

October 15, 2008  
August 13, 2009

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0017**

**Title: Public Assistance Progress Report and Program Forms**

**Form Number(s):** FEMA Forms (FF): 90-49, 90-91, 90-91A, 90-91B, 90-91C, 90-91D, 90-120, 90-121, 90-123, 90-124, 90-125, 90-126, 90-127, and 90-128

### 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.**

Under the Public Assistance (PA) Program, which is authorized by the Stafford Act, FEMA awards grants to assist State and local governments and certain Private Nonprofit (PNP) entities with the response to and recovery from disasters. Specifically, the program, under 44 CFR 206 (with the subsections listed below), provides assistance for debris removal, emergency protective measures, and permanent restoration of infrastructure. The Federal share of these expenses typically cannot be less than 75 percent of eligible costs. The program also encourages protection from future damage by providing assistance for hazard mitigation measures during the recovery process. The PA Program encourages planning for disaster recovery, but PA Program funds may not be

used for the costs of planning. The costs incurred to implement the plans are eligible for reimbursement only if they meet PA Program eligibility criteria. FEMA regulation 44 CFR, Section 206.204(f) requires progress reports to be submitted by the grantee to the Regional Director on a quarterly basis, for any debris clearance, emergency or permanent large projects. The RD and Grantee negotiate the date for submission of the first report. Progress reports will also describe work schedules for completion of work as described in 44 CFR, Section 206.204(c). Progress reports describe the status of those projects on which a final payment of the federal share has not been made to the grantee, and outline any problems or circumstances expected to result in noncompliance with the approved grant conditions. FEMA regulation 44 CFR Section 206.203(c) describes project funding for individual large and small projects. Funding for these projects is adjusted annually to reflect changes in the consumer Price Index for all Urban Consumers published by the Department of Labor. FEMA regulation 44 CFR, Section 206.203(d)(1) describes funding options for improved and alternative projects. If a sub-grantee desires to make improvements but restore the pre-disaster function of a damaged facility, the grantee's approval must be obtained. The federal funding for improved projects is limited to the federal share of the approved estimate of eligible costs. In any case where a sub-grantee determines that the public welfare would not be best served by restoring a damaged public facility or the function of that facility, the grantee may request that the Regional Director approve an alternate project.

Once FEMA has made a determination on an application or project, the applicant may appeal that determination. If an applicant seeks appeal, FEMA regulation 44 CFR, Section 206.206 requires an applicant to submit a request for appeal, and the Grantee (State) to submit a recommendation regarding the applicant's request. For those projects over \$500,000.00 resulting from Hurricanes Katrina or Rita (DR-1603, DR-1604, DR-1605, DR-1606, and DR-1607), applicants may seek arbitration in lieu of an appeal. To seek arbitration, applicants must submit a request for arbitration which may be accompanied by a recommendation from the Grantee (State). Arbitration is authorized by Section 601 of the American Recovery and Reinvestment Act of 2009 (P.L. 111-5).

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**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 is utilized by FEMA to make determinations for PA payments based on the information supplied by the respondents. The following listing provides the instances of information sharing and how the individual collection instruments provide necessary information for PA considerations.

**Progress Reports** outline scheduled work, highlighting problems and unforeseen circumstances that may occur as a result of the applicant's slippage in the established time limit associated with the restoration. The Governor's Authorized Representative (GAR) may use such reports to take action to eliminate the causes of delays and to

identify projects that may require time extensions. The GAR shall provide the Regional Director (RD) with copies of these progress reports together with comments and a report of action taken. Any changes in approved schedules must be justified by the applicant and approved by the GAR and by the RD.

**FF-49 Request for Public Assistance** – The *Request* asks for general information from the State (Grantee) that identifies the applicant and starts the grant process.

**FF 90-91 Project Worksheet (PW)** – FEMA or the applicant (sub-grantee), assisted by the State as appropriate will prepare a *PW* for each project. Federal funds are obligated to the State based on the approved *PW*. The State will then approve sub grants based on the *PWs* approved for each applicant.

