

November 28, 2022

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 - 0054**

**Title: Assistance to Firefighters Grant Programs**

**Form Number(s):**

- 1) FF-207-FY-21-116, Assistance to Firefighter Grant (AFG) Programs;**
- 2) FF-207-FY-22-120, Assistance to Firefighters Grant (AFG) Programmatic Performance Report;**
- 3) FF-207-FY-22-123, Fire Preventions and Safety (FP&S) Programmatic Performance Report;**
- 4) FF-207-FY-22-124, Staffing for Adequate Fire and Emergency Response (SAFER) Hiring Programmatic Performance Report; and**
- 5) FF-207-FY-22-125, Staffing for Adequate Fire and Emergency Response (SAFER) Recruitment and Retention Programmatic Performance Report**

### **General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(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.**

This is a revision to the collection originally approved as the “Assistance to Firefighters Grant Program and Fire Prevention and Safety Grants-Grant Application Supplemental Information” (OMB Control Number: 1660-0054) and “Staffing for Adequate Fire and Emergency Response (SAFER) Grants” (OMB Control Number: 1660-0135), including the merging of both collections under 1660-0054. This merger is necessary due to the two collections asking very similar questions directed toward the same audience. When the collection instrument changed to the FEMA Grants Outcome (FEMA GO) grants management system in 2018, the forms used became very similar as FEMA consolidated the grant applications and streamlined the grants administered by the Assistance to Firefighters Grant Programs Office (AFGP). The four program applications administered by the AFGP include two under 1660-0054, the Assistance to Firefighters Grant (AFG) and Fire Prevention and Safety (FP&S) grant; the Staffing for Adequate Fire and Emergency Response (SAFER) grant program under 1660-0135; and the Assistance to Firefighters Grant - COVID 19 Supplemental (AFG-S), which has no collection associated with it. The applications for the four programs will have some differences due to their different purposes.

The AFG program provides financial assistance directly to eligible fire departments, nonaffiliated emergency medical service (EMS) organizations, and state fire training academies (SFTA) for critical training and equipment.

The FP&S grant program provides financial assistance directly to eligible fire departments; national, regional, state, local, tribal and non-profit organizations such as academic (e.g., universities), public health, occupational health, and injury prevention institutions for fire prevention programs; and supporting firefighter health and safety research and development.

The SAFER grant program provides funding directly to fire departments and volunteer firefighter interest organizations help communities increase the number of firefighters meet industry minimum standards, attain 24-hour staffing to provide adequate fire protection from fire and fire-related hazards, and to fulfill traditional missions of fire departments.

The AFG-S program provides funding directly to eligible fire departments, nonaffiliated EMS organizations, and SFTAs for purchasing critical personal protective equipment and supplies needed to prevent, prepare for, and respond to the COVID-19 public health emergency.

The grant application information collected is necessary to assess the needs of the applicant(s), as well as the benefits to be obtained from the use of funds. The information collected through these applications are the minimum necessary to evaluate grant applications and are necessary for FEMA to comply with mandates delineated in the law. The information collected includes details concerning the applicant's demographics, capabilities, and operational resources, as well as details specific to their request. The collection also includes information concerning the progress of the FEMA funded project(s) and confirmation of adherence to applicable requirements and laws.

This package revision also seeks to merge all thirteen forms from the four grant programs into one pool of questions that FEMA can select from based on the grant program. Because the collection instrument is an electronic system, only the relevant questions pertaining to the type of organization and type of request will appear within the electronic form. This electronic system, FF-207-FY-21-116 – AFG Programs, will allow FEMA to retire FEMA Form 080-0-2 – AFG Application (General Questions and Narrative); FEMA Form 080-0-2a – Activity Specific Questions for AFG Vehicle Applicants; FEMA Form 080-0-2b – Activity Specific Questions for AFG Operations and Safety Applications; FEMA Form 080-3 – Activity Specific Questions for Fire Prevention and Safety Applicants; FEMA Form 080-0-3a – Fire Prevention and Safety; FEMA Form 080-0-3b – Research and Development; FEMA Form 080-0-0-13 – Semi-Annual Performance Plan; FEMA Form 080-0-0-16 – Final Performance Plan; FEMA Form 080-0-4 – SAFER (General Questions for All Applicants); FEMA Form 080-0-4a – SAFER Hiring of Firefighters Application (Questions and Narrative); FEMA Form 080-0-4b – SAFER Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative); FEMA Form 087-0-0-2 – SAFER Quarterly Report and Payment Request Form; and the AFG-S Application. A temporary form, FF-207-FY-22-120 AFG Programmatic Performance Report, FF-207-FY-22-123 FP&S Programmatic Performance Report, FF-207-FY-22-124 SAFER Hiring Programmatic Performance Report, and FF-207-FY-22-125 SAFER Recruitment and Retention Programmatic Performance Report, will be used to collect required performance reports until the system is able to collect this information electronically.

