

September 13, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0151

Title: Facility Access Request

Form Number(s):

- 1) **FEMA Form FF-900-FY-21-100 (formerly 121-3-1-3A), Facility Access Request**
- 2) **FEMA Form FF-900-FY-21-101 (formerly 121-3-1-3B), Facility Access Request**

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 purpose of the collection is for the Federal Emergency Management Agency (FEMA) to obtain information from all persons applying for access to any FEMA controlled facility through the use of two Facility Access Request forms: FEMA Form FF-900-FY-21-100 and FF-900-FY-21-101. This information is used to create a profile in the FEMA Electronic Security System

under the subsystem Physical Access Control System (PACS). The collection of personally identifiable information (PII) is used to authenticate the identity of FEMA employees and contractors, and visitors who request and are granted entry authorization. FEMA uses this collected information to run an additional background check through the National Crime Information Center (NCIC). NCIC is a computerized database administered by the Federal Bureau of Investigation (FBI) that provides ready access to law enforcement agencies for making inquiries about an individual's criminal history. This check verifies that an individual does not have any outstanding warrants for criminal activities indicating a risk to the Department of Homeland Security (DHS). This information collection is further used to contact individuals in the event of an emergency.

All non-FEMA employees and contractors are visitors. U.S. Government employees and contractors working for federal agencies other than FEMA are also visitors. Visitor management is governed by DHS Instruction Manual 121-01-011-01, Visitor Management for DHS Headquarters and DHS Component Headquarters Facilities; FEMA Directive 121-1, Personal Identification Standard; FEMA Directive 121-3, Facility Access; and FEMA Instruction 121-3-1, Credential and Access Reference.

The first form is FEMA Form FF-900-FY-21-100. Current FEMA employees and contractors are not required to fill out this form. This form is used to grant access to all FEMA facilities, except those designated as high security. The PII collected on this form includes full name, home and business phone numbers, social security number (SSN), date of birth (DOB), driver's license number and state issued, place of birth, citizenship status, alien registration number, gender, and place of employment. The second form is FEMA Form FF-900-FY-21-101. This form is identical to the FF-900-FY-21-100; however, it is used to allow individuals to request access to a high security FEMA facility.

To access any FEMA facility, visitors who are employed by the U.S. Government or government contractors, must present a valid employee identification card [Personal Identity Verification (PIV) card or Common Access Card (CAC)] issued by their employing agency and an on-site FEMA-employed sponsor must confirm the visit using the Facility Access Request forms. The visitor's first and last name, agency of employment, and armed status are recorded in PACS as well as the first and last name of the FEMA sponsor who will be escorting the visitor while in the FEMA facility. This information may be provided in advance or, if no notice of the visit is given, at time of entry.

U.S. citizens who are not employed by the U.S. Government or work as government contractors, and who intend to visit a FEMA facility are subject to a background check using the NCIC system. As with non-FEMA U.S. Government employees, all prospective visitors falling under the non-federal U.S. citizen category must be sponsored by an on-site FEMA employee who serves as the primary point of contact for the Agency's Office of the Chief Security Office

(OCSO) during the screening process. Sponsors initiate the screening process for non-federal U.S. citizens by contacting the FEMA Access Control office to communicate their intention to host one or more visitors.

OCSO grants or denies access based on the information provided by NCIC. The determination to grant or deny access is communicated back to the sponsor and recorded in the visitor management module of the PACS along with the date of when the NCIC search was conducted.

Occasionally, federal law enforcement agencies (e.g. FBI, CIA) require access to FEMA facilities as a part of their response to a security event. In these cases, FEMA can program their law enforcement credentials to be accepted by PACS for unescorted access. The information collected from individuals under these circumstances by FEMA is the same as other non-FEMA U.S. Government employees.

The following authorities allow FEMA to collect the data:

