

November 29, 2012

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0054

**Title: Assistance to Firefighters Grant Program-Grant Application
Supplemental Information.**

**Form Number(s): FEMA Form 080-0-2, FEMA Form 080-0-2a, FEMA Form
080-0-2b, FEMA Form 080-0-3, FEMA Form 080-0-3a, and FEMA Form 080-03b.**

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.

Information sought under this submission will comprise the applications for Assistance to Firefighters Grant Program (AFG), Fire Prevention and Safety (FPS) grants. The authorizing legislation allows FEMA to fund fire department activities in as many as fourteen different areas. The authority for AFG and FPS is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 *et seq.*), as amended. The information collected is grant application information which is necessary to assess the needs of the applicants as well as the benefits to be obtained from the use of funds. The information collected through the program's application is the minimum necessary to evaluate grant applications and is necessary for FEMA to comply with mandates delineated in the law. The collection includes details concerning the applicants'

demographics, capabilities, and operational resources as well as details specific to their request.

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 uses this information to ensure that FEMA’s responsibilities under the legislation can be fulfilled, accurately and efficiently. FEMA must ensure that the funds are distributed among career and volunteer/combination departments proportionally equal to the percentage of the nation’s population that those fire departments protect. The information will also be used to objectively evaluate each of the anticipated applicants to determine which of the applicants’ proposals in each of the activities are the closest to the established program priorities.

Assistance to Firefighters Grant (AFG)

FEMA Form 080-0-2, AFG Application (General Questions and Narrative) – The Assistance to Firefighters Grant Program's objective is to provide funding directly to fire departments and nonaffiliated EMS organizations for the purpose of protecting the health and safety of the public and first responder personnel against fire and fire-related hazards. Over the last eight years this program has provided grant funding directly to individual first-responder organizations on a competitive basis. In the AFG application, there are two “program” areas: “Operations and Safety,” which includes training, wellness, equipment, personal protective equipment and modifications, and “Vehicles.”

FEMA Form 080-0-2a, Activity Specific Questions for AFG Vehicle Applicants – This form obtains the information from the applicant regarding the vehicle that the applicant wishes to purchase as well as information about the vehicle that will be replaced by the new vehicle.

FEMA Form 080-0-2b, Activity Specific Questions for AFG Operations and Safety Applications – This form obtains information about the specific items that the applicant wishes to purchase with the grant funds if awarded. The questions are activity specific, thus applicants seeking training funds will answer questions about their training project; applicants seeking funds for equipment will answer questions about their equipment needs; applicants seeking funds for modifications for facilities will answer questions regarding their modification project; and, applicants seeking funds for wellness and fitness projects will answer questions regarding their wellness and fitness program.

Fire Prevention and Safety (FPS) Grants

FEMA Form 080-0-3, Activity Specific Questions for Fire Prevention and Safety Applicants – FPS grants provide funding for an array of prevention activities aimed at

protecting the health and safety of the public and firefighting personnel. Grant funds are available to fire departments as well as national, state, local, or regional organizations that specialize in prevention activities. Due to more wide-ranging span of eligibility, FEMA have a separate application period for interested parties seeking grants for Fire Prevention and Safety (FPS) activities. Fire prevention and safety activities includes public education and awareness, enforcement of fire codes, arson prevention and detection, as well as research and development into areas that would protect firefighters from fire and fire related hazards.

FEMA Form 080-0-3a, Fire Prevention and Safety – This form obtains information about the applicant’s planned research project, the anticipated results of the research project, and the plans for dissemination of the results of the project.

FEMA Form 080-0-3b, Research and Development – This form is used to evaluate projects for the research and development.

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 information is collected via a web-based application through the FEMA Integrated Security and Access Control System, for these grant programs. Paper forms are available in the event an applicant cannot submit their information through the FEMA AFG web application, but any eligible applications submitted in paper, will be converted into the electronic format in order to be consistent in the evaluation process. Instructions and guidance on how to complete these forms can be found on the FEMA website at <http://www.firegrantsupport.com/afg/guidance/> and applications can be accessed on the following FEMA website <https://portal.fema.gov/famsVuWeb/home>.

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.

The U.S. Fire Administration has an incident reporting system that is used to compile fire-related statistics. The system is called National Fire Incident Reporting System (NFIRS), is approved under OMB No.1660-0069 and participation in it is completely voluntary. The NFIRS is a fire incident collection instrument and does not involve a fire department’s fiscal concerns or operational needs; therefore, there is little information that would overlap our collection which is primarily financially and operationally based. NFIRS is voluntary and does not give an accurate account of all functions performed on a yearly basis by a grant applicant. Due to this incomplete data, NFIRS would incorrectly restrict awards to deserving respondents. But, to the extent possible, the information in

NFIRS will be used for those applicants that have participated in the past in lieu of requiring those applicants to resubmit the same information.

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 information collection is not conducted, there would be no basis under which the applications for assistance could be evaluated, thus funds available for the programs' purposes cannot be awarded and the benefits of the activities associated with each of the grant purposes would not be achieved. The information is also necessary to assess the financial needs of the applicants as well as the projected benefits obtained from the use of the grant funds.

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 7(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 September 11, 2012, volume 77, number 176, page 55855. No comments were received for this collection of information.

A 30-day Federal Register Notice was published for comments on November 28, 2012, volume 77, number 229, page 71010. There were no comments received for this collection of information.

(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.

It is FEMA's intention to have each application evaluated and ranked automatically by the automated system prior to review by a panel of subject-matter experts. The experts are representatives from the nine major fire service organizations that are nominated by their respective organizations to provide advice and recommendations regarding the implementation of the AFG, FP&S, and SAFER programs. The nine organizations are:

- Congressional Fire Services Institute (CFSI);
- International Association of Arson Investigators (IAAI);
- International Association of Fire Chiefs (IAFC);
- International Association of Firefighters (IAFF);
- International Society of Fire Service Instructors (ISFSI);
- National Association of State Fire Marshals (NASFM);

- National Fire Protection Association (NFPA);
- National Volunteer Fire Council (NVFC); and
- North American Fire Training Directors (NAFTD).

FEMA consults on a regular basis with a panel of subject matter experts from national and international fire service organizations. Many of these experts are, or have been, chiefs of fire departments in their own communities, therefore, they were sensitive to the burdens the collection may have on the applicants. These experts, by consensus, developed the form, format, and content of the grant program's applications. The panel agreed that the data collected is the absolute minimum necessary in order to evaluate the applications fairly and equitably.

(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.

Annually, FEMA convenes with a panel of expert reviewers to review the grant programs' processes and priorities as well as the grant applications to endorse and or modify the necessity of the information collected and develop criteria for each of the eligible activities.

FEMA also convenes with a panel of the peer reviewers on an annual basis. These panel reviewers consist of 300 or more of the applicants themselves to discuss the burdens of gathering information as the applicant who is submitting the application and as the reviewer who is evaluating the applications.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A updated Privacy Threshold Analysis was submitted to the FEMA Privacy Office on November 15, 2012 for review and submission to the Department of Homeland Security (DHS) for approval. A System Of Records Notice (SORN) was published on August 7, 2009, volume 74, number 151, page 39705-39708.

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.

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. 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 Assistance to Firefighter Grant (AFG) program has three components. There is the AFG general questionnaire and narrative application (FEMA Form 080-0-2), the AFG vehicle questionnaire (FEMA Form 080-0-2a), and the operations and safety questionnaire (FEMA Form 080-0-2b). For a complete application submission either the AFG vehicle questionnaire or the AFG operations and safety questionnaire are required with the AFG general questionnaire.

