

August 17, 2007

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 - 0030**

**Title: Request for the Site Inspection, Landowners Authorization/  
Ingress/Egress Agreement**

**Form Number(s): FEMA Form 90-1 and FEMA Form 90-31**

### **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.**

44 CFR Part 206.117 provides the requirements for disaster-related housing needs of individuals and households who are eligible for temporary housing assistance. Section 408(a) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act P.L.100-707 authorizes the President to provide mobile homes and other readily fabricated dwellings to eligible applicants who require temporary housing as a result of a major disaster. Accordingly FEMA forms 90-1, Request for the Site Inspection and 90-31, Landowner's Authorization Ingress-Egress Agreement are designed to: (1) ensure sites for the temporary housing units will accommodate the unit and comply with local, State and Federal guidelines and regulations regarding the placement of the unit; (2) ensure the landowner, if other than the applicant receiving the unit, will allow the unit to be placed

on the property; and (3) ensure that routes of ingress and egress to and from the property are maintained.

**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 Form 90-1, Request for Site Inspection is used to ensure that the proposed housing unit sites are evaluated to ensure site feasibility, including a determination whether the site is located in a floodplain. FEMA Form 90-31, Landowners Authorization/Ingress-Egress Agreement, is used to obtain approval from the property owner if other than the applicant for (1) placement and (2) transportation of the housing unit through adjacent properties in order to place and remove the housing units. The implementation of this portion of the Temporary Housing Program (Disaster Housing Program) is implemented when the local infrastructure of a local area under a disaster declaration has no rental resources available. This would be in the form of hotels, apartments and or rental homes. Personnel assigned to use these forms are members of Individual Assistance Group located within the Joint Field Office (JFO) for the purpose of housing disaster applicants.

**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.**

At present there are no circumstances that would call for the collections to be handled through the use of automated, electronic, mechanical or using any other technology. The forms are the most efficient way to ensure specific information is collected, recorded and evaluated to reduce the Governments exposure to liability currently.

**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.**

Duplication of benefits may occur when an applicant has additional living expenses insurance benefits to cover the cost of renting alternate housing. In these instances, FEMA may provide a temporary housing unit if adequate alternate housing is not available, or if doing so is the best interest of the household and the government.

**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 does not impact 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.**

If this collection of information is not conducted FEMA would not be able to provide or authorize temporary housing assistance to eligible individuals and households displaced by a disaster. Therefore; FEMA would be in violation of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (P.L. 93-288, as amended, Section 408, Federal Assistance to Individuals and Households.

**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 this 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.**

Respondents are not required to prepare a written response to this collection of information in fewer than 30 days after receipt of it.

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

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 by mandate to retain records but are advised by representatives to retain all documentation for 3 years after the date of filing their individual applications. Inspectors are not required or authorized to retain records. All pertinent information is the property of the US Government.

**(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 involve 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 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 that is not supported by authority established in statute or regulation.

**(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 secret, or other 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 Register Notice was published on May 8, 2007, volume 72, number 88, page 26140-26141. There were no comments received for this information collection. However; the 30-day federal register notice was amended to capture miscalculated burden hour estimate published in the 60 day Federal Register Notice.

**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 not sought consultation with other government or private agencies regarding the information specific to these documents in reference to availability of data, frequency of collection, clarity of instructions, recordkeeping, disclosure or reporting format due to the unique nature of the information collected and of the Temporary Housing Program. No other entity employs or manages similar programs.

**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.**

Any site upon which FEMA place housing units must comply with applicable State and local codes and ordinances, as well as 44 CFR part 9, Floodplain Management and protection of Wetlands, and 44 CFR Part 10, Environmental Consideration, and all other applicable environmental laws and Executive Orders. FEMA will provide guidance and interpretation to meet specific needs through over-site functions. As determined necessary, monitoring and over-site functions will include on-site programs reviews by FEMA.

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

There are no payments or gifts to respondents for this information collection.

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

A Privacy Threshold Analysis (PTA) was prepared and submitted to DHS for review on July 12, 2007, due to Privacy Act information related to individuals and landowners.

**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 required for 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.

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.

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 = Ax B)	(E = CxD)
FEMA Form 90-1, Request for the Site Inspection (Applicants and Site Inspectors)	117,071	1	10 minutes	117,071	19,512
FEMA Form 90-31, Landowner's Authorization Ingress-Egress Agreement (Landowners and Applicants)	117,071	1	10 minutes	117,071	19,512
<b>TOTAL</b>	<b>117,071</b>	<b>1</b>	<b>20 minutes</b>	<b>234,142</b>	<b>39,024</b>

**Note: The 30-day federal register notice was corrected to capture miscalculated burden hours published in the 60-day federal register notice.**

