

March 1, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0047

**Title: Resource Request Form – How to Process Mission Assignments in
Federal Disaster Operations**

**Form Number(s): FEMA Form FF-104-FY-21-120 (formerly 010-0-7),
Resource 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.**

Under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq), FEMA is authorized to provide assistance to State, Tribal, and Territorial (STT) governments based on needs before, during and after a disaster has impacted the STT. Information collected explains which STTs require assistance, what needs to be accomplished, the detail of any resource

shortfalls, and explains what assistance is required to meet these needs. Title 44 CFR Part 206.5 provides the mechanism by which FEMA collects the information necessary to determine what resources are needed and if a mission assignment is appropriate.

Two instruments are being removed from this information collection because they are only used by Federal staff during disasters and do not require approval by the Office of Management and Budget under the Paperwork Reduction Act. Those two instruments are:

- FEMA Form FF-104-FY-21-119 (formerly 010-0-8), Mission Assignment Form;
- FEMA Form FF-104-FY-21-121 (formerly 010-0-8A), Mission Assignment Task Order Form; and
- Associated training provided to the Regions.

- 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-104-FY-21-120 (formerly 010-0-7), Resource Request Form: This form is completed when STTs make a request for assistance to respond to a disaster. The form provides acknowledgement that the tasks are beyond the capability of the State, Tribe, or Territory to respond to as well as documents the type of assistance required. FEMA utilizes this information to determine that the assistance requested is the result of a disaster, not a pre-existing condition and that the type of response is appropriate. A section to include the option for Tribal Representatives to sign has been added to the form.

Key stakeholders in the Federal request process include the Requestor; State Approving Official (SAO); Other Federal Agencies (OFAs); FEMA Operations Section, Logistics Section Ordering Unit, Finance & Admin Section Procurement Unit, and the Planning Section Resources Unit. The intent is to document existing resource request practices and share them with stakeholders to standardize actions and improve efficiency and effectiveness in filling, tracking, and reporting the status of RRFs. A second goal is to enable untrained, incoming staff to quickly comprehend the Federal request process and tracking tools in place to facilitate effective and efficient request tracking.

- 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.**

FEMA Form FF-104-FY-21-120 (formerly 010-0-7), Resource Request Form: The Resource Request Form (RRF) is utilized by FEMA STT and Federal partners as an ordering form to request resources from FEMA. The RRF is initiated in an automated system, WebEOC, which is a web-enabled Incident Management System (ICS) and complies with ICS/National Incident Management System (NIMS/PrepCAST) /Emergency Support Function (ESF) structures. On May 1, 2013, WebEOC became FEMA's Official Crisis Management System. WebEOC contains a suite of status boards patterned after FEMA and ICS forms. One of the primary Core Boards of WebEOC is the Resource Request Board. WebEOC Resource Request process allows Other Federal Agencies (OFAs) and all STT users with a FEMA WebEOC account the ability to create, sign, submit and track a Resource Request directly online with FEMA.

OFAs and STTs that choose not to use WebEOC to submit requests will use the Resource Request Form (RRF) to submit requests to FEMA using their normal process (e.g. fax, e-mail, orally, in person, or by the telephone, etc.). The email address and fax number used will be determined by recipients in FEMA.

Usability testing has been conducted on this collection. As a result, a reduction of 4,426 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 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 collection of information does not impact 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.**

There are no additional obstacles to reducing burden.

- 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 13, 2022, at 87 FR 76208. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on March 1, 2023, at 88 FR 12975. The public comment period is open until March 31, 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.**

The Emergency Support Functions Leadership Group (ESFLG) comprised of other Federal agencies meets regularly throughout the year to discuss the resources necessary and available to meet the needs of STTs during times of disasters. Discussions regarding the mission assignment function routinely occur during these meetings.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three (3) years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

- 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.

