

March 2, 2007

**Supporting Statement for
Paperwork Reduction Act Submissions**

OMB Control Number: 1660 – 0076

Title: Hazard Mitigation Grant Program (HMGP) Application and Reporting

Form Number(s): None

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 (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.

Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Act), 42 USC 5133, as amended by section 102 of the Disaster Mitigation Act (DMA) of 2000, Public Law 106-390, 114 Stat. 1552 authorize data collections to administer the Hazard Mitigation Grant Program (HMGP). FEMA regulations require grantees to report to FEMA on a quarterly basis, certifying how the funds are being used and reporting on the progress of activities funded under the sub-grant awards to Grantees by FEMA. Grantees administer the HMGP, which is a post-disaster program that contributes funds toward the cost of hazard mitigation activities in order to reduce the risk of future damage, hardship, loss or suffering in any area affected by a major disaster. Grantees are defined as any State of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands, or an Indian tribal government that chooses to act as a grantee.

44 CFR 206.436 HMGP regulations describe the application process. Information collected through the grant applications is the minimum necessary to administer grants under the HMGP and includes the project narrative, analysis of the measure's cost-effectiveness referred to as the benefit-cost determination, and environmental review and used in conjunction with OMB No. 1660-0025.

The previous approval of this information collection occurred prior to the occurrence of Hurricanes Katrina and Rita in the Gulf Coast states in 2005. FEMA understands that the magnitude and scope of this event warrant a systematic analysis of Katrina's impact and the possibility that some programs may have to be reassessed as a result. The agency is still heavily involved in recovery operations, and consequently "lessons-learned" results are still being worked out at this time. FEMA is working closely with other Federal and State agencies involved in the recovery process, and will be assisting potential applicants to apply for and secure funding for activities under the HMGP. Policies for the HMGP are governed by the Stafford Act, which was not amended for mitigation assistance for these Disasters. Therefore, the application requirements are still necessary to administer HMGP funding. A better understanding of Katrina's impact on Mitigation programs, if any, is expected within the next 12 months, which is the HMGP application period for these disasters, but this may be extended if requested by the State. FEMA will identify any significant impact from Hurricane Katrina, and if needed, lessons learned will be applied to the HMGP program policies nationwide. Any new program policy or operation affecting the information we collect or how we collect it, will be incorporated in the PRA package to be submitted to OMB for approval previous to the collection's expiration date.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA will use the HMGP project narrative and benefit cost determination submitted by the Grantee to determine whether the Grantee's proposed use of funds meet the requirements and intent of the HMGP. The project narrative, benefit cost determination, and environmental review are used in conjunction with the approved information collection, OMB No.1660-0025 will provide FEMA with the required information needed to determine whether proposed mitigation activities meets funding eligibility criteria. The eligibility reviews must be completed and approved by FEMA before an applicant can receive funds and the eligible activity initiated. The Project Narrative, 44 CFR Section 206.436 explains the FEMA application and review process to the respondent. Benefit-Cost Determination is included in the respondent's application and used by FEMA to determine if the benefits of the grant exceed the costs of the mitigation activity and therefore cost effective. Environmental Reviews provides information necessary to complete environmental reviews under the National Environmental Policy Act and other laws and Executive orders. FEMA works with the respondents to collect environmental information necessary to implement the project. The HMGP Desk Reference (FEMA 345) is used by the respondent as guidance for completing the project narrative. Audits and Audit Trail Requirements are to ensure that respondents who receive grant funds from FEMA comply with audit requirements under the Single Audit Act of 1984. Audits are required in order to confirm that the funds were spent according to legal and policy guidelines.

Grantees and Sub-grantees are responsible for implementing the approved mitigation activity and for reporting to the Grantee regarding activity progress and status of funds received under the grant using the following standardized forms for FEMA grant programs approved under OMB No. 1660-0025, FEMA Emergency Preparedness and Response Grants Administration Forms (formerly: Financial and Technical Assistance Under Performance Partnership Agreement).

