

April 17, 2025

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0132

**Title: Consolidated FEMA-National Training and Education Division
(NTED) Level 3 Training Evaluation Forms**

Form Number(s):

- 1) CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form
FF-008-FY-25-100**

- 2) CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form, FEMA
Form FF-008-FY-25-101**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating**

or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Training and Education Division (NTED), the Center for Domestic Preparedness (CDP) and the National Disaster and Emergency Management University (NDEMU) are geographically separated components of the Federal Emergency Management Agency's (FEMA's) National Preparedness Directorate. As such, all three organizations are part of the National Preparedness Directorate Training Enterprise with unique training missions for specific target audiences and are responsible for supporting and enabling national preparedness Core Capability, Community Lifelines, and Recovery Sector Preparedness performance outcomes described in Presidential Policy Directive (PPD) 8 National Preparedness¹, the National Preparedness Goal (NPG), the National Preparedness System (NPS), and 2022-2026 FEMA Strategic Plan objectives 1.3, 2.1, 2.2, and 3.1.

Like other Federal training organizations the NTED, CDP and NDEMU utilize the Kirkpatrick Training Evaluation Model Level 3 survey results² as one of several training evaluation tools to inform component program managers and leadership with metrics that monitor and report organizational performance and compliance with the Government Performance, Results and Modernization Act of 2010 (the "GPRA Modernization Act of 2010")³. 31 U.S.C. § 1115 (6) requires "...a balanced set of performance indicators to be used in measuring or assessing progress toward each performance goal, including, as appropriate, *customer service, efficiency, output, and outcome indicators* [emphasis added]." Due to the qualitative nature of participants' feedback obtained from this survey measuring impact or changes in course graduates work performance, their occupations or organizational performance behavior the results, with other data, are used to monitor performance of NTED, CDP and NDEMU training programs. NTED and CDP are members of the National Domestic Preparedness Consortium (NDPC). Per 6 U.S.C. § 1102(c)⁴, the NDPC "shall identify, develop, *test*, and deliver training to State, local, and tribal emergency response providers, provide on-site and mobile training at the performance and management and planning levels, and facilitate the delivery of training by the training partners of the Department [emphasis added]." FEMA interprets this authority to "test training" as the ability to assess its effectiveness, which this survey directly facilitates.

¹ <https://www.dhs.gov/presidential-policy-directive-8-national-preparedness>

² https://www.opm.gov/policy-data-oversight/training-and-development/reference-materials/training_evaluation.pdf

³ <https://www.govinfo.gov/content/pkg/PLAW-111publ352/pdf/PLAW-111publ352.pdf>

⁴ [http://uscode.house.gov/view.xhtml?req=\(title:6%20section:1102%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:6%20section:1102%20edition:prelim))

6 U.S.C. § 748(a)(1)⁵ directs the FEMA Administrator to “in coordination with heads of appropriate Federal agencies, the National Council on Disability, and the National Advisory Council, [] carry out a national training program to implement the national preparedness goal, National Incident Management System, National Response Plan and other related plans and strategies.” In addition, 6 U.S.S. § 748(a)(2) directs the FEMA Administrator in developing and implementing the national training program, to ‘work with government training facilities, academic institutions, private organizations, and other entities that provide specialized, state-of-the-art training for emergency managers or emergency response providers; and utilize, as appropriate, training courses provided by community colleges, State and local public safety academies, State and private universities and other facilities.

The Level 3 data collected from course graduates three to six months following training provides NTED, CDP and NDEMU with information and data on how training knowledge, skill and attitudes (KSA’s) gained from training transfer to the student’s job and organization and if the training was applied to the job, an exercise, or during an operational mission. Note: The number of NTED Continuing Training Grants (CTG) training providers may fluctuate, increase, or decrease based on fiscal year grant funding levels approved by Congress.

This revision consolidates all evaluation forms for all offices into two shared instruments.

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.

