

August 16th, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0016

Title: Revision to National Flood Insurance Program Maps: Application Forms for LOMRs and CLOMRs

Form Number(s): FEMA Form 81-89 Series, which includes Forms 81-89, 81-89A, 81-89B, 81-89C, 81-89D, and 81-89E.

General Instructions

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

Specific Instructions

A. Justification

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

The Department of Homeland Security, Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. In 44 CFR Part 65, FEMA specifically requests that communities submit technical information concerning flood hazards and plans to avoid potential flood hazards. In order to revise the Base (1-percent annual chance) Flood Elevations (BFEs), Special Flood Hazard Areas (SFHAs), and/or floodways presented on the NFIP maps, a community must submit scientific or technical data demonstrating the need for a revision. The NFIP regulations cited in 44 CFR Part 65 outline the data that must be submitted for these requests. This collection serves to provide a standard format for the general

information requirements outlined in the NFIP regulations and helps establish an organized package of the data needed to revise NFIP maps. This collection helps to:

- Ensure all data required to process these requests is received with the initial submittal;
- Ensure processing consistency among all requests;
- Ensure that submitted data are presented in a manner that will increase processing efficiency;
- Reduce the amount of time required to process requests; and
- Reduce processing costs.

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

The information collected on FEMA Forms 81-89, 81-89A, 81-89B, 81-89C, 81-89D, and 81-89E is used to determine if such data will result in a modification of a BFE, SFHA, and/or floodway. Once the information is collected, it is submitted to FEMA for review and is subsequently included on the NFIP maps. These maps are used by communities for compliance with floodplain management regulations, by lenders in determining application of the mandatory flood insurance purchase requirement, and by insurance agents in determining actuarial flood insurance rates.

This collection uses a series of six forms, described below:

- a. FEMA Form 81-89, Overview and Concurrence Form provides the basic information regarding the revision request and requires the signatures of the requester, community official and engineer. This form is required for all revision requests. This form describes the location and nature of the requested NFIP map change, and the data required to support the request.
- b. FEMA Form 81-89A, Riverine Hydrology & Hydraulics Form provides the basic information on the scope and methodology of hydrologic and/or hydraulic analyses that are prepared in support of the revision request. This form should be used for revision requests that involve new or revised hydrologic and/or hydraulic analyses of rivers, streams, ponds, or small lakes.
- c. FEMA Form 81-89B, Riverine Structures Form provides the basic information regarding hydraulic structures constructed in the stream channel or floodplain. This form should be used for revision requests that involve new or proposed channelization, bridges/culverts, dams, and/or levees/floodwalls.
- d. FEMA Form 81-89C, Coastal Analysis Form provides the basic information on the scope and methodology of coastal analyses that are prepared in support

of the revision request. This form should be used for any revision requests that involve new or revised coastal analyses.

- e. FEMA Form 81-89D, Coastal Structures Form provides the basic information regarding hydraulic structures constructed along the coast. This form should be used for revision requests that involve new or proposed levees/dikes, breakwaters, bulkheads, seawalls, and for revetments located along the coast.
- f. FEMA Form 81-89E, Alluvial Fan Flooding Form provides the basic information for analyses of alluvial fans. This form should be used for revision requests involving alluvial fans.

In addition to these forms, requests must include but not limited to the following data:

- An annotated Flood Insurance Rate Map (FIRM) and/or Flood Boundary and Floodway Map (FBFM) (if applicable) at the scale of the effective FIRM and/or FBFM showing the revised base floodplain and floodway boundaries delineated on the submitted work map and how they tie into the base floodplain and floodway boundaries shown on the effective FIRM and/or FBFM at the downstream and upstream ends of the revised reach.
- A diskette containing input and output files for all submitted hydrologic and/or hydraulic models
- A topographic work map certified by professional engineer showing the revised proposed base floodplain and floodway boundary delineations and how they tie into the unrevised information.
- Evidence of compliance of all applicable NFIP regulations as identified in the submitted forms.

