

**SUPPORTING STATEMENT FOR
GENERIC CLEARANCE FOR UNITED STATES FIRE ADMINISTRATION
TRAINING, RESEARCH, DATA, AND PREVENTION COLLECTION
OMB Control No.: 1160-NW173
COLLECTION INSTRUMENT(S): NOT APPLICABLE**

B. Collection of Information Employment Statistical Methods

The Agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The potential respondent universe will consist of any stakeholders wishing to voluntarily submit information or be granted access to the United States Fire Administration (USFA) training, research, data and prevention program information. Stakeholders are further identified as including, but not limited to Federal, State, Local, Tribal, Territorial, and private nonprofit organizations. Stakeholders of this collection will also include groups or persons who facilitate first responder fire and EMS support to their communities. This can include but is not limited to, Fire and EMS departments, state training agencies, National Fire Academy Students and Contract Instructors and any other individual wanting to access USFA information for training, research, data or prevention purposes. The number of respondents varies annually depending on the needs of the communities and departments involved in accessing this information for their program use. The number of respondents also varies depending on the number of students enrolled in courses through the admissions system at the National Emergency Training Center (NETC). Collecting data from this generic clearance is used entirely for programmatic review and improvement processes.

Generalizable Quantitative and Qualitative Data

Many activities under this generic clearance will involve the collection of qualitative and quantitative generalizable data submitted voluntarily by members of the USFA stakeholder community. Qualitative data may be collected through a variety of methods (e.g., focus groups, surveys, key informant interviews). Specifics related to the sampling universe, collection methods, and data collection instruments will be described fully in future specific information collection requests submitted under this generic clearance. Information gained from these collections will be used to improve USFA programmatic decisions and to engage external stakeholders.

Standard Program Surveys:

For the standard program surveys conducted within this generic clearance, there will be no sampling method because the survey goes out to every participant as a census. These surveys are offered voluntarily to all participants, aiming to draw generalized conclusions about Fire & EMS training, research, data or prevention programs.

If a program decides to use an instrument to collect survey information, possible topics included in the survey may speak to the perceptions of the program, knowledge and attitudes relevant to the program, delivery method, professionalism, and overall quality of their experience. This information may be used to strengthen program awareness, outreach, and planning consistent with the program's stated goals and objectives.

National Fire Data Center Sub-Collection:

Specifically, the National Fire Incident Reporting System, for 2022, approximately 22,580 fire departments, or 72%, reported incident responses to NFIRS.¹

Expected Response Rates for this Sub-Collection

All fire departments in the country can access the reporting system and are asked to report all types of incidents that occur. Fire departments that report to NFIRS have access to tools for reporting. The U.S. Fire Administration (USFA) expects participation to remain high.

USFA does not use targeted statistical sampling because the goal is to record all fire incidents that occur in any given year. USFA understands there are some departments that do not report,

¹ Based on data from the National Fire Protection Association (NFPA), there were an estimated 29,452 fire departments in the United States in 2020. See NFPA, U.S. Fire Department Profile 2020 (September 2022), [U.S. fire department profile | NFPA Research](#).

but USFA continues its efforts to increase participation. This information collection is intended to be a 100% count of fire incident data, not a sample.

USFA relies on four factors for valid representation of the NFIRS data:

1. Historically high levels of participation of fire departments in the database.
2. Wide geographic distribution of participating fire departments.
3. Diversity of community sizes as represented by participating fire departments.
4. Standardization of core information on fire and casualty reports.

Participation in NFIRS is voluntary; therefore, USFA cannot guarantee that every fire incident is reported. However, the majority of incidents are reported. Some states require fire departments to participate in their state reporting system. Currently, all 50 states, the District of Columbia, and Tribal governments participate in NFIRS. Because of the high reporting rates nationwide, USFA believes that NFIRS is representative of fire departments across the country.

In fire data analyses at the national level, USFA uses at least three years of data to account for fluctuations in fire department participation each year. USFA emphasizes that, along with other Federal agencies, it does not use NFIRS data to derive state level fire estimates. USFA uses NFIRS data to show the scope of the fire problem at the national level only.

2. **Describe the procedures for the collection of information including:**

National Fire Data Center –

Statistical Methodology for Stratification and Sample Selection

No targeted statistical methodology for stratification and sample selection are used for collecting National Fire Data Center data because this collection is voluntary, not a sample.

Estimation Procedure

Data are presented as scaled up national estimates or percentages rather than raw or absolute numbers. Most estimates will be derived as a percentage from categories and applied to national level data from the National Fire Protection Association (NFPA). Because the calculation of national estimates may use various data sources,² adjustments for completeness, consistency, and reliability of data sources and data elements will be made. Extrapolations of the data to national estimates will be calculated using gross totals from NFPA. To address for different proportions

² Data sources include National Fire Protection Association; National Center for Health Statistics; Bureau of the Census; Bureau of Alcohol, Tobacco, and Firearms; National Institute for Occupational Safety and Health; USFA-Firefighter Fatality Project; and Consumer Product Safety Commission.

contained in the data (due to the much larger sample contained in the National Fire Data Center Systems), NFPA estimates of fires, deaths, injuries, and dollar loss for residential, non-residential, mobile and outside properties will be used as a starting point, with other estimates below this level based on proportions. Inevitably, some inconsistencies will remain until all estimates can be derived. To correct for non-response (missing data items) or for data reported as “unknown,” estimates will include adjusted percentages in which “unknown” values are distributed in the same proportion as “known” values.

