

July 15, 2010

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660-0026**

**Title: State Administrative Plan for the Hazard Mitigation Grant  
Program**

**Form Number(s): None**

### General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

#### A. Justification

**1. Explain the circumstances that make the collection of information necessary (give details as to why this information is being collected). Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.**

The development of the State Administrative Plan is required as a condition of receiving Hazard Mitigation Grant Program (HMGP) funding under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, 42 U.S.C. 5170c. Section 404 mandates that FEMA must approve State Administrative Plan before awarding any project grant assistance to a community or State applicant. The regulations for the State Administrative Plan are codified in 44 CFR 206.437, implementing the provisions to the Robert T. Stafford Disaster Relief and Emergency Assistance Act. The plans must comply with administrative requirements in 44 CFR Parts 13 and 206, provide information for environmental and floodplain management review in conformance with 44 CFR Parts 9 and 10, and audit requirements in 44 CFR Part 14. At its minimum, the State Administrative

Plan will include the designated State agency that will act as the grantee, identify the State Hazard Mitigation Officer, identify staffing requirements, establish a guide for implementation activities and procedures to account for non-Federal cost sharing. Additional information requirements are guided by the type of mitigation activities being pursued.

**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 State Administrative Plan is a procedural guide that details how the State will administer the HMGP. The State must have a current administrative plan approved by the appropriate FEMA Regional Director before receiving HGMP funds. The administrative plan may take any form including a chapter within a comprehensive State mitigation program strategy. The State may forward an administrative plan to the Regional Director for approval at any time prior to or immediately after the request for a disaster declaration. An approved plan is a prerequisite of receiving HGMP funds and is used by FEMA in making a determination of the approval for a grant and how much each grant will be.

In the Administrative Plan, the State must establish procedures to guide the following 13 activities and FEMA will review the information provided to determine if each activity is properly documented for:

1. Identify and notify potential applicants of the availability of the program.
2. Ensure that potential applicants are provided information on the application process, program eligibility, and key deadlines.
3. Determine applicant eligibility.
4. Provide information for environmental and floodplain management review.
5. Establish priorities for selection of mitigation projects.
6. Process requests for advances of funds and reimbursements.
7. Monitor and evaluate the progress and completion of selected projects.
8. Review and approve cost overruns.
9. Process appeals.
10. Provide technical assistance as required to sub-grantees.
11. Comply with the administrative requirements.
12. Comply with audit requirements.
13. Provide quarterly progress reports to the Regional Director on approved projects.

**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.**

States may submit the plan to FEMA by e-mailing electronic files(s) containing the plan(s) updates. Information on mitigation and FEMA mitigation programs is made available to the public through FEMA's web site at

<http://www.fema.gov/government/grant/>. A Hazard Mitigation Grant Program Desk Reference, which provides program guidance for both the HMGP and the State Administrative Plan, is available online at:

<http://www.fema.gov/library/index.jsp>.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication of this planning requirement by FEMA, Federal or State activities. The Robert T. Stafford Disaster Relief and Emergency Assistance act requires that the hazard mitigation plans be coordinated with any other mitigation plans adopted or underway at the State or local level, and that these mitigation plans build on, and not duplicate existing plans.

**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 will have no impact on small businesses since they are not required to participate in the development or updates of the State Administrative Plan for the HMGP.

**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.**

The State Administrative Plan for the HMGP is triggered by a major disaster or emergency declaration that results in States and communities seeking Federal grant assistance. Without a FEMA approval State Administrative Plan could not be approved and mitigation grant-funded activities could not proceed, causing states to shoulder financial burdens that they might not be able to adequately fund without the grant.

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

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

This collection does not require respondents to report information 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.**

This collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

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

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

This collection does not require respondents 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.**

This collection does not employ statistical surveys.

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

This collection does not require the use of statistical data classifications.

**(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

This collection does not require any pledges of confidentiality.

**(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This collection does not require respondents to submit proprietary trade secrets.

## **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 5<sup>th</sup>, 2010, Volume 75 pp 24732. 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 July 14, 2010, Volume 75 pp 40846. 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.**

FEMA's regional offices have discussed the HMGP with our State counterparts in annual training sessions and meetings as needed to discuss deficiencies in the program. In addition, FEMA has involved State representatives (as nominated by the National Emergency Management Association) in established meeting sessions regarding data collection and electronic data processing for FEMA mitigation grant programs. In addition, FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conferences.

**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 received input from States and local governments about information collections for the HMGP through meetings between Respondents and the FEMA Regional Offices which occur at unscheduled times during the year.

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

There is no payment or gift to respondents for this data collection.

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

A Privacy Impact Assessment was completed on January 19, 2007 and is currently being reviewed and updated by DHS and FEMA Privacy Offices. A SORN was published on December 15, 2004 and is also currently being reviewed and updated by the DHS and FEMA Privacy Offices.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature involved with this data collection.

**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.**

It has been estimated that out of the 56 States that currently have State Administrative Plans in place, 32 States will update the State Administrative Plan. FEMA estimates that it will take an average of eight (8) hours per State to review information, complete and submit their updated State Administrative Plan to FEMA. It is estimated that approximately 32 States will update their plans twice a year and that each update will require 8 hours, and that the total annual hours burden will be  $32 \times 2 \text{ responses} \times 8 \text{ hours} = 512 \text{ hours}$ .

**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 estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for**

information collection activities should not be included here. Instead this cost should be included in Item 14.

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, or Tribal Government | State Administrative Plan / No Form Number | 32                 | 2                               | 64                     | 8                                   | 512                            | \$42.00                | \$21,504.00                  |
| <b>Total</b>                |  | <b>32</b>          |                                 | <b>64</b>              |                                     | <b>512</b>                     |                        | <b>\$21,504.00</b>           |

- Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.
- “Type of Respondent” should be entered exactly as chosen in Question 3 of the OMB Form 83-I

**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](http://www.bls.gov)) the wage rate category for Urban or Regional planners is estimated to be \$30.00 per hour and applying the multiplier results in a wage of \$42.00. The total estimated annual cost to respondents is \$21,504.

**13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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:**

- 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.**
- 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.**

**Annual Cost Burden to Respondents or Record-keepers**

| <b>Data Collection Activity/Instrument</b> | <b>*Annual Capital Start-Up Cost</b><br>(investments in overhead, equipment and other one-time expenditures) | <b>*Annual Operations and Maintenance Cost</b><br>(such as recordkeeping, technical/professional services, ect.) | <b>Annual Non-Labor Cost</b><br>(expenditures on training, travel and other resources) | <b>Total Annual Cost to Respondents</b> |
|--|--|--|--|---|
|  |  |  |  |   |
|  |  |  |  |   |
|  |  |  |  |   |
| <b>Total</b>                               | 0  | 0  | 0  | 0                                       |

There are no capital, operations and maintenance, or start up costs associated with this collection.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.**

**Annual Cost to the Federal Government**

| <b>Item</b>   | <b>Cost (\$)</b> |
|---|------------------|
| Contract Costs [Describe]   |                  |
| Staff Salaries* See description below   | \$15,284         |
| Facilities [cost for renting, overhead, ect. for data collection activity]          |                  |
| Computer Hardware and Software [cost of equipment annual lifecycle]                 |                  |
| Equipment Maintenance [cost of annual maintenance/service agreements for equipment] |                  |
| Travel  |                  |
| Printing [number of data collection instruments annually]                           |                  |
| Postage [annual number of data collection instruments x postage]                    |                  |
| Other   |                  |
| <b>Total</b>  | <b>\$15,284</b>  |

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

The staff salaries were calculated as a GS 12 Step 5 (\$32.73/hr x 1.4 multiplier = 45.82) to review and approve 64 annual State Administrative Plan for 4 hours per plan is estimated to be \$11,730. Regional Director, Executive Level III (\$79.32/hr. x 1.4 multiplier = 111.05 per hour) review, approve, and notify the State of the approved plan at 30 minutes per plan is estimated to be 64 x .5 hr x \$111.05 = \$3,554. Therefore, the total estimated annualized cost to the Federal Government is \$15,284 annually.

**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> |  |                             |                   |  |                         |                   |
|--|--|-----------------------------|-------------------|--|-------------------------|-------------------|
| <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> |
| State Administrative Plan / No Form Number     |  |                             |                   | 384  | 512                     | 128               |
| <b>Total(s)</b>                                |  |                             |                   | <b>384</b>   | <b>512</b>              | <b>128</b>        |

**Explain:** For the State Administrative Plan, the increase in Annual Hours Burden from 384 to 512 results from the updated estimate of 2 responses per respondent per year from the previous 1.5 responses per respondent because a half of grant application cannot be submitted – it was used as an estimate but should have been calculated at a whole number and 1.5 would round up to 2. This increase of 2 responses represents that all states and territories which FEMA has a mission to respond to now respond. There is no change in regulation, all states and territories are now taking advantage of the grants for hazard mitigation. This results in a net increase of +128 annual burden hours.

|   |
|---|
| <b>Itemized Changes in Annual Cost Burden</b> |
|---|

| <b>Data collection Activity/Instrument</b> | <b>Program Change (cost currently on OMB Inventory)</b> | <b>Program Change (New)</b> | <b>Difference</b> | <b>Adjustment (cost currently on OMB Inventory)</b> | <b>Adjustment (New)</b> | <b>Difference</b> |
|--|---|-----------------------------|-------------------|---|-------------------------|-------------------|
| State Administrative Plan / No Form Number |   |                             |                   | \$10,188  | \$21,504                | 11,316            |
| <b>Total(s)</b>                            |   |                             |                   | <b>\$10,188</b>                                     | <b>\$21,504</b>         | <b>\$11,316</b>   |

**Explain:** For the State Administrative Plan, the increase in the Annual Cost Burden from \$10,188 to \$20,504 results from the increase in responses from respondent, and also from the 1.4 multiplier being applied to the wage rate. The net increase in Annual Cost Burden is +\$11,316.

**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.**

Not applicable. FEMA does not publish the HMGP data collections.

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

NOT APPLICABLE. A valid OMB control number, expiration date and burden disclosure notice will be displayed in all collection's material.

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

NOT APPLICABLE. This collection does not seek exception to the certification statement referenced above.

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

The collection of information for HMGP does not employ statistical methods.