**FF 90-91A Project Worksheet - Damage Description and Scope of Work Continuation Sheet** – FEMA or the applicant (sub-grantee) assisted by the State as appropriate will prepare a *PW* for each project. The scope of work is developed on the *PW* describing in detail the work necessary to return the facility to its pre-disaster design. The Project Worksheet - Damage Description and Scope of Work Continuation Sheet provides additional space for this purpose.

**FF 90-91B Project Worksheet - Cost Estimate Continuation Sheet** FEMA or the applicant (sub-grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Project Cost is developed on the *PW* estimating the cost for repair of the damages described in the Project Description of the *PW*. The Project Worksheet - Cost Estimate Continuation Sheet provides additional space to estimate the cost to restore the facility to its pre-disaster condition.

**FF 90-91C Project Worksheet - Maps and Sketches Sheet** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Project Worksheet – Maps and Sketches Sheet provides field personnel with specific information that enables the facility to be easily located should a site visit be necessary and damages to be described in terms of the function of the facility and its features, or items requiring repair, before work is accomplished because it can affect eligibility determinations.

**FF 90-91D Project Worksheet - Photo Sheet** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Project Worksheet – Photo Sheet provides field personnel with specific information that enables facility damages to be documented before work is accomplished because it can affect eligibility determinations.

**FF 90-120 Special Considerations Questions** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Special Considerations Questions may be used to record factors that could affect compliance with environmental resources, disaster assistance, and historic preservation legislation and Executive Orders on floodplain, wetlands, and environmental justice.

*The following forms are utilized on an as-needed basis that is dependent upon the type of disaster and the needs of the respondents resulting from each disaster.*

**FF 121 PNP Facility Questionnaire** – The PNP Facility Questionnaire, is used by FEMA and State personnel to help determine the eligibility of specific facilities to be approved as a private non-profit (PNP) organization.

**FF 90-123 Force Account Labor Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The Force Account Labor Summary Record may be used to record applicant personnel costs.

**FF 90-124 Materials Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The Materials Summary Record may be used to record the supplies and materials an applicant may take out of stock or purchase.

**FF 90-125 Rented Equipment Summary Record** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Rented Equipment Summary Record may be used to record the costs of rented or leased equipment.

**FF 90-126 Contract Work Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The Contract Work Summary Record may be used to record the costs or work that an applicant has done by contract.

**FF 90-127 Force Account Equipment Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The Force Account Equipment Summary Record may be used to record applicant equipment costs.

**FF 90-128 Applicant's Benefits Calculation Worksheet** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Applicant's Benefits Calculation Worksheet may be used to record the costs fringe benefits for force account labor.

**Request for First Appeal**– After receiving a determination from FEMA, the applicant may file a first appeal with the State, for eventual submission to FEMA. The request must indicate that the applicant wishes to appeal the determination made by FEMA concerning its application for public assistance, and must contain documented justification supporting the applicant's position, specify the monetary figure in dispute and the provisions of Federal law, regulation, or policy with which the applicant believes the initial determination was inconsistent. Once the State receives the applicant's request for appeal, the grantee reviews it and prepares a recommendation for FEMA. The letter

from the grantee includes a written recommendation on the merits of the applicant's appeal. The grantee also forwards to FEMA the applicant's Request for First Appeal.

Request for Second Appeal– If the applicant is dissatisfied with the result of the first appeal, it may seek a second appeal. To do so, the applicant again files a request through the grantee which explains the request and provides any documentation that the applicant feels is necessary to support its contention that FEMA's determination was incorrect. Once the State receives the applicant's request for second appeal, the grantee forwards it to FEMA and may also add its letter recommendation on the merits of the applicant's appeal.