The Mission Assignment Manager Monthly conference call provides an open forum among Regional Mission Assignment Managers and program offices. This forum provides ample opportunities for feedback on internal items such as the Mission Assignment Standard Operating Procedures and the overall mission assignment process.

9. Explain any decision to provide any payments 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 October 5, 2020.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-023: Enterprise Coordination and Approval Processing System (eCAPS). The PIA is being updated and is currently under review with DHS Privacy. No System of Records Notice (SORN) is required for this collection at this time. The current updates do not impact the collection in any manner.

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 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-104-FY-21-120 (formerly 010-0-7), Resource Request Form: is estimated to have 10 respondents (STTs) times 640 response per year for 6,400 total annual responses (10 x 640 = 6,400). It is estimated that each response will require 0.3333 burden hours (20 minutes) to complete, therefore 6,400 responses times 0.3333 burden hours equals 2,133 total annual burden hours (6,400 x 0.3333 = 2,133).

After conducting usability testing, there is a 4,426 hour reduction in burden 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 1.45 (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 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	Total Annual Burden (in	Avg. Hourly Wage Rate	Total Annual Respondent Cost

					(in hours)	hours)		
State, Local and Tribal Governments	Resource Request Form / FEMA Form FF-104-FY-21-120 (formerly 010-0-7)	10	640	6,400	0.3333	2,133	\$84.59	\$180,430
Total		10		6,400		2,133		\$180,430

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.¹ For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates wage rate for Financial Managers (SOC 11-3031) is \$52.54.² Including the wage rate multiplier of 1.61,³ the fully-loaded wage rate is \$84.59 per hour. Therefore, the burden hour cost is estimated to be \$180,430 annually (\$84.59 x 2,133 hours = \$180,430).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed March 29, 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

³ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed December 6, 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

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
[Form Name/#]				
Total	\$0	\$0	\$0	\$0

- 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.**

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

- 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 collection of information.

- 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 ¹ : 4 GS 12 Step 5 (\$106,759) at 5% of their time x 1.45 loaded wage rate ² = \$30,960	\$30,960
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) Three persons traveling three times a year 3 people x \$500 per trip x 3 trips = \$4,500	\$4,500
Other: Training conducted in Regions on the mission assignment process: 3 GS 12 Step 5 (\$101,813) at 2% of their time conducting the training x 1.45 loaded wage rate = \$8,858	\$8,858
Total	\$44,318
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 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 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
Mission Assignment / FEMA Form FF-104-FY-21-119 (formerly 010-0-8)	2,133	0	-2,133			
Mission Assignment Task Order / FEMA Form FF-104-FY-21-121 (formerly 010-0-8A)	2,133	0	-2,133			
Training / No Form	160	0	-160			
Total	4,426	0	-4,426	0	0	0

Explain: While there is no change to FEMA Form FF-104-FY-21-120 (formerly 010-0-7), the other three instruments are being removed from this collection because they are only used by Federal employees and do not require approval under the PRA. The removal of these three instruments reduce the burden by 4,426 hours.

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
Resource Request Form / FEMA Form FF-104-FY-21-120 (formerly 010-0-7)				\$154,472	\$180,430	\$25,958
Mission Assignment / FEMA Form FF-104-FY-21-119 (formerly 010-0-8)	\$ 154,472	\$0	-\$154,472			
Mission Assignment Task Order / FEMA Form FF-104-FY-21-121 (formerly 010-0-8A)	\$ 154,472	\$0	-\$154,472			
Training / No Form	\$11,587	\$0	-\$11,587			
Total	\$320,531	\$0	-\$320,531	\$154,472	\$180,430	\$25,958

Explain: The main reduction in cost burden is from the removal of three instruments from this collection, as they are only used by Federal employees and do not require OMB approval under the PRA. This reduction of \$294,573 (-\$320,531 + \$25,958) in cost burden is offset by a slight increase in the hourly wage rate for the remaining instrument, FEMA Form FF-104-FY-21-120 (formerly 010-0-7), Resource Request Form.

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 no 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 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”.