

November 17, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0089

Title: FEMA Mitigation Success Story Database

Form Number(s): FEMA Form 086-0-25

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.

Consistent with performance-based management practices mandated by the Government Performance Results Act (GPRA) (Public Law 103.62 Section 2) FEMA has established the FEMA Mitigation Best Practices success story process to collect and disseminate information describing successful mitigation and flood insurance practices occurring in communities nationwide. Title 44 CFR Part 2 institutes the process whereby FEMA will promote mitigation activities through the availability of information regarding such. By making this type of detail available, FEMA can translate hazard data into useable information for community risk management. The stories incorporate mitigation strategies that have been successfully implemented and provide real-world evidence of the ability to protect against all hazards.

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 **Informal Interviews** are conducted via telephone to obtain information about mitigation activities that have been completed. The information collected as a result of these interviews allows for the costs, benefits, actions and planning of mitigation activities to be visible to those considering such actions. These interviews promote mitigation as a viable alternative in many different circumstances and provide anyone who is aware of potential problems to be made aware of what FEMA can offer.

The **Mitigation Best Practice Submission Worksheet** provides a template for respondents to follow to submit their success stories about mitigation strategies which have been implemented. The information collected includes details about the area where the strategies have been implemented, a narrative of the actual work performed and the benefits derived from this work. FEMA uses this information to provide examples of successful mitigation activities to those who are considering similar actions. By exemplifying the benefits of such projects, FEMA is able to better meet its mission of promoting mitigation as a method of reducing the effects of disaster occurrences.

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 Mitigation Success Story is available at <http://www.fema.gov/plan/prevent/bestpractices/index.shtm> and the respondent can complete a free-form version of their success story. Verbal success stories are also shared with FEMA and a FEMA representative will take the information and enter it into the database for the respondent. Respondents can also download a Word formatted version at the above Web address and return it via e-mail to mitsuccess@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.

This information is not collected in any form, and therefore is not duplicated elsewhere. The success stories are unique to the individual and the mitigation effort which prompted the story, so there is no duplication to the public.

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 can be collected from small communities and FEMA has made the voluntary submission of information as simple as possible by utilizing checkboxes, short answers and making electronic submission possible.

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 FEMA did not collect this information, a valuable tool in the promotion of mitigation activities would not be available. Without the ability to present real-world results of mitigation activities to those considering implementing their own projects, FEMA's ability to meet its requirements to promote and implement mitigation actions as required in regulation would be compromised.

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

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

There is no requirement to report information 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.

There is no requirement for a written response in fewer than 30 days.

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

There is no requirement to submit more than an original and two copies of documents.

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

There is no requirement 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 methodology.

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

The information collection will not use any statistical data classification.

(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 is no pledge of confidentiality that is 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.

There is no requirement for respondents to submit proprietary trade secrets 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 July 27, 2010, Volume 75 FR 44000. No comments were received for this collection. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on October 27, 2010, Volume 75 FR 66115. **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 Mitigation Division maintains constant consultation with include state, local and tribal government employees who are involved with

mitigation activities, private profit and non-profit entities, and individuals on issues related to disaster mitigation. These consultations take place at events such as the Annual Floodplain Management Association Meeting as well as regional conferences held throughout the year.

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.

Respondents are in regular communication with FEMA as the success stories represent actions taken with the assistance of FEMA. The success stories are submitted upon conclusion of a mitigation action or similar occurrence, and respondents can obtain any assistance necessary as needed.

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.

There are no assurances of confidentiality provided to the respondents for this information collection. A Privacy Threshold Analysis (PTA) has been completed and is being reviewed by the FEMA Privacy Office. The FEMA Privacy Office is also developing for approval a Privacy Act Statement for the Mitigation Best Practice Submission Worksheet instrument (FEMA Form 086-0-25). The status of this information remains the same as of November 2010.

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 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.

For the Informal Interviews, it is estimated the 5 individuals will provide a success story and that it will take approximately 4 hours to provide the information. Each respondent will only respond once, and there will be a total of 20 annual hours of burden.

For the FEMA Mitigation Best Practice Submission Worksheet, it is estimated that 45 individuals will go online and provide a success story electronically. Each respondent will only respond once, and it will take approximately 1.5 hours to provide the information. The total annual hour burden will be 67.5 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
Individual or households; State, local or Tribal Government	Informal Interviews / No Form	5	1	5	4	20	\$28.45	\$569.00
Individual or households; State, local or Tribal Government	Mitigation Best Practice Submission Worksheet / 086-0-25	45	1	45	1.5	68	\$28.45	\$1,934.60

Total		50		50		88		\$2,503.60
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- 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 All Occupations is estimated to be \$20.32 x 1.4 = \$28.45 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents All Occupations is estimated to be \$2,503.60 annually. All occupations includes the individuals who write in about community activities or the local leaders who share the success stories.

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:

- 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

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	0	0	0	

There are no operation, maintenance, capital 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

Item	Cost (\$)
Contract Costs [functionality testing the web-based database, the fields, and the instructions by entering new success stories and attaching supporting material.]	\$54,000
Staff Salaries* 1 of GS 13 , step 5 employees spending approximately 15% of time annually editing and reviewing the information received. $100,904 \times 15\% = \$15,136 \times 1.4 = \$21,190$	\$21,190
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	\$75,190

* 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
Informal Interviews / 086-0-25				540	20	-520
Mitigation Best Practice Submission Worksheet / FEMA Form 086-0-25				23	68	+45
Total(s)				563	88	-475

Explain: There has been a reduction in the number of respondents for the Informal Interviews due to the lessening need to obtain success stories using this method of collecting them. Due to the increased media attention on mitigation activities coupled with more stories being submitted online, the outreach via informal interviews has been able to be reduced. The currently approved hour burden is 540 hours; the new hour burden requested is 20 hours which is a decrease of 520 hours.

There has been an increase in the number of respondents for the Mitigation Best Practice Submission Worksheet FEMA Form 086-0-25 due to the increased use of the Internet by mitigation participants to provide their success stories. The currently approved hour burden is 23 hours; the new hour burden requested is 68, which is an increase in 45 hours.

There has been no change in the information being collected.

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
Informal Interviews / No Form				\$10,173.60	\$569.00	-\$9,604.60
Mitigation Best Practice Submission Worksheet / FEMA Form 086-0-25				\$433.32	\$1,934.60	\$1,501.28
Total(s)				\$10,606.92	\$2,503.60	-\$8,103.32

Explain: There has been a decrease in the Annual Cost Burden for the Informal Interviews due to the reduced number of interviews conducted. The previous Annual Cost Burden was \$10,173.60; the new burden is \$569 resulting in a decrease of \$9,604.60.

There has been an increase in the Annual Cost Burden for FEMA Form 086-0-25 due to the increase in online responses as well as the application of the 1.4 multiplier. The previous Annual Cost Burden was \$433.32, the new cost burden is \$1,934.60, and the total increase is \$1,501.28.

There has been no change in the information being collected.

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.