

January 29, 2020

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0110

Title: FEMA Preparedness Grants: Nonprofit Security Grant Program (NSGP)

Form Number(s): FEMA Form 089-24; FEMA Form 089-25

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.

FEMA’s Nonprofit Security Grant Program (NSGP) provides funding support for security related activities to nonprofit organizations that are at high risk of terrorist attack. The collection of information for the Nonprofit Security Grant Program is mandated by Sections 2003, 2004, and 2009 of the *Homeland Security Act of 2002* (codified as amended at 6 U.S.C. §§ 604, 605, 609a) and various appropriations acts.

The information collected is required to 1) assess the need and potential impact of NSGP funding requests from nonprofit organizations; and 2) allows for a fair method to evaluate requests and determine which applications will be selected for funding.

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.

FEMA Form 089-24, NSGP Prioritization of Investment Justification – This form is used by States to create a prioritized list of applicants (in rank order) from within their State. This will also allow the State Administrative Agency (SAA) to easily provide a prioritized list of applicants, ranked in consideration of two factors:

- Need – The relative need for the nonprofit organization compared to the other applicants;
- Impact – The potential impact of the nonprofit investment on achieving maximum prevention and/or protection results at minimal cost.

FEMA Form 089-25, NSGP Investment Justification– Submitted with the application, this document provides narrative details on proposed activities (Investments) that will be accomplished with grant funds. Investment Justifications must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the IJ is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers. The NSGP grant program uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. The highest scoring applications advance to the national review phase. The national review is comprised of a panel of officials from FEMA (headquarters and regions) and peer subject matter experts. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the respective grant program.

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 NSGP Investment Justification and Selection Criteria and the NSGP Prioritization of Investment Justifications is completed in Microsoft Excel, which are both submitted electronically as attachments to their NSGP application when applying for NSGP via

www.grants.gov. Eligible applicants must apply for funding through this portal accessible on the internet.

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 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.

Repetitive/irrelevant questions have been removed or consolidated resulting in fewer questions overall; FEMA has provided clarity on sections that have historically been ambiguous.

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 FEMA could not request and obtain this information, FEMA could not thoroughly assess applications, exercise comprehensive financial and programmatic management or ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

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.

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

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

There are no requirements for respondents to prepare a written response to this 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.

There are no requirements for a respondent 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.

Generally, under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, records must be retained for three years after closeout. The only exceptions are the following:

- (a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- (b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- (c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- (d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.
- (e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- (f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - (1) *If submitted for negotiation.* If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.
 - (2) *If not submitted for negotiation.* If the proposal, plan, or other computation is not required to be submitted to the Federal Government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting

records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

(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.

There is no statistical survey involved with this data collection.

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

There is no use for statistical data classification in this data collection.

(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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(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 requirements for respondents to submit proprietary trade secret, or other confidential information for this data 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 May 15, 2020, 85 FR 29471. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on July 29, 2020, 85 FR 45649. No comments were received. See attached copy of the published notice included in this package.

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 Federal, State, local and nonprofit partners on a regular basis throughout the year such as Headquarters and Regional FEMA staff, and State Administrative Agencies/previous year grant recipients. FEMA uses teleconferences, email communications, and issue-specific conferences to meet with representatives.

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.

FEMA consults on a regular basis with Federal, State, and local and non profit stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices.

FEMA staff review and adjudicate all comments, questions, and inquiries, received through stakeholder outreach efforts. These types of interactions can affect future iterations of the grant programs in several ways. For example, responses to questions posed by grantees at times result in formal “Frequently Asked Questions” (FAQ) documents which are circulated to wider stakeholder audiences. These FAQs are distributed at various times and venues, including program guidance release, award announcement, and after action conferences.

Additionally, questions may signal to FEMA leadership that clarification on a particular matter is warranted, and as a result, information bulletins are issued to stakeholders. As a result FEMA has developed the *Stakeholder Engagement Plan* to report on the processes it utilizes to incorporate stakeholder input for grant guidance development and award distribution.

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 completed by FEMA and adjudicated by the DHS Privacy Office on XXXXXXXXXXXXXXXX.

The DHS Privacy Office finds that the Nonprofit Security Grants Program State Prioritization, FEMA Form 089-24 is not a privacy sensitive collection. No personally identifiable information is collected by this form.

However, the NSGP Investment Justification, FEMA Form 089-25 is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on XXXXXXXX. No Privacy Act Statement nor SORN coverage is required for the form.

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 NSGP is an existing grant program that uses the forms outlined in this collection. The NSGP provides funding support for target-hardening activities to nonprofit

organizations that are at high risk of terrorist attack. The burden to collect the necessary information is estimated to be 94,575 total annual burden hours.