The authority for these grant programs is derived from the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Div. B (Pub. L. No. 116-136); and Sections 33 and 34 of the Federal Fire Prevention and Control Act of 1974, Pub. L. No. 93-498, as amended (15 U.S.C §§ 2229, 2229a).

**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 uses this information to ensure that FEMA’s responsibilities under the law can be fulfilled accurately and efficiently. The information will also be used to objectively evaluate each of the anticipated applicants to determine which of the applicants’ proposals in each of the activities are the closest to the established program priorities. Lastly, the information will be used to confirm FEMA funded projects are completed within the guidelines of 2 CFR Part 200 and all other applicable laws and requirements.

**Assistance to Firefighters Grant (AFG)**

**General Questions and Narrative** – The purpose of the AFG Program is to enhance the safety of the public and firefighters with respect to fire and fire-related hazards. Over the last eighteen years the program has provided direct financial assistance to eligible fire departments, nonaffiliated EMS organizations, and State Fire Training Academies (SFTA). The funds provide critically needed resources that equip and train emergency personnel to recognized standards, enhance operational efficiencies, foster interoperability, and support community resilience. In the AFG application, there are three “program activities”: “Operations and Safety,” which includes training, wellness, equipment, personal protective equipment and modifications, and “Vehicles Acquisition,” and “Regional Projects,” which involve multiple jurisdictions and may include both Operations and Safety activity and Vehicle activity items. All applicants requesting funding under the AFG program must complete this a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Activity Specific Questions for AFG Vehicle Applicants** – This form obtains the information from the applicant regarding the vehicle that the applicant wishes to purchase, as well as information about the vehicle that will be replaced by the new vehicle. Applicants requesting a vehicle under the Vehicle Acquisition activity or Regional Projects activity must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Activity Specific Questions for AFG Operations and Safety Applications** – These questions obtain information about the specific items that the applicant wishes to purchase under the AFG Operations and Safety activity or Regional Projects activity, if awarded. The questions are sub-activity specific, thus applicants seeking training funds will answer questions about their training project; applicants seeking funds for equipment will answer questions about their equipment needs; applicants seeking funds for personal protective equipment will answer questions about their personal protective equipment needs; applicants seeking funds for modifications for facilities will answer questions

regarding their modification project; and applicants seeking funds for wellness and fitness projects will answer questions regarding their wellness and fitness programs. Applicants requesting training, equipment, personal protective equipment, modifications to facilities, wellness and fitness projects under Operations and Safety Activity or Regional Projects Activity must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

### **Fire Prevention and Safety (FP&S) Grants**

**Activity Specific Questions for Fire Prevention and Safety Applicants** – FP&S grants provide funding for an array of prevention activities aimed at protecting the health and safety of the public and firefighting personnel. Grant funds are available to fire departments as well as national, state, local, tribal, or nonprofit organizations that specialize in prevention activities. FEMA has a separate application period for interested parties seeking grants for Fire Prevention and Safety (FP&S) activities. Fire prevention and safety activities will include public education and awareness, enforcement of fire codes, arson prevention and detection, and research and development into areas that would protect firefighters from fire and fire related hazards. All applicants requesting funding under the FP&S grant must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Fire Prevention and Safety** – These questions obtain information about the applicant’s public education and awareness, enforcement of fire codes, and/or arson prevention and detection project(s). This information includes equipment, materials, and/or supplies needed to complete the proposed project. Applicants requesting funding for public education and awareness, enforcement of fire codes, and/or arson prevention and detection project(s) funding under FP&S grant must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Research and Development** – These questions obtain information about the applicant’s planned research project, the anticipated results of the research project, and the plans for dissemination of the results of the project. Applicants requesting funding for research and development under the FP&S grant must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Semi-Annual Performance Report** – These questions obtain information used for monitoring a grant award such as project updates, milestones accomplished, or possible problems. Applicants that receive a grant award must complete a questionnaire every six months during the grant period of performance.

