

February 22, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0017

Title: Public Assistance Program

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.

The information collected is required for the Public Assistance (PA) Program eligibility determinations, grants management, and compliance with other Federal laws and regulations. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (the Stafford Act), authorizes financial and other forms of assistance to State and local governments and certain Private Nonprofit (PNP) organizations to support the response, recovery, and mitigation efforts following Presidentially declared major disasters and emergencies. 44 CFR Part 206 specifies the information collections necessary to facilitate the provision of assistance under the PA Program.

44 CFR 206.202 describes the general application procedures for the PA program. Section 206.202(c) requires the Grantee to submit a completed Request, FEMA Form 90-49 for each applicant who requests Public Assistance. Section 206.202(d) requires the applicant to submit a Project Worksheet (FEMA Form 90-91, 90-91A, 90-91B, 90-91C, and 90-91D) for each project. The Project Worksheet must identify the eligible scope of work and must include a quantitative estimate for the eligible work. See 44 CFR 206.202(d)(i). As a supplement to the Project Worksheet, FEMA also requires a Special Considerations form, FEMA Form 90-120, and an Applicant's Benefits Calculation Worksheet, FEMA Form 90-128. There are also various optional forms to aid the applicant in preparing and submitting the Project Worksheet.

44 CFR 206.203(d) describes funding options for improved and alternate projects. For an improved project, if a subgrantee desires to make improvements but restore the pre-disaster function of a damaged facility, the Grantee's approval must be obtained. In any case where a subgrantee 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 Administrator approve an alternate project. Prior to the start of construction of any alternate project, the Grantee must submit for FEMA approval (on a Project Worksheet) a description of the proposed alternate project, a schedule of work, and the projected cost of the project. See 44 CFR 206.203(d)(2)(iv). The Grantee must also provide the necessary assurances to document compliance with special requirements, including but not limited to floodplain management, environmental assessment, hazard mitigation, protection of wetlands, and insurance. See 44 CFR 206.203(d)(2)(v).

44 CFR 206.207 requires States to develop a State Administrative plan to administer the PA Program. The submission of the State Administrative Plan is required as a condition of receiving PA funding. FEMA must approve a State Administrative Plan before awarding any project grant assistance to a community or State applicant. The State must submit a revised plan annually. FEMA will request that the State amend its plan to meet current policy guidance in each disaster for which Public Assistance is included.

44 CFR 206.204(c) allows the Grantee to approve time extensions for the completion of projects for an additional 6 months for debris clearance and emergency work and an additional 30 months for permanent work. Time extensions beyond the Grantee's authority (i.e., beyond the extensions available under section 206.204(c)), must be submitted by the Grantee to FEMA. See 44 CFR 206.204(d). Such extensions require the Regional Administrator's approval in writing. See 44 CFR 206.204(d)(2).

44 CFR 206.204(e) allows the subgrantee to evaluate cost overruns for large projects and, when justified, submit a request for additional funding through the Grantee to the Regional Administrator for a final determination. All requests for the Regional Administrator's approval must contain sufficient documentation to support the eligibility of all claimed work and costs. The Grantee must include a written recommendation when forwarding the request to the Regional Administrator. The Regional Administrator will notify the Grantee in writing of the final determination.

44 CFR 206.204(f) requires progress reports to be submitted by the Grantee to the Regional Administrator on a quarterly basis. The Regional Administrator and Grantee negotiate the date for submission of the first report. 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.

Once FEMA has made a determination on an application or project, the applicant may appeal that determination. If an applicant seeks appeal, 44 CFR 206.206 requires an applicant to submit a request for appeal, and the Grantee 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. Arbitration is authorized by Section 601 of the American Recovery and Reinvestment Act of 2009 (P.L. 111-5) and 44 CFR 206.209.

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 Public Assistance 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 Public Assistance considerations.

FF-90-49 Request for Public Assistance – The *Request* asks for general information from the Grantee that identifies the applicant and starts the grant process.

FF 90-91 Project Worksheet (PW) – Form used to document the scope of work and cost estimate for a project. FEMA, or the sub-grantee, assisted by the Grantee as appropriate, will prepare a *PW* for each project, including alternate and improved projects. Federal funds are obligated to the Grantee based on the approved *PW*.

FF 90-91A Project Worksheet (PW) - Damage Description and Scope of Work Continuation Sheet –The damage description includes a description of the predisaster facility; cause of the damage; and dimensions and description of the damage. The scope of work is developed on the *PW* describing in detail the work necessary to repair the damage or replace the facility. The Project Worksheet - Damage Description and Scope of Work Continuation Sheet provides additional space for this purpose.

FF 90-91B Project Worksheet (PW) - Cost Estimate Continuation Sheet - The Project Cost is developed on the *PW* estimating the cost for repair of the damages

described in the scope of work in 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 (PW) - Maps and Sketches Sheet - The Project Worksheet – Maps and Sketches Sheet identifies the damaged facility location, illustrates disaster-related damages, completed work, and proposed repairs. If a project is combined of multiple sites, and possibly a combination of emergency and permanent work, detailed maps and sketches may be necessary to identify each location.

FF 90-91D Project Worksheet (PW)- Photo Sheet - The Project Worksheet – Photo Sheet illustrates and describes general project site conditions, disaster related damages, site irregularities, conditions relating to damaged elements, facility identification (e.g., front gate or building signs), and completed work, or to demonstrate the presence of an immediate threat.

FF 90-120 Special Considerations Questions - The Special Considerations Questions record factors that could affect the scope of work and funding for a project. These include insurance; hazard mitigation; and environmental/historic preservation compliance with Federal laws, regulations, and Executive Orders, such as those that address the environment, floodplains, wetlands, historic preservation, endangered species, and environmental justice. The subgrantee should provide FEMA with supporting documentation.

The following forms (FEMA Forms 90-121, 90-123, 90-124, 90-125, 20-126, 90-127) 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. These forms are part of the Project Worksheet.

FF 121 PNP Facility Questionnaire – The PNP Facility Questionnaire is used by FEMA and the Grantee to help determine a private non-profit (PNP) applicant’s eligibility.

FF 90-123 Force Account Labor Summary Record –The Force Account Labor Summary Record may be used to record costs associated with conducting eligible work by an applicant’s own employees.

FF 90-124 Materials Summary Record –The Materials Summary Record may be used to record the costs associated with supplies and materials that were purchased or taken from an applicant’s stock and used during the performance of eligible work.

FF 90-125 Rented Equipment Summary Record - The Rented Equipment Summary Record may be used to record the costs of rented or leased equipment.

FF 90-126 Contract Work Summary Record – 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 – The Force Account Equipment Summary Record may be used to record applicant equipment costs.

FF 90-128 Applicant's Benefits Calculation Worksheet The Applicant's Benefits Calculation Worksheet may be used to record the percentage of the actual wages that pays for employee benefits, known as fringe benefits.

State Administrative Plan for Public Assistance – Each State/territory must submit a revised plan annually to FEMA. The plan must designate the State agency or agencies which will have responsibility for program administration. The plan must also identify staffing functions, the sources of staff to fill these functions, and the management and oversight responsibilities of each. The plan should describe the procedures to notify potential applicants of the availability of the program; conduct applicants briefings; assist FEMA in determining applicant eligibility; participate in the damage assessment and project application process; process appeals; participate with FEMA in the establishment of hazard mitigation and insurance requirements; comply with administrative requirements in 44 CFR Parts 13 and 206 and the audit requirements in 44 CFR Part 14; process advances of funds and reimbursement; and determine staffing and budget requirements.

Request for Time Extension Beyond the Grantee's Authority –If an applicant requests a time extension beyond the limit of the Grantee's authority, the Grantee must submit the request to the FEMA Regional Administrator for approval. The request should include identification of the project by PW number, the dates and provisions of any previous extensions granted for the particular project, a detailed justification of the need for the extension, and a projected completion date. The FEMA Regional Administrator will make a determination as to whether some or all of the requested extension should be granted and will inform the Grantee in writing.

Requests for Additional Funding for Cost Overruns – For large projects, when a need for additional funding is discovered, the applicant may request additional funding through the Grantee to the FEMA Regional Administrator. The request for additional funding should contain sufficient documentation to support the eligibility of the additional work and costs. The Grantee forwards the request to FEMA, via email or letter, with a written recommendation. FEMA renders a decision and notifies the Grantee in writing, either with an amended PW for additional funding or a written denial of the request.

Progress Reports describe the status of those projects on which a final payment of the Federal share has not been made to the Grantee. For each open project, the quarterly progress report outlines problems or circumstances expected to deviate from approved grant conditions, the result of onsite technical inspections, and the percentage of work completed to date. The Grantee should report cost overruns or changes needed in the approved project scope of work, including improved and alternate projects, in the narrative field of the quarterly progress report. The Grantee can notify FEMA of time extensions within the Grantee's authority in a notation in the quarterly progress report.

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 the Information Technology division, 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 disasters 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 provide the Regional Administrator 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 Project Worksheets. The subgrantee's (local government or eligible private non-profit organization) 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.

The State Administrative Plan is necessary to ensure that a State/territory is ready to administer Public Assistance when disaster strikes. Without a Plan in place, FEMA would not be able to work with the State/territory in the administration of the Public Assistance program.

Requests for funding for cost overruns or time extensions are necessary for subgrantees to be able to complete projects already approved and funded by FEMA.

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:

Not Required

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

Not Required

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

FEMA requires States/territories to report information more than quarterly when instances of unexpected events or disasters require a State Administrative Plan to be submitted for each disaster, for which Public Assistance is included, if such occur within a 3-month period of each other.

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.

Not Required

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

Not Required

(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.

Not Required

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

Not Required

(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.

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There is no pledge of confidentiality not supported by authority.

(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.

Not Required

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 November 17, 2009, Volume 74 pp 59206. 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 February 8, 2009, Volume 75 pp 6213. No 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.

Non-Federal 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. FEMA considers the comments of individual stakeholders 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 individual 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 Grantees/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 56 States and territories will review, consider and then submit a various number of project forms that they have received from sub-grantees for funding, 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 56 Grantees will complete **FEMA Form 90-49**. There will be approximately 212 responses from locals/applicants for a total of 11,872. Each form is estimated to take 10 minutes to complete. It is estimated that 10 minutes x 11,872 responses = 1,983 total annual burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will receive **FEMA Form 90-91, 90-91A, 90-91B, 90-91C and 90-91D**. There will be approximately 903 project worksheets during disaster from locals/applicants for a total 50,568 responses. The total annual burden is estimated to be 50,568 responses x 90 minutes per response = 78,852 hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete **FEMA Form 90-120**. There will be approximately 903 project worksheets during a disaster from locals/applicants, for a total of 50,568 responses. The total annual burden is estimated to be 50,568 responses x 30 minutes per response = 25,284 hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete **FEMA Form 90-128**. There will be approximately 903 project worksheets during a disaster from locals/applicants, for a total of 50,568 responses. The total annual burden is estimated to be 50,568 responses x 30 minutes per response = 25,284 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 56 Grantees (States and territories) will complete optional **FEMA Form 90-121**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 5,264 responses x 30 minutes per response = 2,632 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the optional **FEMA Form 90-123**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 5,264 responses x 30 minutes per response = 2,632 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the optional **FEMA Form 90-124**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 15 minutes to complete. The total annual burden is estimated to be 5,264 responses x 15 minutes per response = 1,316 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the optional **FEMA Form 90-125**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 5,264 responses x 30 minutes per response = 2,632 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the optional **FEMA Form 90-126**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 30 minutes to complete. The total annual burden is estimated to be 5,264 responses x 30 minutes per response = 2,632 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the optional **FEMA Form 90-127**. There will be approximately 94 responses for a total of 5,264. Each form is estimated to take 15 minutes to complete. The total annual burden is estimated to be 5,264 responses x 15 minutes per response = 1,316 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the **State Administrative Plan**. There will be approximately 1 response for a total of 56. Each form is estimated to take 8 hours to complete. The total annual burden is estimated to be 56 responses x 8 hour per response = 448 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the **State Administrative Plan – Submission of Amendments After a**

Declaration. There will be approximately 1 response for a total of 56. Each submission is estimated to take 8 hours to complete. The total annual burden is estimated to be 56 responses x 8 hour per response = 448 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the **Request for Time Extension**. There will be approximately 47 responses for a total of 2,632. Each submission is estimated to take 30 minutes to complete. The total annual burden is estimated to be 2,632 responses x 30 minutes per response = 1,316 burden hours.

FEMA has estimated that approximately 56 Grantees (States and territories) will complete the **Request for Additional Funding Cost Overruns for Large Projects**. There will be approximately 19 responses for a total of 1,064. Each submission is estimated to take 30 minutes to complete. The total annual burden is estimated to be 1,064 responses x 30 minutes per response = 532 burden hours.

FEMA has estimated that approximately 171 sub-grantees will ask for the **Request for Arbitration**, but that the Grantees (States and territories) will complete the request (this is why the actual total number of respondents is maintained at 56 in the chart for question 12c). Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 171 responses x 1 hour per response = 171 burden hours.

FEMA has estimated that approximately 4 states will ask for the **Recommendation for Arbitration**, and the Grantees (States and territories) will complete the request (this is why the actual total number of respondents is maintained at 56 in the chart for question 12c). Each form is estimated to take 1 hour to complete. The total annual burden is estimated to be 4 responses x 1 hour per response x 43 responses per respondent (the number of disasters that this will apply to in these states) = 172 burden hours.

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.

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
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State, Local or Tribal Government	Request for Public Assistance / FEMA Form 90-49	56	212	11,872	0.167	1,983	\$51.10	\$101,312
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)	56	903	50,568	1.5	75,852	\$51.10	\$3,876,037
State, Local or Tribal Government	Special Considerations Questions / FEMA Form 90-120	56	903	50,568	0.5	25,284	\$51.10	\$1,292,012
State, Local or Tribal Government	Applicant's Benefits Calculation Worksheet / FEMA Form 90-128	56	903	50,568	0.5	25,284	\$51.10	\$1,292,012
State, Local or Tribal Government	PNP Facility Questionnaire / FEMA Form 90-121	56	94	5,264	0.5	2,632	\$51.10	\$134,495
State, Local or Tribal Government	Force Account Labor Summary Record / FEMA Form 90-123	56	94	5,264	0.5	2,632	\$51.10	\$134,495
State, Local or Tribal Government	Materials Summary Record / FEMA Form 90-124	56	94	5,264	0.25	1,316	\$51.10	\$67,248
State, Local or Tribal Government	Rented Equipment Summary Record / FEMA Form 90-125	56	94	5,264	0.5	2,632	\$51.10	\$134,495
State, Local or Tribal Government	Contract Work Summary Record / FEMA Form 90-126	56	94	5,264	0.5	2,632	\$51.10	\$134,495

State, Local or Tribal Government	Force Account Equipment Summary Record / FEMA Form 90-127	56	94	5,264	0.25	1,316	\$51.10	\$67,248
State, Local or Tribal Government	State Administrative Plan / No Form	56	1	56	8	448	\$51.10	\$22,893
State, Local or Tribal Government	State Administrative Plan - Submission of Amendments After a Declaration / No Form	56	1	56	8	448	\$51.10	\$22,893
State, Local or Tribal Government	Request for Time Extension / No Form	56	47	2,632	0.5	1,316	\$51.10	\$67,248
State, Local or Tribal Government	Request for Additional Funding Cost Overruns for Large Projects / No Form	56	19	1,064	0.5	532	\$51.10	\$27,185
State, Local or Tribal Government	Progress Report / No Form	56	4	224	100	22,400	\$51.10	\$1,144,640
State, Local or Tribal Government	Request for First Appeal and Recommendation / No Form	56	7	392	1	392	\$51.10	\$20,031
State, Local or Tribal Government	Request for Second Appeal and Recommendation / No Form	56	2	112	1	112	\$51.10	\$5,723
State, Local or Tribal Government	Request for Arbitration / No Form	171	1	171	1	171	\$51.10	\$8,738
State, Local or Tribal Government	Recommendation for Arbitration	4	43	172	1	172	\$51.10	\$8,789
Total		56				167,554		\$8,561,989

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

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 5 employees in Washington DC spending approximately 50% of time annually reviewing information for this data collection. The annual salary for GS-12, step 5 in 2009 (\$82,845) is multiplied by the factor of 1.4 to arrive at the full employment cost. \$115,983 x 12 x 50% = \$695,898	\$695,898
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
Total	\$731,898

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
Request for Public Assistance / FEMA Form 90-49				1,873	1,983	+110
Project Worksheet (PW) and continuation forms/ FEMA Form 90-91(including sheets 90-91A, 90-91B, 90-91C and 90-91D)				71,789	75,852	+4,063
Special Considerations Questions / FEMA Form 90-120				23,930	25,284	+1,354
Applicant's Benefits Calculation Worksheet / FEMA Form 90-128				23,930	25,284	+1,354
PNP Facility Questionnaire / FEMA Form 90-121				2,491	2,632	+141
Force Account Labor Summary Record / FEMA Form 90-123				2,491	2,632	+141
Materials Summary Record / FEMA Form 90-124				1,246	1,316	+70
Rented Equipment Summary Record / FEMA Form 90-125				2,491	2,632	+141
Contract Work Summary Record / FEMA Form 90-126				2,491	2,632	+141
Force Account Equipment Summary Record / FEMA Form 90-127				1,246	1,316	+70

State Administrative Plan / No Form	0	448	+448			
State Administrative Plan - Submission of Amendments After a Declaration / No Form	0	448	+448			
Request for Time Extension / No Form	0	1,316	+1,316			
Request for Additional Funding Cost Overruns for Large Projects / No Form	0	532	+532			
Progress Report / No Form				21,200	22,400	+1,200
Request for First Appeal and Recommendation / No Form				371	392	+21
Request for Second Appeal and Recommendation / No Form				106	112	+6
Request for Arbitration / No Form				171	171	0
Recommendation for Arbitration				171	172	+1
Total(s)		2,744	+2,774	155,998	164,810	+8,812

Explain: FEMA Form 90-49, Request for Public Assistance; FEMA Form 90-91, Project Worksheet (PW); FEMA Form 90-91A, Project Worksheet - Damage Description and Scope of Work Continuation Sheet; FEMA Form 90-91B, Project Worksheet - Cost Estimate Continuation Sheet; FEMA Form 90-91C Project Worksheet - Maps and Sketches Sheet; FEMA Form 90-91D, Project Worksheet - Photo Sheet; FEMA Form 90-120, Special Considerations Questions; FEMA Form 121, PNP Facility Questionnaire; FEMA Form 90-123, Force Account Labor Summary Record; FEMA Form 90-124, Materials Summary Record; FEMA Form 90-125, Rented Equipment Summary Record; FEMA Form 90-126, Contract Work Summary Record; FEMA Form 90-127, Force Account Equipment Summary Record; and FEMA Form 90-128, Applicant’s Benefits Calculation Worksheet, Progress Report, Request for First Appeal and Request for Second Appeal; The expected number of respondents has increased from 53 to 56, increasing the total number of responses accordingly.

For the State Administrative Plan, State Administrative Plan – Submission of Amendments after a Declaration, Request for Time Extension and Request for Additional Finding Cost Overruns for Large Projects, these tools have been added into the collection for the first time.

For the Recommendation for Arbitration (from the State government manager), the prior calculated responses was off by one and is added here.

The Appeals and Arbitration process is a new collection of information. This collection has been amended to include the Appeals and Arbitration process.

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
Request for Public Assistance / FEMA Form 90-49				\$50,271.32	\$101,312	+\$51,040.68
Project Worksheet (PW) and continuation forms/ FEMA Form 90-91(including sheets 90-91A, 90-91B, 90-91C and 90-91D)				\$1,926,816.78	\$3,876,037	+\$1,949,220.22
Special Considerations Questions / FEMA Form 90-120				\$642,281.20	\$1,292,012	+\$649,730.80
Applicant's Benefits Calculation Worksheet / FEMA Form 90-128				\$642,281.20	\$1,292,012	+\$649,730.80
PNP Facility Questionnaire / FEMA Form 90-121				\$66,858.44	\$134,495	+\$67,636.56
Force Account Labor Summary Record / FEMA Form 90-123				\$68,858.44	\$134,495	+\$67,636.56
Materials Summary Record / FEMA Form 90-124				\$33,442.64	\$67,248	+\$33,805.36
Rented Equipment Summary Record / FEMA Form 90-125				\$66,858.44	\$134,495	+\$67,636.56
Contract Work Summary Record / FEMA Form 90-126				\$66,858.44	\$134,495	+\$67,636.56
Force Account Equipment Summary Record / FEMA Form 90-127				\$33,442.64	\$67,248	+\$33,805.36
State Administrative Plan / No Form	0	\$22,893	+\$22,893			
State Administrative Plan - Submission of	0	\$22,893	+\$22,893			

Amendments After a Declaration / No Form						
Request for Time Extension / No Form	0	\$67,248	+\$67,248			
Request for Additional Funding Cost Overruns for Large Projects / No Form	0	\$27,185	+\$27,185			
Progress Report / No Form				\$569,008	\$1,144,640	+575,632
Request for First Appeal and Recommendation / No Form				\$18,600	\$20,031	+\$1,431
Request for Second Appeal and Recommendation / No Form				\$6,388	\$5,723	-\$1,665
Request for Arbitration / No Form				\$8,738	\$8,738	0
Recommendation for Arbitration				\$8,738	\$8,789	+\$51
Total(s)		\$140,219	+\$140,219	\$4,207,461.54	\$8,421,770	+\$4,214,308.46

Explain: FEMA Form 90-49, Request for Public Assistance; FEMA Form 90-91, Project Worksheet (PW); FEMA Form 90-91A, Project Worksheet - Damage Description and Scope of Work Continuation Sheet; FEMA Form 90-91B, Project Worksheet - Cost Estimate Continuation Sheet; FEMA Form 90-91C Project Worksheet - Maps and Sketches Sheet; FEMA Form 90-91D, Project Worksheet - Photo Sheet; FEMA Form 90-120, Special Considerations Questions; FEMA Form 121, PNP Facility Questionnaire; FEMA Form 90-123, Force Account Labor Summary Record; FEMA Form 90-124, Materials Summary Record; FEMA Form 90-125, Rented Equipment Summary Record; FEMA Form 90-126, Contract Work Summary Record; FEMA Form 90-127, Force Account Equipment Summary Record; and FEMA Form 90-128, Applicant’s Benefits Calculation Worksheet, Progress Report, Request for First Appeal and Request for Second Appeal; The expected number of respondents has increased from 53 to 56, increasing the total number of responses accordingly and the wage cost category was updated to more accurately reflect that of the respondents and as a result, the costs have increased. Also, the 1.4 multiplier has been applied to the respondent’s wages and the total cost burden has increased as a result.

For the State Administrative Plan, State Administrative Plan – Submission of Amendments after a Declaration, Request for Time Extension and Request for Additional Finding Cost Overruns for Large Projects, these tools have been added into the collection for the first time.

For the Recommendation for Arbitration (from the State government manager), the prior calculated responses was off by one the update has increased the cost.

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.

This collection does not seek approval to not display the expiration date for OMB approval.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.