

January 14, 2021

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NW121

Title: Coronavirus (COVID-19) Donations Web Portal

Form Number(s): FEMA Form 248-0-0-1

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 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.

Because of the substantial risk to life, safety, or health of individuals due to the probable shortage in emergency medical equipment, supporting distribution infrastructure and other life-sustaining equipment related to Coronavirus (COVID-19) treatment, FEMA requests an Emergency Waiver to incorporate the voluntary donations web portal into the FEMA.gov internet site. This information will allow FEMA to collect voluntary information on possible donations of key equipment and resources that can be distributed to key organizational recipients directly responding to the COVID-19 pandemic.

The web form will collect business contact information from POCs as well as descriptive information about an entity's potential donation item, the location of the items, and the amount of goods being donated.

FEMA requests approval to revise OMB Collection 1660-NW121 COVID-19 Donations Web Portal, FEMA Form 248-0-0-1 to include:

- Collection of Company Information;
- Collection of Company Point of Contact Information; and
- Logistical details of goods for potential donations in direct support of COVID-19 response.

FEMA has authorization to perform this function as described in the National Response Framework, Fourth Edition, October 28, 2019. The National Response Framework Support Annex, *Volunteer and Donations Management Support Annex* states in its Purpose, "The Volunteer and Donations Management Support Annex describes the coordination processes used to support the state in ensuring the most efficient and effective use of unaffiliated volunteers, unaffiliated organizations, and unsolicited donated goods to support all Emergency Support Functions (ESFs) for incidents requiring a Federal response, including offers of unaffiliated volunteer services and unsolicited donations to the Federal Government."

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 FEMA action officer determines if the goods being donated are needed by any organization responding to the COVID-19 situation and uses the information to connect donors making donations with organizations in need by helping to coordinate the movement of those goods either on their own or through contracts. The type of coordination and assistance will vary depending on the type and number of items being donated and the need for the donation.

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 Form 248-0-0-1 will collect business contact information from POCs as well as descriptive information about an entity's potential donation item, the location of the items, and the amount of goods being donated.

The FEMA.gov system then generates a notification email to an inbox monitored by a FEMA action officer for intake.

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 enormous demand for medical equipment amidst this global pandemic is unprecedented. In fact, no data currently exists that can forecast an effective response's impact on the American workforce and the global economy.

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 is a voluntary submission of data by companies that can include small businesses and small entities, it allows the organizations to participate on the national pandemic response.

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.

If this capability is not immediately made available, serious injury or death to American citizens may result due to lack of medical equipment and resources for organizations that provide life-sustaining services to those that have contracted serious cases of the COVID-19 virus given the scale of this global pandemic.

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.

There are no special circumstances associated with this request.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publications 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.

No Federal Register Notice inviting public comments is being submitted. FEMA has submitted a request for Emergency Approval. FEMA will follow the normal approval process after Emergency approval has been obtained.

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.

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.

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

This data collection will not include payment or gifts to complete the form.

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 was adjudicated by the DHS Privacy Office on March 24, 2020. The DHS Privacy Office agrees with the FEMA Privacy Office that the donations web portal/form is a privacy sensitive collection of information requiring PIA coverage as information is collected from members of the public. Coverage is provided by DHS/ALL/PIA-006 DHS General Contact Lists, which discusses the collection of information to facilitate communications between partners.

SORN coverage is not required as no information is retrieved by unique identifier.

FEMA privacy is requiring a Privacy Act Notice on the web page. Additionally, this data is being entered voluntarily there is no requirement to participate.

Privacy Threshold Analysis Version number: 03-24-2020

This information will not be kept confidential but will only be available to authorized recipients. It is offered voluntarily to FEMA with the express goal of making the information available to those in need directly responding to the COVID-19 pandemic.

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 sensitive questions. The data is very basic: Company information and equipment and resource information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

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

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

This information is voluntary, but the table below represents an estimate per Company.

Estimated Annualized Burden Hours and Costs							
Form Name / Form No.	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
FEMA.gov donations web portal; FEMA Form 248-0-0-1	340	10	3,400	0.1667	567	25.16	\$14,266
			0		0		\$ -
			0		0		\$ -
			0		0		\$ -
			0		0		\$ -
			0		0		\$ -
			0		0		\$ -
			0		0		\$ -
	340		3400		567		\$ 14,266.00

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

It is estimated as many as 340 organizations may submit with an average of ten medical equipment entries.

The average time to enter one entry will be 10-11 minutes (.17 hours).

Miscellaneous Healthcare Support Occupations (SOC 31-9090) with a wage rate of \$17.23 per hour, at *1.46 = \$25.16 per hour will perform the entries.

This generates a total cost of \$142,607.

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46. 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 \$59.51.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for SOC 31-9090 is estimated to be \$17.23 per hour, at *1.46 = \$25.16 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Miscellaneous Healthcare Support Occupations is estimated to \$142,607 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.)

There is no cost to the Companies, they already maintain all this standard information on their equipment.

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.

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
N/A				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
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.

The FEMA Action Officers within the National Response Coordination Center (NRCC) will be performing these functions as part of their regular work responsibilities. The table below shows the estimated internal cost.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$ 2
Staff Salaries* [6 of GS 11 step 5 employees spending approximately 3% of time annually... FEMA Response (NRCC) Staff performing manual analysis and processing of records...for the data collection]GS-11, Step 5: \$81,634, Times 1.46 = \$119,186, 3% time annually is \$3,575.57 per person 6 Staff * \$3,575.57 = \$21,453	\$ 21,
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	\$

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

Staff Salaries Calculations: Six GS 11, step 5 employees spending approximately 3% of time annually...FEMA Response (NRCC) Staff performing manual analysis and processing of records:

GS-11, Step 5: \$81,634, Times 1.46 = \$119,186, 3% time annually is \$3,575.57 per person 6 Staff * \$3,575.57 = \$21,453

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.

There are no cost changes because this is a new collection.

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

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
N/A			0			0
			0			0
			0			0
			0			0
			0			0
			0			0
Total	0	0	0	0	0	0

Explain:

We are not submitting any changes.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Explain:

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.

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