

September 18, 2019

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0098

Title: FEMA Citizen Responder Programs Registration

Form Number(s): FEMA Form 008-0-25

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(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 Post Katrina Management Reform Act (PKEMRA), codified within Title 6 U.S. of the Code, requires the FEMA Administrator to provide Federal leadership necessary to prepare for, protect against, respond to, recover from or mitigate against a natural disaster, act of terrorism, or other man-made disaster. This responsibility includes planning, training, and building the emergency management profession by building a comprehensive incident management system with Federal, State, and local government personnel, agencies and authorities, and helping the emergency response providers to effectively respond. 6 U.S.C. 314. As part of this responsibility to help and support emergency response providers, FEMA supports efforts to train and assist in organizing citizen responder programs. With Executive Order 13254, Citizen Corps was launched as a

Presidential Initiative, on January 29, 2002 with a mission to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared for the threats of terrorism, crime, public health issues, and disasters of all kinds.

Another FEMA Citizen Responder program, the Community Emergency Response Team (CERT) was originally developed and implemented by the Los Angeles City Fire Department in 1985. Since 1993 when this training was made available nationally by FEMA, communities in 28 states and Puerto Rico have conducted CERT training. FEMA supports CERT by conducting or sponsoring Train-the-Trainer and Program Manager courses for members of the fire, medical and emergency management community.

To fulfill its mission, the Federal Emergency Management Agency (FEMA) Individual and Community Preparedness Division (ICPD) will collect information from Citizen Corps Councils and Community Emergency Response Team Programs through the Citizen Responder online registration form. The Citizen Responder registration form will allow FEMA as well as State, Tribal and Territorial personnel to evaluate whether prospective Councils/Community Emergency Response Teams (CERTs) have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the program, and provide an efficient way to track the effectiveness of the nationwide network of Councils and CERT programs.

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.

The Citizen Responder registration form is available on-line at <https://community.fema.gov/Register>. State, local, tribal and territorial government personnel use this process to evaluate whether citizen responder programs have the support of the appropriate government officials in their area, ensure a dedicated coordinator is assigned to the Council/CERT program, and efficiently track the effectiveness of the nationwide network of citizen responder programs. These programs make communities more resilient by training communities about disaster preparedness, mitigation, response, public health, and safety issues.

FEMA Form 008-0-25, Citizen Responder Registration Form – The Citizen responder registration form allows ICPD to analyze program activities, structures, and proper sponsorship. Data collected indicates, at a state, local, tribal and territorial level, how local grassroots programs help to prepare communities and individuals. This information is required to link members of the public who are interested in getting prepared with organizations in their community that can help.

The proposed updates to the current registration form are intended to revise the name to the Citizen Responder Programs Registration (from “Citizen Corps Council Registration”) to include all approved FEMA supported citizen responder organizations. FEMA Individual and Community Preparedness Division (ICPD) did not change the scope of the questions but added

some and omitted others to better address current needs. ICPD did change the front page of the collection tool to better adapt to current software.

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.

Requested information will be submitted through an electronic registration page at <https://community.fema.gov/Register>. This is a 100% electronic collection.

Once information is submitted by each respondent, only updated information will need to be added in the future. It will reduce respondents' burden because their information will remain stored and only information requiring edits will need to be changed.

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 here is not available elsewhere. The Citizen Responder registration collects information unique to the citizen responder programs in SLTT areas that are unique to each location.

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.

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.

Without the collection of information as requested, FEMA's responsibilities to support community preparedness and resilience would be greatly compromised. This registration process provides critical information to measure the nation's progress on community preparedness, allows communication to occur directly with dedicated state and local, tribal and territorial leaders/points of contact, and gives FEMA essential feedback on local citizen responder programs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

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

(c) Requiring respondents to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

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 July 11, 2019, 84 FR 33083. **No comments were received.**

A 60-day Federal Register Notice inviting public comments was published on September 24, 2019, 84 FR 50062. **No comments were received.**

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.

FEMA/ICPD regularly requests feedback from citizen responders at SLTT levels, on the information collection process and data required for submission.

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.

ICPD staff members routinely interact with citizen responder programs from all SLTT responders, including 56 states and territories, and request their input on the registration system. ICPD also hosts conference calls and webinars and engages in email correspondence concerning enhancements to the registration process.