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 forms are made available on the Internet and can be downloaded from the website. The forms can be found at the following website address:

http://www.fema.gov/plan/prevent/fhm/frm_form.shtm. The forms are available on the internet for download in Microsoft Word and Adobe Acrobat format. Currently, the collection cannot be submitted to FEMA electronically; users can only print completed forms and mail them to FEMA. Depending on the availability of funding and the priority given to this collection, FEMA may develop the capability for users to return the information electronically.

Effective Flood Insurance Rate Maps (FIRM), Flood Boundary and Floodway Maps (FBFM), and Flood Insurance Study (FIS) reports that cover the area in which a particular property is located can be obtained from the Map Service Center (MSC) on the FEMA website at <http://store.msc.fema.gov>. Those that do not have internet access can contact the Map Service Center at 800-358-9616.

Requestors can check on the status of their Letter of Map Revision (LOMR), and Conditional Letter of Map Revision (CLOMR) request by visiting FEMA's Status of Map Change Requests database at http://www.fema.gov/plan/prevent/fhm/st_main.shtm.

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 no duplicative efforts and no other existing collection can be used or modified to serve these purposes. While the information collected may have been prepared by other Federal, State, or local agencies or by private firms/individuals, this information is only available to FEMA as part of this collection. Usually, the submissions take the form of providing copies of existing information such as topographic data available from State and/or local government agencies. This data may be used to refine the Special Flood Hazard Area boundary delineations.

Detailed information on specific locations within communities, nationwide, is not collected or maintained except at the community level because of the prohibitive costs associated with such an effort. While community officials may maintain such information, as required by 44 CFR §59.22(a), this data are not readily accessible by FEMA and thus must be provided for verification purposes. If available, however, property owners or lessees may use this data in preparing their submissions.

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 collection is the same regardless of size of the business or entity responding to the collection.

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.

If this information were not collected, the NFIP maps could not be revised to reflect current existing flood hazards. Processing of these requests helps to improve the accuracy of FEMA map products, and the effectiveness of the National Flood Insurance Program.

If the collection of information were not conducted, it would deprive individuals of the right to provide scientific or technical data to correct flood insurance maps that may be in error. The impact of this deprivation is difficult to assess, but it would, in all probability, adversely affect community participation in the NFIP, which is voluntary. If this information were not collected, the majority of respondents to this collection would continue to pay higher flood insurance premiums than would be necessary if they were to get a determination showing that their property was no longer in a Special Flood Hazard Area. If this were the case, local pressures would likely mount and cause a significant number of communities to reevaluate their decisions to continue their participation in the NFIP. Without this collection of information the NFIP maps would not reflect actual risk associated with flooding and the citizens may risk their life and property during a disaster.

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

There are no special circumstances for this collection that would require respondents to report information to the agency more often than quarterly.

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

Under no circumstances are respondents required to prepare a written response to the collection of information in fewer than 30 days after receipt of it. Respondents are required by 44 CFR §65.3 to report information within 6 months after the data is available.

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

Respondents are not required to submit more than one original document of this collection.

(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 maintain these records for any period of time.

(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 is not connected with a statistical survey.

(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 a statistical data classification that has not been reviewed and approved by OMB.

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

This collection does not include a pledge 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.

Respondents are not required to submit proprietary or confidential 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 Notice was published for comments on June 20, 2007, volume 72, number 118, pages 34029-34030. No comments received during the 60-day comment period concerning information required by FEMA to revise NFIP maps.

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 conducts several workshops for community officials, engineers,

surveyors, and developers every year on the MT -2 process. While the purpose this workshop is not to solicit feedback on the forms and instructions, attendees use the opportunity to give comments and clarity of instructions. In addition, FEMA's website http://www.fema.gov/plan/prevent/fhm/tsd_emap.shtm includes an email address, in which respondents can provide comments regarding the forms and clarity of instructions. FEMA also provides a toll free number (877-336-2627) to answer questions and provide opportunity for respondents to comment on the forms.

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.

If a community official or other party seeks assistance from FEMA, on the FHBM or FIRM, that an altered or relocated portion of a watercourse provides protection from, or mitigates potential hazards of the base flood, FEMA may request specific documentation from the community certifying and describing how the provisions of flood plain management criteria will be met for the particular watercourse involved. This documentation, which may be in the form of a written statement from the Community Chief Executive Officer, an ordinance, or other legislative action. The statement shall describe the nature of the maintenance activities to be performed, the frequency with which they will be performed, and the title of the local community official who will be responsible for assuring that the maintenance activities are accomplished.

