

July 5, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0118

**Title: Homeland Security Exercise and Evaluation Program (HSEEP)
Documentation**

Form Number(s):

- 1) **FEMA Form FF-008-FY-21-102 (formerly 091-0-1), After Action Report/Improvement Plan (AAR/IP);**
- 2) **FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs);**
- 3) **FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request 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 National Preparedness Goal (the Goal) identifies the core capabilities necessary for preparedness and the National Preparedness System (the System) guides activities that will enable the Nation to achieve the Goal. The System will allow the Nation to track the progress of our ability to build and improve the capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation.

The Homeland Security Exercise and Evaluation Program (HSEEP) is a key part of the “Validating Capabilities” component of the System. In order for this component to operate properly at the national level, the National Exercise Program Support Request Forms are necessary to nominate exercises of national significance into the National Exercise Program. The National Exercise Program is a requirement of Section 648(b)(1) of the Post-Katrina Emergency Reform Act of 2006 (6 U.S.C. § 748(b)(1)) which states that the Administrator of the Federal Emergency Management Agency (FEMA) “shall carry out a national exercise program to test and evaluate the national preparedness goal, National Incident Management System, National Response, and other related plans and strategies.” Additionally, Integrated Preparedness Plans and After Action Report/Improvement Plans are required to partially assess grantee progress towards the Goal.

We are removing part of the burden for the AAR/IP (FEMA Form FF-008-FY-21-102 (formerly FEMA Form 091-0-1)) that represents information collected from Federal Interagency partners. Since those respondents are part of the Federal Government, the Paperwork Reduction Act (PRA) does not apply.

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 Form FF-008-FY-21-102 (formerly 091-0-1), After Action Report/Improvement Plan (AAR/IP) - The FEMA uses these plans submitted from grantees to validate the preparedness capabilities of the Nation. This information is used to create trend analysis documents and also informs the National Preparedness Report.

We are removing part of the burden for the AAR/IP (FEMA Form FF-008-FY-21-102 (formerly FEMA Form 091-0-1)) that represents information collected from Federal Interagency partners. Since those respondents are part of the Federal Government, the PRA does not apply.

FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs) – FEMA will use these plans submitted by grantees to better understand and support the priorities of grant recipients.

FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request Form – FEMA will use this request form to select the most significant exercises in the nation for inclusion into the National Exercise Program.

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.

All information will be collected through email. The After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102 (formerly 091-0-1) and the Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 (formerly 008-0-26) will be available for download from <https://www.fema.gov/hseep> and the NEP Support Request Form, FEMA Form FF-008-FY-21-101 (formerly 008-0-27) will be available for download from <https://www.fema.gov/nep>.

Usability testing has been conducted on this collection. As a result, a reduction of 8,750 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.

The After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102 (formerly 091-0-1) exists as the single report for an exercise’s capability performance and improvement planning. This information is not collected in any other form, and therefore is not duplicated elsewhere.

The Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 (formerly 008-0-26) is also a single report produced annually that identifies a jurisdiction's exercise program priorities. This information is not collected in any other form, and therefore is not duplicated elsewhere.

The NEP Support Request Form, FEMA Form FF-008-FY-21-101 (formerly 008-0-27) will be the only mechanism for a jurisdiction to nominate an exercise into the NEP. 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 information provided in the After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102 (formerly 091-0-1), the ability of the FEMA to assess and validate the current national preparedness capabilities would be diminished. Additionally, without the information from Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 (formerly 008-0-26) as well as the NEP Support Request Form, FEMA Form FF-008-FY-21-101 (formerly 008-0-27) the ability of FEMA to provide support to state, local, Tribal, and territorial governments would be diminished.

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, at 87 FR 75641. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 22, 2023, at 88 FR 10917. No comments were received.

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.

Consultations with Other Federal Agencies, the National Council on Disability, and the National Advisory Council occur annually regarding the development, testing, and evaluation of the Goal and other plans and strategies. Several working groups have been held with exercise and emergency management stakeholders across the Nation in order to provide recommendations for evaluation and planning submission requirements.

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.

Comments from representatives from whom the information is collected from are welcomed. A formal process for this to occur is the inclusion of the “Participant Feedback Summary” section with the report that allows the respondents to offer suggestions, critiques of exercise actions, and other feedback. FEMA uses this information to better prepare for future exercises.

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 FEMA and adjudicated by the DHS Privacy Office on May 26, 2020.

The Homeland Security Exercise and Evaluation Program (HSEEP) is a privacy sensitive collection requiring Privacy Impact Assessment (PIA) coverage. These forms are covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on March 16, 2020. This PIA is currently in the process of being re-authorized and will have new approval dates in the coming weeks. No SORN coverage is required.

