

Supporting Statement for Paperwork Reduction Act Submissions

Title: NATIONAL FLOOD INSURANCE PROGRAM – Mapping Needs Update Support System (MNUSS) Data Worksheet

OMB Control Number: 1660-0081

Form Numbers: 81-108

A. Justification

1. Explain the circumstances that make the collection of information necessary (give details as to why this information is being collected). Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

Under Public Law 103-325, September 23, 1994, the Riegle Community Development and Regulatory Improvement Act of 1994, Title V-National Flood Insurance Reform, Section 575, Updating of Flood Maps, also known as Section 575 of the National Flood Insurance Reform Act (NFIRA) of 1994, it is mandated that at least once every five years, FEMA will assess the need to revise and update all floodplain areas and flood risk zones identified, delineated, or established under section 1360 of the National Flood Insurance Act of 1968. There are approximately 20,000 mapped communities participating in the National Flood Insurance Program (NFIP).

To fulfill the mandate specified in Section 575 of the NFIRA, FEMA established the Mapping Needs Assessment process and the Mapping Needs Update Support System (MNUSS) database in order to effectively identify, and document data regarding community flood hazard mapping needs. MNUSS was designed to store mapping needs at the community level. The current version of MNUSS is an interactive, web-enabled password protected database. In order to facilitate in the identification and collection of communities' current flood hazard mapping needs for input into MNUSS, FEMA developed the MNUSS Data Worksheet. The MNUSS Data Worksheet and Section 575 of the NFIRA are attached.

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: a) how the information will be shared, if applicable, and for what programmatic purpose.

The MNUSS Data Worksheet will be used in the collection of flood hazard mapping needs through a variety of methods to document the data that is required for recording in MNUSS. The Worksheet allows FEMA to gather, in a consistent manner, more specific flood hazard mapping needs information.

One method is the massive data collection effort that occurs at least once every five years to fulfill the requirements of the NFIRA. This data collection effort is supplementary to FEMA's NFIP Biennial Report, OMB No. 1660-0003, (Forms: FEMA-81-28, FEMA-81-29, and FEMA-81-29A) which surveys communities participating in the NFIP on physical changes and development that may affect the flood hazard areas of a community and floodplain management issues. Any community responding yes to Items A-D of Section I of the Biennial Report, as shown below, will be contacted by FEMA for clarification and/or elaboration of changes and activities occurring in a community's flood hazard area.

- A. Does your community have any changes to the base map data on your floodplain maps, such as (1) adding/correcting streets, (2) adding elevation reference marks, (3) aligning map panels, (4) adding LOMRs, or (5) annexation/corporate limit changes?
- B. Have the characteristics of flooding in your community changed to the extent that your floodplain needs to be restudied?
- C. Does your community have information that may be incorporated in a Flood Insurance Boundary Map or Flood Insurance Rate Map? (Examples: watershed studies or base flood elevations established by developers)
- D. Was there a significant man-made change affecting your designated flood hazard areas? (Examples: levees, bridges, extensive filling, excavation or stream channelization)

Another method to collect mapping needs data using the MNUSS Data Worksheet is through the Community Assessment Visit (CAV), and supplementary to the "Effectiveness of a Community's Implementation of the NFIP Community Assistance Program CAC and CAV Reports", OMB No. 3067-0198 (FEMA Forms 81-68 and 81-69). However, due to resource constraints, only a limited number of communities are contacted through this method.

A third method to collect mapping needs data using the MNUSS Data Worksheet is through workshops designed specifically to train local officials on the correct way to assess a community's flood hazard maps, identify mapping needs, and document those needs for entry into MNUSS. However, due to resource constraints, only a limited number of workshops are conducted.

A fourth method to collect mapping needs using the MNUSS Data Worksheet is during the scoping meeting that FEMA conducts after FEMA selects a community for a map update. FEMA's *Guidelines and Specifications for Flood Hazard Mapping Partners* describes this process. The use of the MNUSS Data Worksheet is encouraged to ensure that the data is collected and documented in a consistent manner. Current mapping needs recorded in MNUSS are reviewed and verified at the scoping meeting. If additional mapping needs are identified at the scoping meeting, those needs are documented on the MNUSS Data Worksheet and later entered into MNUSS.

