

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0068

Title: Federal Hotel and Motel Fire Safety Declaration Form

Form Number(s): FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1), Federal Hotel and Motel Fire Safety Declaration Form

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.

The *Hotel and Motel Fire Safety Act of 1990* (Pub. L. 101-391) requires the U.S. Fire Administration (USFA)¹ to establish and maintain a National Master List (NML) of hotels, motels, and similar places of public accommodation. For statutory reference to this requirement, see 15 U.S.C. § 2224(b).

The purpose of collecting the information and compiling it into a list is to identify lodging establishments that offer travelers, including Federal employees on government business, a

¹ The USFA is a Directorate under the Federal Emergency Management Agency (FEMA) and the Department of Homeland Security (DHS).

level of life-safety from fire. The collection information is public and available through the USFA website. The nature of the information collected is that it is voluntary, consists only of basic identifying information related to the business, and a declaration that every guestroom has a hard-wired, single-station smoke alarm, as well as the existence of an automatic fire sprinkler system if there are four or more stories.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

The Federal Hotel and Motel Fire Safety Declaration Form, FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1), is used to collect basic information on life-safety systems related directly to fire-safety in hotels, motels, and similar places of accommodation applying for inclusion on the NML. In completing the form, applicants—property owners, lodging managers, or their delegates—provide basic information including identification of the owner(s) of the property, the business’s Employer Identification Number (EIN), and provisions for life-safety from fire.

The form requests specific responses from applicants as to the installation of smoke alarms in all guestrooms of properties submitted for listing on the NML. In addition, applicants must indicate if the lodging establishment has an automatic fire sprinkler system where the building is four stories or higher. Once approved for the NML, the database record for each lodging establishment is assigned a unique identification number (FEMA ID).

The information is collected and distributed through an on-line, electronic database accessed through the USFA website. Information submitted voluntarily by lodging establishments is reviewed and if the criteria meet the requirements of Public Law 101-391, they are given a FEMA ID number and listed in the NML database. Federal travelers and the public seeking public accommodation with provisions for life-safety from fire access the NML through the on-line database and identify lodging establishments in the area to which they are traveling.

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 prevailing trend has been and continues to be away from the use of paper form and toward the on-line submission and retrieval of the NML information collected by

applicants and users. The number of forms submitted by mail, email, or facsimile has steadily declined and now averages 10 per year. The number submitted through an online form has increased.

Submitting on-line requires a computer and an Internet connection. Completing and submitting the application form on-line takes less time for final approval and issuance of a FEMA ID number. The USFA Hotel-Motel webpage <https://apps.usfa.fema.gov/hotel/> has a link that leads to the form <https://apps.usfa.fema.gov/hotel/register>, and where applicants may login and enter the required information for requesting or updating a listing on the NML. The information provided on-line is the same information as requested on FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1). In submitting the completed form, the applicant declares under penalty of law that the information presented is not false or fraudulent.

Information submitted is reviewed and if the criteria of Pub. L. 101-391 are met, the property is listed on the NML. The NML is a web-based relational database allowing instant updating as information is added, edited, or deleted. This is the most cost-effective method of making the information current and accessible to any traveler seeking guest accommodation in a property offering basic life-safety protection from fire.

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 has an impact on small entities, however, USFA mitigates that impact. Of the over 54,000 properties that have participated in the completion of the Hotel and Motel Safety Declaration Form, the USFA estimates that approximately 5,000 or 10% are considered small entities. The USFA mitigates the impact of this information collection by providing two options for submitting information—fully web-based entry or paper forms entry which reduces the burden to all properties that are voluntarily completing the registration. Properties inclusion in the NML consists of a onetime initial registration. The online database allows properties to access previously submitted data to provide additional updates, so the initial registration information does not need to be resubmitted.

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

Without this collection there would be an undue burden on a traveler seeking guest accommodations that meet the requirements of the law. Public Law 101-391 requires this list be created and maintained. Initially, the list was published annually in the Federal Register. With the advent of web-based data collection and public access, the NML is updated daily.

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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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 22, 2021, at 86 FR 38733. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on November 2, 2021, at 86 FR 60465. The public comment period is open until December 2, 2021.

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.

