden hours was offset slightly by an increase in the number of respondents from 50,000 to 86,115. There were no changes in the number of responses per respondent.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (costs currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (costs currently on OMB Inventory)	Adjustment (New)	Difference
Preparedness Activity Web Collection FEMA Form 008-0-8	\$487,800	\$150,901	-\$336,899			
Preparedness Activity Feedback Form FEMA Form 519-0-11	\$0	\$37,725	\$37,725			
Total	\$487,800	\$188,626	-\$299,174			

Explain: The decrease of \$299,174 in respondent costs from the last renewal resulted from FEMA’s surveying practice that limits the size of the survey variations to no more than 20 questions. That change effectively lowered the total annual burden hours from 15,000 to 6,889. The reduction in burden hours was offset slightly by an increase in the number of respondents from 50,000 to 86,115. There were no changes in the number of responses per respondent.

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 is no planned publication of the information collected.

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.

This collection does not seek exception to the “Certification for Paperwork Reduction Act Submissions” statement.