A fifth method to collect mapping needs using the MNUSS Data Worksheet is through the development of State Implementation Plans. These plans are a cooperative effort on the part of FEMA, the States and local governments that provide a priority list of communities that need map updates. Part of the process of developing a plan includes conducting a mapping needs assessment for communities where there is a high probability that their maps need updating.

A sixth method is through the Cooperating Technical Partner (CTP) program. A CTP may be assigned to contact communities to assess their maps, identify mapping needs, and document those needs on the MNUSS Data Worksheet. In addition, a CTP may be tasked to enter those needs into MNUSS.

Lastly, local officials, State NFIP Coordinators, and other mapping partners, at any time, may use the MNUSS Data Worksheet to document community flood hazard mapping needs, as they arise, for entry into the MNUSS database.

Flood hazard mapping needs information collected through all of the methods described above will enable FEMA to be more responsive to ongoing changes affecting flood hazard areas that occur in communities participating in the NFIP. These changes include, but are not limited to, new corporate limit boundaries, changes in the road network, and changes in flood hazard areas, which affect communities' flood risks. In order to document the flood hazard mapping needs in MNUSS, the MNUSS Data Worksheet will be used to collect precisely the data needed for recording in the MNUSS database. This data is important because it assists FEMA in meeting its regulatory requirements under Section 575 of the NFIRA. In addition, the data may be used to support FEMA's requests each fiscal year for funding flood map updates and is used along with other information to prioritize the flood hazard mapping needs of all communities participating in the NFIP.

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.

To fulfill the requirement of Section 575 of the NFIA for the third 5-year cycle, FEMA will contact the communities by telephone as a result of the response to the NFIP Biennial Report for the 2006-2007 reporting period. Because of the large number of communities that will be contacted, it is imperative that a process be used to track and maintain consistency. This process included the development of a system that will result in timesavings to the federal government. The system is called the Mapping Needs Assessment (MNA) Organizer. It is designed to do a variety of things, such as download data from the Biennial Report, send acknowledgement e-mails to responding communities, organize communities into specific groups of those that need a mapping needs assessment and those that do not, track and coordinate the ordering of existing flood hazard maps for use in the needs assessment, compile and present existing community information from other FEMA databases, track follow-up calls as needed, record summary data from the mapping needs assessment, send thank-you e-mails and NFIP information requested by the communities, and provide progress reports.

As a result of the requirement set forth in Section 575 of the NFIRA, MNUSS was designed to store mapping needs at the community level. The current version of MNUSS is an interactive, web-enabled password protected database. To date, there are approximately 21,942 mapping needs stored in MNUSS representing approximately 6,540 communities.

The MNUSS Data Worksheet is used to document mapping needs for entry into MNUSS. It may be downloaded from MNUSS as a Portable Document Format (pdf) file and also as a Microsoft Word file, printed, and completed by traditional paper methods. MNUSS users, i.e., FEMA, FEMA's contractors, State NFIP coordinators, regional governmental agencies, and FEMA's CTPs enter the mapping needs data onto the hardcopy MNUSS Data Worksheet for entry into MNUSS.

FEMA is researching alternative electronic formats such as an electronic worksheet that could be completed online, submitted electronically, and downloaded automatically to the MNUSS database, thus, resulting in timesavings to the public and FEMA. However, consistency of data is the primary concern with this method.

Another alternative under consideration involves modifying the MNUSS database with a geospatial/Geographic Information System (GIS) interface so that users can identify geographic areas that have mapping needs on a county or watershed level as well as on a community level. However, FEMA's concern is that only a small number of States and communities have the ability to fully utilize a geospatial interface and thus, it may not be a cost-beneficial alternative at this time. As more States and communities incorporate geospatial components to their everyday business activities, this alternative will be frequently revisited to determine whether the burden to respondents can be reduced through the use of information technology.

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.

There are several methods, as mentioned in Question 2 above, by which FEMA gathers information on community mapping needs: the NFIP Biennial Report, the 5-year Mapping Needs Assessment process, Community Assistance Visits (CAVs), workshops, scoping meetings, State Implementation Plans, and CTP activities.

All of these methods are conducted in a way to supplement the information that is already captured in the MNUSS database. The basic premise is that mapping needs documented in MNUSS will be made available to the local officials either prior to or during the various methods of engaging the communities. That data can be verified and new mapping needs identified.

For example, currently, through the NFIP Biennial Report, FEMA surveys all mapped communities participating in the NFIP, once every two years, regarding flood hazard mapping and floodplain management issues. However, this report form is very general and does not request specific data that is needed for a complete mapping needs assessment and identification. Consequently, the NFIP Biennial Report does not constitute a duplication of information.

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.

In an effort to reduce the impact of the primary mapping needs assessment collection on small communities, FEMA is conducting its mapping needs assessment in conjunction with the NFIP Biennial Report. FEMA or its designee (i.e., States, regional entities, contractors) will contact communities by telephone and conduct a mapping needs assessment over the phone. This type of interaction allows FEMA to maximize the use of the local officials time by asking the right questions to elicit the required data. Using the data that is collected during the telephone contacts, FEMA or its designee will complete the MNUSS Data Worksheet for the local officials and enter it into MNUSS. If local officials submit supplemental data, that data will be evaluated and entered on a MNUSS Data Worksheet for entry into MNUSS.

First priority for conducting this mapping needs assessment in conjunction with the Biennial Report will be given to States through their business plans, and/or regional entities through FEMA's Cooperative Technical Partners (CTP) initiative. States and CTPs must demonstrate their capability to conduct a mapping needs assessment, are willing to follow FEMA's established process for collecting appropriate data in the format necessary for entry into MNUSS, and agree to complete the assessments within a specified timeframe.

Also, any community may contact FEMA's Flood Map Assistance Center through a toll-free number to request assistance. The operators will forward calls to FEMA's Mapping Needs Assessment Managers or FEMA contractors that are trained to offer guidance on how to conduct a needs assessment and identify mapping needs. The data that is collected will be documented on the MNUSS Data Worksheet and entered into MNUSS.

In addition, FEMA Regional offices, FEMA contractors, and some States have conducted outreach workshops on completing the MNUSS Data Worksheet with local officials, regional governmental agencies, and State NFIP coordinators. The workshops are designed so that the attendees understand the mapping needs assessment process and are trained on how to assess their maps, identify mapping needs, and document the needs on a MNUSS Data Worksheet so the data is ready for entry into MNUSS.

Lastly, FEMA has capitalized on state and national conferences, such as the Association of State Flood Plain Managers Conference, that are attended by local floodplain administrators as well as others interested in floodplain management, by sharing information on the mapping needs assessment process and providing one-on-one training sessions.

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.

It is important for FEMA to collect, assess and revise flood hazard data so that a community and its residents are aware of the risk associated with flooding and can practice sound floodplain management. Collecting community flood hazard data, at least once every five years, provides the NFIP with sufficient data to understand a community's mapping needs. Collecting information less frequently would result in flood hazard data becoming outdated. Also, collection of changes in floodplain data fulfills the statutory requirement and frequency stated at Section 575 of the NFIRA.

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.

Section 575 of the NFIRA requires the collection of community flood hazard data at least once every five years.

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

The community is not required to submit a written response to the MNUSS form.

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

If the community has updated flood hazard information, they will be asked to submit one copy of the data to be used in future revisions to their FIRM.

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

The MNUSS form does not require the community to retain 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.

The MNUSS worksheet does not include statistical surveys.

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

The MNUSS worksheet does not include statistical data.

(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.

The information collected with the MNUSS worksheets does not include confidential information.

(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 information collected with the MNUSS worksheets does not include confidential or proprietary information.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on July 14, 2006, Volume 71, number 135, pp. 40141. FEMA did not receive any comments for this information collection.

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.

Through the Mapping Needs Assessment Process, the MNUSS Data Worksheet has been used as a tool, by FEMA regional offices, FEMA Mapping Coordination Contractors (MCCs), many State NFIP Coordinators, and several FEMA CTPs, to keep data consistent and to enter the data into MNUSS. FEMA, based on its experience with and comments from the above-mentioned users of the worksheet, have determined that the worksheet needs to be as simple as possible; no longer than one page in length, and that it require only the information that will be entered into MNUSS. In addition, a brief guidance document accompanies the worksheet and describes the data that is being collected. A copy of this document is attached.

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.

FEMA has many opportunities by which it may consult with local officials regarding their communities' mapping needs, e.g., the NFIP Biennial Report, CAVs/CACs, scoping meetings,

workshops, State Implementation Plans, state and national conferences. With the reporting capability of MNUSS, documented mapping needs for any NFIP community may be reviewed and verified when conducting a mapping needs assessment. The mapping needs documented in MNUSS include those that: have been addressed since MNUSS was developed, are being addressed, and still exist. Mapping needs assessments will be conducted for every NFIP community at least every five years, thereby, satisfying the requirement at Section 575 of the NFIRA.

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

No payment or gifts will be given to respondents of the MNUSS worksheet.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information collected with the MNUSS worksheet is available to the general public since it is information the communities would like incorporated into their flood map.

11. Provide additional justification for any questions 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.

No personal or sensitive information is collected through the MNUSS worksheet.

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. 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.

For the second 5-year update data collection that will occur as a result of the responses to the NFIP Biennial Report, the MNUSS Data Worksheet will be completed during follow-up telephone calls to participating communities where communities affirmatively responded to Items A-D in Section I of the NFIP Biennial Report. Based on data received from the first 5-year update data collection that occurred with the NFIP Biennial Report for reporting period 2001-2002, approximately 28.5% of the responding communities indicated they had mapping

needs (a detailed discussion of the adjustments made to the cost estimates can be found below in question 15.) The mapping needs estimated for the 2006-2007 data collection has been adjusted to 30% in anticipation of the increase of needs as a result of Hurricane Katrina. It is estimated that the total number of communities that may respond and therefore, will be contacted by phone for a mapping needs assessment, may range from approximately 4,837 to 6,263. Average number of communities is 5,550.

The overall reporting burden may vary significantly assuming that a community may require anywhere between 1 hour and 8 hours to understand the data that is required, research existing flood hazard data, identify mapping needs, and compile all of the necessary data. These ranges are based upon differences in population, development pressure, geography of the community, and the amount of data that may be necessary to submit depending upon the physical changes affecting the flood hazard areas. In general, single jurisdiction communities (i.e., cities, towns, etc.) may require less time than unincorporated counties for a variety of reasons, such as fewer flooding sources and less land area. We are assuming that approximately 85% of the respondents will be incorporated cities, towns, villages, etc. and 15% will be unincorporated counties. The total burden hours for local officials may range from approximately 8,465 hours to 20,356 hours based on a one-time data collection per 5-year period. The average total hour burden is 13,876, annual hour burden is 2,775. The table below outlines how these figures were derived in a once every five-year period. The annualized costs were not computed in this table.

Annual Burden Hours

| Project/Activity (Survey, Form(s), Focus Group, etc.) | No. of Respondents (A) | Frequency of Responses (B) | Burden Hours Per Respondent (C) | Annual Responses (AxB) | Total Annual Burden Hours (AxBxC) |
|---|------------------------|----------------------------|---------------------------------|------------------------|-----------------------------------|
| FF 81-108 | | | | | |
| Average community burden hours | 5,550 | 1 | 2.5 | 5,550* | 13,875* |
| TOTAL | 5,550 | 1 | 2.5 | 5,550 | 13,875 |

* Data in this table reflects one collection, not annual, but collected once every 5-years

COSTS TO COMMUNITIES FOR ADDRESSING FEMA'S MAPPING NEEDS ASSESSMENT

| MAPPING NEEDS ASSESSMENTS DATA COLLECTION BURDEN | | Lower Range | Upper Range | Average |
|---|--|--------------------|--------------------|-------------------|
| Labor Cost for Mapping Needs Assessments | | | | |
| A | Estimated number of communities responding with "Yes" to Section I questions of the Biennial Report | 4,242 | 5,453 | 4,848 |
| B | Estimated number of communities responding with "No" but with repetitive losses in B, C, X | 404 | 566 | 485 |
| C | Estimated number of communities responding with "No" and later changed to "Yes" | 192 | 244 | 218 |
| D | Total number of communities that may require additional response | 4,837 | 6,263 | 5,550 |
| E | Estimated hours necessary for local officials to research existing flood hazard data and identify mapping needs (Hours per community) | 1.00 | 2.00 | 1.50 |
| F | Estimated hours necessary for communities to obtain supporting materials, discuss community mapping needs information with the contractor, and mail supporting materials (Hours per community) | 0.75 | 1.25 | 1.00 |
| G | Estimated hours necessary for local officials to address FEMA's calls to communities | 8,465 | 20,356 | 13,876 |
| H | Labor Cost for Mapping Needs Assessments (Assuming \$32 per hour) | \$ 270,896 | \$ 651,394 | \$ 444,033 |
| Direct Cost of Mailing Supporting Mapping Needs Assessments Data to FEMA | | | | |
| I | Number of Oversize Response (Assuming 100% will respond with large items such as annotated maps) | 4,837 | 6,263 | 5,550 |
| J | Direct Mailing Cost for Providing Additional Materials (Assuming \$3.00 per oversized response) | \$ 14,512 | \$ 18,790 | \$ 16,651 |
| K | Total Burden Cost to Communities | \$ 285,408 | \$ 670,184 | \$ 460,684 |

A = Estimated number of communities responding with "Yes" to Section I, A-D questions of the Biennial Report. It is assumed that the community response rate will vary between 70 and 90%. Further, it is assumed that 30% of these responding communities will respond with "Yes" to Section I questions.

B = Estimated number of communities responding with "No" but with repetitive losses in B, C, X. It is assumed that 6% of communities responding with "No" will be located in B, C, X zone, requiring follow-up Mapping Needs Assessments. This assumption is based on the 1997 Biennial Report Survey data.

C = Estimated number of communities responding with "No" and later changed to "Yes". It is estimated that 5% of these communities may come back later with mapping needs information.

D = Total number of communities that may require additional response = A + B + C.

E = Estimated hours necessary for local officials to research existing flood hazard data and identify mapping needs (Hours per community). Burden estimates for a community may vary significantly depending on the size of the community and development activities in or near the Special Flood Hazards Area. For single jurisdiction communities, it is estimated that on average they would need 1 hour per community. For maximum burden estimates, it is assumed that the counties would require 8 hours and single jurisdictions would require 1 hour per community. On average the maximum burden per community is approximately 2 hours.

F = Estimated hours necessary for communities to obtain supporting materials, discuss community mapping needs information with the contractor, and mail supporting materials (Hours per community). For single jurisdiction communities, it is estimated that on average they would need 0.75 hour per community. For maximum burden estimates, it is assumed that the counties would require 4 hours and single jurisdictions would require 0.75 hour per community. On average the maximum burden per community is approximately 1.25 hours.

G = Burden Hours for Additional Response = D x (E+F).

| |
|---|
| $\text{Maximum Burden} = (15\% \times 8 \times 19851 + 85\% \times 1 \times 19851) / 19851 = 2.05 \text{ hours per community}$ |
| $\text{Maximum Burden} = (15\% \times 4 \times 19851 + 85\% \times 0.75 \times 19851) / 19851 = 1.25 \text{ hours per community}$ |

COSTS TO COMMUNITIES FOR ADDRESSING FEMA'S MAPPING NEEDS ASSESSMENT

H = Burden Cost for Additional Response = G x Hourly Rate (Assuming \$32/hour). This rate is for a civil engineer and based on the 2001 National Occupational Employment and Wage Estimates developed by the U.S. Department of Labor, Bureau of Labor Statistics and an inflation rate of 2.2% to bring the rate up to 2006. This burden cost assumes a community will incur this one time cost in any given year for a five year period.

I = Communities submitting materials for review (Assuming 100% will respond with large items).

J = Mailing cost for community submittal = I x \$3.00.

K = Total hour burden cost to communities = H + J.

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.

This request for approval only covers one form.

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.

Depending on the volume of data per community, the annualized cost may vary significantly. Using the burden hours and estimated number of communities provided in 12a, the estimated annualized cost to respondents for the hour burden, assuming a wage of \$32 per hour, is \$88,807, or a total cost for the 5-year period of \$444,033.

In addition, if FEMA receives, by mail, supporting technical data from local officials, and assuming 100% of the responses will contain oversized materials, the mailing cost to the average respondent is \$3.00. The estimated total cost to the respondents ranges from approximately \$14,512 to \$18,790. The average cost is \$16,651 for the 5-year period.

Total annualized cost to respondents is \$92,137, or \$460,684 for the 5-year period. The above table shows how these numbers were derived.

ANNUAL COST TO RESPONDENTS

| Program | Burden Hrs | Mean Hr. Rate ⁽¹⁾ (\$) | Average Cost per Respondent ⁽²⁾ (\$) | Annualized Cost All Respondents (\$) |
|-----------------|---------------|-----------------------------------|---|--------------------------------------|
| MNUSS FF 81-108 | 13,875 | \$32 | \$80 (2.5 x \$32) | \$444,000 |
| | | | | |
| Total | 13,875 | \$32 | \$80 | \$444,000 |

*The cost to respondents above does not include ODCs for mailing responses to FEMA. Total direct mailing costs of \$16,651. Additional information about the mailing is discussed above.

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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.

- 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 operation and maintenance or capital and start-up-costs involved with the MNUSS worksheet.

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.

The primary data collection effort for mapping needs assessment will occur when FEMA or its designee (i.e., States, regional entities, contractors) telephone each local official who responds to the NFIP Biennial Report affirmatively to Section I, questions A-D. In addition, telephone calls will be placed to respondents to the NFIP Biennial Report if they answered no to Section I, questions A-D, provided their community has had repetitive flood losses in areas outside of the special flood hazard area. These repetitive losses are an indicator that the current flood hazard map is out of date. Also, an e-mail will be sent to those respondents who indicated a no to Section I, questions A-D. This e-mail will confirm their negative response and offer explanatory information that may cause those respondents to change their response to yes. In turn, this will trigger a telephone call to the respondents for a mapping needs assessment.

Community mapping needs will be received, reviewed and processed and transferred to the MNUSS Data Worksheet for entry into MNUSS. The review and processing may include: organize Biennial Report data and identify MNA communities, send acknowledgment emails, pull current Flood Insurance Rate Maps for reference, provide access to FIS reports, compile and present existing FEMA data on communities, track follow-up calls, record summary mapping needs assessment data, send thank-you emails and NFIP information to communities, provide progress reports, house all the existing and obtained data, and provide statistics and analysis of that data for FEMA's report to Congress, opening submittals, sorting and reviewing each attachment, contacting the communities with follow-up questions, if necessary. The total hours for the activities conducted by a State, regional entity, or contractor are estimated to range between 10,884 and 14,093. The estimated average hours are 12,488. The resulting total estimated costs ranges between \$810,873 and \$1,049,902. The average estimated cost for support of this activity is \$930,388 for the 5-year period.

Because this entire needs assessment process requires structure and organization to track and coordinate this effort, it was determined that a data system for internal tracking would save the government a significant amount of money as well as provide for consistency, reliability and

more quality data. This system is MNA Organizer and is described in Question 3. There is no start-up cost to FEMA since this program was developed for the last MNUSS collection.

Also, assuming that FEMA's project monitoring hours will be approximately 10% of total non-FEMA hours, total Federal Government effort for monitoring is estimated to range between 1,088 and 1,409. The resulting average is 1,249. Using \$45 per hour labor rate (average GS-14), the estimated average cost to the federal government to perform project monitoring is \$56,198.

The total estimated average cost to the government for States, regional entities, or contractors is \$930,388. Attached is a document that outlines how these figures were derived.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT

| Item | Cost (\$) |
|---|-------------------------|
| Contract Costs include (a) contractor hours for researching community data, obtaining all necessary information, calling communities, filling out the MNUSS worksheet, performing quality assurance, and entering data into MNUSS and archiving. Costs also include (b) FEMA's time for monitoring with the contractor to resolve issues. | 874,190(a) 56,198(b) |
| Staff Salaries - Contractor salaries are fully loaded at \$70/hour. Number of employees will fluctuate with no more than 3 people working on the project at one time. FEMA salaries are GS 14 @ \$45/hour spending 10% of contractor total hours. One FEMA staff member is assumed to work on this project with the contractor. | See above |
| Total | \$930,388 |

