

July 12, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0005

Title: National Flood Insurance Program Claims Forms

Form Number(s): 086-0-06, 086-0-07, 086-0-08, 086-0-09, 086-0-10, 086-0-11, 086-0-12, 086-0-13, 086-0-14, 086-0-15, 086-0-16, 086-0-17, 086-0-18, 086-0-19, 086-0-20, 086-0-21

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 National Flood Insurance Program (NFIP) codified as 42 U.S.C. 4001, *et sec.* and is authorized by Public Law 90-448(1968) and expanded by Public Law 93-234 (1973) provides low-cost federally subsidized flood Insurance for existing buildings exposed to flood risk. In return, communities must enact and administer construction safeguards to ensure that new construction in the flood plain will be built to eliminate or minimize future flood damage.

In accordance with Public Law 93-234, the purchase of flood insurance is mandatory when Federal or federally related financial assistance is being provided for acquisition or

construction of buildings located, or to be located, within FEMA-identified special flood hazard areas of communities, which are participating in the program. This collection is also in accordance with FEMA responsibilities under Section 555 of the National Flood Insurance Reform Act of 1994, Title V of the Riegle Community Development and Investment Act of 1994 (Public Law 103-325) which requires the National Flood Insurance Program (NFIP) to provide coverage under the Standard Flood Insurance Policy the increased costs of complying with the land use control measures established under section 136 1 of the National Flood Insurance Act of 1968 as amended. This collection includes all NFIP direct claims. The information collected includes all of the data necessary to adjudicate claims for damages resulting from flood loss.

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 following FEMA forms are used by adjusters and policyholders to collect the information needed to investigate, document, evaluate, and settle claims against NFIP policies by policyholders for flood damage to their insured property or qualification for benefits under Increased Cost of Compliance coverage.

FEMA Form 086-0-06, National Flood Insurance Program Worksheet – Contents - Personal Property

The adjuster and the policyholder list and assess the inventory of flood-damaged personal property on this form. This forms lists the personal property damaged for determination of what is covered within the claim.

FEMA Form 086-0-07, Worksheet - Building

The adjuster and the policyholder list and assess the scope of flood-damaged building property on this form. This documents the damage to the building so that a claim determination may be made.

FEMA Form 086-0-08, Worksheet - Building (Continued)

The adjuster and the policyholder continue to list and assess the scope of flood-damaged building property on this form when the amount of building property damage exceeds the space available on one worksheet. This is a continuation of 086-0-07 if necessary.

FEMA Form 086-0-09, Proof of Loss

The adjuster assist the policyholder with this form to make their statement of the amount claimed, which is signed with details of the loss. This document provides the net amount of the claimed loss and takes into account the amount of insurance coverage on the policy and any depreciation for the property.

FEMA Form 086-0-10, Increased Cost of Compliance Proof of Loss

The adjuster assist the policyholder with this form to make their statement of the amount claimed for an Increased Cost of Compliance (ICC) claim, which is signed with details of the loss. This document provides for calculations to determine the amount of insurance coverage for mitigation activities.

FEMA Form 086-0-11, Notice of Loss

The agent assist the policyholder with giving prompt written notice of flood damage on this form, as required by the Standard Flood Insurance Policy (SFIP). The form includes policy information (name, address, mortgagee), description of the property and damage, and contact information for the policyholder.

FEMA Form 086-0-12, Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy

The adjuster assist the policyholder with this form to make their statement of the actual amount expended repairing building flood damage for reimbursement above actual cash value, when eligible under the terms of the.

FEMA Form 086-0-13, National Flood Insurance Program Preliminary Report

The adjuster uses this form to report information to the NFIP Servicing Agent for setting reserves and initial claims processing.

FEMA Form 086-0-14, National Flood Insurance Program Final Report

The adjuster uses this form to document the overall flood damages to the insured property and to provide a detailed summary of the claims information.

FEMA Form 086-0-15, National Flood Insurance Program Narrative Report

The adjuster uses this form to report additional information in a narrative format that is necessary to document the claim in addition to information provided by the Preliminary Report and Final Report.

FEMA Form 086-0-16, Cause of Loss and Subrogation Report

The adjuster uses this form to identify potentially responsible third parties and their actions that may have caused or worsened flood damage.

FEMA Form 086-0-17, Manufactured (Mobile) Home/Travel Trailer Worksheet

The adjuster uses this form to record information used to determine the replacement cost of a manufactured (mobile) home.

FEMA Form 086-0-18, Manufactured (Mobile) Home/Travel Trailer Worksheet (continued)

The adjuster continues to record information used to determine the actual cash value of a manufactured (mobile) home.

FEMA Form 086-0-19, Increased Cost of Compliance (ICC) Adjuster Report

The adjuster lists the information required to qualify a policyholder for an ICC claim and documents the mitigation option and cost.

FEMA Form 086-0-20, Adjuster Preliminary Damage Assessment

The adjuster lists potentially Substantially Damaged Structures (buildings that appear to be damaged to 50% or more of their market value) in preparation for possible ICC Claims.

FEMA Form 086-0-21, Adjuster Certification Application

This form is used to collect information from those persons seeking to become certified flood adjusters. Under its contract, the NFIP Servicing Agent can only assign flood claim investigations to certified flood adjusters. Adjuster candidates list their personnel information, training, experiences and references on this form to document that they meet the requirements to be certified flood adjusters.

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.

Claim adjusters use automated electronic technology to document damage estimates. The forms are printed and a copy of the damage estimate is provided to the insured for their records. The insured must sign the proof of loss and return it to the NFIP Servicing Agent. Current forms are available electronically on the adjuster's computer. The forms that are completed, with the exception of the three listed below, can be uploaded electronically into the claims adjustment system when the adjustor connects to the system after the work is completed. Once the claim goes through the adjustment process, the following forms, FEMA Form 086-0-09, 086-0-10, and 086-0-12, are sent back to the respondent along with the entire claim package for their review and approval. Once the respondent signs these forms, they can mail, fax or e-mail the signed documents back. As the respondent has been the victim of a flood event, these methods to receive the documentation back have produced the results necessary to ensure timely processing.

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 since only one set of forms is required per claim. Information on each claim is unique to the disaster causing the damage and is not available from any

other sources than the adjuster assigned to the claim. Therefore, there is no duplication of information.

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.

The claims adjuster who performs the investigation works for an independent adjusting firm. These companies perform inspections as a regular part of their business process and are not impacted adversely by the collection of information.

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 information is required to investigate, evaluate, document, and determine the amount of the claim payment due the insured when a loss occurs. Without this collection, the NFIP could not operate and could not provide necessary flood insurance coverage and claims payments to property owners in communities participating in the NFIP.

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 are no special circumstances that require respondents to report information to the agency 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 are no special circumstances that would require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

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

There are no special circumstances that 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.

There are no special circumstances that 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.

There are no special circumstances that require respondents to participate in a statistical survey.

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

There are no special circumstances that require respondents to participate in a statistical survey.

(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.

There are no special circumstances that include a pledge 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.

There are no special circumstances that require respondents to submit proprietary trade secret or other confidential 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 May 5, 2010, Volume 75 pp 24728. 2 comments were received. See attached copy of the published notice included in this package.

The first comment, received on May 5, 2010 from an anonymous source, was reviewed and found to be general comments related to Individual Assistance payments and not to the NFIP claims process. The comments did not request a specific action be taken and also touched on other areas that are not under FEMA's purview.

The second comment received on May 26, 2010 from a person identified as Jean Public indicated a concern that the forms and process for this collection were not properly protecting the American taxpayer. The process by which FEMA collects and acts upon NFIP claims adheres to all applicable regulations, including the Paperwork Reduction Act of 1995. Each claim is fully investigated through the use of forms, photographs and site visits and all steps are taken to ensure that only valid claims are paid.

A 30-day Federal Register Notice inviting public comments was published on July 27, 2010, Volume 75 pp 44002. No comments were. 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.

The Flood Insurance Producer National Committee (FIPNC), which is made up of non-government professionals involved with the NFIP, meets quarterly with government officials from FEMA staff to discuss any aspects of the NFIP that are of concern to them and to make the process as efficient as possible. The forms used within this collection are subject to discussion during the meetings.

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 program personnel discuss the claim forms at annual meetings with the adjusters who are involved with investigating the claims and providing the information. FEMA provides annual training sessions for adjusters.

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

There are no payments or gifts to respondents.

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

The information collected is voluntary; however, failure to submit the required information would prevent processing of a claim. A Systems of Records Notice, National Flood Insurance Program, was published on December 19, 2008. A Privacy Threshold Analysis was completed January 27, 2010. A new Privacy Impact Assessment is currently being generated for DHS approval.

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 requirements for respondents to answer any 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 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.

FEMA Form 086-0-06, National Flood Insurance Program Worksheet – Contents - Personal Property – It is estimated that 2,184 adjustors will assess the personal property damage which is estimated to take 2.5 hours per assessment. The total hour burden would be $2,184 \times 2.5 \text{ hours} = 5,460$.

FEMA Form 086-0-07, Worksheet – Building – It is estimated that 3,640 adjustors will assess the scope of property damage and this is estimated to take 2.5 hours per assessment. The total hour burden would be $3,640 \times 2.5 \text{ hours} = 9,100$.

FEMA Form 086-0-08, Worksheet - Building (Continued) – It is estimated that 3,640 adjustors will utilize this form to continue to list the additional property damage beyond that which fits on FEMA Form 086-0-07 and is estimated to take 1 hour per response. The total hour burden would be $3,640 \times 1 \text{ hours} = 3,640$.

FEMA Form 086-0-09, Proof of Loss – It is estimated that 3,640 adjustors complete the proof of the loss they incurred which is estimated to take .08 hours (5 minutes) hours per response. The total hour burden would be $3,640 \times .08 \text{ hours} = 291.2$.

FEMA Form 086-0-10, Increased Cost of Compliance Proof of Loss – It is estimated that 260 adjustors will complete this statement which is estimated to take 2 hours per response. The total hour burden would be $260 \times 2 \text{ hours} = 520$.

FEMA Form 086-0-11, Notice of Loss – It is estimated that 3,640 Insurance Sales Agents will complete this notice of flood damage which is estimated to take .07 (4 minutes) hours per response. The total hour burden would be $3,640 \times .07 \text{ hours} = 254.8$.

FEMA Form 086-0-12, Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy – It is estimated that 1,040 adjustors will document the actual amount expended repairing flood damage which is estimated to take .1 hour (6 minutes) per response. The total hour burden would be $1,040 \times .1 \text{ hour} = 104$.

FEMA Form 086-0-13, National Flood Insurance Program Preliminary Report – It is estimated that 3,640 adjustors will complete this form to determine reserves which is estimated to take .07 hour (4 minutes) per response. The total hour burden would be $3,640 \times .07 \text{ hour} = 254.8$.

FEMA Form 086-0-14, National Flood Insurance Program Final Report – It is estimated that 3,640 adjustors will document overall flood damage which is estimated to take .07 hour (4 minutes) per response. The total hour burden would be $3,640 \times .07 \text{ hour} = 254.8$.

FEMA Form 086-0-15, National Flood Insurance Program Narrative Report – It is estimated that 2,080 adjustors will complete this narrative to support the final report which is estimated to take .08 hour (5 minutes) per assessment. The total hour burden would be $2,080 \times .08 \text{ hours} = 166.4$.

FEMA Form 086-0-16, Cause of Loss and Subrogation Report – It is estimated that 364 adjustors will complete this form to document any responsible third parties which is estimated to take 1 hour per response. The total hour burden would be $364 \times 1 \text{ hour} = 364$.

FEMA Form 086-0-17, Manufactured (Mobile) Home/Travel Trailer Worksheet – It is estimated that 208 adjustors will assess the personal property determine the replacement cost of a manufactured home which is estimated to take .5 hour (30 minutes) per assessment. The total hour burden would be $208 \times .5 \text{ hour} = 104$.

FEMA Form 086-0-18, Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued) – It is estimated that 208 adjustors will assess the personal property determine the actual cash value of a manufactured home which is estimated to take .25 hour (15 minutes) per assessment. The total hour burden would be $208 \times .25 \text{ hour} = 52$.

FEMA Form 086-0-19, Increased Cost of Compliance (ICC) Adjuster Report – It is estimated that 260 adjustors will document the mitigation option and cost which is estimated to take .42 hour (25 minutes) per assessment. The total hour burden would be $260 \times .42 \text{ hours} = 109.2$.

FEMA Form 086-0-20, Adjuster Preliminary Damage Assessment – It is estimated that 520 adjusters will assess the damage to determine if an ICC claim is possible which is estimated to take .25 hour (15 minutes) per assessment. The total hour burden would be 520 x .25 hours = 130.

