

February 23, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0069

Title: National Fire Incident Reporting System (NFIRS) Version 5.0

Form Number(s): FEMA Form FF-USFA-FY-21-109, National Fire Incident Reporting System (NFIRS) Version 5.0

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 National Commission on Fire Prevention and Control conducted a comprehensive study of the Nation’s fire problem and recommended to Congress actions to mitigate the fire problem, reduce loss of life and property, and educate the public on fire protection and prevention. As a result of the study, Congress enacted Public Law 93-498, the Federal Fire Prevention and Control Act of 1974, (hereinafter referred to as “the Act”) which establishes the U.S. Fire Administration (USFA) to

administer fire prevention and control programs, supplement existing programs of research, training, and education, and encourage new and improved programs and activities by state and local governments.

Section 9(a) of the Act authorizes the USFA Administrator to operate, directly or through contracts or grants, an integrated, comprehensive method to select, analyze, publish, and disseminate information related to prevention, occurrence, control, and results of fires of all types. The Act stipulates that a program be designed to (1) provide an accurate nationwide analysis of the fire problem, (2) identify major problem areas, (3) assist in setting priorities, (4) determine possible solutions to problems, and (5) monitor the progress of programs to reduce fire losses. The National Fire Incident Reporting System (NFIRS) was designed as the vehicle to gather and analyze the kind of information needed to administer the program, such as:

- (1) Information on the frequency, causes, spread, and extinguishment of fires;
- (2) Information on the number of injuries and deaths resulting from fires, including the maximum available information on the specific causes and nature of such injuries and deaths, and information on property losses;
- (3) Information on the occupational hazards faced by firefighters, including the causes of deaths and injuries arising directly and indirectly from firefighting activities;
- (4) Information on all types of firefighting activities including inspection practices;
- (5) Technical information related to building construction, fire properties of materials, and similar information;
- (6) Information on fire prevention and control laws, systems, methods, techniques, and administrative structures used in foreign nations;
- (7) Information on the causes, behavior, and best method of control of other types of fire, including, but not limited to, forest fires, brush fires, fires underground, oil blow-out fires, and water-borne fires; and
- (8) Other information and data as is deemed useful and applicable to any new or special circumstances.

Section 9(b) of the Act also authorizes the USFA Administrator to:

- (1) Develop standardized data reporting methods;
- (2) Encourage and assist state, local, and other agencies, public and private, in developing and reporting information; and
- (3) Make full use of existing data gathering and analysis organizations, both public and private.

The NFIRS is a voluntary, all-incident and all-hazard based data collection system. The Act authorizes the National Fire Data Center (NFDC) of the USFA to gather and analyze information on the magnitude of the Nation's fire problem as well as detailed characteristics and trends. This system allows fire departments to uniformly report on the full range of their activities, from fire, emergency medical services, hazardous materials, and other incidents. To carry out the intentions

of the Act, the NFDC, through a cooperative effort of local, state, private sector, and Federal entities, established the NFIRS in the mid-1970's.

The NFIRS has two objectives: 1) to help state and local governments develop fire reporting and analysis capability for their own use, and 2) to obtain data to assess and subsequently combat the fire problem more accurately at a national level. To meet these objectives, the USFA and its partners developed a standard NFIRS package consisting of forms, a coding structure for data processing purposes, a standard system specification, manuals, computer software, procedures, and documentation for using the system. In 1999, an updated version of the NFIRS was introduced, which expanded the collection of data beyond fires to include the full range of fire department activity on a national scale. Where previous versions of the NFIRS were fire based, the revised version is an all-incident based reporting system. Today, NFIRS has grown in depth and breadth, driven by the fire service users and the local, state, and national-level fire data. NFIRS has grown dynamically over the past two decades, adjusting to new codes, standards, and uses, while taking advantage of new technologies. This vision allowed the system to maintain accessibility, usability, and quality data at all levels from the point of entry to the point of use or modeling.