FEMA Form 20-20 - Budget Information-Non-construction Standard
FEMA Forms 20-16A, B, C, Summary Sheet for Assurances and Certification
FEMA Form 20-10, Financial Status Report
FEMA Form 20-17, Outlay Report and Request for Reimbursement for Construction Program
Standard Form 424, Application for Federal Assistance
FEMA Form 20-18, Report of Government Property
FEMA Form 20-19, Reconciliation of Grants and Cooperative Agreements
Standard Form LLL, Disclosure of Lobbying Activities.

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.

The information management and grants processing system that presently supports the HMGP programmatic lifecycle processes is the National Emergency Management Information System (NEMIS). FEMA is currently working to develop and deploy an eGrants capability in support of its disaster programs, including HMGP that will support the project narrative development and grant administration forms under OMB No. 1660- 0025. The capability will be an Internet/Intranet means to apply for, manage, and report on HMGP and other FEMA mitigation grants. At present, respondents may submit data collections via e-mail, NEMIS, or paper. Grantees may submit their quarterly financial status and progress reports using the electronic version of FEMA Form 20-10. Grantees may submit their quarterly performance reports electronically via NEMIS, or via email using standard word-processing or spreadsheet software. FEMA anticipate having the HMGP available in eGrants within the FY 2007-FY2008 timeframe, and expect its availability to reduce the information collection and reporting burden of Grantees. Until eGrants is deployed, FEMA does not have any practical experience or data to demonstrate or document the anticipated reduced burden.

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 asked for in the HMGP data collection is not duplicative, nor are the data collection tools. Each item asks for unique information. FEMA is looking to unify all the mitigation grant programs, which will include a uniform application package so that all data collection instruments are similar.

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.

The respondents to this data collection are States, Territories, and Indian tribes. Small businesses and other small entities are not eligible to apply directly to FEMA for HMGP funding, therefore; there is no impact to 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.

The Stafford Act established specific eligibility criteria for the use of the HMGP grant program authority. FEMA will not be able to determine eligibility of potential applicants, proposed mitigation activities, cost-effectiveness of the proposed activity, or the effect on the environment, without the information requested in the data collection. Without approval of this information collection, FEMA will not be able to provide disaster assistance for mitigation activities to State and local communities that have been declared under a Presidential Disaster Declaration.

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.

Respondents are not required to report information more often than quarterly unless the respondent chose to amend the information in the data collection.

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

Respondents are not required to prepare a written response to a collection of information with less than 30 days notice.

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

Respondents are not required 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.

Respondents are not required 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.

There is no statistical survey involved with this data collection.

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

There is no use of statistical data classification involved with this data collection.

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.

There is no pledge of confidentiality that is not supported by authority in statute or regulation necessary for this data collection.

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.

There are no requirements for respondents to submit proprietary trade secret or other confidential information for this data 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 was published for this collection on November 8, 2006, volume 71, number 216, Page 65538. There were no comments received for this data 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.

FEMA has received input from States and local governments regarding information collections for the HMGP through meetings between Respondents and the FEMA Regional Offices. FEMA also has invited various State and local stakeholders to participate in meetings to discuss program improvements, to simplify application requirements and to include discussions on data collection and electronic information gathering/processing for FEMA mitigation grants. In addition, FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conferences. The Respondents are members of NEMA and ASFPM.

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's regional offices have discussed the HMGP with our State counterparts in meetings. In addition, FEMA has involved State representatives, nominated by the National Emergency Management Association, in established meeting sessions regarding data collection and electronic data processing for FEMA mitigation grant programs.

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

There is no payment or gift to respondents for this data collection.

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

There is no need to provide assurance of confidentiality to respondents for this data collection since name and address information are available to FEMA, only, and respective states as required for program administration.

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.

There are no questions of a sensitive nature involved with 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. 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.**

ANNUAL BURDEN HOURS

Data Collection Activities / Instruments	No. of Respondents	Frequency of Responses	Burden Hours Per Respondent	Annual Responses	Total Annual Burden
	(A)	(B)	(C)	(D = AxB)	(E = CxD)
Project Narrative Section 209.8(b)	56	18	12 hours	1008	12,096
Benefit-Cost Determination	56	18	5 hours	1008	5,040
Environmental Review	56	18	7.5 hours	1008	7,560
Total Burden for HMGP	56			3024	24,696

The 56 respondents are comprised of States, Territories and Indian tribes that submit an average of 18 project applications annual. Each project application must have a Project Narrative that contains the scope of work for the proposed project (12 hours) and a Benefit-Cost Determination (5 hours) and Environmental Review (7.5 hours) for each project as described in the Project Narrative..

