

March 23, 2012

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0008

Title: Post Construction Elevation Certificate/Floodproofing Certificate

Form Numbers: FEMA 81-31 and FEMA 81-65

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) regulations require the elevation or floodproofing of new or substantially improved structures in designated Special Flood Hazard Areas. As part of the agreement for making flood insurance available in a community, the NFIP requires the community to adopt a floodplain management ordinance that meets or exceeds the minimum requirements of the NFIP. These minimum requirements are intended to reduce future flood losses. One such requirement is that the community requires that buildings be elevated to above the base flood elevation, obtain the elevation of the lowest floor (including basement) of all new and substantially improved structures, and maintain a record of all such information. Non-residential buildings can also be floodproofed to the base flood elevation. The building elevation information should be generated and retained as part of the community’s permit records. The Elevation Certificate is one convenient way for a community to document

building compliance. This form can be completed by engineers and architects, the property owner or by government officials. The Floodproofing Certificate may similarly be used to establish the flood-proofed design elevation in those instances when floodproofing of non-residential structures is a permitted. Engineers and architects complete the Floodproofing Certificate.

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 Elevation Certificate and Floodproofing Certificate are used in conjunction with the NFIP application for flood insurance (OMB collection number 1660-0006, National Flood Insurance Program Policy Forms) in order to properly rate Post-FIRM structures in Special Flood Hazard Areas (44 CFR 61.7,61.8). Post-FIRM are buildings constructed after publication of the Flood Insurance Rate Map (FIRM). In addition, the Elevation Certificate is needed for Pre-FIRM structures being rated under Post-FIRM flood insurance rules. The standardized format of the Elevation Certificate (FEMA Forms 086-0-33) and Floodproofing Certificate for Non-Residential Structures (FEMA Forms 086-0-34) provide community officials with needed data in order to verify building elevation information and determine compliance with the community's floodplain management ordinance. The certificate is then used in conjunction with the flood insurance application so that the building can be properly rated for flood insurance. The elevation data is transmitted by the insurance agent, along with the appropriate NFIP policy forms, to the NFIP.

Documentation of certification by a registered professional engineer or architect that the design and methods of construction of a nonresidential building are in accordance with accepted practices for meeting the floodproofing requirements in the community's floodplain management ordinance is required to obtain insurance. The engineer or architect makes a professional design determination that the building is floodproofed for which they have professional liability. A prudent determination requires: a review of as-built design drawings, that includes wall and floor sections, penetration of utilities into the building; a review of the protection of all openings (such as doors and egress); a review of soil conditions at the site; some calculation of loads and flow-rates of water through the soil; and a site visit to verify this information. Most owners who get this certification will use the services of the original designer of the building who has familiarity with the design.

The information provided on the Elevation Certificate and Floodproofing Certificate assist in FEMA's ability to measure the effectiveness of its regulations in reducing or eliminating damages caused by flooding and the appropriateness of NFIP premium charges for insuring property against the flood hazard.

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 Elevation Certificate and Floodproofing Certificate for Non-Residential Structures can be downloaded from the Internet as text files or PDF files. The surveyor or engineer completing these forms is required to provide his or her license information and to affix his or her seal in certifying the information on the form. The completed forms are either mailed in with the flood insurance application or are scanned and submitted as a scanned document if accompanying a flood application which is submitted electronically.

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 the collection of information is not conducted, FEMA will not be able to measure the effectiveness of the regulations in eliminating or decreasing damage caused by flooding. Also, the appropriateness of its premium charges for insuring property against the flood hazard cannot be adequately assessed for each property resulting in possible over or under-charging for flood insurance policies. This information is collected on a property only once, and may then be passed on to subsequent owners. It may also be retained on file in the community

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

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

(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.

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 21, 2011, Volume 76, Number 224, pp 71989. Comments were received from Smart Vent Production, Inc, Foundation Flood Vents on February 12, 2012. The program office is in the process of setting up a meeting with the Federal Insurance Mitigation Administration (FIMA) to discuss the comments; however, we are looking at an in-house meeting date around February 27, 2012 (Date has to be confirmed by required attendees.) It would only be after this in-house meeting that a meeting with Mike Graham would be scheduled, though we would not hesitate to contact him by phone with any specific questions if that was deemed useful.