9. Explain any decision to provide any payment 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 and adjudicated for this collection on 27 September 2019.

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 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. 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 008-0-25, Citizen Responder Registration Form – FEMA/ICPD anticipates at least one response per year from potentially 4,000 Citizen Responder Programs. estimates that the registration form can be completed within 30 minutes or 0.5 hour and will be filled out by a the equivalent of an Office and Administrative Support Occupation.

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.

There is only one form.

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 1.46 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	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

Citizen Responder team representatives sponsored by State, local, Tribal and territorial governments	Citizen Responder Programs Registration / FEMA Form 008-0-25	4,000	1	4,000	0.5 hour	2,000	\$27.38	\$54,750
Total		4,000		4,000		2,000		\$54,750

Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.46. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the "Avg. Hourly Wage Rate" would be \$62.06.

FEMA expects at least one response per year from potentially 4,000 Citizen Responder Programs and estimates that the registration form can be completed within 30 minutes or 0.5 hour. According to the U.S. Department of Labor, Bureau of Labor Statistics website (BLS), the wage rate category Office and Administrative Support Occupations is estimated to be $\$18.75/\text{hr}^1 \times 1.46^2$ wage rate multiplier = $\$27.38/\text{hr}$. Therefore, the estimated burden hour cost to respondents is estimated to be $\$54,750$ annually. ($\$27.38 \times 2,000 \text{ hours} = \$54,750$)

The decrease of 1,900 in burden hours and \$38,499 in costs from the last renewal is due to putting the form on-line. There were no changes to the number of respondents or the average number of responses per respondent. However, the decrease in burden hours is slightly offset by an increase in the hourly wage rate of \$3.47 from \$23.91 to \$27.38 since the last information collection.

¹ May 2018 National Occupational Employment and Wage Rates (published May 2019), National File (xls), Office and Administrative Support Occupations (OCC Code: 43-0000, Average, Column Title: H_Mean). Accessed and downloaded July 5, 2019. <https://www.bls.gov/oes/tables.htm>.

² December 2018 Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, page 4. Accessed and downloaded July 5, 2019. https://www.bls.gov/news.release/archives/ecec_03192019.pdf.

³ The per hour benefits multiplier is calculated by dividing total compensation for all workers (\$36.32, December 2018, published March 19, 2019) by wages and salaries for all workers (\$24.91, December 2018, published March 19, 2019), which yields a per hour benefits multiplier of 1.46. ($\$36.32 \div \$24.91 = 1.458048$, rounded to 1.46). Fully-loaded wage rates are calculated by multiplying the per hour benefits multiplier by the applicable wage rate from the applicable National Occupational Employment and Wage Rates report. (1.46 per hour benefits multiplier x hourly wage rate = fully-loaded hourly wage)

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 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 annual operations and maintenance costs, or non-labor costs associated with this information collection.

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

There are no capital and start-up costs associated with this information collection.

Annual Cost Burden to Respondents or Record Keepers					
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents	
				\$	-
				\$	-
				\$	-
				\$	-
				\$	-
				\$	-
				\$	-
Total	\$ -	\$ -	\$ -	\$ -	-

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 General IT O&M already covered under ongoing contract	\$4,000
Staff Salaries* 1 GS 13 (\$88,704 salary) employees spending approximately 5 % (\$4,435 x 1.46 benefits = \$6,475) of time annually to review and follow up on submissions for this data collection	\$6,475
Facilities [cost for renting, overhead, etc. for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle]	0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
Printing [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	0
Total	\$10,475

* Note: The “Salary Rate” includes a 1.46 multiplier to reflect a fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from an 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).

"**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
Citizen Responder Registration / FEMA Form 008-0-25				3,900	2,000	-1,900
Total(s)				3,900	2,000	-1,900

Explain:

Since the last information collection approval, citizen responder organizations increased from 3,900 to 4,000 to include State, local, Tribal and territorial responders. The time to complete the form has decreased from 1.0 hour to 0.5 hour due to making the form available on-line.

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
Citizen Responder Registration / FEMA Form 008-0-25				\$93,249	\$54,750	-\$38,499
Total(s)						

Explain:

The decrease in annual cost burden results from the decrease in hourly burden of 1,900 hours but is slightly offset by increased 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 plans to tabulate or publish 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”.