**February 15, 2011**

# Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 – 0004**

**Title: Application for Participation in the National Flood Insurance Program (NFIP)**

**Form Number(s): FEMA Form 086-0-30 (previously FEM A Form 81-64)**

## 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*. is authorized by Public Law 90-448(1968) and expanded by Public Law 93-234 (1973) Section 201 of the Flood Disaster Protection Act of 1973 which requires all flood prone communities throughout the country to apply for participation one year after their flood prone identification or submit to the prohibition of certain types of Federal and Federally-related financial assistance for use in their floodplains. Title 44 CFR 59.2 authorizes that previously unavailable flood insurance protection to property owners in flood-prone areas is now available, and Title 44 CFR Section 59.22 identifies the information required for this application.

**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 Form 086-0-30, Application for Participation in the National Flood Insurance Program and supporting documentation collects the information necessary to allow communities to participate in the National Flood Insurance Program (NFIP). The information collected on the NFIP Application pertains to two general categories of information. One is simple community contact information such as the name of local officials, address, phone number, etc. which will be used for future contact. The second category of information pertains to demographic characteristics such as the number of structures in the community and the number of structures in the floodplain. This information is used to provide basic background information about the community's risk to flooding. FEMA uses this information to enroll the community in the NFIP which allows residents in the community to qualify for flood insurance.

**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.**

Since the NFIP Application serves as a cover sheet containing information about a community joining the NFIP and it is viewed by several parties and is a one-time action, there is minimal value in making it available for completion through electronic formats. The blank application form itself is available on URL http://www.fema.gov/library/viewRecord.do?id=2557, to be downloaded and can be completed by hand. FEMA Form 086-0-30 is returned via e-mail with the required supporting documentation included as attachments. While 95% of respondents email their forms to FEMA, 5% mail them. Due to the limited number of respondents on an annual basis, the cost to develop a system that would allow for the online completion and submission of the form and supporting documentation is prohibitive.

**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.

**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.**

If this collection of information is not conducted, FEMA Form 086-0-30 would not be able to capture information to approve a new participant or community; would not meet the program requirements and not be able to participation in the National Flood Insurance Program.

**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.**

Respondents are not required 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.**

Respondents are not required to prepare written responses in fewer than 30 days.

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

There is no requirement for respondents to submit more than an original and two copies of any document in this collection.

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

Under 44 CFR 59.22(a)(9)(iii), FEMA requires that communities participating in the NFIP, maintain records of development taking place in the flood hazard areas within the community for the duration of the community's participation in the program. These records would include but are not limited to application documentation, floodplain development permits issued, certificates of flood proofing, information on the elevation of the lowest floor of all new or substantially improved structures, any variance actions including justification for their issuance, and demographic changes within the flood-prone areas of communities. This information assists FEMA to evaluate the effectiveness of a community's floodplain management program.

**(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.**

There is no statistical data classification not approved by OMB involved in this collection.

**(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 information does not include a pledge of confidentiality that is not supported by authority established in statute or regulation.

**(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 requirements for respondents to submit proprietary trade secret, or other confidential information for this data 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 November 24, 2010, Volume 75 FR 71716. 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 February 10, 2011, Volume 76 FR 7576. 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.**

The Risk Reduction Division, Floodplain Management Branch attends the annual National Flood Conference and Association of State Floodplain Management conferences. The Branch also holds its own conference known as the Floodplain Management Summit, which meets every two years to provide our partners an opportunity to work with us to improve floodplain management has a whole.

**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.**

State NFIP coordinators provide technical assistance to local officials when a community expresses interest in joining the NFIP. They are available at any time to provide assistance as well as to discuss any issues related to the application process. Additionally, the respondents also have continuous access to the FEMA Regional Coordinators and can discuss the information requirements for the program.

**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.**

A SORN was published on December 19, 2008 at 73 FR 77747, National Flood Insurance Program System of Records. A new Privacy Impact Assessment is currently being generated for DHS approval by the FEMA Privacy Office. A privacy act statement will be needed for FEMA Form 086-0-30 which is currently being reviewed by the FEMA Privacy Office. The status of this information remains the same as of February 2011.

**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 FEMA Form 086-0-30, it is estimated that it 237 Community Officials will complete this form once annually. It is estimated that it will require 4 hours per response and the total annual hour burden will be 237 x 4 hours = 948 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 Respon -dents** | **No. of Respon -ses per Respon -dent** | **Total No. of Responses** | **Avg. Burden per Response (in hours)** | **Total Annual Burde n (in hours)** | **Avg. Hourly Wage Rate** | **Total Annual Respondent Cost** |
| State, local or Tribal Government | FEMA Form 086-0-30 / Application for Participation in the National Flood Insurance Program and | 237 | 1 | 237 | 4 hours | 948 | $44.74 | $42,414 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Supporting Documentation | | | | | | | |
| **Total** | | **237** | | **237** | | **948** | | **$42,414** |

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

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Community Official is estimated to be ($31.96 x 1.4=) $44.74 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Environmental Engineer is estimated to be $42,414 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 is no annual capital, start-up, operations or maintenance cost 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 **[Describe]** | |
| HQ Staff Salaries* **3 of GS 13, step 1 employees spending approximately 20% of time annually reviewing document and making determinations for this data collection (GS 13 step 1 =** | $74,788 |

| | |
|---|---|
| **89,033 x 1.4 = $124,646 x 3 employees = $373,939 x 20% =) $74,788.** | |
| Facilities **[cost for renting, overhead, etc. 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** | $74,788 |

*** 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** |
| FEMA Form 086-0-30 / Application for Participation in the National Flood Insurance Program and Supporting Documentation | | | | 748 | 948 | +200 |
| **Total(s)** | | | | **748** | **948** | **+200** |

***Explain:***

For FEMA Form 086-0-30, the previously approved hour burden was 748 hours; the requested burden is now 948 hours, an increase of 200 hours. The increase in burden hours results from an increase in responses due to the map modernization initiative. The map modernization initiative has resulted in an increase in the number of communities being mapped for the first time or remapped. The mapping process raises the awareness of the NFIP program by communities throughout the United States, resulting in an increase in enrollments.

| 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** |
| FEMA Form 086-0-30 / Application for Participation in the National Flood Insurance Program and Supporting Documentation | | | | $16,328 | $42,414 | +$26,086 |
| **Total(s)** | | | | **$16,328** | **$42,414** | **+$26,086** |

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

***Explain:***

For FEMA Form 086-0-30, the previously approved cost burden was $16,328. The new cost burden is $42,414 which is an increase of +$26,086. This increase is due to the increase in number of respondents and due to the application of the 1.4 multiplier.

**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.