CONTRACTOR* COSTS FOR CONDUCTING MAPPING NEEDS ASSESSMENTS
 (*States, Regional Entities, Contractor)

| MAPPING NEEDS ASSESSMENTS DATA COLLECTION BURDEN | | Lower Range | Upper Range | Average |
|---|---|-------------------|---------------------|-------------------|
| Participating Communities | | | | |
| A | Regular Program and Emergency Program (Minimally Floodprone) | 5,596 | 5,596 | 5,596 |
| B | Regular Program (with BFEs) | 12,240 | 12,240 | 12,240 |
| C | Regular Program (NSFHA) | 2,362 | 2,362 | 2,362 |
| D | Total Participating Communities in the NFIP | 20,198 | 20,198 | 20,198 |
| Labor Cost for Mapping Needs Assessments | | | | |
| Cost of Contractor | | | | |
| E | Estimated number of communities responding with "Yes" to Section I questions of the Biennial Report | 4,242 | 5,453 | 4,848 |
| F | Estimated number of communities responding with "No" but with repetitive losses in B, C, X | 404 | 566 | 485 |
| G | Estimated number of communities responding with "No" and later changed to "Yes" | 192 | 244 | 218 |
| H | Total number of communities that may require MNUSS Data Worksheet | 4,837 | 6,263 | 5,550 |
| I | Total Contractor Hours for researching community data, obtaining all necessary information, calling communities, filling out the MNUSS worksheet, performing quality assurance, and entering data into MNUSS and archiving (2.25 hours per community) | 10,884 | 14,093 | 12,488 |
| J | Total Contractor Cost (Assuming \$70 per hour or GS-12) | \$ 761,894 | \$ 986,485 | \$ 874,190 |
| Cost of FEMA Monitoring of MNUSS Data Collection Efforts | | | | |
| L | FEMA monitoring hours (assume 10% of Contractor total hours) | 1,088 | 1,409 | 1,249 |
| M | Total Estimated FEMA Monitoring Hours | 1,088 | 1,409 | 1,249 |
| N | Total Estimated Cost to Government for Monitoring (Assuming \$45 per hour) | \$ 48,979 | \$ 63,417 | \$ 56,198 |
| O | Total Estimated Cost to Government | \$ 810,873 | \$ 1,049,902 | \$ 930,388 |

A = Number of communities in the Regular Program and Emergency Program (Minimally Floodprone).

B = Number of communities in the Regular Program (with Base Flood Elevations).

C = Number of communities in the Regular Program (No Special Flood Hazard Area).

D = Total Participating Communities in the NFIP.

E = Estimated number of communities responding with "Yes" to Section I, A-D questions of the Biennial Report. It is assumed that the community response rate will vary between 70 and 90%. Further, it is assumed that 30% of these responding communities will respond with "Yes" to Section I questions.

F = Estimated number of communities responding with "No" but with repetitive losses in B, C, X. It is assumed that 6% of communities responding with "No" will be located in B, C, X zone, requiring follow-up Mapping Needs Assessments. This assumption is based on the 1997 Biennial Report Survey data.

G = Estimated number of communities responding with "No" and later changed to "Yes". It is estimated that 5% of these communities may come back later with mapping needs information.

H = Total number of communities that may require MNUSS Data Worksheet = E + F + G.

I = Total Contractor Hours for researching community data, obtaining all necessary information, calling communities, filling out the MNUSS worksheet, performing quality assurance, and entering data into MNUSS and archiving (2.25 hours per community) = H x 2.25

J = Total Contractor Cost = (I x \$70 per hour) The \$70 per hour is fully loaded.)

L = FEMA monitoring hours (assume 10% of contractor total hours) = 0.1 x I

M = Total Estimated FEMA Monitoring Hours = L.

N = Total Estimated Cost to Government for Monitoring (Assuming \$45 per hour) = (M x \$45 per hour).

O = Total Estimated Cost to Government = J+K+N.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping hour and cost burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

Adjustments have been made to the previous hour and cost burden that was estimated for the second 5-year MNUSS data collection. A brief history of MNUSS and the changes to the hour and cost burden are discussed below.

