

December 14, 2007

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 -0072

Title: Mitigation Grant Program/eGrants

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. 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.

This collection of information is necessary to implement the Flood Mitigation Assistance (FMA) grant program authorized by National Flood Insurance Reform Act, 42 U.S.C. 1366, as amended by the Bunning-Bereuter-Blumenauer Flood Insurance Reform Act of 2004, P.L. 108-264. The FMA program is designed to award grants to States, and NFIP-participating communities and Indian tribal governments, so that measures are taken to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insurable under the National Flood Insurance Program (NFIP).

The Pre-Disaster Mitigation (PDM) Program as authorized by Section 203 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 of 2000 (DMA), Public Law 106–

390, 114 Stat. 1552, provides grants to States, territories and Indian tribes for cost-effective mitigation actions prior to a disaster event to reduce overall risks to the population and structures, while also reducing reliance on funding from actual disaster declarations.

The Repetitive Flood Claims (RFC) grant program authorized in 2004 under the Bunning-Bereuter-Blumenauer Flood Insurance Reform Act of 2004 (P.L. 108-264), 42 U.S.C. 4030 authorized up to \$10 million annually to award grants for actions that reduce flood damages to individual properties for which one or more claim payments for losses have been made. The RFC program collects the same information as the PDM and FMA programs.

The Severe Repetitive Loss (SRL) grant program was authorized in 2004 under P.L. 108-264; however funds were not appropriated until FY 2006. The SRL program authorizes up to \$40 million annually to award grants for actions that reduce or eliminate the long-term risk of flood damage to residential properties insured under the National Flood Insurance Program (NFIP), that meet the definition of severe repetitive loss property.

The Federal Emergency Management Agency (FEMA) is requesting approval for OMB No. 1660-0072, Mitigation Grant Program (e-Grants) combined with OMB No.1660-0071 Pre-Disaster Mitigation Grant Programs (PDM), the Repetitive Flood Claims (RFC) and Severe Repetitive Loss (SRL) collections. To better reflect all of the Mitigation e-Grants programs, this Information Collection Request (ICR) have been renamed, Mitigation Grant Program (e-Grants).

The information collection approval does not supersede the paper-based collection. Applicants may apply either via the e-Grants application, accessible on the Internet at <https://portal.fema.gov>, or via the OMB-approved FEMA Grant Administration forms under the approved collection OMB No. 1660-0025.

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 e-Grants application includes the information necessary for FEMA to assess the financial needs of the applicants as well as the projected benefits to be obtained from the use of grant funds for each of its mitigation grant programs. The application will provide FEMA the required information to determine whether the mitigation activity proposed for funding meets eligibility criteria, including a benefit-cost analysis and environmental review. In addition, the applicant will provide FEMA responses to established questions which, combined with the activity eligibility criteria, will be used to objectively evaluate its merits.

The State will use the sub-grantee application for grant assistance to recommend to FEMA the use of limited grant funds. Sub-grantees will be accountable to the grantee for

any collection of information required under the laws and procedures established by that State or Indian tribal government, and will be responsible for providing proprietary information to the grantee on sub-grants funded through the State or tribal government. A Tribe may apply as either a grantee or sub-grantee, and will be required to meet the grant application, reporting and planning requirements of a State or local government depending on their applicant status.

Regulations for each of FEMA mitigation grant programs requires 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 award made to the Grantee by FEMA. Grantees also are responsible for documenting and reporting to FEMA that program funds are used in accordance with the Act and program guidance. FEMA will review the Grantee's quarterly reports to ensure the activities are progressing on schedule and to track the expenditure of funds. Any delays to the implementation and completion of grant awards must be noted in the quarterly report, including an explanation of the reason for the delay and a revised work schedule. The Grantee will review reports from local communities to ensure sub-grant projects are progressing on schedule and funds are being used appropriately. Sub-grant applicants (e.g., local communities) 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. Sub-grant applicants do not report to FEMA.

The information collection activity under OMB Control Number 1660-0025 is the paper-based collection of financial, program, and administrative information from States and local governments pertaining to grant agreements. FEMA will use the information – transmitted either by paper using the FEMA Grant Administration Forms approved under OMB Approval Number 1660-0025 or by Mitigation e-grants system to evaluate applications and make award decisions, monitor ongoing performance and manage the flow of federal funds, and to appropriately closeout the grant award when all work is completed. The use of electronic submission will expedite the review time for FEMA, and enable Grantees to receive approved awards in a timely manner.

