

December 22, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0072

Title: Mitigation Grants Program/eGrants

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. 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.

This collection of information is necessary to implement grants for the Flood Mitigation Assistance (FMA) program, Severe Repetitive Loss (SRL) program, Repetitive Flood Claims (RFC) program and the Pre Disaster Mitigation (PDM) program.

The FMA program is authorized by Section 1366 of the National Flood Insurance Reform Act, 42 U.S.C. 4104c, as amended by the National Flood Insurance Reform Act of 2004 (NFIA), P.L. 108-264. The FMA program, under 44 CFR Part 79, is designed to award grants so that measures are taken to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insurable under the National Flood Insurance Program (NFIP).

The PDM program as authorized by Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Act), 42 USC 5133, as amended by Section 102 of the Disaster Mitigation Act of 2000 (DMA), Public Law 106–390, 114 Stat. 1552, provides grants for cost-effective mitigation actions prior to a disaster event to reduce overall risks to the population and structures, while also reducing reliance on funding from actual disaster declarations.

The RFC program is authorized by the NFIA of 2004 (P.L. 108-264), 42 U.S.C. 4030. The NFIA authorizes up to \$10 million annually to award grants for actions that reduce flood damages to individual properties for which one or more claim payments for losses have been made.

The SRL program is authorized by Section 1361A of the NFIA of 2004, 42 U.S.C. 4102a, with the goal of reducing flood damages to residential properties that have experienced severe repetitive losses under flood insurance coverage. The program under 44 CFR Part 79, focuses on efforts that will result in the greatest savings to the NFIF in the shortest period of time.

In accordance with OMB Circular A-102, FEMA requires that all parties interested in receiving FEMA mitigation grants to submit an application package for grant assistance. The e-Grants system has been developed and revamped to meet the intent of the e-Government initiative, authorized by Public Law 106–107. This initiative requires that all government agencies both streamline grant application processes and provide for the means to electronically create, review, and submit a grant application via the Internet.

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 Mitigation eGrants System (eGrants) is an intuitive, user-friendly, Web-based application that allows Grant and Subgrant applicants to use the Internet to apply for Grants and Subgrants. eGrants replaces the paper-based process that has previously been used.

A part of the eGovernment initiative, eGrants streamlines the application process by providing the ability to apply for and manage their Grant and Subgrant applications over the Internet. It manages the processing of applications and facilitates FEMA’s review and award process, from submission of an application through the entire Grant life cycle.

The **Benefit Cost Determination** is used to collect data to evaluate the proposed project’s cost effectiveness. In short, mitigation projects must be cost effective to be eligible for Hazard Mitigation Assistance, (HMA) funding as demonstrated by a FEMA-validated benefit cost analysis. This cost effectiveness is based on a mix of the initial cost of the project and the life-expectancy of the proposed project as well as the proximity of the project to an area more frequently affected by a hazard (such as floods or hurricanes).

The **Environmental Review** is used to collect information that is needed to ensure that a proposed project is in compliance with all necessary environmental and historic preservation regulations and laws. This information is collected to assure that the impact a project has is minimized as much as possible. For example, if a property is acquired and there is asbestos on the property, FEMA has to assure that it is disposed of according to regulations.

The **Project Narrative-Sub-grant Application** is used to collect the information necessary for FEMA to assess the financial needs of the applicants as well as the projected benefits to be obtained from the use of grant funds for each of its mitigation grant programs. The application provides FEMA the required information to determine whether the mitigation activity proposed for funding meets eligibility criteria. In addition, the Applicant provides responses to FEMA to established questions which, combined with the activity eligibility criteria, will be used to objectively evaluate the merits of the application.

The following forms are used within the grant application process. Approval for the use of these forms is provided for in collection OMB Control Number 1660-0025.

FEMA Form 112-0-2, Budget Information- Construction form is used by States and other recipients in non-disaster programs to submit budget information when applying for grants or cooperative agreements when the major purpose is construction. FEMA does award funds to construct Emergency Operating Centers, to acquire property that is located in the floodplain, and to carry out various other construction related activities. When these awards have the major purpose of construction, the program offices are advised to use this form.