**Final Performance Report** – These questions obtain a summary of grant activities throughout its period of performance. It accounts for all expenses made with the federal share and matching funds. This allows FEMA to validate that the grant funds have been spent on allowable costs, within the period of performance, and many or some other qualified version of requirements have been met. Applicants that receive a grant award must complete these questions at the end of their period of performance.

### **Staffing for Adequate Fire and Emergency Response (SAFER) Grants**

**Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants)** – These questions obtain general information regarding the general characteristics of the applicant’s community such as zoning and population protected. Finally, it obtains information regarding the staffing levels and needs of the applicant, the number of firefighters, both full and part-time, and the number and types of incidents to which the department responds.

**Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative)** – These questions obtain information from the applicant regarding their staffing status, their current response rates, their projected response rates if awarded as well as the staffing level on their first-out engine. Applicants also provide a narrative with detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, the policies and practices of the applicant regarding minority recruitment, the applicants ability to maintain the staffing hired by the grant and the applicant’s policies and practices regarding their allowance of their paid members to volunteer as a firefighter in other jurisdiction during their days off.

**Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative)** – These questions obtain information from the applicant regarding their current staffing levels, the turnover in volunteers, their success in recruiting new volunteers, their ideal staffing levels, and their projected results if awarded. The second part is the narrative where the applicant provides detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the staffing funds were awarded, and the policies and practices of the applicant regarding minority recruitment.

**Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form (formerly FEMA Form 087-0-0-2)** – These questions obtain information used for monitoring a grant award such as project updates, milestones accomplished, or possible problems. This form also serves as a formal request for funds for SAFER grant recipients.

## **Assistance to Firefighters Grant – COVID 19 Supplemental (AFG-S)**

**AFG-S Application (General Questions and Narrative)** – The purpose of the AFG-S Program is to provide funding directly to eligible fire departments, nonaffiliated emergency medical service (EMS) organizations, and State Fire Training Academies (SFTAs) for critical Personal Protective Equipment and supplies needed to prevent, prepare for and respond to the COVID-19 public health emergency. In the AFG application, there are two “program activities”: “Operations and Safety,” which includes training, wellness, equipment, personal protective equipment and modifications, and “Regional Projects,” which involve multiple jurisdictions. All applicants requesting funding under the AFG-S program must complete a questionnaire during the application period specified in the annual Notice of Funding Opportunity (NOFO).

**Programmatic Performance Reports (PPR) (FF-207-FY-22-120, FF-207-FY-22-123, FF-207-FY-22-124, FF-207-FY-22-125)** – The purpose of the PPR is to provide a summary of the progress toward the awarded project goal. Recipients must submit programmatic performance reports as a condition of their award acceptance. Each program has its own PPR form due to the exclusive nature of the individual programs. The PPR forms are a temporary solution until the FEMA GO system is able to collect the performance information within the AFG questionnaire.

**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 a web-based application through FEMA Grant Outcomes (GO) System, for these grant programs. Guidance on how to complete these forms can be found on the FEMA website at <https://www.fema.gov/grants/guidance-tools/fema-go> and applications can be accessed on the following FEMA website <https://go.fema.gov>.

FEMA GO is the system of record for grants within FEMA, developed by the Grants Management Modernization (GMM) program office using agile development methods; meaning the team ships software iteratively, rather than waiting for the entire system to be developed before launching. FEMA GO will incorporate the other 40-plus grant programs FEMA manages.

The FEMA GO system allows the application only to present questions relevant to the request being submitted. The questions presented will change based on type of funding being requested, type of organization, and equipment/services being requested. Only asking relevant questions helps FEMA reduce the burden on respondents completing an application.

Usability testing has been conducted on this collection. As a result, a reduction of 20 minutes has been recognized and included as an update to the collection. This reduction is offset by an increase of respondents. The outcome is an overall increase of 6,366 burden hours.