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 e-Grants system initiative continues to be developed to meet the intent of the E-Government initiative, authorized by Public Law 106–107 passed on November 20, 1999 requires that all government agencies both streamline grant application processes and provide for the means to electronically create, review, and submit a grant application via the Internet. The grant application package requirements generally employ FEMA forms that are available in electronic file format and that can be accessed using the standard software package in e-Grants. In addition, the e-Grants Grant application includes a Sub-grant Application for each project, planning or technical assistance activities; The Sub-

grant Application includes the Benefit-Cost Determination, Environmental Review, and Project Narrative. Grant and sub-grant applicants are encouraged to use electronic means, such as e-Grants, for submitting required information to FEMA for review.

Phase I of e-Grants includes information to complete the applications, program and budget narratives and grant awards.

Phase II of e-Grants includes the electronic processing of quarterly financial performance reports, including both financial status and program performance. Grantees may submit their quarterly financial status reports and closeout reports using the electronic version of FEMA Form 20-10, or by using the paper-based FEMA Form 20-10. Grantees may submit their quarterly performance reports and closeout performance reports electronically via email using standard word-processing or spreadsheet software, or via e-Grants.

Phase III e-Grants collection will be developed to facilitate the electronic administration of grants to include outlay reports (item m above), property management, closeout of grant awards and audit requirements. Included in eGrants for closeout are program performance reports to determine the outcome of mitigation activities and their impact on potential disasters.

For the first cycle, there were a high percentage of sub-grant applicants using e-Grants (59%) versus paper (41%). Since 2004, 100% of all grant applications and sub-grant applications for the PDM and FMA programs have been submitted via eGrants. This demonstrates a preference for e-Grants that include a 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 e-Grants application electronically records the data entered, and eliminates the need for re-entry of the same data for communities and States that apply more than once, or in subsequent years. This reduced potential duplicated efforts of grant and sub-grant applicants when applying for funding for proposed mitigation activities.

The combining of OMB No. 1660-0071 and 1660-0072 streamline and simplify OMB's documentation of the same information collected for different Mitigation grant programs. This effort will reduce the need for multiple reviews of grant information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

The information collection for grant applications will have no impact on small businesses since they are not eligible applicants. Although small businesses are not eligible to apply for directly to FEMA for mitigation grant funds, local communities may submit a sub-grant application to the Grant applicant on their behalf.

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.

Without this collection activity, FEMA will not be able to implement its mitigation grant programs for future fiscal years of the FMA, PDM, SRL and RFC programs under the authorization of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 USC 5133, for PDM, or the National Flood Insurance Reform Act and FEMA will be unable to collect applications from Grantees and sub-grantees or quarterly reports in a uniform format. As a result, FEMA will be unable to expend its annual appropriations of approximately \$240 million for these programs, authorized up to \$150 million for PDM, \$40 million for FMA, \$40 million for SRL and \$10 million for RFC.

Without the approved web-based e-Grants management system for its mitigation grant programs, FEMA will also reduce its capabilities to support information sharing, data collection, records management and financial management, and will be inhibited in its ability to accurately report the status of its programs to Congress or DHS. In addition, FEMA would not be able to provide appropriate oversight to the grantees; ensure that awarded funds are being used appropriately; ensure that funded activities are proceeding in accordance with the conditions of the sub-grant awards; and demonstrate that the grant program is effective in mitigating the risks of natural and technological hazards on life and property.

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 to FEMA 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.

This collection does not require respondents to prepare a written response to a 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.

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

(d) Requiring respondents to retain records, other than health,

medical, government contract, grant-in-aid, or tax records for more than three years.

FEMA is required to track the use of real property acquired with grant funds in order to ensure that the property is maintained for open space use in perpetuity. Sub-grant applicants and Grantees will need to retain real estate transaction and property tracking records indefinitely, but these are maintained as part of the real property deed records, and therefore do not create an additional burden. FEMA will employ e-Grants to maintain its records of properties mitigated, but FEMA does not require the States or sub-grant applicants to utilize e-Grants for this purpose after the grant has been closed. Otherwise, grantees are not required to maintain 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 are no statistical surveys involved in this collection.

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

There are no statistical data classifications used with this 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.

This collection does not require the respondent to submit any pledge of confidentiality not supported by authority 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 the respondent to submit proprietary trade secrets 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.

An Interim Final Rule was published on October 31, 2007, volume 72, number 210, Pages 61720-61750 for this collection. The Interim Final Rule for Flood Mitigation Grants and Hazard Mitigation Planning is amended to streamline and simplify documentation of information collected for all mitigation e-Grants Program under this collection. A 60-day Federal Register Notice was also published for this collection on September 28, 2007, volume 72, number 188, Page 55239-55240. There were no comments received under this notice for this information collection. A 30-day Federal Register Notice was also published for this collection on December 6th, 2007, volume 72, number 234, Page 68891.

b. Describe efforts to consult with persons outside the agency to obtain their view 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 invited State/local representatives and national organizations such as National Association of Towns & Townships, National Association of Counties, American Planning Association, Environmental Protection Agency, to participate in formal and informal discussions for FEMA mitigation grant programs. FEMA continue to consult with interested parties on a regular basis.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA has involved State representatives (as nominated by the National Emergency Management Association (NEMA)) in formal requirements gathering sessions regarding data collection and electronic data processing for FEMA mitigation grant programs. Specifically, these stakeholders have contributed input into the development of the e-Grants system. FEMA will consult with interested parties on a regular basis in the future.