FEMA Form 112-0-3, 112-0-3A, 112-0-3B, and 112-0-3C Summary Sheet for Assurances and Certifications is used by States and other recipients to certify compliance with important Federal requirements.

FEMA Form 112-0-4, Outlay Report and Request for Reimbursement for Construction Program, is used by State and local governments to report outlays for construction grants when directed by FEMA.

FEMA Form 112-0-5, Report of Government Property, is used by grantees to provide a listing of inventoried, non-expendable equipment purchased under a grant or cooperative agreement or Federally-owned equipment that is provided by the agency to be used by the grantee.

FEMA Form 112-0-6, Reconciliation of Grants and Cooperative Agreements, is used by grantees and FEMA personnel to reconcile awards, outlays, and draw downs during and at completion of a grant or cooperative agreement.

FEMA Form 112-0-8, Budget Information—Non-construction Programs, on non-disasters, used by States and other recipients to submit budget data when applying for a grant or cooperative agreement where the major purpose is not construction. The

information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. Budget narrative information is made available to FEMA only upon request by FEMA. On the FEMA disaster grants, this form is used to compile the information necessary to fill out the SF424 face sheet. FEMA has a variety of disaster grants that use OMB approved forms to gather information relating to the nature and extent of the disaster damage. Often, States rely upon FEMA to provide estimates as to the extent of the damage and the projected amounts of federal dollars that will be available. FEMA instructs our State partners to fill in the “Other” column for each grant program that is activated under the disaster, and to provide a breakdown by Federal, State, and Local share as appropriate. The individual program offices in FEMA and their State counterparts maintain the detailed information as to what each program is estimated to cost, and then this information is modified as the disaster response and recovery activity progresses. This practice is consistent with OMB guidance that for any form, except the SF424 face sheet, agencies may shade out or instruct the applicant to disregard any line item that is not needed.

FEMA Form 112-0-7, Obligating Document for Award/Amendment, must be signed by State representative and returned to FEMA.

The following Standard Forms (SF) are used within the grant application process. Approval for use of these forms is provided under a government-wide OMB number used throughout the Federal government.

SF-424, Application for Federal Assistance, is a standard form used by applicants as a required face-sheet for pre-applications and applications submitted for Federal assistance. It is used by Federal agencies to obtain application certification, and is approved for use under OMB No. 4040-0004.

SF-425, Federal Financial Report, State and local governments use this form to report the status of financial expenditures for FEMA grants. It is approved for use under OMB No. 0348-0061.

SF-LLL, Disclosure of Lobbying Activities, is a standard form used by applicants as a required agreement to comply with all requirements of the awarding agency. It is approved for use under OMB No. 0348-0046.

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.

Currently all grant applications for the PDM, RFC, SRL, and FMA programs are submitted via e-Grants. The use of the e-Grants system by respondents allows for 100%

of the information required to be submitted electronically. The individual FEMA Forms can be accessed at <http://www.fema.gov/help/forms.shtm>.

Respondents can access e-Grants through the Website <https://portal.fema.gov/famsVuWeb/home>. New users may access the e-Grants system by selecting the new user button and then entering in the required information in order to be approved for a user name and password. Step-by-step directions to receive a user name and password for the e-Grants system is located on page 12 of the Grant Applicants Quick Reference Guide located on the FEMA.gov website at the following link: <http://www.fema.gov/library/viewRecord.do?id=3266>.

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 elsewhere in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Without this collection activity, FEMA will not be able to implement its mitigation grant programs that are set forth in regulation. As a result, FEMA will be unable to expend its annual appropriations for the PDM, FMA, SRL, and RFC programs.

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.

(b) Requiring respondents to prepare a written response to a 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.

(d) Requiring respondents to retain records, other than health,

medical, government contract, grant-in-aid, or tax 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.

(f) Requiring 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.

(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.

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

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 October 4, 2010, Volume 75 FR 61161. **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 December 20, 2010, Volume 75 FR 79386. **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 has invited State/local representatives and national organizations such as National Association of Towns & Townships, National Association of Counties, American Planning Association, and Environmental Protection Agency, to participate in discussions

for FEMA mitigation grant programs. The timing of these discussions varies and is often conducted on an as needed basis. There is an annual meeting of the National Emergency Management Association where organizations listed above would be able to meet with FEMA to discuss the data collection.

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 involved State representatives (as nominated by the National Emergency Management Association [NEMA]) in formal requirements gathering sessions regarding data collection and electronic data processing for FEMA mitigation grant programs. Generally, these data collection sessions occur annually. Specifically, these stakeholders have contributed input into the development of the e-Grants system. The representatives consult with FEMA both at the annual NEMA convention as well as throughout the year at various conferences.

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.

The National Emergency Management Information System – Mitigation Electronic Grants Management System (NEMIS-MT e-Grants) was published in the Federal Register on Wednesday, December 15, 2004 (Vol. 69, No. 240, pp 75079-75081). The SORN is currently being revised/updated and renamed. The review of the MT-eGrants Privacy Threshold Analysis (PTA) was completed by DHS Privacy Office on December 16, 2010.

The MT-eGrants Privacy Impact Assessment (PIA) was approved January 19, 2007, and is currently being revised/updated and renamed by the FEMA Privacy Office. The status of this information remains the same as of December 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.

The total number of respondents for all 4 programs is 56. Each of the programs uses the Benefit-Cost Determination, Environmental Review, and Project Narrative – Sub-grant Application. The **FMA** has a total of 448 responses and the total annual burden hour for this program is 4,088. The **RFC** has a total of 224 responses and the total annual burden hour for this program is 2,044. The **SRL** has a total of 1,232 responses and the total annual burden hour for this program is 10,276. The **PDM** has a total of 3,360 responses and the total annual burden hour for this program is 27,440.

The total for the Benefit-Cost Determination, it is estimated that 56 State Urban and Regional Planners will complete the form in support of the grant requests made. It is estimated that each response will require 5 hours to complete and will be completed 1,680 times a year among the 4 grant programs. The total annual hour burden for this information collection activity will be $56 \times 30 = 1,680 \times 5 \text{ hours} = 8,400 \text{ hours}$.

The total for the Environmental Review, it is estimated that 56 State Urban and Regional Planners will complete the form in support of the grant requests made. It is estimated that each response will require 7.5 hours to complete and will be completed 1,680 times a year among the 4 grant programs. The total annual hour burden for this information collection activity will be $56 \times 30 = 1,680 \times 7.5 \text{ hours} = 12,600 \text{ hours}$.

The total for the Project Narrative – Sub-grant Application, it is estimated that 56 State Urban and Regional Planners will complete the form in support of the grant requests made. It is estimated that each response will require 5 hours to complete and will be completed 1,904 times a year among the 4 grant program. The total annual hour burden for this information collection activity will be $56 \times 34 = 1,904 \times 12 \text{ hours} = 22,848 \text{ hours}$.

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 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
	FMA							
State, local or Tribal Government	Benefit-Cost Determination	56	2	112	5	560	\$43.54	\$24,382
State, local or Tribal Government	Environmental Review	56	2	112	7.5	840	\$43.54	\$36,574
State, local or Tribal Government	Project Narrative-Subgrant Application	56	4	224	12	2688	\$43.54	\$117,036
Subtotal		56		448		4,088		\$177,992
	RFC							
State, local or Tribal Government	Benefit-Cost Determination	56	1	56	5	280	\$43.54	\$12,191
State, local or Tribal Government	Environmental Review	56	1	56	7.5	420	\$43.54	\$18,287
State, local or Tribal Government	Project Narrative-Subgrant Application	56	2	112	12	1344	\$43.54	\$58,518
Subtotal		56		224		2,044		\$88,996
	SRL							
State, local or Tribal Government	Benefit-Cost Determination	56	7	392	5	1960	\$43.54	\$85,338
State, local or Tribal Government	Environmental Review	56	7	392	7.5	2940	\$43.54	\$128,008

State, local or Tribal Government	Project Narrative-Sub-grant Application	56	8	448	12	5376	\$43.54	\$234,071
Subtotal		56		1,232		10,276		\$447,417
	PDM							
State, local or Tribal Government	Benefit-Cost Determination	56	20	1,120	5	5600	\$43.54	\$243,824
State, local or Tribal Government	Environmental Review	56	20	1,120	7.5	8400	\$43.54	\$365,736
State, local or Tribal Government	Project Narrative-Sub-grant Application	56	20	1,120	12	13,440	\$43.54	\$585,178
Total		56		3,360		27,440		\$1,194,738

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

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 State Urban and Regional Planners is estimated to be (\$31.10 x 1.4 =) \$43.54 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents State Urban And Regional Planners is estimated to \$1,909,143.00 annually.