Although modified over the years, NFIRS Version 4.1 did not keep pace with the changing needs and responsibilities of the Nation's fire service. In the mid-1990s, local-level users, represented primarily by the National Fire Information Council (NFIC), formally requested that NFIRS be fully revised to better reflect the modern fire service and include data collection on things such as emergency medical services, hazardous materials response, and resource (apparatus) and personnel tracking. NFIRS Version 5.0 was developed to provide greater flexibility at the local and state levels including being easily coded for specialized local uses and studies. As technology advanced, the collection instruments and fire departments' on-line capabilities became more flexible and in 2020, NFIRS Version 5.0 became fully web-based without software to install and maintain. All tools are available in one set behind a single login which expedites user maintenance and verification of data submission status. The interfaces were improved with type-ahead feature in code pick lists to reduce time searching for codes.

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.

NFIRS was established in 1975 by the USFA as a cooperative effort of local, state, and Federal authorities to improve uniformity and standardization in fire incident reporting and to ensure that useful data can be analyzed for fire protection planning and management at the Federal, state, and local levels. Data analysis helps local fire departments and states to focus on current problems, predict future problems in their communities, and measure whether their programs are

working. Data analysis also enables the USFA to identify common trends in collected data which may be applicable to fire problems on a national scale.

The USFA uses data from NFIRS to produce a wide variety of reports. In addition to FEMA, state and local governments as well as other Federal agencies use NFIRS data. Specifically, NFIRS data is used:

- (1) At the local level, for setting priorities, targeting resources, and designing fire prevention and education programs specifically suited to the real fire problems of a community or state;
- (2) At the state level, to justify state budgets and support important fire- and arson-related legislation;
- (3) At the national level, to
 - Provide feedback reports to states and local fire departments that enable them to better manage and plan for fire protection and prevention programs;
 - Produce the USFA's report "Fire in the United States" and other reports where possible or when required;
 - Share useful consumer protection information with private concerns and other government agencies; and
 - Perform special studies.

NFIRS participants report fire incident data using standardized terminology, codes, and forms which are described in the "NFIRS Complete Reference Guide" and the system's Design Documentation. Use of the NFIRS standard ensures that fires, other incidents, and casualties are described in a similar manner, making the information more consistent and meaningful.

Local fire departments collect data using web-based online NFIRS application ("eNFIRS"); or optional vendor provided software and a USFA web-based tool to import the data files. This feature provides for a totally web-based data entry tool eliminating the need to download and install client software on the user's computer. No matter which data collection option is used, each form is checked for completeness and accuracy. Some fire departments enter their data into a fire department computer and then send a file of their data to their state office, which rechecks the data for quality control. Other fire departments send data directly to USFA. A small number of fire departments use the paper forms to record the data and send it to their state office to enter in electronic format.

Summaries of communities' fire reports are produced periodically for each participating fire department. NFIRS participants have the option of entering and printing their reports for their own local use.

- 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.**

NFIRS reporting is automated.¹ Since 1999 when Version 5.0 was initiated, electronic reporting was aggressively encouraged and improved several times over the years as it lessened burden hours and made the resultant information more usable by a variety of information technologies and applications such as Geographic Information Systems. States' participation quickly increased and has remained constant. The last major upgrade to the system was in October 2020 and was followed by refinement to its selection lists and account management features. Currently, all 50 states, the District of Columbia, and tribal governments participate in NFIRS. Moreover, USFA implementation of eNFIRS further simplified reporting and lessened complexity, cost, and the burden of reporting especially for smaller departments which generally have fewer resources available. Screen shots for eNFIRS are not available given it is a permission-based and screen -driven interface with many thousands of resultant screens. Instead, a link is provided to the USFA web page where the tools are listed and described.²

Usability testing has been conducted on this collection. As a result, a reduction of 2,805,900 burden hours has been recognized and included as an update to the collection.