Request for Arbitration– For determinations made after February 17, 2009 regarding projects over \$500,000.00 resulting from Hurricanes Katrina or Rita (DR-1603, DR-1604, DR-1605, DR-1606, and DR-1607), in the alternative to appeal, applicants may request arbitration of the disputed determination. To do so, the applicant must submit a Request for Arbitration in the form of a letter submitted to the Grantee, the arbitration administrator and FEMA. The Request for Arbitration must contain a written statement and all documentation supporting the position of the applicant, as well as the name and address of the applicant's authorized representative or counsel. For determinations made before February 17, 2009, if the applicant has an appeal pending with FEMA, the request must also indicate that the applicant wishes to handle the matter via arbitration and withdraw the appeal. For determinations made before February 17, 2009, which have become final agency actions, arbitration is not an option.

Recommendation for Arbitration– For applicants seeking arbitration, the grantee may submit a letter to FEMA in support or opposition of the applicant's request, if desired, which includes the name and address of the Grantee's authorized representative or counsel.

**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 Public Assistance (PA) Division, in conjunction with IT, developed the Emergency Management Mission Integrated Environment (EMMIE) a web-based application used for the PA grant process at <http://www.fema.gov/government/grant/pa/forms.shtm>. EMMIE is now available for use in all disaster as of July 1, 2008. EMMIE enables PA applicants to apply for federal disaster grant assistance via the Internet. It is estimated that once the online application is deployed, 75% of applicants will submit their applications online within 5 years and the remainder will use the traditional paper forms. We also anticipate that 50% of project worksheets will be submitted using EMMIE within 5 years. The program office will review the use of the electronic application system by the respondents as time progresses.

**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.**

This information is not collected in any other form, and therefore is not duplicated elsewhere.

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

This information collection does not have an impact on small businesses or 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.**

FEMA has statutory responsibility to administer federal disaster assistance response, including coordination with State and local governments and the accurate estimation of the amount and extent of damage in affected areas. Failure to collect this information would prevent FEMA from providing funds for recovery from disasters.

The Progress Report, Request for Assistance and Project Worksheet provides the Regional Director with the necessary information to help eliminate causes of delays or to grant extensions of time as required, identify the applicant and start the grant process, and obligate Federal funds to the State based on *Progress Worksheets*. The sub grantee's (local government) failure to submit the Progress Report, *Request for Public Assistance* or *Project Worksheets* could jeopardize its eligibility for grant assistance. If this information were collected less frequently, grantees could not obtain initial or final payment of the Federal cost share of a project.

Applicants who seek a reevaluation of a FEMA determination on their project or eligibility would be unable to do so should FEMA not collect requests for appeal or arbitration. FEMA's failure to offer an appeal or arbitration would violate section 423 of the Stafford Act and Section 601 of the American Recovery and Reinvestment Act of 2009.

**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.**

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

The Grantee must submit its written recommendation in support or opposition of the applicant's request for arbitration, if desired, within 15 calendar days of receipt of the applicant's request for arbitration. The Grantee's recommendation is optional, and not required for the applicant/subgrantee to obtain an arbitration review. In selecting 15 calendar days, FEMA is implementing the intent of the ARRA. The Act specifically requires the arbitration process to "expedite" recovery efforts from Hurricanes Katrina and Rita. A 15-calendar day time limit is intended to expedite the resolution of the applicant's or subgrantee's dispute. However, this 15-day time period should allow sufficient time for the Grantee to review the request and prepare a recommendation without delaying the arbitration process.

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

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

**(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.**

**(f) Requiring 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.**

**(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.**

#### **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 inviting public comments was published on May 13 2008, volume 73, number 93, Pages 27546-27547. There were no comments received for this information collection. See attached copy of the published notice included in this package.

The PRA notice requirement for the appeal and arbitration portions of this collection have been waived.

**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.**

Stakeholders of the process gather annually to discuss grant process as well as the PA program. Topics covered include the streamlining of the PA grant process as well as the related issues and program requirements. The results from these discussions are considered and appropriate changes are implemented.