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, local or Tribal Government	Benefit-Cost Determination	56	30	1,680	5 hours	8,400	\$43.54	\$365,735
State, local or Tribal Government	Environmental Review	56	30	1,680	7.5 hours	12,600	\$43.54	\$548,605
State, local or Tribal Government	Project Narrative-Sub-grant Application	56	34	1,904	12 hours	22,848	\$43.54	\$994,803
Total		56		5,264		43,848		\$1,909,143

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

The following forms are utilized for the FEMA grant programs, but the burden hours are not calculated nor submitted for approval within this collection. The following forms are approved for use in collection OMB Control Number 1660-0025.

Type of Respondent	Form Name / Form Number	No. of Responses	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
Flood Mitigation Assistance (FMA) (97.029)								
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	3	168	9.7	1630		
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	1	56	1.7	95		
State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	3	168	1.2	202		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	1	56	4.2	235		
State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	1	56	0.084	5		
Total				504		2,167		
New Repetitive Flood Claims (RFC) (97.092)								
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	1	56	9.7	543		

State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	1	56	1.2	67		
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	1	56	1.7	95		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	1	56	4.2	235		
State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	1	56	0.084	5		
Total				280		945		
New Severe Repetitive Loss (SRL)								
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	1	56	9.7	543		
State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	1	56	1.2	67		
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	1	56	1.7	95		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	1	56	4.2	235		

State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	1	56	0.084	5		
Total				280		945		
Pre-Disaster Mitigation (PDM) (97.047)								
State, Local or Tribal Government	Budget Information - Construction / FEMA Form 112-0-2	56	1	56	17.2	963		
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	2	112	9.7	1086		
State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	2	112	1.2	134		
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	2	112	1.7	190		
State, Local or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs / FEMA Form 112-0-4	56	20	1120	17.2	19264		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	2	112	4.2	470		

State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	2	112	0.084	9		
Total				1736		22,116		

The following Standard Forms are utilized for the FEMA grant programs, but the burden hours are not calculated nor submitted for approval within this collection.

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
Flood Mitigation Assistance (FMA) (97.029)								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	3	168	0.75	126		
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				448		471		
New Repetitive Flood Claims (RFC) (97.092)								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	1	56	0.75	42		
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				336		387		
New Severe Repetitive Loss (SRL) (xx.xxx)								

State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	1	56	0.75	42		
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				336		387		
Pre-Disaster Mitigation (PDM) (97.047)								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	2	112	0.75	84		
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	2	112	0.167	19		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				448		439		

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 record keeping, capital, start-up or maintenance costs associated with this information collection.

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	0

There are no operation and maintenance, or capital and start-up costs associated with this the collection of information.

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.

The total cost to FEMA is \$6,240,801.20. Approximately 26 staff members with an estimated grade level of GS-13 review and make determinations for these grant programs.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Describe] FEMA contracts the maintenance and enhancements to the eGrant data collection. The annual cost of this maintenance contract with IBM, Inc. is \$3,000,000.00 for the sustainment/maintenance of the eGrants system. Total cost: \$3,000,000.00	\$3,000,000.00
Staff Salaries* [26 GS-13, step 1 employees spending approximately 100% of their time annually reviewing and making determinations for the grant programs]. 26 x \$89,033.00 = \$2,314,858.00 x 1.4 = \$3,240,801.20	\$3,240,801.20
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	\$6,240,801.20
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* 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.

Explain: There are no changes to the annual hour burden and there has been no change to 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
Benefit-Cost Determination				\$222,852	\$365,735	+\$142,883
Environmental Review				\$334,278	\$548,605	+\$214,327
Project Narrative-Sub-grant Application				\$606,157.40	\$994,803	+\$388,645.60
Total(s)				\$1,163,287.40	\$1,909,143.00	+\$745,855.60

Explain:

The adjustment increase in the annual cost burden results from the application of the 1.4 multiplier to the wages.

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.