FEMA has estimated that approximately 2,030 respondents will complete the **FEMA Form 089-25** (NSGP Investment Justification). Each form is estimated to take 4 hours to complete. The total annual burden is estimated to be 1,100 responses x 4 hours per response = 8,120 hours.

FEMA has estimated that approximately 56 respondents will complete the **FEMA Form 089-24** (NSGP Prioritization of Investment Justifications). Each form is estimated to take 15 hours to complete. The total annual burden is estimated to be 56 responses x 15 hours per response = 840 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 1.4 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.

Table A.12: 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
Not-for-profit Institutions	NSGP Investment Justification / FEMA Form 089-25	2,030	1	2,030	4	8,120	\$36.47	\$296,136
State, Local or Tribal Government	NSGP Prioritization of the Investment Justifications / FEMA Form	56	1	56	15	840	\$50.75	\$42,630

	089-24							
Total		2,086		2,086		8,960		\$338,766

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.6¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.6, and the entry for the “Avg. Hourly Wage Rate” would be \$68.02.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2018 Occupational Employment and Wage Estimates wage rate for Emergency Management Directors (SOC 11-9161) in State governments (NAICS 999200) is \$31.72. Including the wage rate multiplier of 1.6, the fully-loaded wage rate is \$50.75 per hour. The annual burden hour cost is estimated to be \$42,630.00 (\$50.75 x 840 hours).

The wage rate for Community and Social Service Occupations (SOC 21-0000) is \$23.69. Including the wage rate multiplier³ of 1.46, the fully-loaded wage rate is \$34.59 per hour. Therefore, the annual burden hour cost is estimated to be \$296,136.40 (\$36.47 x 8,120 hours).

The total annual burden hour cost is estimated to be \$338,766.40 (\$42,630 + \$296,136.40)

The Standard Forms listed in the table below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF). Other data collection activities approved by OMB are also identified in the table below.

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 December 19, 2019. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$50.89 by Wages and salaries for State and local government workers of \$31.75 per hour yielding a benefits multiplier of approximately 1.6

² Information on the mean wage rate from the U.S. Department of Labor Bureau of Labor Statistics is available online at: <https://www.bls.gov/oes/tables.htm>

³ 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 23, 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.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate (\$)	Total Annual Respondent Cost (\$)
Standard Forms								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	1	56	0.75	42		
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A	56	1	56	3	168		
State, Local or Tribal Government	Assurances - Non-Construction Program / SF 424B	56	1	56	0.25	14		
State, Local or Tribal Government	SF 424C, Budget Information (Construction)	56	1	56	3	168		
State, Local or Tribal Government	SF 424D, Standard Assurances (Construction)	56	1	56	0.25	14		
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9		
State, Local or Tribal Government	Direct Deposit Sign-Up Form / SF 1199A	56	1	56	0.167	9		

State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				616		760		
Other Departments/ Agencies Data Collection Activities								
State, Local or Tribal Government	EHP - Environmental Screening Form / FEMA Form 024-0-1; FEMA OMB Number 1660-0115	33	1	33				
State, Local or Tribal Government	FEMA Form 112-0-3C, Certifications Regarding Lobbying; Debarment; Suspension and Other Responsibility Matters, and Drug-Free Workplace Requirements / OMB Collection 1660-0025	33	1	33				
Total				66				

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.

The total cost to FEMA is **\$287,456.40**. Approximately 20 staff members with an estimated grade level of GS-13 review and analyze the information collected by this program.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$0
Staff Salaries ¹ 20 of GS 13 Step 5 employees spending approximately 10% of time annually on this administrative and financial data collection. (20 x \$116,353 x 0.1 x 1.46 ² = \$)	\$339,751
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
Total	\$339,751
¹ Office of Personnel Management 2020 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/20Tables/html/DCB.aspx .	
² Wage rate includes a 1.46 multiplier to reflect the 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 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).

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
NSGP Investment Justification / FEMA Form 089-25				92,400	8,120	84,280
NSGP Prioritization of Investment Justifications FEMA Form 089-24				2,175	840	1,335
Total(s)				94,575	8,960	85,615

Explain:

There has been a reduction of information being collected. However, the number of respondents for FEMA Form 089-24 and 089-25 increased because the number of eligible applicants increased.

In prior years, nonprofit organizations had to be located with a Urban Area Security Initiative-designated urban area, eligibility has since expanded so nonprofits regardless of location may apply.

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
NSGP Investment Justification / FEMA Form 089-25				\$3,272,808	\$287,610	-\$2,985,198
NSGP Prioritization of Investment Justifications / FEMA Form 089-24				\$107,967	\$329,685=6	\$221,719
Total(s)				\$3,380,775	\$617,296	\$2,763,479

Explain:

The change in cost burden is due to an increase in the number of respondents for FEMA Form 089-24 since the last collection update. The total Annual Cost Burden is \$338,766.

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.

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.