Degree of Accuracy Needed for the Purpose Described in the Justification

No statistical tests are computed on this data with any specified percentage level of confidence. Also, data are generally reported as scaled up national estimates, rather than absolute numbers.

Unusual Problems Requiring Specialized Sampling Procedures

No specialized sampling procedures are used for data collection.

Use of Periodic Data Collection Cycles to Reduce Burden

Data are reported every day of the year by fire departments responding to incidents across the county.

Fire & EMS Information Requests – No statistical methodology for stratification and sample selection are required for the instruments of this sub-section of the generic clearance. No statistical analysis is being conducted on the information submitted, which is purely for the creation of customer accounts to provide them access to programmatic content on USFA Fire & EMS research and prevention programs.

Fire Data Repositories - No statistical methodology for stratification and sample selection are required for the instruments of this sub-section of the generic clearance. No statistical analysis is being conducted on the information submitted, which is collected voluntarily from participants wishing to enroll their organization into a USFA program. USFA programs use the data collected from these instruments to calculate the number of participants within a geographical area and analyze the needs of participants based on their responses. No statistical analysis is being conducted.

Admissions – No statistical methodology for stratification and sample selection are required for the instruments of this sub-section of the generic clearance. No statistical analysis is being conducted on the information submitted, which is purely for the creation of student accounts to generate a transcript and allow a stakeholder to apply for courses hosted through the NETC.

National Fire Academy – No statistical methodology for stratification and sample selection are required for the instruments of this sub-section of the generic clearance. The standard program surveys within this section are provided to the entire population and would thus be classified as a census. Every participant is provided the opportunity to voluntarily complete an electronic or paper survey which is done immediately following the program being evaluated, or at a specific time following the conclusion of their program (approximately 4 months for long-term evaluations).

- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

This generic clearance consists of instruments that are entirely voluntary in nature, and no stakeholder or individual member of the public is required to submit information to gain a benefit. because of that, any methods to maximize response rates undertaken by USFA program offices are to increase the volume of voluntary respondents done through outreach with our Fire & EMS stakeholders to increase the variety and type of respondents and not to influence their responses.

There is no financial incentive for respondents to answer the survey questions. The incentive is the opportunity for applicants to express their opinion and evaluate their satisfaction with their recent USFA experience. The feedback is vital to USFA's continuous improvement in service delivery.

If a specific program wants to utilize incentives to boost participation, it will be outlined in the submission for that program survey.

USFA makes every possible effort to ensure that when data estimates are needed (such as with the National Fire Data Center sub-collection), they are accurate, valid, and reliable. To ensure the validity of the information and consistency in the data reporting, the National Fire Data Center uses a set of standardized definitions for a common core of information on fire and casualty reports. States and fire departments across the nation are encouraged to participate. USFA continues to solicit participation from departments that do not report. Tools for reporting are equally available to all departments.

With 1.2 million new fire incident responses reported in 2022, comprising a solid majority of all fires, this generic collection reflects a wide geographic distribution of fire departments and

represents communities of all sizes. USFA, after conducting several studies regarding representativeness in response to OMB terms of clearance, has determined that there is no known major bias that would have meaningful impact on national level estimates.³ Furthermore, fire data exhibit stability over time as evidenced by 10-year trends and the fact that results based on the full data set are generally similar to those based on part of the data. Data are further validated against other external data sources. It is expected that these measures will help to maintain sufficiently high reporting rates suitable to analysis, specifically for the National Fire Data Center sub-collection which conducts statistical analysis from its associated instruments.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

All requests to collect information under this clearance must align with The Federal Fire Prevention and Control Act of 1974 (Pub. L. 93-498, as amended) (15 U.S.C. §§ 2201 et seq.). All instruments will be carefully evaluated to ensure consistency with the intent, requirements, and boundaries of this programmatic clearance.

Pretesting: At the creation/review/renewal of each instrument to be accepted into this generic clearance, a pretest will be conducted on less than 9 persons to discover any potential problems with the survey instrument or process. This pretesting phase is crucial for identifying issues early on and making necessary adjustments. For quality assurance purposes, data from the pilot will be reviewed and improvements made to the survey process as deemed necessary. Pretesting will be done with internal staff (unassociated with the survey development), limited external colleagues, and/or customers who are familiar with the program. Information from this pretest may be used to make necessary revisions to improve usability of the instruments.

Qualitative Research: Qualitative research, such as focus groups, may also be used to refine surveys over time. These focus group may be undertaken to understand or uncover new issues related to service delivery, design, deployment, response rates, non-response bias, and results analysis. These results can then be used to improve the survey questions and delivery.

³ Findings in USFA's *NFIRS Representativeness Study* (2011) show high reporting rates at the national and regional levels, and fire departments across the country, whether they be career, volunteer, or protect communities of varying sizes, are well represented in NFIRS. USFA concluded that NFIRS reporting departments are representative of the universe of all fire departments in the United States (<https://www.reginfo.gov/public/do/DownloadDocument?objectID=32395301>).

- 5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

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This generic collection is developed for the USFA to evaluate information voluntarily submitted by State, Local, Tribal and Territorial stakeholders specifically in the field of Fire & EMS to help develop, design, conduct, and analyze feedback on USFA programs. All instruments associated with this generic clearance should relate directly to The Federal Fire Prevention and Control Act of 1974 (Pub. L. 93-498, as amended) (15 U.S.C. §§ 2201 et seq.)