

June 25, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0026

**Title: State Administration Plan for the Hazard Mitigation Grant
Program**

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.

The development of the State Administrative Plan is required as a condition of receiving Hazard Mitigation Grant Program (HMGP) funding under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988. Section 404 mandates that FEMA must approve State Administrative Plan before awarding any project grant assistance to a community or State applicant. The regulations for the State Administrative Plan are codified in 44 CFR 206.437, implementing the provisions to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288 as amended. The plans must comply with administrative requirements in 44 CFR Parts 13 and 206, provide information for environmental and floodplain management review in conformance with 44 CFR Parts 9 and 10, and audit requirements in 44 CFR Part 14.

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 State Administrative Plan is a procedural guide that details how the State will administer the HMGP. The State must have a current administrative plan approved by the appropriate FEMA Regional Director before receiving HGMP funds. The administrative plan may take any form including a chapter within a comprehensive State mitigation program strategy. The State may forward an administrative plan to the Regional Director for approval at any time prior to or immediately after the request for a disaster declaration. An approved plan is a prerequisite of receiving HGMP funds. Independent of the frequency of disaster declarations, each State should review and update the plan at least annually. If the State determines that its current plan does not require changes, the State should notify FEMA within 90 days after the disaster declaration.

The Administrative Plan describes how the State will manage the HMGP in the event of a disaster. At a minimum the plan will:

- Designate the State agency that will act as grantee;
- Identify the State Hazard Mitigation Officer;
- Identify staffing requirements and resources; and
- Establish procedures to guide certain administrative activities.

In the Administrative Plan, the State must establish procedures to guide the following 13 activities.

- Identify and notify potential applicants of the availability of the program.
- Ensure that potential applicants are provided information on the application process, program eligibility, and key deadlines.
- Determine applicant eligibility.
- Provide information for environmental and floodplain management review
- Establish priorities for selection of mitigation projects.
- Process requests for advances of funds and reimbursements.
- Monitor and evaluate the progress and completion of selected projects.
- Review and approve cost overruns.
- Process appeals.
- Provide technical assistance as required to sub-grantees.
- Comply with the administrative requirements.
- Comply with audit requirements.
- Provide quarterly progress reports to the Regional Director on approved projects.

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.

FEMA has not implemented a requirement for States to use information technology to submit the State Administrative Plan for the HMGP updates; however, it does not preclude States from e-mailing electronic files(s) containing the plan(s) updates. Information on mitigation and FEMA mitigation programs is made available to the public through FEMA's web site at <http://www.fema.gov/government/grant/>. A Hazard Mitigation Grant Program Desk Reference, which provides program guidance for both the HMGP and the State Administrative Plan, is available online at <http://www.fema.gov/library/viewRecord.do?id=1472>.

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 is no duplication of this planning requirement by FEMA, Federal or State activities. The Robert T. Stafford Disaster Relief and Emergency Assistance act requires that the hazard mitigation plans be coordinated with any other mitigation plans adopted or underway at the State or local level, and that these mitigation plans build on, and not duplicate existing plans.

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 will have no impact on small businesses since they are not required to participate in the development or updates of the State Administrative Plan for the HMGP. The primary responsibility for development or update of a Plan is assigned to a State agency; however, any State agency that influences development within the hazard-prone areas through ongoing programs and activities should be involved in the development and implementation of the plan/plan updates.

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 State Administrative Plan for the HMGP is triggered by a major disaster or emergency declaration that results in States and communities seeking Federal grant assistance. Without a FEMA approval State Administrative Plan could not be approved.

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.

This collection does not require respondents to report information more than quarterly.

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

This collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

This collection does not require respondents to submit more than an original and two copies of any document.

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

This collection does not require respondents 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.

This collection does not employ statistical surveys.

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

This collection does not require the use of statistical data classifications.

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

This collection does not require any pledges of confidentiality.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has

instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection does not require respondents to submit proprietary trade secrets.

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 comments on April 3, 2007, volume 72, number 63, Page 15893. There were no comments received for this collection of information.

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.

Following each major disaster declaration, FEMA Regional offices consult with State representatives with the responsibility of reviewing the State Administrative Plan.

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.

Following each major disaster declaration, FEMA Regional offices consult with State representatives with the responsibility of reviewing the State Administrative Plan. If needed, the State prepares updates, amendments, or revisions to the Plan in order to meet current policy guidance or changes in the administration of the Hazard Mitigation Grant Program. If no changes are necessary, a written statement is submitted by the State to FEMA indicating that the Plan is current.

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

This collection does not provide any payments or gifts to respondents.

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

This collection does not collect information of a confidential nature.

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.

This collection does not collect information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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	Number of Respondents	Frequency of Responses	Hour Burden Per Response (hours)	Annual Responses	Total Annual Hour Burden (hours)
	(A)	(B)	(C)	(D = AxB)	(E = CxD)
Review & Update State Administrative Plan	32	1.5	8	48	384
Total	32	1.5	8	48	384

56 States and territories have completed the development of State Administrative Plans since the passage of the Stafford Act in 1988. Therefore, each State that is the recipient of a disaster declaration is only required to update or verify that no changes are needed to their State Administrative Plan in order to be eligible for funding. Therefore, burden hours are only calculated for review and updates to State Administrative Plans for those States that are recipients of disaster declarations.

It has been estimated that out of the 56 States, an annual average of 32 States will receive disaster declarations, with an average of 1.5 declarations per year per State. FEMA estimates that it will take an average of eight (8) hours per State to review, update (if

necessary), and submit their State Administrative Plan to FEMA. Therefore, the total annual burden hours is 384 hours (32 State respondents x 1.5 responses per State x 8 hours per response = 384 hours).

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

This collection does not employ the use of any forms.

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	Hour Burden (hours)	Mean Hr. Rate⁽¹⁾ (\$)	Average Cost per Respondent⁽²⁾ (\$)	Annualized Cost All Respondents (\$)
Urban and Regional Planners	384	26.53	\$212	\$10,188.
TOTAL	384	26.53	\$212	\$10,188.

Hour burden costs are only calculated for review and updates to State Administrative Plans. Costs are not expected to be excessive, as most States utilize existing State staff to review, update and implement the administrative plan. The current U.S. Department of Labor, Bureau of Labor Statistics (BLS) website data indicate the median hourly earnings of Urban and Regional Planner is \$26.53. Therefore, the total annual estimated costs for States and territories for the information collection associated with the State Administrative Plans are \$10,188. (384 burden hours x \$26.53 per hour = \$10,188.).

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.)

There are no recordkeeping costs associated with this collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such a 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: [One FEMA employee GS-12/5 staff @ four hours per review, plus one Regional Director, Executive Level III @ ½ hour approval]	\$7,653.36
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing	0
Postage	0
Other	0
Total	\$7,653.36

Average annualized cost to the Federal Government for a GS 12/5 (\$30.57 per hour) to review and approve 48 annual State Administrative Plan for 4 hours per plan is estimated to be \$5,869.44. Regional Director, Executive Level III (\$74.33 per hour) review, approve, and notify the State of the approved plan at 30 minutes per plan is estimated to be \$1,783.92. Therefore, the total estimated annualized cost to the Federal Government is \$7,653.36 annually.

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.

Itemized Changes in Hour Burden and Cost Burden.

Changes in Hour Burden		
Data Collection Activity/Instrument	Program Changes (hours)	Adjustments (hours)
Review and Update of State Administrative Plans		+1 hour
Total		+1 hour
Changes in Cost Burden		
Data Collection Activity/Instrument	Program Changes (\$)	Adjustments (\$)
State Review and Update of Plans		+\$1,047

Federal Review and Approval Plans		+\$662
Total		+\$1,709.

There was an adjustment of 383 total burden hours to 384 (+1 hour). The hour per response for respondents was increased by 1 hour. The program office has decided that the additional time will allow States representatives more time to consult with FEMA regarding any updates to plans.

The cost to respondents for the hour burden (Item 13) has adjustment increase from \$9,141 to \$10,188. This is an adjustment of +\$1,047 annually as a result of an increase in the earnings of urban and regional planners for this data collection activity. The cost to the federal government has an adjustment increase from \$6,992 to \$7,653.36 (+661.36) annually due to the cost for a GS 12/5 (\$30.57 per hour) to review and approve plans and the Regional Director, Executive Level III (\$74.33 per hour) to review, approve, and notify the State of approved plans.

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 of information will not have results published, 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.

A valid OMB control number, expiration date and burden disclosure notice will be displayed in all collection's material.

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". This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable" Question #3 in the supporting statement justifies the non-use of information technology.

B. Collections of Information Employing Statistical Methods.

This collection does not employ statistical methods.