On March 20, 2012, a meeting was held at the FIMA Crystal City office with Mike Graham and Tom Little of Smart Vent. In attendance were FIMA staff members representing the Floodplain Management Branch, the Building Science Branch, and the Underwriting Branch. The meeting was held at the request of Mike Graham to address the comments submitted by Smart Vent in response to the 60-day Federal Register Notice concerning FEMA's request for OMB approval for renewal with changes for the Elevation Certificate and Flood proofing Certificate (OMB No. 1660-0008).

Of primary concern to Mr. Graham were the Certifications of Engineered Openings, which are made available online for download by manufacturers and sellers of vents to promote sale and use of their products, which do not meet the FEMA requirements for certified engineered flood openings.

It was discussed at the meeting that the primary purpose of the Elevation Certificate is to provide building elevations and related information certified by a licensed land surveyor. While the Elevation Certificate does collect basic information about the area of flood openings in order to facilitate the underwriting of flood insurance policies, it is not the purpose of the Elevation Certificate to collect information for use in determining validity or acceptability of Certificates of Engineered Flood Openings, which are certified by an engineer or architect. For this reason, the specific questions that Smart Vent suggested be added to the Elevation Certificate concerning engineered openings will not be added to the Elevation Certificate.

However, we agree to the usefulness of the Smart Vent recommendations that (1) the requirement for detailed photos of flood openings be emphasized, and (2) the Elevation Certificate Instructions include information on the FEMA requirements for Certification of Engineered Flood Openings. The Elevation Certificate will be revised to contain these. In conjunction with (2) above, Section A of the Elevation Certificate will be revised to include a box to be checked indicating if a certificate of engineered flood openings is attached.

A 30-day Federal Register Notice inviting public comments was published on March 1, 2012, Volume 77, Number 41, page 12607. See attached copy of the published Federal Register Notice attached. There were no comments received during this comment period.

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.

NFIP program personnel frequently discuss the certificates at meetings with involved users; e.g., insurance agents, company officials, surveyors, and others. The Mitigation Directorate works very closely with the surveyors, engineers, and architects during the development process.

In June 2008 an Elevation Certificate Workgroup was formed to review the form and make suggestions for its improvement. Subsequent changes to the Elevation Certificate were made as a direct result of the efforts of this workgroup.

In September 2011 FEMA formed a workgroup to review and make recommendations for the improvement of the Elevation Certificate and the Floodproofing Certificate. This workgroup was composed of FEMA Mitigation Directorate staff that had invited and compiled comments on the Elevation Certificate and the Floodproofing Certificate from the private sector, included engineers, surveyors, community officials, floodplain managers, insurance company representatives, insurance producers, underwriters, and others.

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.

These forms are supplied to insurance agents, community officials, surveyors, engineers, architects and NFIP policyholders/applicants. Surveyors, engineers, and architects complete the Elevation Certificate. Engineers and architects complete the Floodproofing Certificate. Community officials are provided the building elevation information required to document and determine compliance with the community's floodplain management ordinance. NFIP policyholder/applicants provide the appropriate certificate to insurance agents. The certificate is then used in conjunction with the flood insurance application so that the building can be properly rated for flood insurance. NFIP personnel frequently discuss the certificates at meetings with these involved users.

The changes recommended and adopted by the FEMA workgroup are reflected in the revision of the Elevation Certificate and Floodproofing Certificate, which is submitted for approval with this submission. The changes are primarily to the instructions to make them clearer and to clarify details of the information being submitted on the forms to avoid having to contact the surveyor, engineer, architect, or property owner for clarification after receipt of the forms.

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 Post Construction Elevation Certificate and Floodproofing Certificate, Privacy Threshold Analysis (PTA) was submitted to DHS for review on February 6, 2012. On February 15, 2012 DHS determined that a PIA and SORN was required for this information collection request. DHS approved the use of the DHS PIA: DHS/ALL-PIA 006 General Contact Lists PIA to support this collection of information.

DHS also approved the use of System of Records Notices (SORNs) DHS/ALL-002 Mailing and Other Lists published on November 25, 2008, volume 73, Number 228, Page 71659-71661, and the DHS/FEMA-003 National Flood Insurance Program published on December 19, 2008, Volume 73, Number 245, page 7747-77750 to support this collection.