**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.**

A FEMA/State Public Assistance Conference is held annually. State and local officials are invited to attend and share their views on the above collection of information. Also each FEMA Region conducts regular State Partnerships Meetings to discuss the Public Assistance Program with States local continuants.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) has been submitted for review regarding this 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.**

There are no 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.**

This collection of information requires the submittal of information from a Grantee/State who is the grant administrator for all funds provided under the Public Assistance Grant Program. The applicant's authorized local representatives is responsible for representing the applicant and for ensuring that the applicants have identified all eligible work and submitted all cost for disaster related damages for funding. FEMA has estimated that approximately 53 States and territories will review, consider and then submit a various number of project forms that they have received from sub-grantees for funding, **however, the actual number of project forms will vary from project to project**, therefore the number of responses may vary.

During the event of a disaster, FEMA has required that State submit quarterly (4) **Progress Reports**. These reports describe the status of disaster related projects. It is estimated that 53 States x 4 reports annually = 212 total responses. Each report is estimated to take 100 hours. The burden hours per response is estimated to be 212 reports x 100 hours = 21,200 total annual burden hours.

FEMA has estimated that 53 Grantees will complete **FEMA Form 90-49**. Each State will receive approximately 212 responses from locals/applicants for a total of 11,262. Each form is estimated to take 10 minutes to complete. It is estimated that 10 minutes x 11,262 responses = 1,873 total annual burden hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will receive **FEMA Form 90-91, 90-91A, 90-91B, 90-91C and 90-91D**. Each State will receive approximately 903 project worksheets during disaster from locals/applicants for a total 47,859 responses. The total annual burden is estimated to be 47,859 responses x 90 minutes per response = 71,789 hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete **FEMA Form 90-120**. Each State will receive approximately 903 project worksheets during a disaster from locals/applicants, for a total of 47,859 responses. The total annual burden is estimated to be 47,859 responses x 30 minutes per response = 23,930 hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete **FEMA Form 90-128**. Each State will receive approximately 903 project worksheets during disaster from locals/applicants for a total of 4 7,859 responses. The total annual burden hours is estimated to be 47,859 responses x 30 minutes per response = 23,930 hours.

*The following forms are utilized on an as-needed basis that is dependent upon the type of disaster and the needs of the respondents resulting from each disaster.*

FEMA has estimated that approximately 53 Grantees (States and territories) will complete optional **FEMA Form 90-121**. Each State will receive approximately 94 responses from locals/applicants for a total of 5000. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 4,982 responses x 30 minutes per response = 2,491 hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete the optional **FEMA Form 90-123**. Each State will receive approximately 94 responses from a total of 5000. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 4,982 responses x 30 minutes per response = 2,491 burden hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete the optional **FEMA Form 90-124**. Each State will receive approximately 94 responses from a total of 5000. Each form is estimated to take 15 minutes to complete. The total annual burden is estimated to be 4,982 responses x 15 minutes per response = 1,246 burden hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete the optional **FEMA Form 90-125**. Each State will receive approximately 94 responses from a total of 5000. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 4,982 responses x 30 minutes per response = 2491 burden hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete the optional **FEMA Form 90-126**. Each State will receive approximately 94 responses from a total of 5000. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 4,982 responses x 30 minutes per response = 2491 burden hours.

FEMA has estimated that approximately 53 Grantees (States and territories) will complete the optional **FEMA Form 90-127**. Each State will receive approximately 94 responses from a total of 5000. Each form is estimated to take 15 minutes to complete. The total annual burden is estimated to be 4,982 responses x 15 minutes per response = 1246 burden hours.

FEMA estimates that the approximate number of applicants seeking first appeals is 371. This number is based on the average number of appeals received in fiscal years 2007 and 2008. In FY 2007 the number of appeals totaled 405, while the number of appeals in FY 2008 was 323. These 323 appeals are received from 53 State, local, and Tribal governments with an average of 7 responses each. The total annual burden is estimated to be 371 responses x 60 minutes per response = 371 burden hours.

FEMA estimates that the number of second appeals will be 106 per year. This figure is based on fiscal year 2007 and 2008 data. There were 54 appeals filed in FY 2007 and 197 in FY 2008. The second appeals are also received from 53 State, local, and Tribal governments, with an average of 2 responses each. The total annual burden is estimated to be 106 responses x 60 minutes per response = 106 burden hours.

Conservatively estimating that 80 percent of appeals involve large projects (currently defined as those projects over \$64,200), FEMA estimates that 291 appeals are associated with the total 5,008 large projects obligated by FEMA per year. As a result, FEMA estimates that 5.81 percent of large projects are appealed ( $5.81\% = 291/5,008$ ). By applying this percentage, FEMA estimates that 127 appeals are expected from the 2,188 large projects over \$500,000 that have not yet received an initial determination from FEMA for disasters DR-1693, DR-1604, DR-1605, DR-1606, and DR-1607 ( $5.81\% \times 2,188 = 127$ ). FEMA conservatively estimates that 100 percent of those who are eligible for arbitration would request arbitration. In addition to the 2,188 project worksheets which have not yet received an initial determination from FEMA, as of June 5, 2009, FEMA had 44 pending appeals. Although it is not expected that all of these appeals will be withdrawn in favor of arbitration, as a conservative estimate for the purposes of this analysis, FEMA estimates that all 44 will withdraw in favor of arbitration. Therefore these applicants/subgrantees will also submit a request for arbitration containing a statement that they withdraw their appeal, through the Grantee. Altogether FEMA estimates that 171 applicants/subgrantees will choose arbitration. FEMA estimates it will take the applicant/subgrantee approximately one hour to prepare its request. Therefore the total annual burden is estimated to be 171 for applicants/subgrantees to request arbitration.

Once it receives an applicant/subgrantee's request for arbitration, the Grantee has 15 days to submit a recommendation on the merits of that request to FEMA, should the Grantee so choose. A Grantee's recommendation is entirely voluntary and is not required for the applicant/subgrantee to receive arbitration of the dispute. FEMA conservatively estimates that 100 percent of Grantees will submit recommendations and that it will take the Grantees one hour to prepare that recommendation. Since only 4 States (TX, AL, MS, and LA) have grants that are eligible for arbitration, all 171 recommendations would come from those 4 States, with an average of 43 recommendations per State. The total annual burden is therefore estimated to be 172 responses x 60 minutes per response = 172 burden hours.

However, those who seek arbitration will do so in lieu of appeal, so the number of burden hours per year for the filing of first and second appeal requests will be reduced by the number of burden hours per year for the filing of arbitration requests.

**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 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.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Project Manager, State, local or tribal government	Progress Report / No Form Number	53	4	212	100	21,200	\$26.84	\$569,008
Project Manager, State, local or tribal government	Request for Public Assistance / FEMA Form 90-49	53	212	11,236	0.167	1,873	\$26.84	\$50,271
Project Manager, State, local or tribal government	Project Worksheet (PW) and continuation forms/ FEMA Form 90-91(including sheets 90-91A, 90-91B, 90-91C and 90-91D)	53	903	47,859	1.5	71,789	\$26.84	\$1,926,817
Project Manager,	Special Considerati	53	903	47,859	0.5	23,930	\$26.84	\$642,281

State, local or tribal government	ons Questions / FEMA Form 90-120								
Project Manager, State, local or tribal government	Applicant's Benefits Calculation Worksheet / FEMA Form 90-128	53	903	47,859	0.5	23,930	\$26.84	\$642,281	
	<b>OPTIONAL FORMS</b>								
Project Manager, State, local or tribal government	PNP Facility Questionnaire / FEMA Form 90-121	53	94	4,982	0.5	2,491	\$26.84	\$66,858	
Project Manager, State, local or tribal government	Force Account Labor Summary Record / FEMA Form 90-123	53	94	4,982	0.5	2,491	\$26.84	\$66,858	
Project Manager, State, local or tribal government	Materials Summary Record / FEMA Form 90-124	53	94	4,982	0.25	1,246	\$26.84	\$33,443	
Project Manager, State, local or tribal government	Rented Equipment Summary Record / FEMA Form 90-125	53	94	4,982	0.5	2,491	\$26.84	\$66,858	
Project Manager, State, local or tribal government	Contract Work Summary Record / FEMA Form 90-126	53	94	4,982	0.5	2,491	\$26.84	\$66,858	

Project Manager, State, local or tribal government	Force Account Equipment Summary Record / FEMA Form 90-127	53	94	4,982	0.25	1,246	\$26.84	\$33,443
State, local or tribal government	Request for First Appeal and Recommendation	53	7	371	1	371	\$51.10	\$18,600
State, local or tribal government	Request for Second Appeal and Recommendation	53	2	106	1	106	\$51.10	\$6,388
Project Manager, local or tribal government	Request for Arbitration	171	1	171	1	171	\$51.10	\$8,738
State Government Manager	Recommendation for Arbitration	4	43	172	1	171	\$51.10	\$8,738
<b>TOTALS</b>				<b>185,737</b>		<b>155,998</b>		<b>\$4,916,579</b>

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

There are no record keeping, capital, start-up or maintenance costs associated with this information collection. The recordkeeping and reporting of project information is conducted via states' own financial systems already available and a normal component of the normal and routine business processes of individual states.

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 [Describe]	\$0
Staff Salaries 12 GS 12 step one employees spending approximately 50% of time annually reviewing information for this data collection. \$69,764 x 12 x 50%	\$418,584
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 hotel and transportation 12 x \$3,000 per employee	\$36,000
Printing [number of data collection instruments annually]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Other	\$0
<b>Total</b>	<b>\$454,584</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.

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.

<b>Itemized Changes in Annual Burden Hours</b>
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<b>Data collection Activity/Instrument</b>	<b>Program Change (hours currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (hours currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
Progress Report / No Form Number				22,400	21,200	-1200
Request for Public Assistance / FEMA Form 90-49				1,333	1,873	540
Project Worksheet (PW) and continuation forms/ FEMA Form 90-91(including sheets 90-91A, 90-91B, 90-91C and 90-91D)				55,173	71,789	16,616
Special Considerations Questions / FEMA Form 90-120				5,929	23,930	18,001
Applicant's Benefits Calculation Worksheet / FEMA Form 90-128				3,922	23,930	20,008
PNP Facility Questionnaire / FEMA Form 90-121				530	2,491	1,961
Force Account Labor Summary Record / FEMA Form 90-123				8,719	2,491	-6,228
Materials Summary Record / FEMA Form 90-124				8,719	1,246	-7,473
Rented Equipment Summary Record / FEMA Form 90-125				8,719	2,491	-6,228
Contract Work Summary Record / FEMA Form 90-126				8,719	2,491	-6,228
Force Account Equipment Summary Record / FEMA Form 90-127				8,719	1,246	-7,473
Audit of States, local government and non-profit organizations				1,680	0	-1,680
Request for First Appeal and Recommendation	0	371	+371			
Request for Second	0	106	+106			



Appeal and Recommendation						
Request for Arbitration	0	171	+171			
Request for Arbitration Recommendation	0	172	+172			
<b>Total(s)</b>		+820	<b>+820</b>	<b>134,562</b>	<b>155,178</b>	<b>20,616</b>

**Explain:**

Progress Report – The reduction is based on incorrect math calculations utilized at the time of the last review.

FEMA Form 90-120 – The increase in burden hours results from an incorrect time of 10 minutes per response assigned at the time of the last collection approval request; this now reflects the actual time of 30 minutes.

