

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0004

Title: Application for Participation in the National Flood Insurance Program

Form Number(s): FF-81-64

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 National Flood Insurance Program (NFIP) is authorized by Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973). Communities must make application for eligibility in the program by submitting the items listed on the enclosed prerequisites for the sale of flood insurance which is taken from section 59.22 CFR 44 of the NFIP regulations. Section 201 of the Flood Disaster Protection Act of 1973 requires all flood prone communities throughout the country to apply for participation one year after their flood prone identification or submit to the prohibition of certain types of Federal and Federally-related financial assistance for use in their floodplains. The information collected on the NFIP Application pertains to two general categories of information. One is simple community contact information such as the name of local officials, address,

phone number, etc. which will be used for future contact. The second category of information pertains to demographic characteristics such as the number of structures in the community and the number of structures in the floodplain. This information is used to provide basic background information about the community's risk to flooding.

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 is collected from communities wanting to join the NFIP. Local floodplain administrators fill out the application and mail it to a FEMA Regional office, which then processes and forwards the application to the national office. The application is then used to enroll the community into the NFIP. The NFIP provides flood insurance to communities that apply for participation and make a commitment to adopt and enforce land use control measures that are designed to protect development from future flood damages. The NFIP Application form will enable FEMA to continue to rapidly process new community applications and to thereby more quickly provide flood insurance protection to the residents of the communities.

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.

Since the NFIP Application serves as a cover sheet containing information about a community joining the NFIP and it is viewed by several parties and is a one-time action, there is minimal value in making it available for completion through electronic formats. The blank application form itself is available on URL <http://www.fema.gov/library/viewRecord.do?id+2557>, to be downloaded and they subsequently completed by hand.

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 efforts involved with this data collection.

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.

There are no impacts to small business or other small entities in this data 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 collection of information is not conducted, FEMA Form 81-64 would not be able to capture the essential information to approve community participation in the National Flood Insurance Program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

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

Respondents are not required to report information 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 written responses in fewer than 30 days.

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

There is no requirement for respondents to submit more than an original and two copies of any document in 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.

Under 44 CFR 59.22(a)(9)(iii) and 60.6(a)(6), FEMA requires that communities participating in the NFIP maintain records of development taking place in the flood hazard areas within the community. These records would include but are not limited to any application documentation, floodplain development permits issued, certificates of flood proofing, information on the elevation of the lowest floor of all new or substantially improved structures, any variance actions including justification for their issuance, and demographic changes within the flood-prone areas of communities. This information assists FEMA to evaluate the effectiveness of a community's floodplain management program. The information should be retained permanently.

(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 methodology.

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

There is no statistical data classification not approved by OMB involved in 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 information 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.

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this data collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice was published for comments on September 11, 2007, volume 72 number 175, Page 51829. There were no comments received for this information collection.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

There is no formal consultation with persons external to FEMA or the NFIP has been conducted.

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.

State NFIP coordinators provide technical assistance to local officials when a community expresses interest in joining the NFIP. They assist the local official in completing the application form and any other required data. The NFIP State coordinators find the application process acceptable.

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 payment or gift to respondents.

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

FEMA does not offer assurances of confidentiality to its respondents for this information collection.

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 contain 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.

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)
FF 81-64	187	1	4	187	748
TOTAL	187	1	4	187	748

Enrollments in the NFIP have increased by 37, according to the Community Information System (CIS), the official database for the NFIP.

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

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.

Annual Cost to Respondents for Hour Burden

Respondent's Occupational Category	Total Annual Burden Hours	Mean Hour Rate (\$)	Average Cost per Respondent (\$)	Total Annual Cost Burden (\$)
State Officials	187	\$21.83	\$87.00	\$16,328.00
Total	187	\$21.83	\$87.00	\$16,328.00

The estimated burden hour cost for State officials, using wage rate categories is estimated to be \$16,328.00, according to U.S. Department of Labor Bureau of Labor Statistics (www.bls.gov) website, State Level occupations for 2007.

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:

There are no start-up, capital, operational, or maintenance costs for 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 as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

ANNUALIZED COST TO THE FEDERAL GOVERNMENT	
Item	Cost (\$)
Staff Salaries (2 GS-12, x 360 hours for reviewing and processing data collection)	\$9,712
Facilities	N/A
Computer Hardware and Software	N/A
Equipment Maintenance	N/A
Travel	N/A
Printing	N/A

Postage	N/A
Other (Toll-free phone lines and fax machines)	N/A
Total	\$9,712

The Government’s labor cost for this collection is estimated to be \$9,712. This cost includes Federal staff time (2 FTE, GS-12), dedicating approximately 360 hours annually, for reviewing and data entry associated with this collection.

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.

According to the Community Information System (CIS), the official database for the NFIP, has an adjustment increase of 37 enrollments in the NFIP for the current reporting period. Due to this increase, the total burden hours have also increased from 600 to 748 (+148) hours.

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 \$16,328.00. This collection has an adjustment cost increase of +\$16,328.00.

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 data for OMB approval.

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

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

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.