- 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 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, but USFA mitigates that impact. Of the 23,500 fire departments participating in NFIRS, USFA estimates that 22,795, or 97 percent,³ are considered small entities.⁴ USFA mitigates the impact of this information collection in two ways. First, USFA provides three options for submitting information—fully web-based entry, partial web-based entry in cooperation with the state, and, although rarely used at present, paper forms entry

¹ See USFA's NFIRS home page at <https://www.nfirs.fema.gov/>.

² See USFA's "eNFIRS Applications" web page at <https://www.usfa.fema.gov/data/nfirs/applications/>

³ See NFPA, U.S. Fire Department Profile 2018, (2020), <https://www.nfpa.org/-/media/Files/News-and-Research/Fire-statistics-and-reports/Emergency-responders/osfdprofile.pdf>.

⁴ See 44 U.S.C. 3506, 5 U.S.C. 601.

facilitated by the state, which reduces the burden to all departments that are voluntarily reporting the data.

Second, USFA mitigates the impact on all fire departments, whether they report NFIRS data or not, by providing a centralized and standardized system that gathers data from fire departments all across the U.S. and makes that data readily available to all communities and the public. Because the NFIRS data is standardized nationwide, the research based on that data is applicable nationwide. Even if the fire department chooses not to report the NFIRS data, its community government can access the data easily; thus, the community government need not spend resources to develop its own data collection tool/system to enhance fire safety.

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.

The absence of NFIRS data would have a negative impact on a wide range of Federal activities related to the reduction of the loss of life and property due to fire. While the obvious agency dependent on NFIRS data for program planning and evaluation is the USFA, NFIRS data are central to the work of other Federal Agencies such as the Consumer Product Safety Commission, the National Highway Traffic Safety Administration, the Centers for Disease Control, and the Department of Defense. Timely reporting at all levels is critical to the ability of these agencies to respond to the national fire problem in a timely and effective manner.

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 December 9, 2022, 87 FR 75642. No comments were received

A 30-day Federal Register Notice inviting public comments was published on February 22, 2023, at 88 FR 10913. The public comment period is open until March 24, 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.**

Numerous focus groups were consulted for the development of the NFIRS Version 5.0 system and forms. Participants included but were not limited to:

- a. U.S. Census Bureau
- b. Bureau of Standards
- c. National Fire Protection Association
- d. Consumer Product Safety Commission
- e. State Fire Marshals
- f. Local fire department officials
- g. National Fire Information Council
- h. U.S. Chemical Safety and Hazard Investigation Board
- i. National Association of State Foresters
- j. USDA Forest Service
- k. Symposium on Medical Support for the Fire Service
- l. National Wildland Coordinating Group
- m. Bureau of Alcohol, Tobacco, and Firearms
- n. National Highway Traffic Safety Commission

- 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.**

Ongoing feedback regarding the information to be collected, the format for collection, and the supporting system is received from a wide range of end users, including the National Fire Information Council (NFIC), which is comprised of NFIRS Program Managers at the state and local level; via focus groups, work groups, general meetings, and the NFIRS Support Center.

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

USFA does not provide payments or gifts to respondents for this data collection.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

The information will be kept private or anonymous to the extent allowable by law. There is no assurance of confidentiality provided to the respondents. A Forms-Privacy Threshold Analysis (PTA) was approved on April 30, 2019 (expires August 7, 2023) as part of the documentation for the NFIRS Authority to Operate (ATO), which in turn was approved by the FEMA Chief Information Officer and Chief Information Security Officer. System of Records Notice (SORN) coverage for system access information is provided by DHS/ALL - 004 General Information Technology Access Account Records System (GITAARS), which outlines the collection and maintenance of information used to provide authorized individuals with access to Department of Homeland Security (DHS) information technology resources. No SORN coverage is required for incident response information collected in NFIRS because it is retrieved by incident number, date, or time and not by personal identifier.