FEMA Forms 90-49, 90-91, 90-91A, 90-91B, 90-91C, 90-91D, 90-121, and 90-128 – The increase in the Annual Burden Hours is due to an increase number of disaster responses received over the prior collection approval review.

FEMA Forms 90-123, 90-124, 90-125, 90-126, 90-127 – The reduction in the Annual Burden Hours for each of these forms results from the less frequent need for these forms.

Audit of States, local government and non-profit organizations – This function is covered under OMB No. 1660-0025 and no longer is reported in this collection.

The Appeals and Arbitration process is a new collection of information. This collection has been amended to include the Appeals and Arbitration process. This is a new program change which has an increase of +820 burden hours.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Progress Report / No Form Number				\$625,856	\$569,008	(\$56,848)

Request for Public Assistance / FEMA Form 90-49				\$37,244	\$50,363	\$13,119
Project Worksheet (PW) and continuation forms/ FEMA Form 90-91(including sheets 90-91A, 90-91B, 90-91C and 90-91D)				\$1,541,534	\$1,926,803	\$385,269
Special Considerations Questions / FEMA Form 90-120				\$165,656	\$642,268	\$476,612
Applicant's Benefits Calculation Worksheet / FEMA Form 90-128				\$109,581	\$642,268	\$532,687
PNP Facility Questionnaire / FEMA Form 90-121				\$14,808	\$66,858	\$52,050
Force Account Labor Summary Record / FEMA Form 90-123				\$243,609	\$66,858	(\$176,751)

Materials Summary Record / FEMA Form 90-124				\$243,609	\$33,429	(\$210,180)
Rented Equipment Summary Record / FEMA Form 90-125				\$243,609	\$66,858	(\$176,751)
Contract Work Summary Record / FEMA Form 90-126				\$243,609	\$66,858	(\$176,751)
Force Account Equipment Summary Record / FEMA Form 90-127				\$243,609	\$33,429	(\$210,180)
Audit of States, local government and non-profit organizations				\$46,939	\$0	(\$46,939)
Request for First Appeal with Recommendations	\$0	\$18,958	\$18,958			
Request for Second Appeal with Recommendations	\$0	\$5,417	\$5,417			

Request for Arbitration	\$0	\$8,738	\$8,738			
Request for Arbitration Recommendation	\$0	\$8,738	\$8,738			
<b>Total(s)</b>	<b>\$0</b>	<b>+\$41,851</b>	<b>+\$41,851</b>	<b>\$3,759,663</b>	<b>\$4,165,002</b>	<b>\$405,339</b>

**Explain:**

Progress Report – The reduction is based on incorrect math calculations utilized at the time of the last review, which affected the cost associated with this collection.

FEMA Forms 90-49, 90-91, 90-91A, 90-91B, 90-91C, 90-91D, 90-121, and 90-128 – The increase in the Annual Cost Burden is due to an increase number of disaster responses received over the prior collection approval review.

FEMA Forms 90-123, 90-124, 90-125, 90-126, 90-127 – The reduction in the Annual Cost Burden Hours for each of these forms results from the less frequent need for these forms.

Audit of States, local government and non-profit organizations – This function is covered under OMB No. 1660-0025 and no longer is reported in this collection.

The Appeals and Arbitration process is a new collection of information. This collection has been amended to include the Appeals and Arbitration process. This is a new program change which has an increase of \$42,464 burden cost. However, because those seeking arbitration will not be seeking appeal, the amount of burden cost per year for the filing of first and second appeal requests will be reduced by the burden cost per year for the filing of arbitration requests. Therefore the actual burden cost will be no more than +24,987.90.

**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.**

FEMA does not intend to employ the use of statistics or the publication thereof for this information 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.**

FEMA will display the expiration date for OMB approval of this information collection.

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

FEMA does not request an exception to the certification of this information collection.

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

There is no statistical methodology involved in this collection.