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.

Respondents will include state, local, Tribal, and territorial governments that are recipients of grant aid or would like to nominate an exercise into the National Exercise Program. It is estimated that 56 state and territorial governments, 28 local (Urban Area Security Initiative) governments, and 25 tribal governments will each submit 3 After Action Report/Improvement Plans and 1 Integrated Preparedness Plan. Each After Action Report/Improvement Plan is estimated to take 40 hours to complete and each Integrated Preparedness Plan is estimated to take 12 hours to complete. It is further estimated that approximately 35 state, local, tribal, and territorial governments will choose to submit a National Exercise Program Support Request Form per year, which will take approximately 2 hours to complete. The total burden for all three forms will therefore be 14,458 hours.

FEMA Form FF-008-FY-21-102 (formerly 091-0-1), After Action Report/Improvement Plan (AAR/IP) – is estimated to have 109 respondents times three (3) responses per year for 327 total annual response ($109 \times 3 = 327$). It is estimated that each response will require 40 burden hours to complete, therefore 327 responses times 40 hours equals 13,080 total annual burden hours ($327 \times 40 = 13,080$).

FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs) – is estimated to have 109 respondents times one (1) responses per year for 109 total annual response ($109 \times 1 = 109$). It is estimated that each response will require 12 burden hours to complete, therefore 109 responses times 12 hours equals 1,308 total annual burden hours ($109 \times 12 = 1,308$).

FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request Form – is estimated to have 35 respondents times one (1) responses per year for 35 total annual response ($35 \times 1 = 35$). It is estimated that each response will require 2 burden hours to complete, therefore 35 responses times 2 hours equals 70 total annual burden hours ($35 \times 2 = 70$).

After conducting usability testing there is an 8,750 burden hour reduction 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 response for 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 1.46 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, or Tribal, Government	After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1)	109	3	327	40	13,080	\$54.98	\$719,138
State, Local, or Tribal, Government	Integrated Preparedness Plans / FEMA Form FF-008-FY-21-100 (formerly 008-0-26)	109	1	109	12	1,308	\$54.98	\$71,914
State, Local, or Tribal, Government	National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)	35	1	35	2	70	\$54.98	\$3,849
Total		253		471		14,458		\$794,901

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 report Occupational Employment and Wage Estimates wage rate for Management Analysts (SOC code 13-1111) is \$34.15.¹ Including the wage rate multiplier of 1.61,² the

¹ 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

fully loaded wage rate is \$54.98 per hour. Therefore, the burden hour cost is estimated to be \$794,901 annually (\$54.98 x 14,458 hours = \$794,901).

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.

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

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no capital or start-up costs associated with this information collection.

² Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed November 18, 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

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries: 2 of GS 13, step 5 employees ¹ spending approximately 20% of time annually reviewing data, making determinations of outcomes performing follow-up as necessary, and assuring quality control of the process for this data collection 2 x \$126,949 x 1.45 loaded wage rate ² x 20 percent = \$73,630	\$73,630
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 (not to exceed)	\$0
Total	\$73,630
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 17, 2023 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 an Federal Government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A “**Program decrease**”, is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal Agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

An “**Adjustment**” denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) (States, Local, Tribal, Territorial Governments)				21,800	13,080	-8,720
National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)				100	70	-30
Total(s)				21,900	13,150	-8,750

Explain: There will be a decrease in the hours of the After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) collection due to a decrease in the number of reports estimated to be submitted from state, local, and Tribal governments. This reflects actual data collection for several years, compared to an overestimation previously submitted. While there will still be a collection of the After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) from state, local, Tribal, and territorial governments, the collection of AAR/IP (FEMA Form FF-008-FY-21-102 (formerly FEMA Form 091-0-1)) from the Federal Government is removed from the hour estimation as collection from the Federal Government do not apply here.

After conducting usability testing there is an 8,750 burden hour reduction on the OMB inventory.

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
After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) (States, Local, Tribal, Territorial Governments)				\$1,404,251	\$719,138	-\$685,113
Integrated Preparedness Plans / FEMA Form FF-008-FY-21-100 (formerly 008-0-26)				\$84,255	\$71,914	-\$12,341
National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)				\$6,442	\$3,849	-\$2,593
Total(s)				\$1,494,948	\$794,901	- \$700,047

Explain: There will be a reduction in the annual cost burden of \$700,047 due to a decrease in the number of the number of respondents and the number of responses per respondent. There was also a change in the average hourly wage rate.

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.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.