

November 20, 2009

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0081

**Title: National Flood Insurance Program – Mapping Needs Update
Support System (MNUSS) Data Worksheet**

Form Number(s): FEMA Form 146-0 (Replaces 81-108)

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 Public Law 103-325, September 23, 1994, the Riegle Community Development and Regulatory Improvement Act of 1994, Title V-National Flood Insurance Reform, Section 575, Updating of Flood Maps, also known as Section 575 of the National Flood Insurance Reform Act (NFIRA) of 1994, it is mandated that as least once every five years, FEMA will assess the need to revise and update all floodplain areas and flood risk zones identified, delineated, or established under section 1360 of the National Flood Insurance Act of 1968. There are over 20,100 mapped communities participating in the National Flood Insurance Program (NFIP).

To fulfill the mandate specified in Section 575 of the NFIRA, FEMA established in 1994 the Mapping Needs Assessment process and the Mapping Needs Update Support System (MNUSS) database in order to effectively identify, and document data regarding community flood hazard mapping needs. MNUSS was designed to store mapping needs at the community level. The current version of MNUSS is an interactive, web-enabled, password protected database. In order to facilitate in the identification and collection of communities' current flood hazard mapping needs for input into MNUSS, FEMA developed the MNUSS Data Worksheet. The MNUSS Data Worksheet and Section 575 of the NFIRA are attached. FEMA intends to update the collection process using a geospatial platform but as this may not be fully implemented prior to the expiration of the current form, FEMA intends to continue the use of the MNUSS Data Worksheet at this time.

Through FEMA's five-year Flood Map Modernization Program (Map Mod), FEMA's inventory of paper maps was modernized to a digital platform and some engineering

updates were made. Because of the nation-wide effort, FEMA began collecting mapping needs on a continual basis. The requirement in the NFIRA, starting in 2004, is being met on a more frequent and continual basis.

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 MNUSS Data Worksheet will be used in the collection of flood hazard mapping needs to document the data that is required for recording in MNUSS. The Worksheet allows FEMA to gather, in a consistent manner, more specific flood hazard mapping needs information.

Flood hazard mapping needs information collected through all of the methods described above will enable FEMA to be more responsive to ongoing changes affecting flood hazard areas that occur in communities participating in the NFIP. These changes include, but are not limited to, new corporate limit boundaries, changes in the road network, and changes in flood hazard areas, which affect communities' flood risks. In order to document the flood hazard mapping needs in MNUSS, the MNUSS Data Worksheet will be used to collect precisely the data needed for recording in the MNUSS database. This data is important because it assists FEMA in meeting its regulatory requirements under Section 575 of the NFIRA. In addition, the data may be used to support FEMA's requests each fiscal year for funding flood map updates and is used along with other information to prioritize the flood hazard mapping needs of all communities participating in the NFIP.

The collection OMB No. 1660-0003, The National Flood Insurance Program Biennial Report, surveys communities participating in the NFIP on physical changes and development that may affect the flood hazard areas of a community and floodplain management issues. The forms associated with the Biennial Report are FEMA-81-28, FEMA-81-29, and FEMA-81-29A. Any community that has established flood hazards that responds 'yes' to Items A-D of Section I of the Biennial Report, can use the MNUSS Data Worksheet to report these changes.

The collection OMB No. 1660-0023, Effectiveness of a Community's Implementation of the NFIP Community Assistance Program CAC and CAV Reports, which evaluates how well communities are achieving flood loss reduction objectives. Information resulting from this collection can identify areas where map updates might be required, resulting in the need to complete the MNUSS form.

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.

FEMA estimates that 60% of the respondents use technology to respond to this collection. FEMA is investigating the possibility of adding the information collected into a Web-based tool and upon completion this will allow for 100% of the respondents to do so electronically.

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 information collected does not duplicate data available 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.

Any community may contact FEMA's Flood Map Assistance Center to request assistance. The operators will forward calls to FEMA's Mapping Needs Assessment subject matter experts or FEMA contractors that are trained to offer guidance on how to conduct a needs assessment and identify mapping needs.

In addition, FEMA Regional offices, FEMA contractors, and some States have conducted outreach workshops on completing the MNUSS Data Worksheet with local officials, regional governmental agencies, and State NFIP coordinators. The workshops are designed so that the attendees understand the mapping needs assessment process and are trained on how to assess their maps, identify mapping needs, and document the needs on a MNUSS Data Worksheet so the data is ready for entry into MNUSS.

Lastly, FEMA has capitalized on state and national conferences, such as the Association of State Flood Plain Managers Conference, that are attended by local floodplain administrators as well as others interested in floodplain management, by sharing information on the mapping needs assessment process and providing one-on-one training sessions.

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.

It is important for FEMA to collect, assess and revise flood hazard data so that a community and its residents are aware of the risk associated with flooding and can practice sound floodplain management. Collecting community flood hazard data, on a continual basis, provides the NFIP with sufficient data to understand a community's mapping needs. Collecting information less frequently would result in flood hazard data becoming outdated. Also, collection of changes in floodplain data fulfills the statutory requirement stated in Section 575 of the NFIRA.

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.

There is no requirement to respond more than quarterly.

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

There is no requirement to respond in fewer than 30 days.

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

There is no requirement 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.

The MNUSS form does not require the community to retain 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.

The MNUSS worksheet does not include statistical surveys.

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

The MNUSS worksheet does not include statistical data.

(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.

The information collected with the MNUSS worksheets does not include confidential information.

(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.

The information collected with the MNUSS worksheets does not include confidential or proprietary information.

8. Federal Register Notice:

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

A 60-day Federal Register Notice inviting public comments was published on September 10, 2009, Volume 74, Number 174, pp. 46614. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on [date, Volume xx, Number xx, pp. xx]. **[Select one---No comments were received OR x number of comments related to (state topic of comments) were received].** See attached copy of the published notice included in this package.

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.

Through the Mapping Needs Assessment Process, the MNUSS Data Worksheet has been used as a tool, by FEMA regional offices, FEMA Contractors, many State NFIP Coordinators, and several FEMA CTPs, to keep data consistent and to enter the data into MNUSS. FEMA, based on its experience with and comments from the above-mentioned users of the worksheet, have determined that the worksheet needs to be as simple as possible. This means that it can be no longer than one page in length, and that it requires only the information that will be entered into MNUSS.

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 many opportunities by which it may consult with local officials regarding their communities' mapping needs, e.g., the NFIP Biennial Report, CAVs/CACs, scoping meetings, workshops, State and local Business Plans, and state and national conferences.

With the reporting capability of MNUSS, documented mapping needs for any NFIP community may be reviewed and verified when conducting a mapping needs assessment. The mapping needs documented in MNUSS include those that have been addressed since MNUSS was developed, are being addressed, and still exist. Mapping needs assessments are an ongoing process but will be conducted for every NFIP community at least every five years, thereby, satisfying the requirement at Section 575 of the NFIRA.

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

No payment or gifts will be given to respondents of the MNUSS worksheet.

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

The information collected with the MNUSS worksheet is available to the general public since it is information the communities would like incorporated into their flood map.

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.

No personal or sensitive information is collected through the MNUSS worksheet.

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 for each collection instrument (separately list each instrument and describe information as requested). 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.

On average, there are 460 respondents each year to the MNUSS worksheet. The average burden per response is 2.5 hours and with each respondent only responding once, the total annual hours burden will be 1,150 hours per response.

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. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. 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.

Table A.12: Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State, Local or Tribal Government	FEMA Form 146-0 / MNUSS Data Worksheet	460	1	460	2.5	1,150	\$47.75	\$54,913
Total		460				1,150		\$54,913

* Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.4. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4, and the entry for the “Avg. Hourly Wage Rate” would be \$59.51.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for “Natural Science Managers, State Government (OES designation)” is estimated to be \$47.75 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents is estimated to be \$54,912.50 annually.

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:

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.

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.

In addition to the wage rate costs in Question 12 above, FEMA may receive, by mail, supporting technical data from local officials. Assuming oversized materials, the mailing cost to the average respondent is \$3.00. The percentage of respondents replying by mail is 40% of the 460 respondents, and the cost for mailing would be \$3.00 times 184 respondents equals \$552 annually.

The prior collection had a total cost of \$92,137 calculated, however most of this was incorrectly taken from the chart in the last supporting statement that simply broke down the high and low values for anticipated response rates and then identified a mean value of respondents (5,550) for a 5 year period, identifying a time burden per response and then multiplying this by a wage rate averaged out at \$32 per hour. Again, this chart was solely intended to identify how the total number of respondents was calculated, but the totals were added to the postage expense and then submitted for review – which incorrectly inflated the total cost burden. This is now corrected and the only value that is now submitted in this question is the postage.

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 – data collection costs and work contractors perform on the review of the mapping needs update requests. Amount budgeted equals 5,903 hours times a fully loaded wage rate of \$70.00, which equals \$413,210. Also included is \$20,000 for database maintenance.	\$433,210
Staff Salaries - FEMA’s time for monitoring with the contractor to resolve issues. FEMA salary for GS 14 assigned equals \$49.22 per hour times the wage rate multiplier of 1.4 equals \$68.91. The GS 14 will spend an estimated 295 hours per year on this project, for a total of \$20,328.	\$20,328
Total	\$453,538

Contract costs – Work performed within the contract includes: community mapping needs will be received, reviewed and processed and transferred to the MNUSS Data Worksheet for entry into MNUSS. The review and processing may include: pulling current Flood Insurance Rate Maps for reference, reviewing Flood Insurance Study reports, compiling and presenting existing FEMA data on communities, recording summary mapping needs assessment data, housing all the existing and obtained data, and providing statistics and analysis of that data, if necessary. Also included is an estimated amount of \$20,000 earmarked for hardware and overall database maintenance.

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

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

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

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

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 146-0 / MNUSS Data Worksheet				2,775	1,150	-1,625
Total(s)				2,775	1,150	-1,625

Explain:

Adjustments to the total number of respondents, based on historical records and projected responses for the next three years have reduced the total. The total annual hour burden

decreases accordingly from 2,775 to 1,150 based on the anticipated drop in yearly responses. Previously, the burden to respondents was based on a five-year cycle but this was corrected and is reflected in the OMB Notice of Approval dated 2/13/09. The original approved burden reflected a total for 5 years (13,875 – see the OMB Notice of action dated 2/13/09 for the reduction in hours from the 5-year total to the 1-year total of 2,775).

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
FEMA Form 146-0 / MNUSS Data Worksheet				\$88,800	\$54,913	-\$33,887
Total(s)				\$88,800	\$54,913	-\$33,887

Explain:

Adjustments have been made to the annual cost to the Federal Government from the last submission to this one. Changes to the cost estimates involve updating the annual number of respondents (reduction from 1,110 to 460) and the resulting change to the total annual burden in hours to respondents. Additionally, the wage rate category now is adjusted by applying the multiplier, so the actual cost burden change is affected by this. Previously, the burden to respondents was based on a five-year cycle but this was corrected and is reflected in the OMB Notice of Approval dated 2/13/09.

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

The results from this collection will not be published.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

The expiration date will be displayed on the form.

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

There are no exceptions to the certification statement for this submission.

B. Collections of Information Employing Statistical Methods.

The collection of this information does not employ statistical methods.