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

No gifts are provided to respondents.

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

This collection does not involve privacy act information. The information on the form consists of documentation and interpretation of public documents. The information of the collection is publicly available and therefore not confidential, including community participation status in the National Flood Insurance Program (NFIP). The NFIP data collection is provided on a voluntary basis.

FEMA does not mandate use of the forms. However, the forms provide assurance that all pertinent data relating to an individual request are submitted in the collection.

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

This collection does not include questions 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.

Based on historical records, it is anticipated that FEMA will receive at least 10,080 responses for this collection. Respondents to this collection are typically developers, community officials or private engineering firms. Because of ongoing development in communities, a respondent may submit multiple responses to request multiple changes to the NFIP maps. The estimated number of burden hours per respondent to submit all forms in this collection has been determined to be 14.5 hours.

Table 1. Annual Hour Burden

Data Collection Activity/Instrument	No. of Respondents	Frequency of Responses	Hour Burden Per Response	Annual Responses	Total Annual Hour Burden
	(A)	(B)	(C)	(D) = (AxB)	(E) = (Cx D)
Form 81-89, Overview and Concurrence Form	1,680	Annual (1)	1.0	1,680	1,680
Form 81-89A, Riverine Hydrology & Hydraulics Form	1,680	Annual (1)	3.5	1,680	5,880
Form 81-89B, Riverine Structures Form	1,680	Annual (1)	7.0	1,680	11,760
Form 81-89C, Coastal Analysis Form	1,680	Annual (1)	1.0	1,680	1,680
Form 81-89D, Coastal Structures Form	1,680	Annual (1)	1.0	1,680	1,680

Form 81-89E, Alluvial Fan Flooding Form	1,680	Annual (1)	1.0	1,680	1,680
TOTAL	1,680*		14.5	10,080	24,360

* The number of respondents equals total number of collection package received. Estimated number of collection package received in a given year is 1,680.

The Overview and Concurrence Form is estimated to 1 hour per respondent. This form is completed by developer’s representatives (typically, engineering firms or land surveyors). The developer may review forms prepared by their representatives and sign the form as a requester for the collection. The certifying official should be the Chief Executive officer (CEO) for the community or an official legally designated by the CEO. Engineer or Land Surveyor will certify their analysis and supporting data for the request.

The Riverine Hydrology & Hydraulics Form is estimated to take 3.5 hours per respondent. This form is completed by engineers or land surveyor to do analyses of rivers, streams, ponds, or small lakes. As identified in the form, community official may be involved in providing public or individual notifications to impacted property owners of increased hazards on their property, if applicable. A separate form is used for each flooding source.

The Riverine Structures Form is estimated to take 7 hours per respondent. This form is completed by engineers or land surveyors for revision request that involve new or proposed channelization, bridges/culverts, dams and levees/floodwalls. A separate form should be used for each flooding source

The Coastal Analysis Form is estimated to take 1 hour per respondent. This form is completed by developers or their representatives. This information is intended to document the steps taken by the requester in the process of preparing the revised models or analyses and the resulting revised Flood Insurance Study (FIS) information. This form is estimated to taken 1 hour to complete and certify.

The Coastal Structures Form is estimated to take 1 hour per respondent. This form is completed and certified by engineers or land surveyors. While property owners or their representatives signing this form is not required to have obtained the supporting data or perform the analyses, they must have supervised and review the work

The Alluvial Fan Flooding Form is estimated to take 1 hour per respondent. A complete engineer analyses must be submitted in support of each section of this form. In addition, it may be necessary to complete other forms relating to specific flood control measures, such as levees/floodwalls, channelization or dams.