The follow burden for the Hazard Mitigation Grant Program for financial and administrative reporting has been approved under OMB No. 1660-0025, FEMA Emergency Preparedness and Response Directorate Grants Administrative Forms, expiration date July 2007.

ANNUAL BURDEN HOURS					
Data Collection Activities / Instruments	No. of Respondents	Frequency of Responses	Burden Hours Per Respondent	Annual Responses	Total Annual Burden
	(A)	(B)	(C)	(D = AxB)	(E = CxD)
FEMA Form 20-10, Financial Status Report	52	1	1 hours	4	10,400
FEMA Form 20-16,A,B,C, Summary Sheet for Assurances and Certification Certif	52	1	1.7 hours	1	4,550
FEMA Form 20-17, Outlay Report and Request for Reimbursement for construction Program	52	15	17.?	15	672,750
FEMA Form 20-18, Report of Government Property	52	6	4.2 hours	6	66,300
FEMA Form 20-19, Reconciliation of Grants and Cooperative Agreement	52	6	5 minutes	6	1,300
FEMA Form 20-20, Budge Information (Nonconstruction)	52	15	9.7 hours	15	380,250
SF-424, Application for Federal Assi	52	1	45 minutes	1	1,950

SF LLL, Disclosure of g n	52	1	10 minutes	1	433
Total	52			49	1,137,933

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.

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.

ANNUAL COST TO RESPONDENTS				
Program m	Burden Hrs	Mean Hr. Rate (\$)	Average Cost per Respondent (\$)	Annualized Cost All Respondents (\$)
Urban and Regional Planners	24,696	26.75	\$12,974	\$660,618

The State Hazard Mitigation Office staff is most likely to have responsibility for data collections completed at the State level. The offices are usually comprised of urban and regional planners. Wage rates were determined using data from the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Current BLS data indicate that the median hourly earnings of urban and regional planners for 2004 were \$26.75.

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:

There is no total annual cost burden to respondents for collection of information.

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.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT	
Item	Cost (\$)
Contract Costs	0
Staff Salaries	776,394
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0

Travel	0
Printing	0
Postage	0
Other	0
Total	776,394

The staff salaries were calculated as a GS 11/5 (\$29.47/hr) employee reviewing the project narrative for two hours, a GS 11/5 employee reviewing and recalculating the benefit-cost determination for 3 hours, a GS 12/5 (\$35.32/hr) employee managing an environmental review for 13 hours, and four GS 11/5 employee conducting an audit at 25 hours each. There are an average of 1008 project narratives, 1008 benefit-cost determinations, 1008 environmental reviews, and 56 audits. The total cost for HMGP is \$776,394. The HMGP Desk Reference is used by respondents and not Federal Government, so no cost was calculated.

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.

The number of responses for this collection have decreased from 8,523 to 3024. This adjustment is due to the decrease in the number of respondents from 1,815 to 56. The affected public for this data collection should have been identified has 56 States and Territories. FEMA have estimated that approximately 18 projects will be received from respondents annually.

The burden hours for this data collection have decreased from 52,199 total burden hours to 24,696 (-27,503 difference). An adjustment of -21,735 hours was decreased from this information collection due the reporting financial and administration grant activity forms were approved under OM.B No. 1660-0025, FEMA Emergency Preparedness and Responses Grants Administration Forms. An adjustment of -3120 burden hours has also been eliminated from this data collection. FEMA should not have identified the standard OMB Circulars as a data collection.

A program change of -2,648 total burden hours have been decreased from this collection due to the data being captured in the new Interim Final Rule for Flood Mitigation Grants and Hazard Mitigation Planning, 44 CFR Part 80.

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.

This collection does not involve results that will be published, or outline plans for tabulation and publication.

17. If seeking approval to not 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 data 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.

There is no exception to the certification statement for this data collection.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.