**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 U.S. Fire Administration has an incident reporting system that is used to compile fire-related statistics. The National Fire Incident Reporting System (NFIRS) is approved under OMB No.1660-0069, and participation in the NFIRS is completely voluntary. The NFIRS is a fire incident collection instrument and does not involve a fire department's fiscal concerns or operational needs; therefore, there is little information that would overlap with our collection, which is primarily financially and operationally based. NFIRS is voluntary and does not give an accurate account of all functions performed on a yearly basis by a grant applicant. Due to this incomplete data, NFIRS would incorrectly restrict awards to deserving respondents. But, to the extent possible, the information in NFIRS will be used for those applicants that have participated in the past in lieu of requiring those applicants to resubmit the same information.

**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.**

In an effort to reduce the impacts on small businesses or other small entities FEMA meets annually with stakeholders to ensure only questions necessary for the effective evaluation of an application are required to be answered. The FEMA GO system has the ability to determine which questions are relevant to a particular request and reduces the amount of time and effort to complete the electronic application by not displaying questions that are not applicable.

The FEMA GO system uses information available through the System for Award Management (SAM) to auto populate information available in the application process. This further reduces time and effort in completing an electronic application.

Lastly, FEMA offers the public the opportunity to address their concerns for the burden of time to complete the application directly to our help desk and through publication in the Federal Register. All comments and concerns are investigated and addressed in a timely manner.

**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 the information collection is not conducted, there would be no basis under which the applications for assistance could be evaluated, thus funds available for the programs' purposes cannot be awarded and the benefits of the activities associated with each of the grant purposes would not be achieved. The information is also necessary to assess the financial needs of the applicants and the projected benefits obtained from the use of the grant funds. If the information collection is not conducted, there would be no way to track progress of projects or mitigate issues found through active monitoring. The results would also track gross fraud, waste, and abuse of Federal funding. There would also be no way to validate that all applicable laws and regulations were followed.

**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.**

This information collection does not require respondents to report information more than quarterly.

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

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

This information collection does not require 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.**

Per 2 CFR Part 200, grant recipients are required to maintain grant-related documents for at least three (3) years, but this can be longer.

**(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.**

This information collection does not include a statistical survey.

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

This information collection does not use 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.**

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

**(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.**

This information collection does not require respondents to submit trade secrets 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 August 2, 2022, at 87 FR 47227. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on November 28, 2022, at 87 FR 73011. The public comment period is open until December 28, 2022.

**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.**

Representatives from the nine major fire service organizations are nominated by their respective organizations to provide advice and recommendations regarding the implementation of the AFG, FP&S, SAFER and AFG-S programs. The nine organizations are:

- 1) Congressional Fire Services Institute (CFSI);
- 2) International Association of Arson Investigators (IAAI);
- 3) International Association of Fire Chiefs (IAFC);
- 4) International Association of Firefighters (IAFF);
- 5) International Society of Fire Service Instructors (ISFSI);
- 6) National Association of State Fire Marshals (NASFM);
- 7) National Fire Protection Association (NFPA);
- 8) National Volunteer Fire Council (NVFC); and
- 9) North American Fire Training Directors (NAFTD).

As part of the consultation required by the Federal Fire Prevention and Control Act of 1974, as amended, FEMA consults twice a year with this panel of subject matter experts regarding the burdens the collection may have on the applicants. These experts, by consensus, developed the form, format, and content of the grant program's applications. The panel agreed that the data collected is the absolute minimum necessary to evaluate the applications fairly and equitably.

In addition, as part of developing AFG, FP&S, SAFER, and AFG-S in FEMA GO, the team worked with countless grant applicants and recipients through direct observation and non-standardized oral communication in connection with these observations to test the usability of the application. This included getting feedback on the clarity of the instructions, the reporting format, and the collected data. Their feedback was incorporated into the design of this collection. This feedback did not need OMB approval per 5 C.F.R. 1320.3(h)(3). Exclusions to the regulatory definition of "information" under Paperwork Reduction Act (September 5, 2014).

**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.**

As part of the consultation required by the Federal Fire Prevention and Control Act of 1974, as amended, FEMA annually convenes a panel of experts to review the grant programs' processes and priorities twice a year. The panel also reviews the necessity of the information collected and develops criteria for each of the eligible activities.

**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 and approved by the Department of Homeland Security (DHS) on November 23, 2021. FEMA's Privacy Office recommends this collection continue to be considered privacy sensitive.