- 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.**

See table in 12(a)

- c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Annual Cost to Respondents for Hour Burden

Data Collection Activity/Instrument	Respondent's Occupational Category	Median Wage (\$)	Total Annual Hour Burden (hour)	Total Annual Cost Burden (\$)
Form 81-89, Overview and Concurrence Form	Developers or Individual Property Owners	\$14.15	420	\$5,943
	State/Local Community Officials	\$50.00	420	\$21,000
	Engineers/ Land Surveyors	\$31.82	840	\$26,728
Form 81-89A, Riverine Hydrology & Hydraulics Form	State/Local Community Officials	\$50.00	1,260	\$63,000
	Engineers/ Land Surveyors	\$31.82	4,620	\$147,008
Form 81-89B, Riverine Structures Form	Engineers/ Land Surveyors	\$31.82	11,760	\$374,203
Form 81-89C, Coastal Analysis Form	Engineers/ Land Surveyors	\$31.82	1,680	\$53,458
Form 81-89D, Coastal Structures Form	Engineers/ Land Surveyors	\$31.82	1,680	\$53,458
Form 81-89E, Alluvial Fan Flooding Form	Engineers/ Land Surveyors	\$31.82	1,680	\$53,458
TOTAL			24,360	\$798,256

The total Annual Cost Burden for this collection is \$798,256. Engineers and Surveyors are the primary public affected by this forms collection. They are hired by the developers or individual property owners to research, collect all necessary data, and analyze this information for the collection. Developers or individual property owners (or their representatives) are also involved for a brief review of the collection forms. In addition, the State, Local, or Tribal government representatives review the completed collection forms against their record and concur, if appropriate. The estimates provided are based on the burden involved for reviewing and/or completing the collection forms.

The burden rate assumed for the developer or individual property owners (or their representatives) to complete this form collection are based on average annual pay figures for the United States in 2005. According to the United States Department of Labor, Bureau of Labor Statistics, the average median hourly wage rate was \$14.15. This figure was used to determine the annual cost to the developer or individual property owners (or their representatives). The developer or individual property owners may be involved in reviewing and signing Form 81-89, "Overview and Concurrence Form". It is estimated that they will spend 420 hours (0.25 hours on each collection x 1,680 collection per year). The total annual responses for the developers or individual property owners (or their representatives) annual burden hours (420) was multiplied by the median hour rate for developer (\$14.15) to arrive at a total cost of \$5,943 for developers or individual property owners (or their representatives).

The burden rate assumed for State, Local, or Tribal governments is based on a "revealed preference" approach, as outlined in the October 4, 1999, OMB paper "Estimating Paperwork Burden" (available at <http://www.whitehouse.gov/omb/fedreg/5cfr1320.html>). The median hourly wage rate for a community official in 2004 was assumed to be \$50.00. The State/Local Community Officials owners are typically involved in reviewing and certifying Form 81-89, "Overview and Concurrence Form". In addition, as required in Form 81-89A, "Riverine Hydrology & Hydraulics Form", State/Local Community Officials may be required to provide public or individual notifications to impacted property owners of the increased hazards. It is estimated that they will spend 420 hours (0.25 hours on each collection x 1,680 collection per year) for Form 81-89 and 1260 hours (0.75 hours on each collection x 1,680 collection per year) annually for Form 81-89A notifications. The total annual responses for the State/Local Community Officials equals annual burden hours (1,680) was multiplied by the median hour rate for developer (\$50.00) to arrive at a total cost of \$84,000 for community officials.

The burden rate assumed for Engineers and Land Surveyors to complete this form collection is based on the average annual pay figures for these professions, according to the United States Department of Labor, Bureau of Labor Statistics. The median hourly wage rate for a surveyor in 2005 was \$22.05, and for an engineer was \$31.82.

All collections would require an engineer's involvement, but may not require a surveyor's service. Therefore, for burden computation, we utilized the engineer's wage. It is estimated that they will spend 840 hours (0.5 hours on each collection x 1,680 collection per year) for Form 81-89 and 4,620 hours (2.75 hours on each collection x 1,680 collection per year) annually for Form 81-89A notifications. For the remainder of the forms, engineers will be only involved with these collections. Therefore, engineers will spend $(840+4,620+11,760+1,680+1,680+1,680=)$ 22,260 hours annually for this collection. At the median hourly rate of \$31.82 for engineers, this collection will cost \$708,313.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

The cost to developers for engineers and/or land surveyors services is estimated to range from \$10,000 to \$25,000, depending on the scope of the project. The engineers and/or land surveyor service includes scoping, surveying cross-sections, developing hydrologic and hydraulic analysis, and preparing work maps and reports documenting the engineering analysis and results. The average cost to developers for engineers and/or land surveyor services is estimated to be \$17,500 however; it would likely vary on a property by property basis. The annual cost to 1,680 respondents multiplied by an average cost of \$17,500 is estimated to be approximately \$29.4 million.

