

July 28, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0134

Title: Preparedness Activity Registration and Feedback

Form Number(s):

- 1) FEMA Form FF-008-FY-23-101 (formerly 008-0-8), Preparedness Activity Registration; and**
- 2) FEMA Form FF-008-FY-23-102 (formerly 519-0-11), Preparedness Activity Feedback 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. 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.**

As part of 6 U.S.C. §§ 313 – 314, and Section 611 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (codified at 42 U.S.C. § 5196), the mission of the Federal Emergency Management Agency (FEMA) is to reduce the loss of life and property and protect the Nation from all hazards by leading and supporting the Nation in a risk-based, comprehensive emergency management system of preparedness, protection, response,

recovery, and mitigation. FEMA’s Individual and Community Preparedness Division (ICPD) supports the FEMA Mission by connecting individuals, organizations, and communities with research and tools to build and sustain capabilities to prepare for any disaster or emergency. The Division conducts research to better understand effective preparedness actions and ways to motivate the public to take those actions. ICPD develops and shares preparedness resources and coordinates comprehensive disaster preparedness initiatives that empower communities to prepare for, protect against, respond to, and recover from a disaster. This mission is achieved through close coordination with the FEMA Regions and working relationships with Federal, state, local, and Tribal agencies. This includes working with nongovernmental partners from all sectors both nationally and through neighborhood-based community groups.

This collection will allow ICPD to gather the following information from the public via web form(s):

- Feedback: General feedback on the effectiveness of national FEMA preparedness programs and initiatives and website user experience
- Activity Details: Information regarding the type, size and location of preparedness activities hosted by members of the public and community organizers
- Point of Contact (POC) Information: For registration within the site and follow-on communication, if needed
- Future Engagement Requests: Allow for the public to enroll in the ICPD newsletter or other public communications
- Publication Ordering: Submitting requests to the FEMA publication warehouse to have materials shipped directly to members of the public

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.

To fulfill its mission ICPD collects information from individuals and organizations by the Preparedness Activity Registration Form and the Preparedness Activity Feedback Form located within a public website (called “Preparedness Community”). This collection facilitates FEMA’s ability to assess its progress for the following programs:

- Ready 2 Help (https://community.fema.gov/PreparednessCommunity/s/ready-2-help?language=en_US)

- You Are the Help Until Help Arrives
(https://community.fema.gov/PreparednessCommunity/s/until-help-arrives?language=en_US)
- Event Registration
(https://community.fema.gov/PreparednessCommunity/s/login/?language=en_US)
- Collections where ICPD partners with other National Preparedness Directorate (NPD) offices

As new programs or initiatives are created, ICPD will leverage the pre-approved questions in the question bank provided for this collection.

ICPD uses this information to inform the continuous improvement of the programs and the Division’s outreach. Further, the information allows the Division to analyze seasonal trends in preparedness across the variety of programs. Raw data is not shared outside of the database; only results of the data assessment is shared. The data is used for internal reports as well as public-facing talking points.

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.

Usability Testing has been conducted on this collection. As a result, there is no change to this collection at this time. The information is collected via web forms; there is no downloadable form. Any portion of the collection that is associated with personally identifiable information (PII) (Name, Phone, Email, Address) is only collected in the “gated” side of the site secured by username and password. To reduce burden, ICPD collects information without requiring a login, whenever possible.

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 other 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.

Without the collection of information as requested, FEMA's responsibility for administering comprehensive preparedness training would not be possible. This registration process provides critical information to measure participation in preparedness activities and gives FEMA feedback on progress toward its mission to enhance nationwide resilience.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (See 5 CFR 1320.5(d)(2)):

- 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.**

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

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

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 March 31, 2023, at 88 FR 19316. One public comment was received.

Public Comment FEMA-2023-0008-0002: “While I do not think data collection is necessary for the proper performance of the agency, I do feel the collection of data could be helpful and practical. Having been through the flooding of Hurricane Ian in the State of Florida, I had direct contact with this agency and received plenty of timely resources, help, and aid. However, that is not the story I heard from family, friends, and neighbors. Therefore, I think having the data for improvement could be beneficial. Will people cooperate with the agency after they have felt pushed aside and ignored? That will remain to be seen.”

FEMA Response: ICPD uses data regularly in order to develop efficient and effective preparedness programming for individuals and communities across the nation. Data collection, including asking the public for their opinions on ICPD educational materials, helps ICPD make informed decisions about program development and program revision cycles. The collection mentioned in this information collection request contains multiple methods for the public to freely share their perspectives and opinions on ICPD programming online.

A 30-day Federal Register Notice inviting public comments was published on July 28, 2023, at 88 FR 48903. The public comment period is open until August 28, 2023.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

FEMA/ICPD regularly consults with state and local emergency management staff to obtain views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, and data elements collected.

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.

ICPD staff meet monthly or as needed with state and local emergency management staff to obtain input. Additionally, a portion of this collection is specifically to gather feedback.

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.

An updated Privacy Threshold Analysis (PTA) has been approved by DHS with an expiration date of March 20, 2026.

Privacy Impact Assessment (PIA) coverage for this collection is provided by DHS/ALL/PIA-016, Application and Registration Records for Training and Exercise Programs (ARRTEP), dated November 12, 2021.