FEMA Form 080-0-2 - It takes approximately 9 hours to complete the AFG general questionnaire form. It has been estimated that a total of 12, 000 Local fire departments will submit one AFG general questionnaire form, for a total of 12, 000 respondents. Each respondent will complete one AFG general questionnaire annually.

FEMA Form 080-0-2a - It takes approximately 11 hours to complete the AFG vehicle questionnaire. It has been estimated that 4, 300 local fire departments will submit one AFG vehicle questionnaire form, for a total of 4, 300 respondents. Each respondent will complete one AFG vehicle questionnaire annually with their AFG general questionnaire.

FEMA Form 080-0-2b- It takes approximately 4.6 hours to complete the AFG operations and safety questionnaire form. It has been estimated that 7700 local fire departments will submit one AFG operations and safety questionnaire form, for a total of 4, 300 respondents. Each respondent will complete one AFG vehicle questionnaire annually with their AFG general questionnaire.

The Fire Protection and Safety (FPS) funding opportunity has three components. There is the FPS general questionnaire (FEMA Form 080-0-3), the FPS activity questionnaire and narrative (FEMA Form 080-0-3a), and the research and development activity questionnaire and narrative (FEMA Form 080-0-3b). For a complete application submission either the FPS activity questionnaire or the research and development activity questionnaire are required with the FPS general questionnaire.

FEMA Form 080-0-3 – It has been estimated to take 2.5 hours to complete the FPS general questionnaire form. It has been estimated that 1,400 local fire departments and 300 Not-for-Profit institutions will submit one FPS general questionnaire form, for a total of 1,700 respondents. Each respondent will complete one FPS general questionnaire annually.

FEMA Form 080-0-3a - It has been estimated to take 2.5 hours to complete the FPS activity questionnaire and narrative. It has been estimated that 1,400 local fire departments and 300 Not-for-Profit institutions will submit one FPS activity questionnaire form, for a total of 1,700 respondents. Each respondent will complete one FPS activity questionnaire with their FPS general questionnaire annually.

FEMA Form 080-0-3b – It has been estimated to take 21.5 hours to complete the FPS research and development questionnaire and narrative. It has been estimated that 10 Not-for-Profit institutions will submit one FPS research and development questionnaire with their FPS general questionnaire annually.

(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. 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.

Annual Hour Burden

| Type of Respondent | Form Name/ Form Number | No. of Respondents | No. of Response per Respondent | Avg. Burden per Response (in hours) | Total Annual Burden (in ours) | Avg. Hourly Wage Rate* | Total Annual Respondent Cost |
|------------------------------------|--|--------------------|--------------------------------|-------------------------------------|-------------------------------|------------------------|------------------------------|
| State, Local, or Tribal Government | FEMA Form 080-0-2, AFG Application (General Questions) | 12,000 | 1 | 9 | 108,000 | \$48.47 | \$5,234,544.00 |

| | | | | | | | |
|------------------------------------|--|---------------|---|-----|----------------|---------|-----------------------|
| | and | | | | | | |
| State, Local, or Tribal Government | FEMA Form 080-0-2a, Activity Specific Questions for AFG Vehicle Applicants | 4,300 | 1 | 11 | 47,300 | \$48.47 | \$2,292,536.40 |
| State, Local, or Tribal Government | FEMA Form 080-0-2b, Activity Specific Questions for AFG Operations and Safety Applicants | 7,700 | 1 | 4.6 | 35,420 | \$48.47 | \$1,716,736.56 |
| | AFG Subtotal | 24,000 | | | 190,720 | | \$9,243,816.96 |
| State, Local, or Tribal Government | FF 080-0-3 Activity Specific Questions for Fire Prevention and Safety Applicants | 1,700 | 1 | 2.5 | 4,250 | \$48.47 | \$190,232.00 |
| Not-for-profit institutions | Activity Specific Questions for Fire Prevention and Safety Applicants | 300 | 1 | 2.5 | 750 | \$48.47 | \$23,100.00 |
| State, Local, or Tribal Government | FF 080-0-3a Fire Prevention and Safety | 1,700 | 1 | 2.5 | 4,250 | \$48.47 | \$190,232.00 |
| Not-for-profit institutions | Fire Prevention and Safety | 300 | 1 | 2.5 | 750 | \$48.47 | \$23,100.00 |
| Not-for-profit institutions | FF 080-0-3b Research and Development | 10 | 1 | 41 | 410 | \$46.31 | \$41,387.50 |
| | FPS Subtotal | 4,010 | | | 10,410 | | \$468,051.50 |
| Grand Total | | 28,010 | | | 201,130 | | \$9,711,868.46 |