- 18 U.S.C. § 930, “Possession of firearms and dangerous weapons in Federal facilities.”
- 42 U.S.C. § 5197a, “Security Regulations.”
- 6 C.F.R. Part 37, “Real ID Driver’s Licenses and Identification Cards.”
- 41 C.F.R. Part 102-74, Subpart C, “Conduct on Federal Property.”
- 44 C.F.R. Part 15, “Conduct at the Mt. Weather Emergency Assistance Center and at the National Emergency Training Center.”
- 40 U.S.C. 1315, "Law Enforcement Authority of Secretary of Homeland Security for Protection of Public Property",
- DHS Delegation 120002, "Delegation to Designated Officers and Agents on Behalf of Mount Weather Police Department", dated June 26, 2006.
- DHS Management Directive 11005, “Suspending Access to DHS Facilities, Sensitive Information, and IT Systems.
- Department of Homeland Security (DHS) Directive 121-01, Chief Security Officer and DHS Delegation 12000, Security Operations within the Department of Homeland Security.
- FEMA Directive 121-1, Personal Identity Verification Guidance, establishes the policy and procedures for FEMA preparation, issuance, use, and disposition of DHS PIV cards for all eligible FEMA employees and qualified contractors as required by Homeland Security Presidential Directive 12 (HSPD-12) FEMA Directive 121-1, Homeland Security Presidential.
- Directive (HSPD-12), “Policy for a Common Identification Standard for Federal Employees and Contractors,” August 27, 2004.

- Office of Management and Budget Memorandum 11-11, “Continued Implementation of Homeland Security Presidential Directive (HSPD-12) Policy for a Common Identification Standard for Federal Employees and Contractors,” February 3, 2011.
- Office of Management and Budget Memorandum 05-24, “Implementation of Homeland Security Presidential Directive (HSPD) 12 Policy for a Common Identification Standard for Federal Employees and Contractors,” August 5, 2005.

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-900-FY-21-100 (formerly 121-3-1-3A), Facility Access Request & FEMA Form FF-900-FY-21-101 (formerly 121-3-1-3B), Facility Access Request:

The Agency will collect information using two Facility Access Request forms: FEMA Form FF-900-FY-21-100 and FF-900-FY-21-101. The data is used to create a record within ESS/PACS. FEMA’s OCSO also uses the information provided on these forms to run an additional background check through the NCIC to determine whether to grant or deny entry authorization for any individual requesting access to a FEMA controlled facility. NCIC is a computerized database administered by the FBI that provides ready access to law enforcement agencies for making inquiries about an individual’s criminal history. This check verifies that the individual does not have any outstanding warrants for criminal activities indicating a risk to the Department.

OCSO does share any data that is captured on these forms.

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.

These forms will be electronically stored on the FEMA PACS. These forms can be emailed upon request via the FEMA Access Control. These forms, upon completion can be submitted electronically via (password protected) email to FEMAAccessControl@fema.dhs.gov or hand delivered to the Access Control Office. In order to program another agency’s access control card, the applicant must appear in person with their card and must know their 6-8 digit PIN.

Usability Testing has been conducted on this collection. As result, there is no change to this collection at this time.

1. What was the purpose of the usability testing?
 - a. The purpose was to ensure the process of access control to the MW facility was well understood for those members of the “public” e.g., contractors performing work on site, needing access to MW to complete their job duties.
2. How was the useability testing conducted?
 - a. All person’s needing access is a monitored process. Access documentation was monitored and access provision or denial as a result. Collection of personally identifiable information, and identification to correlate this data were requested and processed to ensure access could be granted.
3. How many participants and what was their familiarity with the collection?
 - a. 20,500 participants. All participants were familiar with the requirements for access control documentation to access the facility.
4. What were the results of the useability testing?
 - a. The process is a federated process for all Department of Homeland Security federal facilities and is also a requirement for facility access at specified location before admittance.
5. What did you find (burden, ease of use, etc.)?
 - a. No undue burden, and standard processing time for access to be granted for “public” contract personnel or other visitors to perform their obligations at the facility location.
6. What did the participants recommend?
 - a. No changes were recommended, as the process is a known federally required process for access to federal and secure facilities.
7. What changes, if any, will be made to the collection?
 - a. No changes.

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 information collected on these forms will be used to create a new record within FEMA’s ESS/PACS and is not already available for use or modification.

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.

The 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 detrimental consequences to Federal/FEMA programs or policy activities if the collection of information is not conducted or is conducted less frequently. It is imperative that the Agency ensures the safety of its personnel and properties when determining whether to grant or deny entry authorization to any individual requesting access to a FEMA facility. The collected information is necessary to run an additional background check through the NCIC to verify that the individual does not have any outstanding warrants for criminal activities indicating a risk to the Department. FEMA also needs to ensure that all visitors are accounted for during emergency situations inside all FEMA facilities.

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.

The only circumstance that would require respondents to report information to the agency more than quarterly would be if the respondent received a new agency specific identification card that needed to be coded for FEMA facilities.