The DHS Privacy Office concluded that NFIRS is covered by DHS/FEMA/PIA-044 National Fire Incident Reporting System (NFIRS).

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 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. Consolation 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.**

FEMA Form FF-USFA-FY-21-109, National Fire Incident Reporting System (NFIRS) Version 5.0 Modules 1-11 (electronic, web-based) - This is the electronic collection tool for reporting fires and is the mechanism using standardized reporting methods to collect and analyze fire incident and related data at the Federal, state, and local levels. USFA estimates the average burden per response to be 0.35 hours (21 minutes) and includes the time to gather the information, read instructions and report the information. There are 23,500 respondents that are fire departments, each reporting multiple incidents using their own staffing resources and operating protocols for doing so: fire officer, firefighter, office staff, or some combination of these personnel.

NFIRS is estimated to have 23,500 respondents times 1,194 response(s) per year for 28,059,000 total annual responses ($23,500 \times 1,194 = 28,059,000$). It is estimated that each response will require 0.35 (in hours) burden hours to complete, therefore 28,059,000 responses times .35 (in hours) hours equals (in hours) 9,820,650 total annual burden hours ($28,059,000 \times .35 = 9,820,650$).

After conducting usability testing there is a 2,805,900 reduction in burden hours on 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 in 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 1.45 (1.61 for State and local government employees) and this**

total should be entered in the cell for “Avg. Hourly Wage Rate.” The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

| Estimated Annual | | | |
|--------------------|----------------------|--------------------|---------------------------------|
| Type of Respondent | Form Name / Form No. | No. of Respondents | No. of Responses per Respondent |
| | | | |

Note: The “Avg. Hourly Wage Rate” for each respondent include a 1.45 multiplier to reflect a fully-loaded wage rate.

“Type of Respondent should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.61.⁵ For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.61, and the entry for the “Avg. Hourly Wage Rate” would be \$68.44.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates wage rate category for SOC 33-2011 is estimated to be \$26.58 per hour.⁶ Including the wage rate multiplier of 1.61, the fully loaded wage rate is 42.79. Therefore, the estimated burden hour cost to respondents SOC 33-2011 is estimated to be \$420,225,614 annually.

This revised submission’s decrease of \$120,064,461 in burden cost resulted from improvements to the web-based application in the October 2020 modernization effort. The stand-alone software was decommissioned, and the interface of the electronic, web-based application improved with type ahead features.

⁵ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/eccec_03182022.pdf. Accessed March 29, 2022. The wage multiplier 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.

⁶ 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

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:

| Annual Cost Burden to Respondents or Record Keepers | | | | |
|--|---|--|--|----------------------------------|
| Data Collection Activity/Instrument | *Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures) | *Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.) | Annual Non-Labor Cost (expenditures on training, travel and other resources) | Total Annual Cost to Respondents |
| FEMA Form FF-USFA-FY-21-109, National Fire Incident Reporting System (NFIRS) Version 5.0 Modules 1 through 11 (Electronic) | \$1,128,000 | \$1,974,000 | \$0 | \$3,102,000 |
| | | | | |
| Total | \$1,128,000 | \$1,974,000 | \$0 | \$3,102,000 |

- 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 systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

Please see the chart above and the explanation in 13b below.

- 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.**

In total, the annual cost burden to respondents or recordkeepers is \$3,102,000. The total annual capital and start-up cost is based on the initial purchase of an average computer system estimated at \$1,200 with a 5-year life cycle, and a NFIRS usage rate for each system at 20 percent, which results in an annual average cost of \$240 per electronic system. As there are approximately 23,500 electronic systems supporting NFIRS 5.0, the annual capital and start-up cost for respondents is estimated at \$1,128,000 ($\$1,200 \times (1 \text{ year} \div 5 \text{ years}) \times 0.20 \text{ usage rate} \times 23,500 \text{ systems} = \$1,128,000$).