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

This collection does not provide payments or gifts 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 is subject to the Privacy Act of 1974, and applicants are advised of FEMA's privacy policy through the "Privacy Policy" on the bottom of the e-Grants Mitigation screen. The National Emergency Management Information System – Mitigation Electronic Grants Management System (NEMIS-MT e-Grants) was published

in the Federal Register on Wednesday, December 15, 2004 (Vol. 69, No. 240, pp 75079-75081). This notice describes the type of personally identifiable information that FEMA proposes to collect from eligible Applicants/States and sub-applicants/local communities of FEMA mitigation grants, and identifies the routine uses to provide notice about routine management and oversight information sharing. Further, the Notice identifies the security safeguards and compliance measures in e-Grants to ensure that all personally identifiable information contained in e-Grants is sufficiently protected against unauthorized access or misuse of data. The Privacy Impact Assessment (PIA), dated January 19, 2007, that supports this System of Record Notice, is posted on the Department of Homeland Security website at www.dhs.gov.

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 that are commonly considered private.

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.

All sections of the e-Grants applications, both the Grant Application and Reporting Forms and the Grant Supplemental Information, are the same for all mitigation grant programs. The estimated burden for this Information Collection Request (ICR) submission is 56 respondents, 5,264 responses and a total of 43,848 total annual burden hours.

Grant Supplemental Information – Sub-Grant Applications					
Data Collection Activities/ Instrument	Number of Respondents (A)	Frequency of Responses (B)	Hours Burden per Response (C)	Annual Responses (D=A*B)	Annual Burden Hours (E=C*D)
FMA					
Benefit-Cost Determination	56	2	5 hours	112	560
Environmental Review	56	2	7.5 hours	112	840
Project Narrative – Sub-grant Application	56	4	12 hours	224	2,688
Subtotal FMA	56			448	4,088

The limited funding for the **FMA** program will not permit approval of a large number of applicants. The number of respondents is estimated to be 56 eligible State, Territories to Indian Tribal applicants, with an estimated 4 sub-grant applications per State, or 224 responses per year.

RFC						
Benefit-Cost Determination		56	1	5 hours	56	280
Environmental Review		56	1	7.5 hours	56	420
Project Narrative – Sub-grant application		56	2	12 hours	112	1,344
Subtotal RFC		56			224	2,044

Limited funding of the **RFC** program will not permit approval of a large number of applicants. Therefore, the number of respondents is estimated to be 56 eligible State, Territories or Indian Tribal applicants, with 2 sub-grant applications per State, or 112 total responses per year.

SRL					
Benefit-Cost Determination	56	7	5 hours	392	1,960
Environment Review	56	7	7.5 hours	392	2,940
Project Narrative-Sub-grant Application	56	8	12 hours	448	5,376
Subtotal SRL	56			1,232	10,276

This amendment to include the newly authorized Severe Repetitive Loss (**SRL**) Program will increase the estimated burden for this information collection.

PDM					
Benefit-Cost Determination	56	20	5 hours	1,120	5,600
Environmental Review	56	20	7.5 hours	1,120	8,400
Project Narrative – Sub-grant application (including PDM Evaluation Information Questions ⁵)	56	20	12 hours	1,120	13,440
Subtotal PDM	56			3,360	27,440

The number of respondents is estimated to be 56 eligible State, Territories or Indian Tribal applicants, with up to 20 sub-grant applications per State, or 1,120 responses per year.

The following burden hours for PDM have been removed from this collection (-23592.8 and captured in the parent information collection for FEMA Grant Administrative Forms. PDM (OMB No. 1660-0071) will be discontinued as a separate collection and combined into this revised collection, 1660-0072, Mitigation Grant Program/e-Grants. The following FEMA Grants Administration Forms below is an optional method for submission of paper-based applications for PDM. These forms/burden hours have been removed from this submission and captured under the approved OMB collection 1660-0025, FEMA Grant Administration Forms.

