

Changes to Collection OMB No. 1660-0013

The following questions have been updated since the last OMB Approval:

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 answer is updated to reflect the current collection.

The Flood Disaster Protection Act of 1973, as amended, 42 U.S.C. 4001 *et seq.*, recognized that a reasonable method of sharing the nation's risk of flooding at the national level was required. This established a requirement to purchase flood insurance for properties at risk from a flood. It also further provided an exception to this requirement for State-owned properties that are covered under an adequate State policy of self-insurance (42 U.S.C. 4012(c)(1) (Section 102)). When States provide proof of this self-insurance, the designated property is not required to be covered by flood insurance. Title 44 CFR Part 75 establishes standards with respect to the Administrator's determinations that a State's plan of self-insurance is adequate and satisfactory for the purposes of the Act, from the requirement of purchasing flood insurance coverage, for State-owned structures and their contents in areas identified by the Administrator as A, AO, AH, A1-A30, AE, AR, AR/A1-30, AR/AE, AR/AO, AR/AH, AR/A, A99, M, V, VO, V1-V30, VE, and E zones, in which the sale of insurance has been made available, and to establish the procedures by which a State may request exemption.

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. This answer is updated to reflect the current collection.

To receive an exemption from the requirement to purchase flood insurance, the State must provide proof of self insurance which specifies that the hazards covered by the self-insurance plan expressly include flood and flood related hazards and coverage to State-owned structures and their contents equal to that under a regular flood insurance policy. Also required is the location of the property/structures, an estimate of the replacement costs for the property/structures, an estimate of the annual losses to flood damage, flood loss experience of State-owned property/structures and a certified copy of flood plain management regulations setting for standards for affected State-owned property/structures.

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. This answer is updated to reflect the current collection.

The method of responding to this collection is via a free-form letter. Respondents can utilize a document creation software such as MS Word to create the letter and then send via e-mail attachment to mary.chang@dhs.gov.

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. Please note the answer to 8 b and c is updated to reflect the current collection.

Due to the unique nature of the program and the fact that no private insurance companies or others outside of FEMA would deal with exemptions for flood insurance requirements, there are no consultations that occur other than those directly with the respondents. FEMA manages the information collection activities per regulation and makes every effort to keep the program as efficient as possible for the sake of the respondents.

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 regularly consults with the States who respond to this collection throughout the year. These consultations are directly with regional or headquarters staff; these FEMA agents are known to the respondents and can be contacted directly through telephone or e-mail contact.

12. Provide estimates of the hour burden of the collection of information. The statement should: PLEASE NOTE: All changes are detailed in Question 12 (below).

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 estimate that 20 State Financial Managers will provide the information required to request an exception to flood insurance for a property/structure and that it will take 5 hours per request to complete. The total annual hour burden will be 20×5 hours per response = 100 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
State, local or Tribal Government	Letter of Application / No Form	20	1	20	5	100	\$62.62	\$6,262
Total		20		20		100		\$6,262

• 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 Financial Manager is estimated to be (\$44.73 x 1.4 =) \$62.62 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Financial Manager is estimated to be \$6,262 annually.

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.

Note change to cost to the Federal Government below.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs	
Staff Salaries* [1 of GS 14 , step 6 employee spending approximately 3% of time annually processing the information received for this data collection] [1 GS 14 Step 6 = \$122,744 x 3% = \$3,682 x 1.4 = \$5,155]	\$5,155
Facilities	
Computer Hardware and Software	
Equipment Maintenance	
Travel	
Printing	
Postage	
Other	
Total	\$5,155

* 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.

See descriptions below each chart for changes.

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
Letter of Application / No Form				\$3,090	\$6,262	\$3,172
Total(s)				\$3,090	\$6,262	\$3,172

Explain:

There is a change to annual cost burden from \$3,090 to \$6,262, an increase of \$3,172. This increase results from the application of the 1.4 multiplier wage rate.