

August 24, 2022

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0139**

**Title: Ready Campaign PSA Creative Testing Research**

**Form Number(s):**

**FEMA Form FF-305-FY-21-100 (formerly 008-0-21) Recruitment  
Screener (script)**

**FEMA Form FF-305-FY-21-101 (formerly 008-0-22) Focus Group  
Discussion Guide**

### 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 collection is in accordance with Executive Orders 12862 Setting Customer Service Standards, 13571, Streamlining Service Delivery and Improving Customer Service, requiring all Federal agencies to survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services. The Government

Performance and Results Act of 1993 (GPRA) (Pub. L. 103-62) requires Federal agencies to set missions and goals and to measure agency performance against them. The GPRA Modernization Act of 2010 (Pub. L. 11-352) requires quarterly performance assessments of government programs for the purposes of assessing agency performance and improvement. The Federal Emergency Management Agency (FEMA) is collecting information through focus groups to improve its public service advertising campaign on disaster preparedness.

**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's mission is helping people before, during, and after disasters. . Launched in February 2003, the Ready campaign is a national public service advertising (PSA) campaign that works in support of this mission and is designed to educate and empower Americans to prepare for and respond to emergencies, including natural and man-made disasters. In support of this mission, FEMA is requesting clearance to conduct information collections in the form of Focus Group Studies over the next three years. This information collection is intended to assess the target audience's reaction to the creative concepts developed for the Ready Campaign PSA and to determine the clarity, relevance, and motivating appeal of the concepts prior to final production of the advertising – for a multi-media national advertising campaign that launches new PSAs each September. The Ready Campaign PSA targets parents and guardians, age 25-54, who have children age 6-17 years old in the household. The campaign will include materials in English and Spanish; thus, focus groups are planned among both English and Spanish speaking parents and guardians.

All creative concepts will be presented in rough, unfinished formats because the research is conducted prior to producing the PSAs. The agency will recommend the format for each media type, which will be shared with FEMA prior to the research. This information collection will be used to determine whether the advertising will be effective and motivating to elicit the intended change in behavior and will help determine whether revisions should be incorporated into the creative concepts prior to final production. Focus groups are an important information gathering technique because they allow for more in-depth feedback from parents and guardians than other types of studies. Focus groups serve the narrowly defined need for direct and informal opinion on a specific topic.

Specifically, the key objectives of creative message testing are to determine:

- How well the target audience understands the concepts
- The overall appeal of the concepts

- The strengths and weaknesses of the concepts
- The relevancy of the concepts to the target audience
- How motivating the concepts are to the target audience to follow through on the call-to-action, or main “ask” of the advertising

For this specific information collection, focus groups will be used as a qualitative research tool to better understand parents’ and guardians’ attitudes and emotions in response to creative concepts designed to communicate information about preparing for emergencies.

**FEMA Form FF-305-FY-21-100 (formerly 008-0-21), Recruitment Screener (script)** – will be used to survey all potential respondents and ensure the individuals qualify to participate.

**FEMA Form FF-305-FY-21-101 (formerly 008-0-22), Focus Group Discussion Guide** – will be used by the moderator to guide the focus group discussion and ensure the necessary information is collected.

Focus groups do not yield meaningful quantitative findings. They can provide public input, but they do not yield data about public opinion that can be generalized to the population at large. As such, they cannot be used to drive the development of policies, programs, and services.

**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.**

Focus group studies are directed group discussions that enable skilled observers to infer the underlying views and assumptions of the group. To facilitate interpretation, the focus group discussions are recorded and videotaped so that both a visual record and written transcript of the discussion are available for review.

**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 this information is not collected, a vital link in gathering information by FEMA to develop appropriate creative messages will be missed.

Without examining the reactions of parents and guardians to various creative approaches, FEMA cannot adequately determine which approaches are most likely to resonate with these audiences and to ultimately increase preparedness behavior in the United States. Without the information obtained from this data collection, FEMA may make assumptions about attitudes, knowledge, and understanding of proposed messages that are not accurate or useful. The agency could potentially waste time and resources pursuing ineffective approaches.