Type of Collection Forms	Number of Respondents (A)	Frequency of Responses (B)	Number of Responses C = (A*B)	Hours Per Response and Record keeping (D)	Annual Burden Hours E=(C*D)
PDM					
SF-424	56	2	112	0.75	84
FEMA Form 20-10	56	8	448	1	448
FEMA Form 20-16, 20-16A, 20-16B, 20-16C	56	2	112	9.7	1086.4
SF-LLL	56	2	112	0.17	19.04
FEMA Form 20-18	56	2	112	4.2	470.4
FEMA 20-19	56	2	112	0.08	8.96
FEMA Form 20-20	56	2	112	9.7	1086.4
FEMA Form 76-10A	56	2	112	1.2	134.4
FEMA Form 20-15	56	1	56	17.2	963.2
FEMA Form 20-17	56	20	1120	17.2	19264
Annual Audit & Audit Trail Requirements	56	1	56	0.5	28
Total					23592.8

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 Hour Burden					
Data Collection Activity/Instrument	No. of Respondents	Frequency of Responses	Hour Burden Per Response	Annual Responses	Total Annual Burden Hours
	(A)	(B)	(C)	(D) = (AxB)	(CxD)
Benefit Cost Determination	56	30	5	1680	8,400
Environmental Review	56	30	7.5	1680	12,600
Project Narrative Sub-grant Application	56	34	12	1904	22,848
TOTAL	168			5264	43,848

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.

The total annual estimated costs to States and Indian Tribal governments for information collection associated with the mitigation grant programs is \$1,163,287.40. This calculation is based on the number of annual burden hours for wage rates for Urban and Regional Planners, responsible for collecting the information or completing the e-Grants information at the State level. FEMA determined wage rates using data from the U.S. Department of Labor, Bureau of Labor Statistics (BLS). The BLS data indicate that the median hourly earnings of Urban and Regional Planners are \$26.53 per hour.

Annual Cost to Respondents for Hour Burden

Respondent's Occupational Category	Total Annual Burden Hours	Mean Hour Rate (\$)	Total Annual Cost Burden (\$)
Urban and Regional Planners	43,848	\$26.53	\$1,163,287.40
Total	43,848	\$26.53	\$1,163,287.40

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 is not cost burden to respondents or record-keepers resulting from this information collection.

The cost estimates should be split into two components:

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

There is no operation and maintenance cost for this information collection.

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 information 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 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.

System enhancements to the existing system will continue into future years, at an average cost to FEMA of \$750,000 per year in contract costs.

FEMA Headquarters and Regional staff will be responsible for awarding mitigation grants to States and Indian Tribal governments, reviewing and evaluating all grant applications, monitoring the grants administration and grants management practices of the grantee, and conducting enforcement activities. The average annualized cost to the Federal Government to manage the mitigation grant programs is estimated to be a contract cost of \$750,000 and a full-time staff per Region and 3 full time staff at FEMA headquarters have been dedicated to supporting these mitigation programs, for an annualized cost to the Federal government of approximately \$2 million.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT	
Item	Cost (\$)
Contract Costs [system development; IT Helpdesk]	\$750,000
Staff Salaries [13 GS employees spending approximately 100% of time managing mitigation grant programs]	\$2,000,000
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing	0
Postage	0
Other	0
Total	\$2,750,000

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.

The burden hours in the table for Grant Program “PDM” in Question 12a above, (previously part of OMB No. 1660-0071, Pre-Disaster Mitigation Grant Program) was miscalculated in the last OMB submission. The total burden hours for Grant PDM

(+50,887) captured during the last OMB submission was incorrect. The total burden hours should have been +51,032.8 (the 145.8 difference due to math error on prior submission). This grant breaks down into the financial component that is now part of collection OMB No. 1660-0025 (FEMA Grants Administrative Forms) of 23,592.8, leaving a total of 27,440 hours retained in OMB No.1660-0072 (Mitigation Grant Programs e-Grants submission). An additional program change of +10,276 hours have been included in this data collection to capture the new SRL program, therefore an increase of +37,716 total burden hours are included in this data collection submission.

Also, the original submission (with FMA & RFC) there was an increase in responses of 672 vs. 484 (previously approved). The previously approved amount of 484 was incorrect; the correct number of responses for FMA (456 hours) and RFC (204) was a total of 660. The new numbers of responses for this collection are 672, an actual increase of 12, not the 188 if comparing the previously approved amount against the currently submitted value. The previously approved burden hours for this collection was 6,172, and this was incorrect due to a math error in the total number of burden hours for RFC (submitted as 2,084 hours but adding $280 + 420 + 1,344 = 2,044$, not 2,084). The correct total burden hours for the prior submission should have been 6,132, which match the current number of burden hours for these two grants (see tables for grants FMA and RFC in Question 12a above). The current submission for number of burden hours for FMA is 43,848, which represents the 6,132 hours for FMA and RFC, along with addition of SRL (10,276) plus the addition of the administrative burden hours for PDM (27,440).

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 plans to tabulate or publish the results of this collection.

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.

B. Collections of Information Employing Statistical Methods.

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION