

Narrative of Changes

The purpose of the Narrative of Changes is to clearly indicate changes to a collection since the previous approval.

Collection Title: State/Local/Tribal Hazard Mitigation Plans

OMB Control No.: 1660-0062

Current Expiration Date: 9/30/2014

Collection Instruments: CFR Citation (44 CFR 78; 44 CFR 201)

- New Local and Tribal Plans (formerly New Plan Development (including local and Tribal))
- Local and Tribal Plan Updates (formerly Mitigation Plan Updates (includes local and Tribal))
- State Review of Local and Tribal Plans (formerly Mitigation Plans Review by States (includes local and Tribal))
- Standard State Plan Updates (newly identified category derived from Mitigation Plan Updates (includes local and Tribal))
- Enhanced State Plan Updates (newly identified category derived from Mitigation Plan Updates (includes local and Tribal))

The following are the changes to the collection:

There are no changes to the information being collected. However, State Mitigation Plan Updates (Standard and Enhanced) are now separate from Local and Tribal Plan Updates. In addition, the frequency of State Mitigation Plan Updates (Standard and Enhanced) submissions has decreased. Associated wage rates have also been updated for all collections. Furthermore, there have been a number of adjustments on how hour burden and costs are estimated.

There are no form numbers associated with this collection.

Supporting Statement:

Question 8a – Updated to reflect FRN publication information.

Question 10 – Updated to reflect current privacy information.

Question 12 – Total Annual Burden Hour estimate decreased from 768,320 hours to 227,366 hours. Changes to Annual Burden Hour Estimate include the following:

- New Local and Tribal Plans -
 - Average Burden per Response decreased from 2,080 hours to 289 hours
- Local and Tribal Plan Updates
 - Number of Responses per Respondent decreased by 1
 - Average Burden per Response decreased from 320 hours to 249 hours
- State Review of Local and Tribal Plans
 - Number of Responses per Respondent decreased by 1
- Standard State Plan Updates
 - Total Number of Responses increase of 9
 - Average Burden per Response increase of 1,040 hours
- Enhanced State Plan Updates

- o Total Number of Responses increase of 2
- o Average Burden per Response increase of 2,659 hours

See Question 15 for explanation.

Question 13 – There has been a change in the way cost burden was reported in 2011 to 2012. Annual cost burden was previously derived from multiplying total annual burden hours for each collection identified in supporting statement question 12 by the associated wage rates. The new cost comes from question 13 of the supporting statement and included start-up, maintenance, and other associated costs. As a result, annual costs have increased from \$33,452,652 to \$33,532,730. See Question 15 for explanation.

Question 14 – Costs to the Federal Government updated.

Question 15 – Burden hour decreased from 768,320 hours to 227,366 hours. Annual costs have increased from \$33,452,652 to \$33,532,730. See reference tables and explanations below.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
New Plans (Local and Tribal)				582,400	80,920	-501,480
Plan Updates (Local and Tribal)				179,200	125,496	-53,704
State Reviews of Local and Tribal plans				6,720	6,272	-448
Standard State Plan Updates	0	9,360	+9,360			
Enhanced State Plan Updates	0	5,318	+5,318			
Total(s)	0	14,678	+14,678	768,320	212,688	-555,632

Explain:

First, an adjustment was made to the methodology used to estimate the number of collections. FEMA has separated out the burden for State Mitigation Plan updates (Standard and Enhanced) from the existing mitigation plan update category thus creating two new categories, one for Standard State Mitigation Plan updates and one for Enhanced State Mitigation Plan updates.

Second, an adjustment was made to the methodology used to estimate hour burden based on HMGP and PDM grant awards. Using HMGP and PDM grant awards, FEMA estimates an average cost of \$57,000 for New Local and Tribal Plans, \$49,000 for Local and Tribal Updates, \$205,000 for Standard State Plan Updates, and \$524,000 for Enhanced State Plan Updates. These cost estimates were then broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent). To calculate hour burden, the percent of costs attributed to personnel costs was divided by an updated Urban and Regional Planner loaded

wage rate for each information collections. This resulted in new Average Burden per Response estimates. However, changes to the State Review of Local and Tribal Plans results purely from modification to the number of plans reviewed and the associated wage rate.

One effect of this altered approach is that some of the burden previously accounted for in hour burden has likely shifted annual cost estimates. In addition, the decrease in State Mitigation Plan frequency from an update every 3 years to every 5 years also decreases the hour burden that would have otherwise been included.

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
New Plans (Local and Tribal)				\$25,357,696	\$12,289,200	-\$13,068,496
Plan Updates (Local and Tribal)				\$7,802,368	\$19,015,920	\$11,213,552
State Reviews of Local and Tribal plans				\$292,588	\$0	-\$292,588
Standard State Plan Updates	\$0	\$1,420,650	+\$1,420,650			
Enhanced State Plan Updates	\$0	\$806,960	+\$806,960			
Total(s)	\$0	\$2,227,610	+\$2,227,610	\$33,452,652	\$31,305,120	-\$2,147,532

Explain:

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMGP and PDM grant awards as well as the distribution between personnel costs, contracting costs, and non-labor costs identified above. This approach captures contract support from the private sector in developing, updating, and reviewing plans which was not accounted for previously.

As the development of a New or Local Tribal Plan is a one-time cost, FEMA uses the percent of grant money attributed to contracting costs and non-labor costs to estimate Annual Start-Up Costs. FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs for the remaining information collections. However, no costs, beyond burden hours, are attributed the State Review of Local and Tribal Plans.