Privacy Impact Assessment (PIA) coverage is provided by DHS/FEMA/PIA-013 – Grants Management Programs and DHS/FEMA/PIA-052 – Grants Management Modernization. System of Record Notification (SORN) coverage is not needed because the program does not retrieve grant information by personal identifier.

**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.**

**AFG general questionnaire**—takes approximately 14 hours to complete. An estimated total of 11,697 local fire departments will submit one AFG general questionnaire form, for a total of 11,697 respondents. Each respondent will complete one AFG general questionnaire annually. FEMA estimates total burden hours of 163,758 (11,697 total respondents  $\times$  14 burden hours).

**FP&S general questionnaire**— takes approximately 6.5 hours to complete. An estimated 959 local fire departments will submit one FP&S general questionnaire form per year for 6,234 (959  $\times$  1  $\times$  6.5) burden hours and an estimated 210 not-for-profit institutions will submit one FP&S general questionnaire form per year for (210  $\times$  1  $\times$  6.5) 1,365 burden hours. The combined total of both types of respondents is 7,599 (6,234 + 1,365) burden hours.

**Semi-Annual Performance Report** – takes approximately 0.25 hours (15 minutes) to complete and is submitted twice (2) a year. An estimated 3,050 local fire departments will submit two Semi-Annual Performance Reports per year equaling 1,525 (3,050  $\times$  2  $\times$  0.25) burden hours and twelve (12) not-for-profit institutions will submit two Semi-Annual Performance Reports per year equaling 6 (12  $\times$  2  $\times$  0.25) burden hours. The combination of both respondent types yields 1,531 (1,525 + 6) total burden hours.

**Final Performance Report** – takes approximately 4.35 hours to complete and is submitted once per year. An estimated 3,050 local fire departments will submit one Final Performance Report per year for 13,268 (3,050  $\times$  1  $\times$  4.35) burden hours and twelve (12) not-for-profit institutions will submit one (1) Final Performance Report per year for 52.2 (12  $\times$  1  $\times$  4.35) burden hours, which is rounded to 52 burden hours. The combination of both respondent types yields 13,320 (13,268 + 52) total burden hours.

**SAFER general questionnaire** – takes approximately 14 hours to complete for State and Local organizations, takes approximately seven (7) hours for not-for-profit institutions and is submitted once (1) per year. An estimated 1,391 local fire departments will submit one SAFER general questionnaire per year for 19,474 ( $1,391 \times 1 \times 14$ ) burden hours and 27 not-for-profit institutions will submit one SAFER general questionnaire form per year for 189 ( $27 \times 1 \times 7$ ) burden hours. The combination of both respondent types yields 19,663 ( $19,474 + 189$ ) total burden hours.

**SAFER Quarterly Reports** – takes approximately one (1) hour to complete and is submitted four (4) times per year. An estimated 315 State, Local, or Tribal Governments will submit four (4) SAFER Quarterly Reports per year for 1,260 ( $315 \times 4 \times 1$ ) burden hours and twelve (12) not-for-profit institutions will submit four SAFER Quarterly Reports per year for 48 ( $12 \times 4 \times 1$ ) burden hours. The combination of both respondent types yields 1,308 ( $1,260 + 48$ ) total burden hours.

**AFG-S Application** - takes approximately five (5) hours to complete and is submitted once per year. An estimated 3,377 local fire departments will submit one AFG-S Application per year for 16,885 ( $3,377 \times 1 \times 5$ ) total burden hours.

After conducting usability testing there is a 20 minute reduction in burden on the OMB inventory. This reduction is offset by an increase of respondents which results in an overall increase of 6,366 burden 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.**

Please see the responses to 12a and 12c.

**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 1.45 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 Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	AFG Grant Programs System/ AFG Semi-Annual Performance Report FF-207-FY-21-116 / FF-207-FY-22-120 / FF-207-FY-22-123 / FF-207-FY-22-124 / FF-207-FY-22-125	23,839	1	23,839	7.9833	190,314	\$64.45	\$12,265,737
Not-for-Profit Institutions	AFG Grant Programs System/ AFG Semi-Annual Performance Report FF-207-FY-21-116 / FF-207-FY-22-120 / FF-207-FY-22-123 / FF-207-FY-22-124 / FF-207-FY-22-125	273	1	273	5.15	1,406	\$56.64	\$79,636
<b>Total</b>		<b>24,112</b>		<b>24,112</b>		<b>191,720</b>		<b>\$12,345,373</b>

