

April 17, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NW152

**Title: Logistics Supply Chain Management Systems Cloud (LSCMS-C)
Access Control Form**

Form Number(s):

- 1) FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20), Logistics Supply Chain Management Systems Cloud (LSCMS-C) Access Control Form;**
- 2) FEMA Form FF-145-FY-22-103, Transportation Service Providers (TSP) Registration 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 Logistics Supply Chain Management System Cloud (LSCMS-C) Access Control Form, FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20), is required for FEMA and Non-FEMA personnel who require access to the LSCMS-C operational system, enabling end users to process supply chain management transactions. LSCMS-C Access Control Form is completed by internal FEMA and external (non-FEMA) users, vendors, and Transportation Service Providers (TSPs) who require access to the system. The TSPs' end users complete the access form based on the yearly participation of the FEMA's Tender of Service Program.

Authorities:

- Interstate Commerce Act, 49 U.S.C. §§ 10721, 13712.
- Federal Acquisition Regulation, Subpart A-General; part 47, "Transportation";
- Federal Management Regulation, 41 C.F.R. Parts 102-117, 102-118.
- The Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207.
- Homeland Security Act of 2002, 6 U.S.C. § 311 *et seq.*

The Transportation Service Providers (TSP) Registration Form is additionally required for Transportation Service Providers who would like to apply to be a part of the FEMA Standard Tender of Service (FEMA STOS) program for FEMA STOS specific information that will be included in their LSCMS profiles.

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.

Data collected from Non-FEMA personnel is used to provision access to the Logistics Supply Chain Management System Cloud (LSCMS-C) operational system to complete the day to day supply chain management transaction for the FEMA Logistics Management Directorate (LMD), for the ordering, tracking, monitoring, reporting, shipping, of FEMA assets, commodities, and medical supplies both domestically and Outside the Continental United States (OCONUS) in support of pre- and post-disaster response operations.

Authorized users of the LSCMS-C operational system will have access to minimal personally identifiable information (PII), primarily point of contact information associated with the disaster commodities and assets order entry request for other end users to complete the fulfillment of FEMA orders for ordering, receiving, and delivery of

the commodities and assets for FEMA Disaster Response and Recovery activities, as well as non-disaster activities for Mission Support, as documented in the LSCMS-C Privacy Threshold Analysis (PTA).

To obtain access to LSCMS-C environment, a user (FEMA Internal, Non-FEMA, Strategic Partners and Vendors, TSP, etc.) must complete LSCMS-C Curriculum Course, specific to the end users job function. For FEMA Internal Users, the Training Branch will email the end user the access form and certification of completion that includes the completed training date. For Non-FEMA External Users, the FEMA STOS or the FEMA Contracting Officer's Representative (COR) will email the end user the Logistic Gateway Training link and Access Form. Once completed, the LSCMS-C Access Control Form will be submitted to the end user to complete all appropriate form fields which include the actual system functional roles with provisions access specifically by FEMA Regions Locations, LMD Distribution Center (DC/THSS) Locations, and the type of form being submitted (New Request; Modification Request, Re-certification Request, Deletion Request). This form requires accurate completion to complete system supply chain transactions. For FEMA Internal Users, the user fills in the form electronically, digitally signs, and emails the form to their Supervisor/FEMA COR, who in turn reviews, signs, and emails it to the Total Asset Visibility (TAV) Resource Accountability Coordination Center (TRACC) at fema-tracc-hq@fema.dhs.gov for processing. For non- FEMA External / LMD / FEMA TSPs, the Access Form is provided via an email from the FEMA Transportation Service Program Officer with the Link (Provider Transportation Service Program) from FEMA's website:

<https://www.fema.gov/business-industry/doing-business/transportation>. The LMD Supply Chain Integration Branch (SCIB) FEMA COR provides the access form and Logistics Gateway Training link via email to all awarded contracted Strategics Vendor/ Partners. External users depending on the operational functional capability will electronically sign or print/sign/scan and email the form to their FEMA COR/FEMA STOS Program Officer which in turn will review and digitally sign and email it to TRACC (fema-tracc-hq@fema.dhs.gov) for processing.

TRACC System Administrators review the Access Control Form, E-Sign, and complete the creation of the user profile and assign the specific role base position within the LSCMS-C Operational System. TRACC System Administrators emails the user a notification that the access request is completed and processed, along with the system URL to log in to the LSCMS-C system successfully. TRACC System Administrators emails the completed E-signed access control form to the UAM inbox (fema-lscms-user-accounts@fema.dhs.gov) The UAM then creates a folder for the requester by name within the LMD LSCMS-C Account Management directory then files the user's access form in the named user's folder [[Q:\Logistics Systems Division\LSCMS-C User Account Management](#)]

For non- FEMA External / LMD / FEMA TSPs, the TSP Registration Form is provided via an email from the FEMA TSP Officer with the form. External user FEMA TSPs, depending on the operational functional capability will electronically sign or print/sign/scan and email the form to the FEMA STOS Program Officer which will review and process the form by updating their profile with the collected information into the LSCMS-C system.