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:

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 May 31, 2024, at 89 FR 47159. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on September 19, 2024, at 89 FR 76866. The public comment period closes on October 21, 2024.

- a. 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.**

FEMA has not consulted 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, and on the data elements to be recorded, disclosed, or reported.

- b. 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.**

FEMA has not consulted with representatives from whom information will be obtained on FEMA Form FF-900-FY-21-100. FEMA meets annually with representatives and mission partners to discuss the information that is collected on FEMA Form FF-900-FY-21-101.

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

Payments or gifts to respondents is not authorized at any time.

- 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 approved on August 31, 2022. A PIA for this collection was also secured labeled: PIA – DHS/ALL/PIA-039 Physical Access Control System and SORN: DHS/ALL 024 Perimeter Access Control and Visitor Management SORN and DHS/ALL-025 Law Enforcement Authority in Support of the Protection of Property Owned, Occupied, or Secured by DHS.

- 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 uses Facility Access Request / FF-900-FY-21-100 and Facility Access Request / FF-900-FY-21-101 to obtain information from individuals requesting access to any FEMA controlled facility. Facility Access Request / FF-900-FY-21-100 is used to grant access to all FEMA facilities, except those designated as high security. Current FEMA employees and contractors are not required to fill out this form. Facility Access Request / FF-900-FY-21-101 is identical to the Facility Access Request / FF-900-FY-21-100. However, it is used to allow individuals to request access to high security FEMA facilities. FEMA only tracks the total number of requests submitted. Therefore, it is not able to differentiate how many forms it receives requesting access to facilities with lower security levels from forms it receives requesting access to facilities with higher security levels.

FEMA Form FF-900-FY-21-100 (formerly 121-3-1-3A) / Facility Access Request and FEMA Form FF-900-FY-21-101 (formerly 121-3-1-3B) / Facility Access Request

FEMA estimates that 20,500 respondents will submit a Facility Access Request one (1) time annually. It is estimated that each response will require 10 minutes (0.1667 burden hours) to complete, for a total of 3,417 ($20,500 \times 0.1667$) annual burden hours.

FEMA reviewed paperwork burden for forms that respondents use to request access to any FEMA-controlled facility. FEMA estimated there was a decrease in burden hours on the OMB inventory of 68 hours.

- 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.

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
Federal, State, Local Tribal, and Territorial Government	Facility Access Request FEMA Form FF-900-FY-21-100/ FEMA Form FF-900-FY-21-101	20,500	1	20,500	0.1667	3,417	\$52.73	\$180,178
Total		20,500		20,500		3,417		\$180,178

- 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 1.61¹ 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**

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03132024.pdf. Accessed August 13, 2024. The wage multiplier is calculated by dividing total compensation for State and Local Government workers of \$60.56 by Wages and salaries for State and Local Government workers of \$37.53 per hour yielding a benefits multiplier of approximately 1.61.

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

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates for All Occupations (SOC 00-0000) wage rate was \$32.75 per hour.² Including the wage rate multiplier of 1.61, the fully loaded wage rate is \$52.73 ($\32.75×1.61). Therefore, the estimated burden hour cost to respondents is estimated to be \$180,178 ($3,417 \times \52.73) annually.

- 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:

- 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.
 - 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.
- 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.**

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/2023/may/oes_nat.htm#00-0000. Accessed August 13, 2024.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries ¹ : Four GS 11 Step 5 employees spending approximately 5% of time annually inputting information collected into the Physical Access Control System. ($4 \times \$93,798 \times 0.05 \times 1.45^2 = \$27,201$)	\$27,201
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	\$27,201
¹ Office of Personnel Management 2024 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/2024/DCB.pdf . Accessed August 13, 2024. 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
Facility Access Request FEMA Form FF-900-FY-21-100/ FEMA Form FF-900-FY-21-101				3,485	3,417	-68
Total				3,485	3,417	-68

Explain: FEMA estimated a decrease of 68 burden hours annually.

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
Facility Access Request FEMA Form FF-900-FY-21-100/ FEMA Form FF-900-FY-21-101				\$127,098	\$180,178	\$53,080
Total				\$127,098	\$180,178	\$53,080

Explain: FEMA estimated an increase of \$53,080 (\$180,178 - \$127,098) annually. This increase was driven by an increase of \$16.26 (\$52.73 - \$36.47) per hour in the fully-loaded wage rate for All Occupations (SOC 00-0000).

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.

17. If seeking approval no to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This collection does not seek approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification state identified in Item 19 “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-I.

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