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45 for not-for-profit institutions, for-profit businesses, and individuals and households. Multiply the non-loaded “Avg. Hourly Wage Rate” by 1.61 for State, Local or Tribal Government.<sup>1</sup> For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45 for not-for-profit institutions and 1.61 for State, Local, or Tribal Government, and the entry entries for the “Avg. Hourly Wage Rate” would be \$61.64 and \$68.44 respectively.**

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates the wage rate category First-Line Supervisor/Manager of Fire Fighting and Prevention Workers (SCO 33-1021) is \$40.03 per hour.<sup>2</sup> Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$64.45 per hour. The First-Line Supervisor/Manager of Fire Fighting and Prevention Workers category accurately represents the majority of State, Local or Tribal Government

<sup>1</sup> 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/2021/may/oes\\_nat.htm](https://www.bls.gov/oes/2021/may/oes_nat.htm)<https://www.bls.gov/oes/tables.htm>. Accessed on November 1, 2022.

<sup>2</sup> 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 2022.” Available at <https://www.bls.gov/oes/2021/may/oes192041.htm>. Accessed on November 1, 2022. The wage multiplier for not-for-profit institutions is calculated by dividing total compensation for all workers of \$40.35 by wages and salaries for all workers of \$27.83 per hour yielding a benefits multiplier of approximately 1.45. The wage multiplier for State, Local, or Tribal Government is calculated by dividing total compensation for State and local Government workers of \$54.96 by Wages and salaries for State and Local Government workers of \$34.09 per hour yielding a benefits multiplier of approximately 1.61.

respondents. The wage rate category for Environmental Scientists and Specialists (SCO 19-2041) is \$39.06 per hour. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$56.64 per hour. The Environmental Scientists and Specialists category accurately represents Not-for-profit institutions respondents. The estimated burden hour cost to respondents is \$12,345,373 (= \$12,265,737 + \$79,636) 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.)**

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.**

There are no operation or maintenance costs associated with this information collection.

**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 capital or start-up 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	\$0

Staff Salaries <sup>1</sup> [Four of GS 14, Step 5 employees spending approximately 37.5% of time annually developing, maintaining and monitoring electronic system for the data collection][ $\$143,064 \times 0.375 \times 4 \times 1.45^2 = \$311,164$ ][Three of GS 15, Step 5 employees spending approximately 16.7% of time annually developing, maintaining, and monitoring electronic system for data collection] [ $\$168,282 \times 0.167 \times 3 \times 1.45 = \$122,248$ . Total salaries are \$433,412 ( $\$311,164 + \$122,248$ )]	\$433,412
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
<b>Total</b>	<b>\$433,412</b>
<sup>1</sup> Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx</a> . Accessed November 1, 2022	
<sup>2</sup> The Salary Rate includes a 1.45 multiplier to reflect a fully-loaded Federal employee 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 an 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).

An **“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
Assistance to Firefighters Grants (AFG) Application (General Questions and Narrative) / FEMA Form 080-0-2	90,000	0	-90,000			0
Activity Specific Questions for AFG Vehicle Applicants / FEMA Form 080-0-2a	28,600	0	-28,600			0

Activity Specific Questions for AFG Operations and Safety Applications / FEMA Form 080-0-2b	34,040	0	-34,040			0
Activity Specific Questions for Fire Prevention and Safety (FPS) Applicants / FEMA Form 080-0-3	2,500	0	-2,500			0
Fire Prevention and Safety /FEMA Form 080-0-3a	2,375	0	-2,375			0
Research and Development /FEMA Form 080-0-3b	1,075	0	-1,075			0
Semi-Annual Performance Report /FEMA Form 080-0-0-13	870	0	-870			0
Final Performance Report /FEMA Form 080-0-0-16	7,830	0	-7,830			0
Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants) / FEMA Form 080-0-4	9,271	0	-9,271			0
Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4a	4,628	0	-4,628			0
Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4b	3,285	0	-3,285			0
Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form / FEMA Form 087-0-0-2	880	0	-880			0
AFG Grant Programs System /AFG Semi-Annual Performance Report FF-207-FY-21-116 / FF-207-FY-22-120 / FF-207-FY-22-123 / FF-207-FY-22-124 / FF-207-FY-22-125	0	191,720	191,720			0
<b>Total</b>	<b>185,354</b>	<b>191,720</b>	<b>6,366</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Explain:** In 2018 FEMA began its migration into the FEMA GO system as the new system of record for all FEMA grants. The pilot programs were the AFG, FP&S, and SAFER grant programs. FEMA GO designers took the liberty of combining all the necessary application forms into one within their electronic application system. The result is a simplified and streamlined process to apply for funding. Several smaller forms have been absorbed into a larger questionnaire with the ability to only display questions that apply to the applicant completing the application or report. This allowed us to remove many of the forms that were listed under this collection and has shortened the amount of time it takes to complete the forms.