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.

At this time the LSCMS-C access form and TSP Registration Form request is collected via a manual submission where the end user completes an Adobe pdf form and send via multi sources of email options.

Usability testing has been conducted on this new information 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 Logistics Supply Chain Management System Cloud is the Agency's main supply chain management system that requires external coordination with commercial Transportation Providers and Strategic Partner and Vendors via contracts and agreements within multiple public and private sector to provide additional support to deliver resources to disaster survivors.

The TSP Registration form supplements the LSCMS-C Control Access Form above to collect information that is only needed from FEMA-External FEMA TSPs.

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.

The FEMA STOS Program is available to all types and sizes of commercial transportation companies. As such, small businesses have to satisfy the same program requirements as other participants in the FEMA STOS Program.

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 the access form and registration form data is not collected from the external NON-FEMA end users then FEMA's LMD will not be able to complete the primary mission to deliver the right resources, at the right place, at the right time, to support State, Tribal and Territorial Governments to disaster survivors.

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.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

(c) Requiring 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.

(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.

(f) Requiring the use of 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.

(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.

The LSCMS-C and TSP Registration forms do not have any special circumstances that would cause an information collection to be conducted in each manner described above. Not applicable.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publications 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 November 10, 2022, at 87 FR 67923. One complimentary comment was received and FEMA thanks the anonymous commentor.

Comment 1 (FEMA-2022-0029-0002): "Great document !"

FEMA Response to Comment 1: FEMA simply thanks the anonymous commenter for the complimentary comment.

A 30-day Federal Register Notice inviting public comments was published on April 17, 2023, at 88 FR 23450. The public comment period is open until May 17, 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.

Not applicable.

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.

Not applicable.

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

Not applicable.

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) for the LSCMS-C was approved by DHS Privacy on July 15, 2022. The PTA for TSP Registration forms was approved by DHS Privacy on January 19, 2023.

Both the LSCMS-C and TSP Registrations forms are considered privacy sensitive systems that require Privacy Impact Assessment (PIA) coverage, and that coverage is provided by two existing PIA's:

- DHS/ALL/PIA-015 Web Portals, last updated on June 1, 2020; and
- DHS/ALLPIA-006 General Contact Lists, last updated on August 28, 2020.

System of Records Notice (SORN) coverage for the LSCMS-C is provided by DHS/ALL-004 General Information Technology Access Account Records (GITAARS), published on November 27, 2012, at 77 FR 70792.

A Privacy Notice for the TSP Registration applicants was approved by DHS Privacy on January 19, 2023.

There is no assurances of confidentiality.

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.

The LSCMS-C form and TSP registration form do not contain any information that is sensitive in nature. Not applicable.

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.

FEMA's Logistics Management Directorate has active contracts with both Strategic Partners and Vendors to provide several modes of Transportation, as well as orders of commodities and assets. As such, these strategic contracts maximally reduce the time burden of contracting vehicles for FEMA logistics (and special surveys relating to such), to include the contract vehicle of the FEMA STOS Program, as this ensures it is only utilized in absolutely necessary instances.

When Federal Government users and/or commercial transportation vendors of all types and sizes to participate in the FEMA STOS program, they must first undergo initial access procedures, and maintain currency of their active account status through re-validation annually, in accordance with IT systems control, as is mandated to Federal Government IT system in accordance with Appendix III to OMB Circular No. A-130. The process of both onboarding initial access procedures for Federal Government users includes completing FEMA LSCMS-C training and the FEMA Access form FF-145-FY-22-102 (formerly 119-0-0-20). Initial access procedures for FEMA STOS Program commercial transportation vendors of all types and sizes includes completing FEMA STOS Program training and the FEMA STOS Program TSP Form. Annual validation for both Federal Government users and/or commercial transportation vendors of all types and sizes requires only completing the FEMA Access form FF-145-FY-22-102 (formerly 119-0-0-20) or the FEMA STOS Program TSP Form, respectively. Estimates of burden via number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument, is outlined below:

FEMA estimates that 35 contractors will submit an average of three (3) submissions of the LSCMS-C Access Form FF-145-FY-22-102 annually. Each response will take 0.30 hours (18 minutes) for a total annual burden of 31.5 ($= 35 \times 3 \times 0.30$) hours.