As stated in preceding paragraph; NTED, CDP, and NDEMU all utilize the Kirkpatrick Four Level Training Evaluation Model to assess training effectiveness. Donald Kirkpatrick developed the four-level model of training evaluation: Level 1 evaluation captures the students’ perception or reaction to training; Level 2 completes a pre-post comparison of learning via tests/examinations and performance assessment checklists of the student learning (change in behavior). **Level 3 evaluation instruments** capture how the training transfers to the students’ work environment and their particular job; and Level 4 captures information about the return on key stakeholder expectations of the course or training program. The data collected by these training evaluation forms is shared with representatives from each course/program’s respective target audience during three-year course/program reviews. All three organizations analyze the data to determine

⁵ <https://www.law.cornell.edu/uscode/text/6/748>

what revisions are needed in curriculum, delivery and to elicit inputs to improve training while providing documentation as to how training was applied, and how it impacts the individual and organization. The supporting statements immediately below are for each component:

CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100:

NTED: As each training partner receives and reviews individual responses for each course, they create a batch file and enter data into the NTED Registration Evaluation System (RES) database. All NTED component organizations share training data and information collected with representatives from their respective audiences during scheduled three-year course reviews.

CDP: Level 3 student evaluations collect data on training transfer to the student's workplace. This Post Graduate Evaluation provides information and data to measure the program effectiveness. The instrument is a product and process output and outcome measure used to capture the degree to which the course material effects the performance of each student in their place of employment or operations. The data is used to assess the validity and utility of course material as it relates to the actual performance of duties. CDP and other NTED components analyze the data for trends and gaps to determine what revisions, if any, are needed in curriculum or delivery and how CDP can improve program performance and document how the training was applied, and how it impacts individuals, organizations and mission operations. FEMA Forms 092-0-2(A) and 092-0-2(B) (explained in paragraph "c" below, were revised to incorporate five common questions used by other NTED components. Also, to reduce burden and eliminate repeat questions on other surveys all questions regarding CDP facilities, transportation and other mission support activities have been removed.

NDEMU: Similarly, to the entries above NDEMU Level 3 Student Form –is used to collect quantitative and qualitative information to determine whether students are applying knowledge and skills obtained in training in their work places. To measure the level of retention and or application of new knowledge and skills gain through training approx. 3 – 6 months following training the level 3 is distributed by NDEMU via email to graduates of their National Emergency Training Center (NETC) resident and mobile training courses. The NDEMU does this by releasing an email to each class/course cohort with instructions on how to complete the .PDF file survey. The survey contains voluntary responses to both quantitative and qualitative questions. Once graduates complete their survey, they return it to the NDEMU via email for data aggregation and analysis. NDEMU is currently in the

process of using Touchpoints⁶ to digitize Level 3 evaluations. Students will receive a survey link via email, directing them to a webpage to complete the survey.

CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101

CDP: The Level 3 supervisor evaluation is used to capture the degree which course material affects the performance of students in their place of employment as viewed by their supervisors. The data is used to assess the validity and relativity of the course material and student responses as it relates to actual performance of duties. The supervisor working with and observing the employee can objectively determine if and/or how the training has improved the employee's performance and how this training can impact and improve their organization through changes to plans, policies, procedures, operations and/or other protocols.

NDEMU, CDP and NTED all share the training data and information they obtain from their Level 3s with respective stakeholder groups during three-year course/program reviews. Other stakeholders who receive this data information are NPD, FEMA Executive Leadership, the Office of Management and Budget (OMB), and Congress.

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.

CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100:

NTED: This is a new data collection for NTED and their NDPC and CTG partners. Collectively the NTED and its partners participated in the design of a new Level 3 Post Course Assessment Form that will be delivered by each partner to their respective course/program graduates by class cohort. Technology involves distribution and collection of training data and information via email with data aggregation using Micro-Strategy© software licensed by the NPD-NTED.

Beginning in the 1st Quarter of FY 2020 quarterly Level 3 performance from all three NTED components will be shared with the NTED Analytics Team so that it may be

⁶ <https://touchpoints.app.cloud.gov/index>

included in the NTED performance metrics – this data sharing is made possible using the FEMA NTED Shared Drive.