Background:

For the first 5-year cycle (September 23, 1994 to September 23, 1999), a one-time letter was sent to Chief Executive Officers and flood plain administrators who represented approximately 18,000 mapped NFIP communities. The letter requested very general information about a community's flood hazard mapping needs and did not constitute a data collection.

For the second 5-year cycle (September 23, 1999-September 23, 2004), the primary mapping needs assessment data collection was conducted in conjunction with the 2001-2002 NFIP Biennial Report mailed in 2003. Prior to the mailing of the 2001-2002 Biennial Report, the MNUSS Data Worksheet was developed. Through extended outreach and training, approximately 3,000 mapping needs were collected for approximately 35 states.

As a result of the MNUSS information collected through the Biennial Report in 2003, the cost and burden estimates for the third 5-year cycle (September 23, 2004-September 23, 2009) have been adjusted as follows:

- Number of participating communities increased from 19,851 to 20,198.
- Estimated number of communities responding with "Yes" to Section I questions was changed from 50% of the responding communities would answer yes to 30%. This information was updated based on the actual numbers associated with the 2001-2002 response rate. The actual percentage was 28.5%; however, because of the assumed increase need with the 2005 hurricane season, the percentage was increased to 30%.
- Estimated number of communities responding with "no" and later changed to "Yes" was changed from 10% to 5%.
- Based on the 2001 National Occupational Employment and Wage Estimates developed by the U.S. department of labor, the burden cost for community's additional response rose from \$30 an hour to \$32 an hour from when the original estimate was developed to when the third 5-year cycle will take place.
- Contracting hourly rate increased from \$60 per hour to \$70.

- Government hourly rate for monitoring increased from \$40 an hour to \$45
- Total contractor hours for researching community data, obtaining all necessary information, calling communities, filling out the MNUSS worksheet, performing quality assurance, and entering data into MNUSS and archiving was adjusted from 1.65 hours per community to 2.25 hours per community. The average time per community calculated from the second 5-year update was 2.85 hours per community. The difference from the original estimate and the actual cost is 1.2 hours. Since the second 5-year update was the first time the MNUSS data was collected through the Biennial Report, the assumption has been made that the community contact and collection of community information will be more efficient the second time; therefore, only half of the additional time needed per community has been added to the estimate (additional .6 hours per community)

Final conclusion of adjustments; even though there was a large decrease to the percentage of communities being contacted for mapping needs, there are more participating communities; the costs have increased and the estimate for the community outreach per community has increased. As a result, costs have not decreased a great deal from the second 5-year cost and burden estimate. The original total costs were estimated at \$992,636. The adjusted total costs are estimated at \$930,388. The biggest change was to the estimated total community costs. The original total costs to the communities were \$714,731; the adjusted amount decreased to \$460,684. Additional information can be found on the attached worksheets.

In addition, since mapping needs may arise at any time, and be documented and entered into MNUSS at any time, the MNUSS Data Worksheet has been used in an ad hoc manner since its development.

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.

At least once every five years, in conjunction with the requirements of Section 575 of the NFIRA, FEMA will conduct a mapping needs data collection using the MNUSS Data Worksheet to document communities' needs for flood hazard map updates. Through FEMA's website, statistics by FEMA Region and State, relating to the collected data, will be posted on a periodic basis, no less than once a year. Provided funds are available, this data collection may occur as frequently as every two years in conjunction with the NFIP Biennial Report or with other data collection methods mentioned previously that result in significant data being collected.

The MNUSS Data Worksheet may be completed at any time and the data is input into MNUSS as it is received. Once input into MNUSS, the data, immediately, becomes available for use by MNUSS users. MNUSS users consist of FEMA staff, State NFIP coordinators, regional governmental agencies, such as flood control districts, and FEMA's CTPs. On request, current MNUSS data will be provided. In addition, local officials may view "snapshot" data that is posted to the MNUSS web site approximately twice a year.

Every fiscal year, the data obtained from communities through the use of the MNUSS Data Worksheet will be evaluated and will assist in the planning and decision-making related to the allocation of funds for map updates as well as in supporting FEMA's funding requests to the Office of Management and Budget and Congress for map updates.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

The expiration date will be displayed on the form.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement for this submission.

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods.