

July 2, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0037

**Title: Application Form for Single Residential Lot or Structure
Amendments to National Flood Insurance Program Maps**

Form Number(s): FEMA Form 086-0-22, 086-0-22A

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 Department of Homeland Security’s Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. With the passage of the Flood Disaster Protection Act of 1973, an owner of a structure, with a federally backed mortgage, located in the 1-percent annual chance floodplain, was required to purchase Federal flood insurance. Title 44 CFR parts 65 and 70 provide for a mechanism to request a review and also indicate the requirements necessary to apply for a reassessment of this determination. In order to remove an area from a Special Flood Hazard Area (SFHA), the owner or lessee of the property must submit scientific or technical data demonstrating that the area is “reasonably safe from flooding” and not in the SFHA.

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.

FEMA collects scientific and technical data submissions to determine whether a specific, single-lot property is located within or outside of a SFHA. FEMA provides the appellant with a written determination as to his/her decision. If the property is determined not to be within a SFHA, the appropriate map is modified by a Letter of Map Amendment (LOMA). The owner or lessee of a property uses a LOMA to show that a property is not flood prone, making it possible for the lending institution to waive the flood insurance requirement. If insurance is carried for the property, the new determination should result in significantly lower rates.

FEMA Form 086-0-22 and FEMA Form 086-0-22A (Spanish version), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps. This form allows the owner or lessee of a single lot or structure to understand and prepare the data required to determine if the single lot or structure is located in the SFHA. The form describes the location of the property, what is being requested, and what data are required to support the request.

In addition to these forms, requests must include the following:

A copy of the Plat Map for the property (with recordation data and stamp of the Recorder's Office) OR

A copy of the property deed (with recordation data and stamp of the Recorder's Office), accompanied by a tax assessor's map or other certified map showing the surveyed location of the property relative to the local streets and watercourses

Copy of the effective FIRM panel and/or Flood Boundary and Floodway Map (FBFM) (if applicable) on which the property location has been accurately plotted.

The forms supplement the general information requirements in the NFIP regulations and establish an organized, systematic approach to collect data needed to request removal from a SFHA in a manner that will:

- Ensure all data required to process such a request is received with the initial submittal;
- Ensure processing consistency between all processing partners;
- Ensure that submitted data are presented in a manner that will increase processing efficiency;
- Reduce the amount of time required to process requests; and
- Reduce processing costs.

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 forms (086-0-22 and 086-0-22A) are available on the Internet and can be downloaded from the website. The forms can be found at the following website address: http://www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm. The forms are provided in Adobe® Acrobat® PDF format and as Microsoft Word WinZip archives. Users are able to download the files and print completed forms manually and mail them to FEMA. Currently, there is no method for submitting completed forms online. Depending on the availability of funding from the federal government and the priority given to this collection, FEMA may develop the capability for users to return completed forms electronically over the Internet.

Effective Flood Insurance Rate Maps (FIRM), Flood Boundary and Floodway Maps (FBFM), and Flood Insurance Study (FIS) reports that cover the area in which a particular property is located can be obtained from the Map Service Center (MSC) on the FEMA website at <http://store.msc.fema.gov>. Those that do not have internet access can contact the Map Service Center at 800-358-9616.

Requestors can check on the status of their Letter of Map Amendment (LOMA) request by visiting FEMA's Mapping Information Platform website at <https://hazards.fema.gov>.

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 are no duplicative efforts. The basic information required to request this benefit is not available elsewhere. Part of the application process involves the submission of maps, etc to support the application and the respondent can provide copies of existing documents instead of duplicating the information in another format.

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 collection of information will have the same impact on small businesses or other small entities as all other respondents.

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.

If the collection of information were not conducted, it would deprive individuals of the right to provide scientific or technical data to correct flood insurance maps that may be in error. If this information were not collected, the majority of respondents to this collection

would continue to pay higher flood insurance premiums than would be necessary if they were to get a determination showing that their property was no longer in a Special Flood Hazard Area. If this were the case, local pressures would likely mount and cause a significant number of communities to reevaluate their decisions to continue their participation in the NFIP. Without this collection of information there would also be increased costs for mapping, since these requests would require physical revisions to the Flood Insurance Rate Maps.

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 for this collection that would require respondents to report information to the agency more often than quarterly.

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

Under no circumstances are respondents required to prepare a written response to the collection of information in fewer than 30 days after receipt of it.

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

Respondents are only required to submit one copy of all documents.

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

Respondents are not required to retain any records pertaining to this collection.

(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 is not used in statistical surveys not designed to produce valid and reliable results that can be generalized to the universe of study.

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

This collection does not require the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by

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

This collection does not include 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 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 FR pp 24723. 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 27, 2010, Volume 75 pp 44001. 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.

In preparation of the forms and instructions, FEMA's Production and Technical Services Contractors and Customer and Data Services Contractor were consulted regarding changes to the forms and instructions. No major changes to the forms and instructions are being 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.

By the nature of the information collection activity, itself, consultation with those from whom information is to be obtained is continuous. These consultations are conducted on a daily basis by FEMA's Production and Technical Services Contractors. When requests are received from respondents (homeowners, surveyors, and engineers), comments are often included regarding the forms and instructions. The majority of the comments involve the clarity of instructions. In addition, FEMA's website (http://www.fema.gov/plan/prevent/fhm/tsd_emap.shtm) includes an email address, in which respondents can provide comments regarding the forms and clarity of instructions.

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

There will be no payments or gifts provided to respondents.

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

A Privacy Impact Assessment was completed January 27, 2006 and is currently being reviewed by DHS for updating. A SORN was published February 15, 2006 and is also currently being reviewed by DHS for updates.

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 required for this collection of information.

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.

It is anticipated that FEMA Forms 086-0-22 and 086-0-22A will result in approximately 18,775 responses to this collection each year. The responses consists of one form that

will require both the homeowner to complete a part and a surveyor or engineer to complete the remainder. Each form requires a total average of 2.4 hours to complete; 1.2 hours for the homeowner and 1.2 hours for the surveyor or engineer. The total annual hours burden is calculated to be 18,775 x 2.4 hours = 45,060 annual 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. 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
Homeowner	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22	16,428	1	16,428	1.2	19,714	\$21.80	\$429,765
Homeowner	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish) /	2,347	1	2,347	1.2	2,816	\$21.80	\$61,389

	FEMA Form 086-0-22A							
Subtotal		18,775		18,775		22,530		\$491,154
Surveyor	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22	11,500	1	11,500	1.2	13,800	\$35.66	\$492,108
Surveyor	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish) / FEMA Form 086-0-22A	1,643	1	1,643	1.2	1,972	\$35.66	\$70,322
Subtotal		13,143		13,143		15,772		\$562,430
Engineer	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22	4,928	1	4,928	1.2	5,913	\$50.22	\$297,001

	Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish) / FEMA Form 086-0-22A							
Engineer		704	1	704	1.2	845	\$50.22	\$42,436
Subtotal		5,632		5,632		6,758		\$339,437
Total		18,775		37,550		45,060		\$1,393,021

- 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

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for All Occupations (representing all homeowners) is estimated to be (\$15.77 x 1.4=) \$20.88 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents All Occupations is estimated to be (19,714 + 2,816 =) 22,530 hours x \$20.88 = \$491,154 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Surveyors is estimated to be (\$25.87 x 1.4 =) \$35.66 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Surveyors is estimated to be (13,800 + 1,972 =) 15,772 hours x \$35.66 = \$562,430 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Civil Engineers is estimated to be (\$35.87 x 1.4 =) \$50.22 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Civil Engineers is estimated to be (5,913 + 845 =) 6,758 hours x \$50.22 = \$339,437 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.

There are no start-up, capital, operational, or maintenance costs for this collection. The homeowner does not contract for the surveyor or engineer to complete the form.

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, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22		\$7,392,600		
Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish) / FEMA Form 086-0-22A		\$1,056,150		
Total		\$8,448,750		

FEMA Forms 086-0-22 and 086-0-22A require an elevation certificate to be submitted. The property owner is required to hire a surveyor or engineer at an average cost of \$450. The total cost for this is $(16,428 + 2,347) \times 450 = 18,775 \times 450 = \$8,448,750$.

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 Contractor cost to handle incoming calls related to application process: 30,674 x 6 minutes average per call x \$57.50 per hour = 3,067 hours x \$57.50 = \$176,353.	\$176,353
Staff Salaries* 1 of GS 12 , step 6 employees spending approximately 15% of time annually to the coordination, completion, and final submission for this data collection] [\$41.85 x 1.4 = \$58.59 x 8 hours x 39 days = \$18,280]	\$18,280
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 [30,000 copies at \$.23 per page]	\$7,000
Postage [30,000 copies x .44]	\$13,200
Other	
Total	\$218,187

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

The contractor costs are estimated to be \$179,707. This cost includes call center staff responding to an average of 30,674 calls per year that pertain to this collection. Most of these calls are from respondents who require assistance with completing the forms and interpretation of the instructions. Based on historical call center data, calls pertaining to the forms lasts an average of 6 minutes. Based on an average loaded rate of \$55.00 per hour, the contractor costs for responding to these calls is \$168,707. The contract costs associated with completing and submitting required documents for this collection is estimated to be \$11,000. This includes 200 hours and is based on an average loaded rate of \$55.00 per hour.

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.

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

Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22 and FEMA Form 086-0-22A (Spanish) (Combined for all respondents)				31,680	45,060	+13,380
Total(s)				31,680	45,060	+13,380

Explain: The annual burden hours increased from 31,680 to 45,060, representing an increase of 13,380. This increase, reflected as an adjustment, is due to an increase in estimated annual responses from the previous collection. The increase in the number of responses can be attributed to the issuance of new Flood Insurance Rate Maps (FIRMs) for numerous communities in FY09. The new or revised flood hazard areas had an impact on many homeowners in these communities and therefore an increased number of responses to this collection were received.

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
Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22 and FEMA Form 086-0-22A (Spanish) (Homeowner)				\$224,136	\$491,154	\$267,018
Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22 and FEMA Form 086-0-22A (Spanish) (Surveyor)				\$244,490	\$562,430	\$317,940
Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form 086-0-22 and FEMA Form 086-0-22A (Spanish) (Engineer)				\$151,209	\$339,387	\$188,228
Total(s)				\$619,835	\$1,393,021	\$773,186

Explain – The Annual Cost Burden has increased due to the increase in number of responses as well as the use of the 1.4 multiplier for the wage-rate categories. The increase in the number of responses can be attributed to the issuance of new Flood Insurance Rate Maps (FIRMs) for numerous communities in FY09. The new or revised flood hazard areas had an impact on many homeowners in these communities and therefore an increased number of responses to this collection were received.

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.

There are no outline plans for tabulation and publication of data 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.

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

There is no statistical methodology involved in this collection.