FEMA has estimated that the burden hour to Landowners, site inspectors and applicants to review and complete FEMA Form 90-31 is estimated to be 10 minutes. Landowners and Site Inspectors must review and complete the landowner's agreement with the applicants for placement and/or the removal process for housing units and utility access and installation. FEMA has estimated that the burden hour to complete FEMA form 90-1 is 10 minutes. The form is completed by FEMA site inspectors and disaster applicants for site inspections of properties. FEMA site inspectors must complete and review site utility information on the form with applicant. Although applicants burden for completing these forms are minimal, FEMA site inspectors and landowners must ensure that the applicant is present when completing the forms. **Both forms are required to receive temporary housing assistance.**

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 for Hour Burden

Respondent's Occupational Category	Total Annual Burden Hours	Mean Hour Rate (\$)	Average Cost per Respondent (\$)	Total Annual Cost Burden (\$)

<b>Individuals and Households</b>	<b>19,512</b>	<b>\$18.84</b>	<b>\$3.14</b>	<b>\$367,606.08</b>
<b>LandOwners</b>	<b>19,512</b>	<b>\$25.14</b>	<b>\$4.19</b>	<b>\$490,531.68</b>
<b>Total</b>	<b>39,024</b>	<b>\$37.68</b>	<b>\$7.33</b>	<b>\$858,137.76</b>

*Note: The supporting statement was amended to capture miscalculated burden hour cost published in the 60-day Federal Register Notice.*

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the mean hour wage rate for Individuals and Households is estimated to be \$18.84 and for Landowners \$25.14, therefore, the estimated burden hour cost to respondents is = \$858,137.76 annually. Site inspectors are FEMA employees therefore their burden hour cost will be to the government.

**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:**

Respondents are advised by representatives to retain all documentation for 3 years after the date of filing their applications. Inspectors are not required or authorized to retain records. There is no additional cost burden to respondents for record keeping as a result of this collection. Applicants are not required to pay for site inspections; this is done as part of the Temporary Housing Program Site Inspection Process.

**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.**

FEMA has estimated the annualized cost to the government utilizing the US Office of Personnel Management Salary Table under the following formula for the personnel involved in the collection and processing of the 90-1 and 90-31. For Estimated annual staff salaries 300 GS 11, Step 5 employees spending approximately 40 hours a week doing site inspections and processing 117,071 at \$25.51 per hour = \$53,238.00 per employee annually = \$15,971,400.00. The cost of printing these forms is \$600.00. The total annualized cost to the government is \$15,972.000.00.

<b>ANNUALIZED COST TO THE FEDERAL GOVERNMENT</b>	
<b>Item</b>	<b>Cost (\$)</b>
Contract Costs [Specify what is for and what is included, i.e. S/W development, survey, etc.]	0
Staff Salaries [State number of employees involved, GS-level, Time spent w/ this collection] Additional information contained in above statement	\$15,971,400.00

Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing	\$600
Postage	0
Other	0
<b>Total</b>	<b>\$15,972,000.00</b>

**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.**

#### **Itemized Changes in Annual Burden Hours**

<b>Data collection Activity/Instrument</b>	<b>Burden Hours Currently on the OMB Inventory</b>	<b>Adjustment (New)</b>	<b>Difference</b>
FEMA Form 90-1	167	19,512	+19,345
FEMA Form 90-31	200	19,512	+19312
<b>Total(s)</b>	<b>367</b>	<b>39,024</b>	<b>+38,657</b>

The adjustment in burden hours for this collection has increased from 367 hours to 39,024 hours (+38,657). The number of responses for this collection has increased from 1,200 responses to 234,142 (+232,942). Although the hour per response for FEMA Forms 90-1 and 90-31 has not changed, the burden increase was estimated based on the results of the massive devastation from hurricanes Katrina and Rita, which caused difficulties in acquiring suitable individual housing. These total hours do not indicate normal burden hours associated with the Temporary housing program. These estimates represent an extreme case Burden during a catastrophic disaster.

#### **Itemized Change in Annual Cost Burden**

<b>Data Collection Activity/Instrument</b>	<b>Old Adjustment Cost Burden</b>	<b>Adjustment (New)</b>	<b>Difference</b>
<b>Individuals and Households</b>	<b>0</b>	<b>\$367,606.08</b>	<b>+\$367,606.08</b>
<b>Landowners</b>	<b>0</b>	<b>\$490,531.68</b>	<b>+\$490,531.68</b>
<b>Total(s)</b>	<b>0</b>	<b>\$858,137.76</b>	<b>+\$858,137.76</b>

The burden hour cost to respondents was not captured during the last OMB submission. The estimated burden hour cost to respondents, using wage rate categories is estimated to be \$858,137.76 annually.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no outline plans for tabulation and publication of data for this information collection.

**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 date for OMB approval.

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

This collection does not seek exception to "Certification for Paperwork Reduction Act Submissions". This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable".

## **B. Collections of Information Employing Statistical Methods.**

**THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION.**