In April of 2020, FEMA was charged with aiding the nation’s fire service in its efforts to prevent, prepare for, and respond to the COVID-19 public health emergency. FEMA created an application form for this emergency and added that form to this collection.

An increase in coverage for instruments included in this information collection resulted in 3,464 additional State, Local, or Tribal respondents and 40 additional Not-for-profit respondents.

These three programmatic changes resulted in an overall increase of 6,366 burden hours.

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
Assistance to Firefighters Grants (AFG) Application (General Questions and Narrative) / FEMA Form 080-0-2	\$5,758,200	\$0	-\$5,758,200			\$0
Activity Specific Questions for AFG Vehicle Applicants / FEMA Form 080-0-2a	\$1,829,828	\$0	-\$1,829,828			\$0
Activity Specific Questions for AFG Operations and Safety Applications / FEMA Form 080-0-2b	\$2,177,879	\$0	-\$2,177,879			\$0
Activity Specific Questions for Fire Prevention and Safety (FPS) Applicants / FEMA Form 080-0-3	\$159,950	\$0	-\$159,950			\$0
Fire Prevention and Safety / FEMA Form 080-0-3a	\$151,953	\$0	-\$151,953			\$0
Research and Development / FEMA Form 080-0-3b	\$60,017	\$0	-\$60,017			\$0
Semi-Annual Performance Report / FEMA Form 080-0-0-13	\$55,663	\$0	-\$55,663			\$0
Final Performance Report / FEMA Form 080-0-0-16	\$500,963	\$0	-\$500,963			\$0
Staffing for Adequate Fire and Emergency Response (SAFER) (General Questions All Applicants) / FEMA Form 080-0-4	\$593,159	\$0	-\$593,159			\$0
Staffing for Adequate Fire and Emergency Response Hiring of Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4a	\$296,099	\$0	-\$296,099			\$0
Staffing for Adequate Fire and Emergency Response Recruitment and Retention of Volunteer Firefighters Application (Questions and Narrative) / FEMA Form 080-0-4b	\$210,174	\$0	-\$210,174			\$0
Staffing for Adequate Fire and Emergency Response Quarterly Report and Payment Request Form / FEMA Form 087-0-0-2	\$56,302	\$0	-\$56,302			\$0
AFG Grant Programs System / AFG Semi-Annual Performance Report / FF-207-FY-21-116 / FF-207-FY-22-120 / FF-207-FY-22-123 / FF-207-FY-22-124 / FF-207-FY-22-125	\$0	\$12,345,373	\$12,345,373			\$0
<b>Total</b>	<b>\$11,681,683</b>	<b>\$12,345,373</b>	<b>\$663,690</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

**Explain:** In 2018 FEMA began its migration into the FEMA GO system as the new system of record for all FEMA grants. The pilot programs were the AFG, FP&S, and SAFER grant programs. FEMA GO designers took the liberty of combining all the necessary application forms into one within their electronic application system. The result is a simplified and streamlined process to apply for funding. Several smaller forms have

been absorbed into a larger questionnaire with the ability to only display questions that apply to the applicant completing the form. This allowed us to remove many of the forms that were listed under this collection and has shortened the amount of time it takes to complete the application or report.

In April of 2020, FEMA was charged with aiding the nation's fire service in its efforts to prevent, prepare for and respond to the COVID-19 public health emergency. FEMA created an application form for this emergency and have added that form to this collection.

An increase in coverage for instruments included in this information collection resulted in 3,464 additional State, Local, or Tribal respondents and 40 additional Not-for-profit respondents.

These three programmatic changes resulted in an overall increase in burden cost of \$663,690.

**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".