CDP: The Level 3 Student Evaluation is an electronic survey instrument sent to the student approximately six - nine months following the student’s completion of a CDP course. A reminder email is sent to graduates approximately one - two weeks before the evaluation is due in the event the survey instrument has not already been submitted. The email message describes the importance of completion of the evaluation instrument and provides information for accessing the instrument using the student’s FEMA SID (Student Identification) account number. The electronic format for this evaluation was determined to be the least burdensome, as users can access, complete, and submit the instruments at their convenience with minimal effort. The Questionmark© software is used for electronic delivery of the Level 3 evaluations. This software was purchased to reduce the burden and create ease of completion for students.

NDEMU: NDEMU emails their Level 3 Supervisor Evaluations with instructions to graduates three – six months following training. Instructions include how to complete, save, and return individual PDF survey responses to NETC for centralized data and information aggregation and analysis. NDEMU is currently in the process of using Touchpoints⁷ to digitize Level 3 evaluations. Students will receive a survey link via email, directing them to a webpage to complete the survey.

CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101

CDP: Level 3 Supervisor Evaluation is an electronic survey instrument sent to the student’s supervisor approximately six - nine months following the student’s completion of a CDP course. A reminder email is sent to the supervisor approximately one - two weeks before the evaluation is due in the event the survey instrument has not already been submitted. The email message describes the importance of completing the evaluation instrument and provides information on completing and submitting the form. The form is sent directly to the supervisor using their email or physical address. Electronic format for this evaluation was determined to be the least burdensome, as users can access, complete, and submit the instruments at their convenience with minimal effort. Questionmark© software is used for electronic delivery of the Level 3 evaluations.

This usability testing plan aims to evaluate the effectiveness, clarity, and user-friendliness of the Level 3 Training Evaluation Survey by assessing instructions, rating scales, and question wording. The test will involve 6-8 participants from diverse roles participating

⁷ <https://touchpoints.app.cloud.gov/index>

in 30-45 minute remote or in-person sessions where they will complete the survey while thinking aloud. Facilitators will guide participants, ask probing questions about clarity, and document observations. Key metrics include language clarity, navigation ease, completion time, and user confidence. Results will be analyzed to identify pain points and recommend improvements, ensuring the survey effectively gathers meaningful feedback and enhances future training programs.

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 by other sources or forms, and therefore is not duplicated elsewhere

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities, and instead focuses on students and supervisors as individuals.

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.

These course evaluation instruments are meant to provide systematic feedback for NTED, CDP, and NDEMU courses, enabling program managers to potentially improve course material, delivery, overall program effectiveness, and to inform FEMA's executive team and Congress on national preparedness capabilities. Ultimately, the information and data provide NTED, NPD, FEMA, OMB and Congressional Leadership empirical data or indicators on the Nation's overall preparedness level and ensures these programs are compliant with the 2010 GPRA Modernization Act of 2010 § 1115 (A) Fed. Gov. and (B) Agency Performance Plans (6). Without this data, it is difficult to determine operational and strategic needs for improvements for each course/program delivery to meet the nation's disaster capability/response needs.

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.

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 January 17, 2025, at 90 FR 5924. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on April 17, 2025, at 90 FR 16146. The 30-Day public comment period closes on May 16, 2025.

- 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.**

Information Technology, the CDP's contractor for Training Delivery, and the CDP's contractor for Student Services were consulted regarding instrument format, content, delivery and submission. Government staff were also consulted as to the type of data they are needing in order to make improvements in their work toward meeting the agency's mission.

CDP, NDEMU and NTED are component organizations of the National Preparedness Directorate. All three organizations consult with each other, and their respective stakeholders on the utilization of these evaluation forms to obtain their views on the availability of data, frequency of collection and clarity of instructions. The results of the data collected are shared with their respective audiences during scheduled three-year course reviews, and/or audits. All NTED Training organizations (CDP, NDEMU and NTED) use the Four Level Kirkpatrick Model of Training Program Evaluation (endorsed

by the Department of Homeland Security (DHS) and OMB) which requires four levels, or continuous engagement with stakeholders before, during and after training to assess end-user, supervisor and organizational reaction, level of learning, change in behavior, and return on expectations. The Four Level Kirkpatrick Model of Training Program Evaluation is endorsed by both DHS and OMB.