FEMA estimates that 19 Strategic Partners and Vendors will submit an average of three (3) submissions of the LSCMS-C Access Form FF-145-FY-22-102 annually. Each response will take 0.30 hours (18 minutes) for a total annual burden of 17.1 ($= 19 \times 3 \times 0.30$) hours.

FEMA estimates that 465 Tender of Service Transportation Providers will submit an average of three (3) submissions of the LSCMS-C Access Form FF-145-FY-22-102 annually. Each response will take 0.30 hours (18 minutes) for a total annual burden of 418.5 ($= 465 \times 3 \times 0.30$) hours.

FEMA estimates that the same 465 Tender of Service Transportation Providers will submit an average of three (3) submissions of the TSP Registration Form FF-145-FY-22-103 annually. Each response will take 0.30 hours (18 minutes) for a total annual burden of 418.5 ($= 465 \times 3 \times 0.3$) hours.

By conducting usability testing, the burden hours have been confirmed for this new collection.

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 to 12a and 12c.

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
Private Sector (Contractors)	LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	35	3	105	0.3	31.5	\$28.83	\$908
Private Sector (Strategic Partners and Vendors)	LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	19	3	57	0.3	17.1	\$28.83	\$493
Private Sector (Tender of Service Transportation Providers)	LSCMS-C Access Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	465	3	1,395	0.3	418.5	\$28.83	\$12,065
Private Sector	TSP Registration Form / FEMA Form FF-145-FY-22-103	465	3	1,395	0.3	418.5	\$28.83	\$12,065
Total		984		2,952		885.6		\$25,531

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 example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4546, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2021 Occupational Employment and Wage Estimates wage rate for Transportation and Material Moving Occupations (SOC: 53-0000) is \$19.88 per hour. Including the wage rate multiplier of 1.45, the fully loaded wage rate is \$28.83 per hour. Therefore, the annual burden hour cost is estimated to be \$25,531 (= 885.6 × \$28.83 - \$1 due to rounding).

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.)

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2022.” Available at https://www.bls.gov/news.release/archives/eccec_03182022.pdf. Accessed on August 31, 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

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#53-0000. Accessed on August 31, 2022.

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should consider 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 period over which costs will be incurred.

There are no capital 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 record keeping 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 [Contractor Staff, Strategic Partners/Vendors and FEMA Tender of Service Transportation Providers cost to process, manage and review the forms]	\$1,307
Staff Salaries ¹ [<u>LSCMS-C Form, FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20):</u> 22 GS 13 Step 5 employees spending approximately 95% of time annually to process, manage, and review documentation submitted by private businesses seeking to complete supply chain transactions] $[\$126,949 \times 0.95 \times 22 \times 1.45^2 = \$3,847,189]$ <u>TSP Registration Form, FEMA Form FF-145-FY-22-103:</u> 4 GS 13 Step 5 employees spending approximately 15% of time annually to process, manage, and review documentation submitted by Transportation Service Providers. $[\$126,949 \times 0.15 \times 4 \times 1.45^2 = \$110,446]$ $[\$3,847,189 + \$110,446 = \$3,957,635]$	\$3,957,635
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
Total	\$3,958,942
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
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20) (Contractors)	0	31.5	31.5	0	0	0
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20) (Strategic Partners/Vendors)	0	17.1	17.1	0	0	0
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20) (FEMA Tender of Service Transportation Providers)	0	418.5	418.5	0	0	0
TSP Registration Form / FEMA Form FF-145-FY-22-103	0	418.5	418.5	0	0	0
Total	0	885.6	885.6	0	0	0

Explain: Program increase of 885.6 (= 31.5 + 17.1 + 418.5 + 418.5) annual burden hours due to new collection.

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
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	\$0	\$908	\$908	0	0	0
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	\$0	\$493	\$493	0	0	0
LSCMS-C Access Control Form / FEMA Form FF-145-FY-22-102 (formerly 119-0-0-20)	\$0	\$12,065	\$12,065	0	0	0
TSP Registration Form / FEMA Form FF-145-FY-22-103	\$0	\$12,065	\$12,065			
Total	\$0	\$25,531	\$25,531	0	0	0

Explain: Program increase of \$25,531 (= 885.6 × \$28.83 - \$1 due to rounding) annual cost burden due to new collection.

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

There are no outline plans for tabulation and publication of data for this information collection. The LSCMS-C Access Form and TSP Registration Form do not collect information that requires publication.

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. That supports the LSCMS-C Access Form and TSP Registration Form.

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 an exception to the certification statement in Item 19 “Certification for Paperwork Reduction Act Submissions”.