System of Records Notice (SORN) coverage is not required as information is not retrieved by a unique identifier.

There are no assurances of confidentiality provided to the respondents for this information collection

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection

instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

ICPD strives to keep registration for its preparedness programs easy and quick. Each preparedness activity registration has a basic point of contact and demographic questions. To tailor the information collection depending on which program each registration is focusing on, each registrant is required to answer only the questions taken from the question bank pertinent to the registrant's program. Because FEMA is using both FEMA Form 008-0-8 (Preparedness Activity Registration) and FEMA Form 519-0-11 (Preparedness Activity Feedback Form), the number of responses for this information collection increased from 50,000 to 86,115. The time to complete the registration decreased from 18 minutes (0.3 hour) to five minutes (or 0.08 hour). To reduce burden, each registration or feedback opportunity should not exceed 20 questions and take a maximum of five minutes to complete. FEMA estimates the total hourly burden for this information collection at 7,174 total hours.

FEMA Form FF-008-FY-23-101 (formerly 008-0-8), Preparedness Activity Web Collection: ICPD has six variations of the survey and estimates that 11,482 respondents will complete each variation for 68,892 respondents ($6 \times 11,482 = 68,892$).

It is estimated to have 68,892 respondents times 1 response per year for 68,892 total annual responses. It is estimated that each response will require 5 minutes (0.0833 burden hours) to complete, therefore 68,892 responses times 0.0833 hours equals 5,739 total annual burden hours ($68,892 \times 0.0833 = 5,739$).

FEMA Form FF-008-FY-23-102 (formerly 519-0-11), Preparedness Activity Feedback Form: ICPD estimates that 25 percent of the 68,892 respondents to FEMA Form FF-008-FY-23-101 (formerly 008-0-8), or 17,223 respondents also will participate in this optional feedback survey ($68,892 \times 0.25 = 17,223$).

It is estimated to have 17,223 respondents times 1 response per year for 17,223 total annual responses. It is estimated that each response will require 5 minutes (0.0833 burden hours) to complete, therefore 17,223 responses times 0.0833 hours equals 1,435 total annual burden hours ($17,223 \times 0.0833 = 1,435$).

After conducting usability testing there is no change to the burden hours as listed in the OMB inventory.

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 our responses to 12a above and 12c below.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or Households	Preparedness Activity Web Collection / FEMA Form FF-008-FY-23-101 (formerly 008-0-8)	68,892	1	68,892	0.0833	5,739	\$30.28	\$173,777
Individuals or Households	Preparedness Activity Feedback Form, FEMA Form FF-008-FY-23-102 (formerly 519-0-11)	17,223	1	17,223	0.0833	1,435	\$30.28	\$43,452
Total		86,115		86,115		7,174		\$217,229

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45¹. For

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03172023.pdf. Accessed March 20, 2023. The national wage multiplier is calculated by dividing total compensation for all workers of \$42.48 by wages and salaries for all workers of \$29.32 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees the wage multiplier is calculated by dividing total compensation for State and local government workers of \$57.60 by

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 Statistics website (www.bls.gov) the wage rate category for **Office and Administrative Support Occupations (43-0000)** is estimated to be **\$20.88** per hour². Including the wage rate multiplier of 1.45, the fully loaded wage rate is **\$30.28**. Therefore, the estimated burden hour cost to respondents **Office and Administrative Support Occupations** is estimated to be **\$217,229 (7,174 burden hours x \$30.28)** 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:

Estimated Annualized			
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent

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.

Wages and salaries for State and local government workers of \$35.69 per hour yielding a benefits multiplier of approximately 1.61.

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2021/may/oes_nat.htm

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: General IT O&M already covered under ongoing contract	\$4,000
Staff Salaries*: 1 GS 13, step 5 employee in Washington, DC ¹ spending approximately 5 percent of time annually to review and follow up on submissions for this data collection. (1 x \$126,216 x 0.05 x 1.45 ⁽²⁾ = \$9,150.66, rounded to \$9,151)	\$9,151
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
Printing [number of data collection instruments annually]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Other	\$0
Total	\$13,151

¹ Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf> . Accessed December 29, 2022.

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).

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
Preparedness Activity Web Collection / FEMA Form FF-008-FY-23-101 (formerly 008-0-8)				5,739	5,739	0
Preparedness Activity Feedback Form, FEMA Form FF-008-FY-23-102 (formerly 519-0-11)				1,435	1,435	0
Total				7,174	7,174	0

Explain: There are no changes to the burden or information being collected.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (costs currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (costs currently on OMB Inventory)	Adjustment (New)	Difference
Preparedness Activity Web Collection / FEMA Form FF-008-FY-23-101 (formerly 008-0-8)				\$157,134	\$173,777	\$16,643
Preparedness Activity Feedback Form, FEMA Form FF-008-FY-23-102 (formerly 519-0-11)				\$39,290	\$43,452	\$4,162
Total				\$196,424	\$217,229	\$20,805

Explain: There is an increase due to the general increase in wages since our last renewal.

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 is no planned publication of the information collected.

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 the “Certification for Paperwork Reduction Act Submissions” statement.