The USFA consulted with representatives from 21 states and U.S. territories as well as Property Managers to obtain their reviews on this information collection. This year's consultation included representatives from the State Fire Marshal's Offices in Florida, North Dakota, Nebraska, Puerto Rico as well as 17 others. In addition, daily contact is made with Property Managers to update records on the NML. No comments were received on FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1).

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.

The USFA consults with representatives from the U.S. states and territories at least once a year or more as needed. The Property Managers consult USFA daily as records need to be updated. No comments were received on FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1).

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 the DHS Office of Privacy on January 25, 2021. This collection has Privacy Impact Assessment (PIA) coverage under DHS/ALL/PIA-006 DHS General Contacts List and System of Records Notice (SORN) coverage under DHS/ALL-004 General Information Technology Access Account Records System (GITAARS). This form includes the necessary Privacy Notice.

Participation in the Hotel and Motel Fire Safety Program is voluntary. The information is business-related (hotel or motel entity) and involves only point of contact for the business. It does, however, require the Employer Identification Number (EIN) of the business applying to the NML. Participants are aware of the voluntary nature of registration and the intended publication of limited (non-critical or non-essential) information on the USFA website of the information contained in the NML. There are no assurances of confidentiality provided to the respondents for this information collections.

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.

It is estimated that 2,511 lodging managers (Business or other For-Profit) will complete one (1) FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1) per each lodging establishment they seek to register and that the average burden per response will be 15 minutes (0.25 hours), for a total of 628 burden hours.

It is estimated that 21 state fire inspectors will review an average of 30 responses from hotels and motels, and that the total time per response will be 20 minutes (0.333 hours) to review each FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1) for a total of 210 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.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

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
Business or other For-Profit	Federal Hotel and Motel Fire Safety Declaration Form / FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1)	2,511	1	2,511	0.25	628	\$45.50	\$28,574
State, local or Tribal Government	Review of FEMA Form FF-USFA-FY-21-112 (formerly 516-0-1)	21	30	630	0.33	208	\$49.47	\$10,290
Total		2,532		3,141		836		\$38,864

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.² For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics³, the May 2020 Occupational Employment and Wage Estimates wage rate for Lodging Managers (SOC Code 11-9081) is \$31.38. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$45.50 per hour. Therefore, the annual burden hour cost is estimated to be \$28,574 annually (\$45.50 x 628 hours = \$28,574).

The wage rate for Fire Inspectors and Investigators (SOC Code 33-2021) is \$30.54. Including the wage rate multiplier of 1.62,⁴ the fully-loaded wage rate is \$49.47 per hour.

² 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, June 2021.” Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed September 28, 2021. The wage multiplier is calculated by dividing total compensation for all workers of \$38.91 by wages and salaries for all workers of \$26.85 per hour yielding a benefits multiplier of approximately 1.45

³ 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/2020/may/oes_nat.htm

Therefore, the annual burden hour cost is estimated to be \$10,290 annually (\$49.47 x 208 hours = \$10,290).

The total estimated burden hour cost to respondents is estimated to be \$38,864 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.)

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
N/A				
Total	\$0	\$0	\$0	\$0

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

⁴ 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, June 2021.” Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed September 28, 2021. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$53.59 by Wages and salaries for State and local government workers of \$33.09 per hour yielding a benefits multiplier of approximately 1.62

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: 1 GS 11, step 5 employees in Washington DC spending approximately 75% of their time annually for data collection. [1 x \$82,453 x 0.75 x 1.45 ¹ = \$89,667.64]	\$89,668
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	\$89,668

¹ Office of Personnel Management 2021 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB.aspx>. Accessed October 4, 2021

² Wage rate includes a 1.45 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 Form FF-USFA-FY-21-112	0	0	0	523	838	315

(formerly 516-0-1)						
Total	0	0	0	523	838	315

Explain:

The burden hours have increased based on the estimated number of respondents and responses from the last OMB submission. The current annual hour burden is 523 hours, the new hours burden is 838 for an increase of 315 annual hour burden.

Itemized Changes in Annual Cost Burden

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
N/A						
Total	\$0	\$0	\$0	\$0	\$0	\$0

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.

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.

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.