Recordkeeping burden is minimal and considered usual business practice for communities. This is the requirement for each community to keep on file all supporting analyses and documentation used to support a determination that property (land or structures) are "reasonably safe from flooding" [as referenced in §65.5(a)(4)(ii), §65.:(a)(5), §65.6(a)(14)(ii), and §65.6(a)(15) - May 4,2001, Final Rule (Vol. 66, No. 87, pages 22442 - 22443)].

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

There is no cost to respondents for Operation and Maintenance.

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 is no Capital and Start-up Cost for this collection.

Annual Cost Burden to Respondents or Record-keepers

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

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Description below.]	\$18,500
Staff Salaries [1 GS12 employee spending approximately .5% of time annually (\$63,809 per year) time to the review, coordination, and approval of the final submission for MT-2 forms.]	\$3,190
Facilities [cost for renting, overhead, ect. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
Printing [32,500 MT-2 annually]	\$21,360
Postage [mailing 500 MT-2 forms as requested]	\$200
Other	\$0
Total	\$43,250

The contractor costs are estimated to be \$18,500. This cost includes call center staff responding to an average of 3,200 calls per year that pertain to this collection. Most of

these calls are from respondents who require assistance with completing the forms and interpretation of the instructions. Based on historical call center data, calls pertaining to the forms lasts an average of 6 minutes. Based on an average loaded rate of \$50.00 per hour, the contractor costs for responding to these calls is \$16,000. The contract costs associated with completing and submitting required documents for this collection is estimated to be \$2,500. This includes 50 hours and is based on an average loaded rate of \$50.00 per hour.

Staff salary cost is estimated to be \$3,190. This cost includes one GS 12 government employee dedicating five percent of their time to the review, coordination, and approval of the final submission for MT-2 forms.

The postage cost for mailing 500 MT -2 forms and an instruction, as requested, is estimated to be \$200 based on a postage cost of \$0.39 per mailing.

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

A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours

Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Adjustment (hours currently on OMB Inventory)	Adjustment (New)
FEMA Form 81-89 Series			20,880	24,360
Difference				+3480
Total(s)				+3480

Explain: Annual burden hours due to additional responses.

Itemized Change in Annual Cost Burden				
Data Collection Activity/Instrument	Program Change (Old Cost Burden)	Program Change (New)	Old Cost Burden	Adjustment (New)
FEMA Form 81-89 Series	0	0	\$25,200,000	\$29,400,000
Difference				+\$4,200,000
Total(s)				+\$4,200,000

Explain: Annual burden hours due to additional responses.

The total number of respondents for this collection has changed to 1,680 and the total annual number of responses 10,080. Although the mix of complexity of a determination request has been stable over the years, there is no way of predicting with absolute certainty the number of determinations that will be requested in a given year.

The total burden hours increased from 20,880 to 24,360 (+3480) hours. This increase is due to increase in the number of respondents for this collection. This has caused a program adjustment of +3480 hours.

The annualized cost to 1,680 respondents multiplied by an average cost of \$17,500 is estimated to be approximately \$29.4 million annually. This cost is attributed to the cost to developers for the services of a license surveyor or engineer to conduct the analyses required for this information collection.

During September of 2005, the nation was impacted by Hurricane Katrina. The Terms of Clearance for this collection required an evaluation of the impact, if any, to this forms collection. There have been no regulatory or statutory changes that have affected this collection and consequently no changes in burden hours or annual responses.

As a lesson learned, FEMA is now re-evaluating accredited levees where new flood hazards studies are underway. However, this has no impact on this collection.

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.

The results of information collections will be made in accordance with NFIP regulations 44 CFR Parts 65 will not be published for statistical use.

17. If seeking approval not to 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 the certification statement referenced above.