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 a sensitive nature requested for this information collection.

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 burden hours for FEMA Form 086-0-33 include the time required for the respondent to gather all information and provide responses on form. The burden hours also include the time required by the architect or surveyor who is hired by the respondent to perform the work necessary to respond to some of the questions contained on FEMA Form 086-0-33. The burden hours for FEMA Form 086-0-33 also include the time required to view the Web-based training module. Based on the numbers of new elevation-rated policies for buildings in designate flood hazard areas issued by the NFIP for the past 12 months, FEMA estimates a total of 6,560 respondents submitting FEMA Form 086-0-33 (Elevation Certificate) times 3.75 hours per response equaling 24,600 hours burden.

The burden hours for FEMA Form 086-0-34 represent the time required by the respondent to gather and review all necessary maps, construction/building codes and other data as well as inspecting the site prior to certifying the building meets the requirements set forth for floodproofing. Based on the numbers of new elevation-rated policies for buildings in designate flood hazard areas issued by the NFIP for the past 12 months and on available data keyed into the flood insurance policy information system that indicates rating based on floodproofing, FEMA estimates a total of 15 respondents submitting FEMA Form 086-0-34 (Floodproofing Certificate) at 3.25 hours per response equaling 48.75 hours burden.

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 |
| Surveyors (contracted by the property owners) | Elevation Certificate FEMA 086-0-33 and Instructions | 6,560 | 1 per structure | 6,560 | 3.75 hours | 24,600 hours | \$39.13 | \$962,598 |
| Architects / Engineers (contracted by the property owners) | Floodproofing Certificate FEMA 086-0-34 | 15 | 1 per structure | 15 | 3.25 hours | 48.75 hours | \$50.85 | \$2,479 |
| Total | | 6,575 | | 6,575 | | 24,648.75 | | \$965,077 |

- 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 surveyors is estimated to be \$39.13 (\$27.95 X 1.4) per hour including the wage rate multiplier, therefore, the estimated burden hour cost to surveyors is estimated to \$962,598 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for architects/engineers is estimated to be \$50.85 (\$36.32 x 1.4) per hour including the wage rate multiplier, therefore, the estimated burden hour cost to architects/engineers is estimated to \$2,479 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.**

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, etc.) | Annual Non-Labor Cost (expenditures on training, travel and other resources) | Total Annual Cost to Respondents |
|--|--|--|--|---|
| Elevation Certificate FEMA 086-0-33 | 0 | \$2,296,000 | 0 | \$2,296,000 |
| Floodproofing Certificate FEMA 086-0-34 | 0 | \$5,250 | 0 | \$5,250 |
| Total | 0 | \$2,301,250 | 0 | \$2,301,250 |

The cost to the respondent (i.e., applicants for flood insurance for whose building the certificate is being completed) is estimate to be a fee of \$350 charged to the applicant by

the private sector professional completing the Elevation Certificate of Floodproofing Certificate.

The annual cost to 6,560 respondents x and average cost of \$350 per FEMA form 086-0-33 (Elevation Certificate) is estimated to be \$2,296,000.

The annual cost to 15 respondents x and average cost of \$350 per FEMA form 086-0-34 (Floodproofing Certificate) is estimated to be \$5,250.

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: Data Entry Clerks processing forms and Underwriter Specialists to review forms. (See Note 1 below for breakdown of cost) | 17,758. |
| Staff Salaries: Two GS-12; Two GS-13; Two GS 14 spending approximately 1.9% of time annually reviewing certificates. (See Note 2 below for breakdown of cost) | 11,589. |
| Facilities: Annual cost for warehouse storage for certificates (See Note 3 below for breakdown of cost) | 240. |
| Computer Hardware and Software: [cost of equipment annual lifecycle] | 0 |
| Equipment Maintenance [cost of annual maintenance/service agreements for equipment] | 0 |
| Travel | 0 |
| Printing annual printing cost for Calendar Year 2011 (See Note 4 below). | 1,833. |
| Postage [annual number of data collection instruments x postage] (See Note 5 below). | 1,513. |
| Other annual updating of web-based training module (See Note 6 below). | 1,000. |
| Total | \$33,933. |

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

The total Annualized Cost to the Federal Government is estimated to be \$33,933. The approximate cost is determined as follows:

Note 1: The total Contract Cost associated with this information collection is \$17,758, which is equal to the \$4,606 cost of the contractor Data Entry Clerks to process the forms plus the \$13,152 cost of the contractor Underwriting Specialists to review the information on the forms, which are submitted in conjunction with applications for flood insurance . These costs were determined as follows:

Hourly wage of a contractor Underwriting Specialist: \$24.00

Time an Underwriting Specialist spends reviewing an Elevation Certificate or Floodproofing Certificate (submitted in conjunction with an application for NFIP flood insurance): 5 minutes per form

Number of Elevation Certificates/Floodproofing Certificates reviewed in one hour by an Underwriting Specialist: 12

Total number of Elevation Certificates and Floodproofing Certificates processed annually: 6,575

Total hours spent annually by Underwriting Specialists reviewing Elevation Certificates and Floodproofing Certificates equals the total number of forms processed annually divided by the number of forms processed per hour, which is: 6,575 forms divided by 12 forms per hour, which equals 547.9 hours... rounded to 548 hours.

Total annual cost for contractor Underwriting Specialists to review Elevation Certificates and Non-Residential Floodproofing Certificates equals the hours spent by contractor Underwriting Specialists times the hourly wage of an Underwriting Specialist, which is 548 hours times the Underwriting Specialists wage of \$24.00 per hour, which equals \$13,152.

Hourly wage of a contractor Data Entry Clerk: \$14.00

Time a Data Entry Clerk spends processing an Elevation Certificate or Floodproofing Certificate (submitted in conjunction with an application for NFIP flood insurance): 3 minutes per form

Number of Elevation Certificates/Floodproofing Certificates processed in one hour by a Data Entry Clerk: 20

Total number of Elevation Certificates and Floodproofing Certificates processed annually: 6,575

Total hours spent annually by contractor Data Entry Clerks processing Elevation Certificates and Floodproofing Certificates equals the total number of forms processed annually divided by the number of forms processed per hour, which is: 6,575 forms divided by 20 forms per hour, which equals 329 hours.

Total annual cost for contractor Data Entry Clerks to process Elevation Certificates and Non-Residential Floodproofing Certificates equals the hours spent by contractor Data Entry Clerks times the hourly wage of a Data Entry Clerk, which is 329 hours times the Data Entry Clerks wage of \$14.00 per hour, which equals \$4,606.

Note 2: Federal Employees are estimated to spend a total of 200 hours annually in reviewing Elevation Certificates and Non-Residential Floodproofing Certificates, for an annual approximate cost of \$11,589 in Staff Salary. The approximate cost is determined as follows:

The number and grades and annual cost of each of these Federal Employees reviewing the forms are estimated as follows:

- Two GS-12s, paid \$84,855 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$3,224 per year
- Two GS-13s, paid \$100,904 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$3,834 per year
- Two GS-14s, paid \$119,238 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$4,531 per year

The total of \$3,224, \$3,834, and \$4,531 is \$11,589.

Note 3: The annual warehouse storage cost associated with the Elevation Certificate and Non-Residential Floodproofing Certificate is \$240. This is based on a cost of \$10 per month per form for twelve months, or \$10 per month times 2 forms times 12 months.

Note 4: The annualized printing cost of the Elevation Certificate and Non-Residential Floodproofing Certificate forms is calculated to be \$2,750, which is determined as follows:

The cost of printing the Elevation Certificate form for calendar year 2009 was \$5,000. The cost of printing the Non-Residential Floodproofing form for calendar year 2009 was \$500. The sum of these two is \$5,500. These forms were not reprinted in 2010 or 2011, because the supply on hand from the 2009 printing was considered sufficient to meet the demand for the forms through the 2011 calendar year. Therefore, averaging the printing cost of the forms over the three years results in an estimated annual printing cost of \$1,833.

Note 5: The annualized mailing cost associated with the Elevation Certificate and Non-Residential Floodproofing Certificate is estimated to be approximately \$1,513. This is based on a 2011 mailing cost for the Elevation Certificate of \$1,421 and a 2011 mailing cost for the Non-Residential Floodproofing Certificate of \$92.

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 |
|---|--|-----------------------------|-------------------|--|-------------------------|-------------------|
| Elevation Certificate FEMA Form 086-0-33 and Instructions | 0 | 0 | 0 | 8,213 | 24,600 | +16,387 |
| Floodproofing Certificate FEMA Form 086-0-34 | 0 | 0 | 0 | 33 | 49 | +17 |
| Total(s) | 0 | 0 | 0 | 8,246 | 24,649 | +16,404 |

Explain:

The burden hour per response for FEMA Form 086-0-33 and FEMA Form 086-0-34 has remained the same. However the burden hours for this collection increased from 8,213 to 24,649 hours, an adjustment increase of +16,436 hours.

This increase is due to a major private sector insurance company having recently stopped writing flood insurance in its own name and directing its agents to obtain flood insurance for their clients from the NFIP Direct. There has been a significant increase in the number of flood insurance applications being submitted to the NFIP Direct Servicing Agent. Since the Elevation Certificate and Floodproofing Certificate are submitted in conjunction with an application for flood insurance, more applications are being submitted results in more Elevation Certificates and Floodproofing Certificates being submitted. The total number of responses for the Elevation Certificate has increased from 2,190 to 6,560 (+4,370 responses). The number of responses for the Floodproofing Certificate has increased from 10 to 15 responses (+5 responses).

| Itemized Changes in Annual Cost Burden | | | | | | |
|---|---|-----------------------------|-------------------|---|---------------------|----------------------|
| Data collection Activity/Instrument | Program Burden Cost on OMB Inventory | Program Change (New) | Difference | Adjustment cost currently on OMB Inventory | Adjustment | Difference |
| Elevation Certificate FEMA Form 086-0-33 and Instructions | \$160,637. | 0 | 0 | 0 | \$2,296,000. | +\$2,135,363. |
| Floodproofing Certificate FEMA Form 086-0-34 | \$1,076. | 0 | 0 | 0 | \$5,250. | +\$4,174. |
| Total(s) | \$161,713. | | | | \$2,301,250. | +\$2,139,537. |

Explain:

This collection has an adjustment in Annual Cost Burden due to:

- (1) The Program Burden Cost (see table above) on the OMB Inventory was not recorded correctly. The figures of \$160,637, \$1,076, and \$161.713 (as show in column 2 in the table above) should have been \$766,500, \$3,500, and \$770,000, respectively. The figures recorded in the inventory of \$160,637, \$1,076, and

\$161,713 represent the costs to respondents using *wage rate categories*, and were provided in the answer to Question 12 in Table A.12: Estimated Annualized Burden Hours and Costs, in the Supporting Statement submitted prior to this one (three years ago). These were not the figures that should have been recorded in the inventory. The figures that should have been recorded in the inventory, i.e., \$766,500, \$3,500, and \$770,000, are those representing the total cost burden to respondents resulting from the information collection, as were provided in answer to Question 13 in the Table entitled “Annual Cost Burden to Respondents or Record-keepers” in the prior Supporting Statement. This correction accounts for \$608,287 of the total +\$2,139,537 change in Annual Cost Burden.

- (2) The remainder of the change in the Annual Cost Burden is an adjustment increase due to an increase in the number of respondents for FEMA Form 086-0-33, from 2,190 to 6,560. (6,560 respondents x \$350 for professional surveyor = \$2,296,000) The number of respondents for FEMA Form 086-0-34 also increased, from 10 to 15 respondents. (15 respondents x \$350 for professional engineer/architect = \$5,250). The adjustment due to the increase in the total number of forms submitted accounts for \$1,531,250 of the total +\$2,139,537 change in Annual Cost Burden.

This increase in the number of forms being submitted is due to a major private sector insurance company having recently stopped writing flood insurance in its own name and directing its agents to obtain flood insurance for their clients from the NFIP Direct. As a result of this, there has been a significant increase in the number of flood insurance applications being submitted to the NFIP Direct Servicing Agent. Since the Elevation Certificate and Floodproofing Certificate are submitted in conjunction with an application for flood insurance, more applications being submitted results in more Elevation Certificates and Floodproofing Certificates being submitted.

Combining (1) and (2) above, the total annual cost burden for this collection has increased from \$161,713 to \$2,301,250.

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.

When Item 17 on the Form OMB 83-I is checked “Yes”, the following documentation should be included in the Supporting Statement to the extent it applies to the methods proposed:

**THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS
COLLECTION.**