FEMA Form 086-0-21, Adjuster Certification Application – It is estimated that 520 adjusters will seek to become certified adjusters which is estimated to take .25 hour (15 minutes) per assessment. The total hour burden would be 520 x .25 hours = 130.

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.

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
Business or other for-profit	National Flood Insurance Program Worksheet-Contents-Personal Property / FEMA Form 86-0-06	2,184	1	2,184	2.5	5,460.0	\$38.74	\$211,520
Business or other for-profit	Worksheet - Building / FEMA Form 086-0-07	3,640	1	3,640	2.5	9,100.0	\$38.74	\$352,534
Business or other for-profit	Worksheet - Building (Continued) / FEMA Form 086-0-08	3,640	1	3,640	1	3,640.0	\$38.74	\$141,014
Business or other for-profit	Proof of Loss / FEMA Form 086-0-09	3,640	1	3,640	0.08	291.2	\$38.74	\$11,281
Business or	Increased Cost	260	1	260	2	520.0	\$38.74	\$20,145

other for-profit	of Compliance Proof of Loss / FEMA Form 086-0-10							
Business or other for-profit	Notice of Loss / FEMA Form 086-0-11	3,640	1	3,640	0.07	254.8	\$40.68	\$10,365
Business or other for-profit	Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy / FEMA Form 086-0-12	1,040	1	1,040	0.1	104.0	\$38.74	\$4,029
Business or other for-profit	National Flood Insurance Program Preliminary Report / FEMA Form 086-0-13	3,640	1	3,640	0.07	254.8	\$38.74	\$9,871
Business or other for-profit	National Flood Insurance Program Final Report / FEMA Form 086-0-14	3,640	1	3,640	0.07	254.8	\$38.74	\$9,871
Business or other for-profit	National Flood Insurance Program Narrative Report / FEMA Form 086-0-15	2,080	1	2,080	0.08	166.4	\$38.74	\$6,446
Business or other for-profit	Cause of Loss and Subrogation Report / FEMA Form 086-0-16	364	1	364	1	364.0	\$38.74	\$14,101
Business or other for-profit	Manufactured (Mobile) Home/Travel Trailer Worksheet / FEMA Form 086-0-17	208	1	208	0.5	104	\$38.74	\$4,029
Business or other for-profit	Manufactured (Mobile) Home/Travel Trailer	208	1	208	0.25	52.0	\$38.74	\$2,014

	Worksheet (Continued)/ FEMA Form 086-0-18							
Business or other for- profit	Increased Cost of Compliance (ICC) Adjuster Report / FEMA Form 086-0-19	260	1	260	0.42	109.2	\$38.74	\$4,230
Business or other for- profit	Adjuster Preliminary Damage Assessment / FEMA Form 086-0-20	520	1	520	0.25	130.0	\$38.74	\$5,036
Business or other for- profit	Adjuster Certification Application / FEMA Form 086-0-21	520	1	520	0.25	130.0	\$38.74	\$5,036
Total		3,640		29,484		20935.2		\$811,524

- 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) the wage rate category for Claims Adjusters, Examiners, and Investigators (Claim Adjusters) is estimated to be \$38.74 per hour including the wage rate multiplier, therefore, the estimated cost to respondents is estimated to be \$797,533 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Insurance Sales Agent is estimated to be \$40.68 per hour including the wage rate multiplier, therefore, the estimated cost to respondents is estimated to be \$10,365 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.

Annual Cost Burden to Respondents or Record-keepers

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

There are no operation and maintenance, or capital and start-up costs associated with this the collection of information. There is no cost for the insurance adjuster services to respondents as these costs are part of the contract costs and the fee to the adjuster is paid out of these. See Question 14.

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 - The contract costs for claims processing is estimated to be an average of \$1,019.00 per claim based on an estimated 5,200 claims annually. The total would be \$1,019 x 5200 = \$5,298,800.	\$5,298,800.00
Staff Salaries* [1 of GS 14 , step7 employee spending approximately 20% of time annually monitoring the program including quality review of selected claims and adherence to program guidelines] [\$126,251 x 20% x 1.4 = \$35,350]	\$35,350
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	
Total	\$ 5,303,786

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

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
National Flood Insurance Program Worksheet-Contents-Personal Property / FEMA Form 86-0-06				7,875	5,460.00	-2,415.0
Worksheet - Building / FEMA Form 086-0-07				12,375	9,100.00	-3,275.0
Worksheet - Building (Continued) / FEMA Form 086-0-08				5,250	3,640.00	-1,610.0
Proof of Loss / FEMA Form 086-0-09				420	291.2	-128.8

Increased Cost of Compliance Proof of Loss / FEMA Form 086-0-10				750	520	-230.0
Notice of Loss / FEMA Form 086-0-11				368	254.8	-113.2
Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy / FEMA Form 086-0-12				150	104	-46.0
National Flood Insurance Program Preliminary Report / FEMA Form 086-0-13				368	254.8	-113.2
National Flood Insurance Program Final Report / FEMA Form 086-0-14				368	254.8	-113.2
National Flood Insurance Program Narrative Report / FEMA Form 086-0-15				240	166.4	-73.6
Cause of Loss and Subrogation Report / FEMA Form 086-0-16				525	364	-161.0
Manufactured (Mobile) Home/Travel Trailer Worksheet / FEMA Form 086-0-17				150	104	-46
Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued)/ FEMA Form 086-0-18				75	52	-23.0
Increased Cost of Compliance (ICC) Adjuster Report / FEMA Form 086-0-19				158	109.2	-48.8
Adjuster Preliminary Damage Assessment / FEMA Form 086-0-20				188	130	-58.0
Adjuster Certification Application / FEMA Form 086-0-21				188	130	-58.0
Total(s)				29,448	20,935.2	-8,512.8

Explain: The prior PRA submission included calculations based on the catastrophic events Hurricanes Katrina and Rita. Disaster activity has decreased to more historically normal levels and the new annual burden hours reflect this. The Annual Hour Burden at the time of the last PRA submission was 29,448, the new Annual Hour Burden is 20,935.2 and the net decrease is -8,512.8 hours.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
National Flood Insurance Program Worksheet- Contents-Personal Property / FEMA Form 86-0-06				\$174,904	\$211,520	\$36,616.00
Worksheet - Building / FEMA Form 086-0-07				\$274,849	\$352,534	\$77,685.00
Worksheet - Building (Continued) / FEMA Form 086-0-08				\$116,603.00	\$141,014	\$24,411.00
Proof of Loss / FEMA Form 086-0-09				\$9,328.00	\$11,281	\$1,953.00
Increased Cost of Compliance Proof of Loss / FEMA Form 086-0-10				\$16,658.00	\$20,145	\$3,487.00
Notice of Loss / FEMA Form 086-0-11				\$8,173.00	\$10,365	\$2,192.00
Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy / FEMA Form 086-0-12				\$3,332.00	\$4,029	\$697.00
National Flood Insurance Program Preliminary Report / FEMA Form 086-0-13				\$8,173.00	\$9,871	\$1,698.00
National Flood Insurance Program Final Report / FEMA Form 086-0-14				\$8,173.00	\$9,871	\$1,698.00
National Flood Insurance Program Narrative Report / FEMA Form				\$5,330.00	\$6,446	\$1,116.00

086-0-15						
Cause of Loss and Subrogation Report / FEMA Form 086-0-16				\$11,660.00	\$14,101	\$2,441.00
Manufactured (Mobile) Home/Travel Trailer Worksheet / FEMA Form 086-0-17				\$3,332.00	\$4,029	+697.00
Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued)/ FEMA Form 086-0-18				\$1,666.00	\$2,014	\$348.00
Increased Cost of Compliance (ICC) Adjuster Report / FEMA Form 086-0-19				\$3,509.00	\$4,230	\$721.00
Adjuster Preliminary Damage Assessment / FEMA Form 086-0-20				\$4,175.00	\$5,036	\$861.00
Adjuster Certification Application / FEMA Form 086-0-21				\$4,175.00	\$5,036	\$861.00
Total(s)				\$654,040	\$811,524	+\$157,484

Explain: Based on the revised estimated Annual Hours Burden, the Annual Cost Burden would decrease from \$654,040 to \$577,069 without the 1.4 multiplier factored in. However, there has been an overall increase in the total Annual Cost Burden due to the incorporation of the 1.4 multiplier on the wage rates. The Annual Cost Burden at the time of the last PRA submission was \$654,040, the new Annual Cost Burden is \$811,524 and the net increase is +\$157,484.

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

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

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

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

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

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

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.