**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 March 1, 2022, at 87 FR 11455. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August 24, 2022, at 87 FR 52018. The public comment period is open until September 23, 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.**

**c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

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

It is standard practice to reimburse focus group respondents for their time. Each respondent will be provided with \$75 following their participation in a session. This amount is in line with the industry standard and will avoid bias of receiving responses only from individuals generally predisposed to be helpful.

**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 approved on July 17, 2020, and valid until July 17, 2023. No personally identifiable information is collected, stored or retrieved by FEMA, so Privacy Impact Assessment (PIA) and System of Record Notice (SORN) coverage for this collection was determined to not be needed.

**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.**

An estimated 50 potential respondents will complete one (1) Recruitment Screener survey, FF-305-FY-21-100 (formerly 008-0-21) to determine their eligibility for the Focus Group and the average burden per response will be 10 minutes (0.1667 hours), for a total of eight (8) burden hours.

An estimated 40 respondents will participate in the Focus Group Discussion, FF-305-FY-21-101 (formerly 008-0-22) to provide their views and input on FEMA's creative concepts and that average burden per response will be 75 minutes (1.25 hours), for a total of 50 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. 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
Individuals or Households	Recruitment Screener (survey script) / FEMA Form FF-305-FY-21-100 (formerly 008-0-21)	50	1	50	0.1667	8	\$40.61	\$325
Individuals or Households	Focus Group Discussion Guide / FEMA Form FF-305-FY-21-101 (formerly 008-0-22)	40	1	40	1.25	50	\$40.61	\$2,031
<b>Total</b>		<b>90</b>		<b>90</b>		<b>58</b>		<b>\$2,356</b>

Note: Burden hours rounded to whole numbers due to rounding in ROCIS.

**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<sup>1</sup>. 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.**

<sup>1</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at [https://www.bls.gov/news.release/archives/ecec\\_03182022.pdf](https://www.bls.gov/news.release/archives/ecec_03182022.pdf). Accessed May 10, 2022. The wage multiplier 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



According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>2</sup>, the May 2021 Occupational Employment and Wage Estimates wage rate for All Occupations (Standard Occupational Classification 00-0000) is \$28.01. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is estimated at \$40.61 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$2,356 (\$40.61 x 58 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.)**

**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 and maintenance cost involved 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 and start-up-cost involved with this collection.

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<sup>2</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)

<b>Annual Cost Burden to Respondents or Recordkeepers</b>				
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
Recruitment Screener (survey script) / FEMA Form FF-305-FY-21-100 (formerly 008-0-21)	\$0	\$0	\$0	\$0
Focus Group Discussion Guide / FEMA Form FF-305-FY-21-101 (formerly 008-0-22)	\$0	\$0	\$0	\$0
<b>Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

**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.**

<b>Annual Cost to the Federal Government</b>	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries:	
1 GS 13 Step 5- 23 hours at \$84.11 (\$58.01 x 1.45 loaded wage rate) = \$1,935	\$4,507
1 GS 15 Step 5- 22 hours at \$116.91 (\$80.63 x 1.45 loaded wage rate) = \$2,572	
Facilities [cost for renting, overhead, etc. for data collection activity]	\$45,000
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel (not to exceed)	\$5,000
<b>Total</b>	<b>\$54,507</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_h.aspx">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB_h.aspx</a> . Accessed May 10, 2022.	
<sup>2</sup> 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
Recruitment Screener (survey script) / FEMA Form FF- 305-FY-21-100 (formerly 008-0-21)	0	0	0	8	8	0
Focus Group Discussion Guide / FEMA Form FF-305-FY-21-101 (formerly 008-0-22)	0	0	0	50	50	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>58</b>	<b>58</b>	<b>0</b>

**Explain:** There is no change.

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
Recruitment Screener (survey script) / FEMA Form FF- 305-FY-21-100 (formerly 008-0-21)	\$0	\$0	\$0	\$284	\$325	+\$41
Focus Group Discussion Guide / FEMA Form FF-305-FY-21-101 (formerly 008-0-22)	\$0	\$0	\$0	\$1,776	\$2,031	+\$255
<b>Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2,060</b>	<b>\$2,356</b>	<b>+\$296</b>

**Explain:** These changes are adjustments due to changes in wage rates and the wage rate multiplier since the last time this collection was approved in 2019.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

**17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.**

FEMA will display the expiration date for OMB approval of this information collection.

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

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