

November 15, 2020

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0144

Title: Individual & Community Preparedness Division (ICPD) Annual Youth Preparedness Council (YPC) Application Form

Form Number(s): FEMA Form 008-0-0-24

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.

The FEMA Youth Preparedness Council (YPC) was formed to bring together youth leaders from across the country who are highly interested and engaged in advocating youth preparedness and making a difference in their communities. This collection meets the requirements of 6 U.S.C. Sec. 742, National Preparedness, and Presidential Policy Directive – 8 (PPD-8) which emphasize the need for involvement from all sectors of society in preparing for and responding to threats and hazards.

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 008-0-0-24, FEMA Youth Preparedness Council Application – This application form is used to select interested council members based on dedication to public service, efforts in making a difference in their community, and potential for expanding their impact as a national advocate for youth preparedness.

Council member activities and their involvement in the Council are in alignment with goals 5.2. and 5.3 from the Quadrennial Homeland Security Review (QHSR). Members are expected to represent the youth perspective on emergency preparedness and take information back to their communities to share. Council members are expected to develop and complete preparedness-related projects.

Youth apply using personal identifiable demographic and contact information, which FEMA retains confidentially for the purposes of providing acceptance/denial responses to applicants and determining a representative sample of applicants. Letters of recommendation and academic records are required, while supplemental materials highlighting past achievements are encouraged. Attached is a copy of the application packet questions.

Application questions seek to determine an applicant’s present level of engagement on youth and/or emergency preparedness programming, as well as future aspirations within the field. This includes the impact they would make as a Council member and their proposed project(s).

FEMA Headquarters and regional staff review completed applications to select Council members based on dedication to public service, efforts in making a difference in their community, and potential for expanding their impact as a national advocate for youth preparedness. Applicants for the YPC apply via FEMA’s website and a total of 15 youths are selected. Additionally, some FEMA regional offices use the National Youth Preparedness Council recruitment process and forms to select members for their regional Youth Preparedness Councils and youth preparedness activities.

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.

Applicants apply through the Youth Preparedness Council portal or using a fillable PDF available at <https://community.fema.gov/applytoYPC/s/login/>. They can answer the questions onto the form or provide a short video where they answer the questions in video form. Applicants must submit their responses (written or oral) and supporting materials in the portal or send them to FEMA-Prepare@fema.dhs.gov. Applicants have the choice to fill out the PDF or use the online portal, which allows them to save their work throughout the process. Both of these options allow them to manage their time and allots for multiple opportunities to save and return later to their work.

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.

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.

If applications are not collected, FEMA will have no available pool of youth from which to select our Youth Preparedness Council and FEMA will be unable to engage youths in the manner described in our QHSR goals, 5.2 & 5.3. Additionally, if this information collection is conducted less frequently than annually, FEMA will be unable to recruit new members to the council after the terms of the current members' lapse at one or two years.

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

- (a) Requiring respondents to report information to the agency more often than quarterly.**
- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**
- (c) Requiring respondents to submit more than an original and two copies of any document.**
- (d) Requiring respondents to retain records, other than health,**

medical, government contract, grant-in-aid, or tax records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

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

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on July 10, 2020. Volume 85 FR 41622. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on December 8, 2020. Volume 85 FR 79019. 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.

Not applicable. FEMA ICPD has received feedback from Youth Preparedness Council members as well as contract staff regarding the application.

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 ICPD asks YPC members for their feedback regarding the application process.

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 Privacy on November 13, 2020.

PIA coverage is required. DHS PRIV concurs that interim coverage is provided under DHS/FEMA/PIA-029 Citizen Corps Program.

SORN coverage is provided under DHS/ALL-003 Department of Homeland Security General Training Records, 73 FR 71656 (November 25, 2008), which describes the Department's collection and documentation of individuals who are provided DHS training, and DHS/FEMA-006 Citizen Corps Program, 78 FR 43890 (July 22, 2013), which describes the Department's establishment and registration of Citizen Corps Councils and CERT programs.

FEMA Privacy recommends the approved Privacy Act e3 Statement be included in both the PDF application form and online webform. **Once DHS/FEMA-006 has been updated, the Privacy Act Statement will need to be updated to reflect the new SORN coverage.**

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 a 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.

Average number of respondents – 200

Frequency of response – once annually (elective)

Annual hour burden – 1 hour 25 minutes per individual

The hour burden was determined by asking council members to comment on the estimated amount of time it took them to complete their applications in previous years. While the introductory questions will remain the same, FEMA ICPD utilize a question bank for the narrative responses and will format applications to have a similar or smaller annual hour burden by using character/word limits and limiting the total number of questions. $200 \times 1.4167 = 283$

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.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per	Total No. of Response	Avg. Burden per	Total Annual	Avg. Hourly	Total Annual Respondent

			Respondent	s	Response (in hours)	Burden (in Hours)	Wage Rate	Cost
Individuals or households	FEMA Youth Preparedness Council Application / FEMA Form 008-0-0-24	200	1	200	1.4167	283	\$10.59	\$2,997
Total		200		200		283		\$2,997

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.

The Federal minimum wage was selected as the most appropriate wage category for youths given data limitations on teenage workers. According to the U.S. Department of Labor, Bureau of Labor Statistics², the Federal minimum wage is \$7.25. Including the wage rate multiplier of 1.46, the fully-loaded wage rate is \$10.59 (\$10.585) per hour. Therefore, the annual burden hour cost is estimated to be \$2,997 (\$10.59 x 283 hours).

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.

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 May 1, 2020. 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 Information on the Federal minimum wage rate from the U.S. Department of Labor Bureau of Labor Statistics is available online at: <https://www.dol.gov/general/topic/wages>

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 recordkeeping, 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 [Annual contract costs for the YPC application process, including: marketing of the application, responding to queries, compiling and facilitating the selection process for applicants, and promoting new YPC member selections takes approximately less than 1% of our contract resources, amounting to \$59,694.40.]	\$59,694
Staff Salaries ¹ one GS-12 Step 5 and one GS-11 Step 5 employees spending approximately 5% of time annually producing and distributing the application, then evaluating and selecting applicants. $((\$97,848 \times 0.05 + \$81,634 \times 0.05) \times 1.46^2 = \$13,102.186)$	\$13,102
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	\$72,796
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 . Accessed May 1, 2020. 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 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
FEMA Youth Preparedness Council Application / FEMA Form 008-0-0-24	142	283	+141	0	0	0
Total(s)	142	283	+141			

Explain:

For the YPC Application Form collection, the previously approved burden hours were 142 as the current estimated annual hour burden is 1.42 hours per respondent with an estimated 100 respondents. FEMA ICPD expects no changes in the estimated annual hour burden per respondent (Note: rounding accounted for the 1 hour difference resulting in an increase of 141 hours for an additional 100 applications, rather than 142 hours). FEMA ICPD has increased the number of estimated respondents due to increased interest in the program and other youth preparedness activities at both the regional and national levels.

Itemized Changes in Annual Cost Burden

Explain:

There is no cost burden for this collection.

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.

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

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

FEMA does not request an exception to the certification of this information collection.