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.

Consultation with those from whom information is to be obtained is continuous, as representatives from the Training Support and Student Services department talk directly to first responders and receivers in “Meet and Greet” sessions held every Tuesday or Wednesday evening in the lodging area at CDP. Reports of these meetings are developed and distributed to various departments for possible new course development, technology changes and other recommendations toward improving CDP’s overall services to the student’s needs. Comments regarding the forms and instructions are directed to CDP’s Curriculum and Evaluation department for future modifications of the instruments.

Similar to the CDP response above, both NDEMU and NTED also consult with their respective audience groups or customers on a periodic and three-year cyclic basis. Instructional Systems Design ISD, as well as the Kirkpatrick Model are systems approaches to provide continuous consultation with customers (students, their supervisors and decision makers) while training is designed, developed, piloted and delivered. The two Training Evaluation forms included in this submission provide data-based decisions obtained from continuous customer, product and process feedback for the FEMA National Preparedness Training mission.

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

CDP, NDEMU and NTED do 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 approved by FEMA's Privacy Division on March 31, 2025, and expires March 31, 2028.

Privacy Impact Assessment (PIA) coverage was determined to not be needed.

System of Records Notice (SORN) coverage was determined to not be needed.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature required in this data collection.

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 Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by NTED to have 7,000 SLTT protective services respondents times 1 response per year for 7,000 total annual responses (7,000 x 1 = 7,000). It is estimated that each response will require 0.25 burden hours to complete, therefore 7,000 responses times 0.25 hours equals 1,750 total annual burden hours (7,000 x 0.25 = 1,750).

FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by NTED to have 500 **SLTT emergency management director** respondents times 1 response per year for 500 total annual responses ($500 \times 1 = 500$). It is estimated that each response will require 0.25 burden hours to complete, therefore 500 responses times 0.25 hours equals 125 total annual burden hours ($500 \times 0.25 = 125$).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by NTED to have 250 **Private Sector protective services** respondents times 1 response per year for 250 total annual responses ($250 \times 1 = 250$). It is estimated that each response will require 0.25 burden hours to complete, therefore 250 responses times 0.25 hours equals 63 total annual burden hours ($250 \times 0.25 = 62.5$ rounded to 63).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by CDP to have 4,000 **SLTT protective services** respondents times 1 response per year for 4,000 total annual responses ($4,000 \times 1 = 4,000$). It is estimated that each response will require 0.25 burden hours to complete, therefore 4,000 responses times 0.25 hours equals 1,000 total annual burden hours ($4,000 \times 0.25 = 1,000$).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by CDP to have 2,000 **SLTT healthcare practitioners technical occupation** respondents times 1 response per year for 2,000 total annual responses ($2,000 \times 1 = 2,000$). It is estimated that each response will require 0.25 burden hours to complete, therefore 2,000 responses times 0.25 hours equals 500 total annual burden hours ($2,000 \times 0.25 = 500$).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form is estimated by CDP to have 5,874 **SLTT emergency management director** respondents times 1 response per year for 5,874 total annual responses ($5,874 \times 1 = 5,874$). It is estimated that each response will require 0.25 burden hours to complete, therefore 5,874 responses times 0.25 hours equals 1,469 total annual burden hours ($5,874 \times 0.25 = 1,468.5$ rounded to 1,469).

The combined burden for **FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form** by all offices is 4,906.5 burden hours ($1,750 + 125 + 63 + 1,000 + 500 + 1,469 = 4,907$), rounded up to **4,907** burden hours.

FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form is estimated by NDEMU to have 400 **SLTT protective services**

respondents times 1 response per year for 400 total annual responses ($400 \times 1 = 400$). It is estimated that each response will require 0.25 burden hours to complete, therefore 400 responses times 0.25 hours equals 100 total annual burden hours ($400 \times 0.25 = 100$).

FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form is estimated by NDEMU to have 200 **SLTT healthcare practitioners technical occupation** respondents times 1 response per year for 200 total annual responses ($200 \times 1 = 200$). It is estimated that each response will require 0.25 burden hours to complete, therefore 200 responses times 0.25 hours equals 50 total annual burden hours ($200 \times 0.25 = 50$).

The combined burden for **FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form** by all offices is 150 burden hours ($100 + 50 = 150$).

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 in Question 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 (1.62 for State and local government employees)⁸ 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.

⁸ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03142025.pdf. Accessed March 14, 2025. The national wage multiplier is calculated by dividing total compensation for all workers of \$47.20 by wages and salaries for all workers of \$32.52 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees the wage multiplier is calculated by dividing total compensation for State and local government workers of \$63.46 by Wages and salaries for State and local government workers of \$39.22 per hour yielding a benefits multiplier of approximately 1.62.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, or Tribal Government (Protective Services)	CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	7,000	1	7,000	0.25	1,750	\$53.01	\$92,768
State, Local, or Tribal Government (Emergency Management Directors)	CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	500	1	500	0.25	125	\$59.92	\$7,490
Private Sector (Protective Services)	CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	250	1	250	0.25	63	\$40.22	\$2,534
State, Local, or Tribal Government (Protective Services)	CDP , NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	4,000	1	4,000	0.25	1,000	\$63.08	\$63,080
State, Local, or Tribal Government (Healthcare Practitioners and Technical occupation)	CDP , NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	2,000	1	2,000	0.25	500	\$79.49	\$39,745
State, Local, or Tribal Government (Emergency Management Directors)	CDP , NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	5,874	1	5,874	0.25	1,469	\$59.92	\$88,022
State, Local, or Tribal Government (Protective Services)	CDP, NDEMU , and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101	400	1	400	0.25	100	\$63.08	\$6,308
State, Local, or Tribal Government (Healthcare Providers and Technical Occupations)	CDP, NDEMU , and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101	200	1	200	0.25	50	\$79.49	\$3,975
Total		20,224		20,224		5,057		\$303,922

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.62. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.62, and the entry for the “Avg. Hourly Wage Rate” would be \$68.87.

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student Evaluation Form: For NTED, according to the U.S. Department of Labor, Bureau of

Labor Statistics⁹, the May 2023 Occupational Employment and Wage Estimates wage rate for **Protective Services** working for state governments (**SOC 33-0000**) is \$32.72. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$53.01 per hour. Therefore, the annual burden hour cost is estimated to be \$92,768 (\$53.01 x 1,750 hours).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student

Evaluation Form: For NTED, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Emergency Management Directors** working for state governments (**SOC 11-9161**) is \$36.99. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$59.92 per hour. Therefore, the annual burden hour cost is estimated to be \$7,490 (\$59.92 x 125 hours).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student

Evaluation Form: For NTED, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Protective Services** in the private sector (**SOC 33-0000**) is \$27.74. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$40.22 per hour. Therefore, the annual burden hour cost is estimated to be \$2,534 (\$40.22 x 63 hour).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student

Evaluation Form: For CDP, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Protective Services** in state, local, or Tribal governments (**SOC 33-0000**) is \$38.94. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$63.08 per hour. Therefore, the annual burden hour cost is estimated to be \$63,080 (\$63.08 x 1,000 hours).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student

Evaluation Form: For CDP, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Healthcare Practitioners and Technical Occupations** in state, local, or Tribal governments (**SOC 29-0000**) is \$49.07. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$79.49 per hour. Therefore, the annual burden hour cost is estimated to be \$39,745 (\$79.49 x 500 hours).

FEMA Form FF-008-FY-25-100, CDP, NDEMU, and NTED Level 3 Student

Evaluation Form: For CDP, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate

⁹ 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

for **Emergency Management Directors** working for state governments (**SOC 11-9161**) is \$36.99. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$59.92 per hour. Therefore, the annual burden hour cost is estimated to be \$88,022 (\$59.92 x 1,469 hours).

FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form: For NDEMU, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Protective Services** in state, local, or Tribal governments (**SOC 33-0000**) is \$38.94. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$63.08 per hour. Therefore, the annual burden hour cost is estimated to be \$6,308 (\$63.08 x 100 hour).

FEMA Form FF-008-FY-25-101, CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form: For NDEMU, according to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates wage rate for **Healthcare Providers and Technical Occupations** in state, local, or Tribal governments (**SOC 29-0000**) is \$49.07 . Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$79.49 per hour. Therefore, the annual burden hour cost is estimated to be \$3,975(\$79.49 x 50 hours).

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:

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
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 system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

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

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

There are no capital or start-up costs associated with this 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: NDEMU: Contractors open the PDF surveys, place them into a folder, and then import them into the RCE. This process is estimated to take about 2 minutes per response. The hourly rate is \$35.34. (5874 x 2 (min) = 11,748 minutes divided by 60 minutes = 195.8 hours x \$35.34= \$6919.572 annual cost. (Rounded up to \$6,920).	\$6,920
Staff Salaries ¹ 1 of GS 9 Step 5 employee spending approximately 10% of time annually to process NTED for the data collection, and 1 GS 11 Step 5 spending approximately 10 % of time annually to review, coordinate, and assure quality control (1 x \$79,246 x 0.1 [\$7,925] + 1 x \$95,878 x .1 [\$9,588] = \$17,513) x 1.45 = \$25,394	\$25,394
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle] For NTED no charge; for CDP no charge; for NDEMU no charge.	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment] no equipment maintenance for NDEMU, no Equipment maintenance for CDP; no equipment maintenance for NTED	\$0
Travel	\$0
Total	\$32,314
<small>1 Office of Personnel Management 2025 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/2025/DCB.pdf. Accessed January 13, 2025.</small>	
<small>2 Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.</small>	

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
TPP Level 3 Post Course Assessment, FEMA Form FF-008-FY-21-113 (formerly 016-0-2)	28,055	-	(28,055)			-
Level 3 Evaluation Form for Students, FEMA Form FF-008-FY-21-114 (formerly 092-0-02A)	1,500	-	(1,500)			-
Level 3 Evaluation Form for Students, FEMA Form FF-008-FY-21-115 (formerly 092-0-02B)	150	-	(150)			-
Follow-Up Evaluation Survey, FEMA Form FF-008-FY-21-116 (formerly 519-0-1)	1,469	-	(1,469)			-
CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-100	-	4,907	4,907			-
CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101	-	150	150			-
Total	31,174	5,057	(26,117)	-	-	-

Explain: There is an overall reduction of 26,117 burden hours due to the consolidations of all previous instruments into the two new instruments that are shared between the three offices.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
TPP Level 3 Post Course Assessment, FEMA Form FF-008-FY-21-113 (formerly 016-0-2)	\$1,306,977	\$0	\$(1,306,977)			-
Level 3 Evaluation Form for Students, FEMA Form FF-008-FY-21-114 (formerly 092-0-02A)	\$73,910	\$0	\$(73,910)			-
Level 3 Evaluation Form for Students, FEMA Form FF-008-FY-21-115 (formerly 092-0-02B)	\$7,391	\$0	\$(7,391)			-
Follow-Up Evaluation Survey, FEMA Form FF-008-FY-21-116 (formerly 519-0-1)	\$79,473	\$0	\$(79,473)			-
CDP, NDEMU, and NTED Level 3 Student Evaluation Form, FEMA Form FF-008-FY-25-101	\$0	\$293,639	\$293,639			-
CDP, NDEMU, and NTED Level 3 Supervisor Evaluation Form, FEMA Form FF-008-FY-25-101	\$0	\$10,283	\$10,195			-
Total	\$1,467,751	\$303,922	\$(1,163,829)	-	-	-

Explain: There is an overall reduction of \$1,163,829 in cost burden due to the reduction in burden hours mitigated by the general rise in wage rates.

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 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.

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 exception to “Certification for Paperwork Reduction Act Submissions”.