Using guidance from the FEMA Information Technology Services Directorate, the annual operations and maintenance (O&M) costs are estimated at 7 percent of the purchase price of a computer system (\$1,200); therefore O&M is estimated at \$84 per computer system per year. Again, multiplying by 23,500 electronic systems supporting NFIRS 5.0, the annual O&M cost to respondents is estimated to be \$1,974,000 (23,500 systems x \$84 per year = \$1,974,000).

13. 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: NFIRS development and maintenance; data warehouse | \$2,588,814 |
| Staff Salaries*: 4 GS 13, step 5 employees ¹ in Washington, DC spending 100% of time annually multiplied by 1.45 benefits multiplier. ² (4 x \$126,949 x 1.45 = \$736,304.20 rounded to \$736,304) | \$736,304 |
| Facilities [cost of renting, overhead, etc. for data collection activity]: None. | \$0 |
| Computer Hardware and Software [cost of equipment annual lifecycle]: Computers, software, hardware, etc. for Staff in Washington, DC. | \$111,000 |
| Equipment and Maintenance [cost of annual maintenance/service agreements for equipment]: None. | \$0 |
| Travel: None. | \$0 |
| Printing [number of data collection instruments annually]: None. | \$0 |
| Total | \$3,436,118 |
| 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 January 12, 2023. | |
| ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate. | |

Total costs to the Federal Government increased by approximately \$969,852 since the last approved information collection. Specifically, contract costs increased by \$702,370 and staff salaries increased by \$267,482 due to the approved increases in the General Schedule of Federal Wages.

14. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of 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 regulation 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 collection 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 A | | |
|-----------------------|---------------------------------------|---------|
| Data Collection | Program Change (hours currently on | Program |

Explain: The total decrease of 2,805,900 burden hours is due to recent modernization that has improved and therefore reduced the burden hours for reporting data to NFIRS.

| <p style="text-align: center;">Data Collection Activity/Instrument</p> | <p style="text-align: center;">Program Change (hours currently on OMB Inventory)</p> | |
|---|---|--|

Explain: The decrease of \$110,468,283 in the annual cost burden to respondents results primarily from the reduction in burden hours, mitigated by an increase in wage rate and use of the State and local government wage multiplier.

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.

The NFIRS is a voluntary system and is not based on a statistically selected sample. It is extensively used by local fire departments to track their incident responses and for data analysis to support fire department needs at the local level. NFIRS data alone are not used to generate national level estimates (no state or sub-state level estimates are derived). Instead, NFIRS data are scaled up to national estimates derived from the NFPA’s annual Survey of Fire Departments for U.S. Fire Experience. NFPA’s Survey is a stratified random sample of fire departments across the Nation. USFA uses the methodology outlined in “The National Estimates Approach to U.S. Fire Statistics” by Hall and Harwood as a basis for determining fire estimates.⁷

NFIRS data collection is an ongoing process. FEMA creates NFIRS Public Data Release files, which are raw data for a given calendar year. Generally, FEMA releases the files in late fall. USFA then releases residential building and nonresidential building fire loss estimates on an annual basis per the USFA website. These estimates are calculated using NFIRS data based on

⁷ See John Hall and Beatrice Harwood, The National Estimates Approach to U.S. Fire Statistics, 25 Fire Technology 99, at 101, 112 (1989), available at <https://www.nfpa.org/-/media/Files/News-and-Research/Fire-statistics-and-reports/NFPA-estimates-and-methodology/NationalEstimatesApproach.pdf>.

the “National Estimates Methodology for Building Fires and Losses.”⁸ USFA publishes other fire-related reports throughout the year based on the residential building and nonresidential building fire loss estimates.

17. If seeking approval no 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 state identified in Item 19 “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-I.

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions.”

⁸ USFA, National Estimates Methodology for Building Fires and Losses (2012), http://www.usfa.fema.gov/downloads/pdf/statistics/national_estimate_methodology.pdf.