* 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 1st Line Supervisor/Manager Firefighting and Prevention Worker is estimated to be \$34.62 per hour, and the wage rate category for Environmental Scientists and Specialists is estimated to be \$33.08 per hour, therefore, the estimated burden hour cost to respondents is estimated to \$9,711,868.46 annually to include the 1.4 multiplier to reflect a fully loaded wage rate.

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.)

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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.**

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 Support [Systems Engineering and Technical Assistance (SETA) Contract Costs. Information Systems Security Officer – The contractor is responsible for providing IT related services as it relates to the Certification and Accreditation (C&A), Plan of Actions and Milestones (POA&Ms), and security of the Assistance to Firefighters Grants System (AFG).] | \$132,258 |
| Staff Salaries* [two hours per day of the Project Officer’s time calculated at the GS-14 level, 49.22 per hour x 2 hrs. per day = 49.22 x 2 x 5 days a week x 52 weeks = 25,594.40] | \$25,594.40 |
| AFG – Operations and Maintenance of the AFG supported by the IBM EADIS Contract | \$2,700,000 |
| AFG Website | \$150,000 |
| Contract Support – Net America – [Customer Service, Technical Assistance, Systems Access, Enterprise Operations Service, System Testing, and overhead] | \$300,000 |
| Total | \$3,307,852.40 |

* 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 080-2 (Local) | 163,020 | 108,000 | -55,020 | | | |
| FEMA Form 080-2 (Not for Profit) | 1,980 | 0 | -1,980 | | | |

| | | | | | | |
|---|----------------|----------------|----------------|--|--|--|
| FEMA Form 080-3 (Local) | 16,000 | 47,300 | +31,300 | | | |
| FEMA Form 080-4 (Local) | 26,000 | 35,420 | +9,420 | | | |
| FEMA Form 080-5 (Local) | 4,300 | 4,250 | -50 | | | |
| FEMA Form 080-5 (Not for Profit) | 600 | 750 | +150 | | | |
| FEMA Form 080-3a (Local) | 0 | 4,250 | +4,250 | | | |
| FEMA Form 080-3a (Not for Profit) | 0 | 750 | +750 | | | |
| FEMA Form 080-6 (Not for Profit) | 1,075 | 410 | -665 | | | |
| SAFER FEMA Form 080-7(Local) | 2,940 | 0 | -2,940 | | | |
| SAFER FEMA Form 080-7 (Not for Profit) | 60 | 0 | -60 | | | |
| SAFER FEMA Form 080-8 (Local) | 7,500 | 0 | -7,500 | | | |
| SAFER FEMA Form 080-10 (Local) | 3,525 | 0 | -3,525 | | | |
| SAFER FEMA Form 080-10(Not for Profit) | 225 | 0 | -225 | | | |
| Total | 227,225 | 201,130 | -26,095 | | | |

Explain: There is a burden decrease of 1,980 hours due to not for profit organizations no longer being eligible for funding under the AFG program. The result of this change is the elimination of not for profit respondents for FEMA form 080-2.

There is a burden decrease of 14,250 hours due to the Staffing for Adequate Fire and Emergency Response (SAFER) grant collection since it has been separated from the AFG collection. This separation was necessary due to the fact that SAFER and AFG are authorized separately, and therefore have separate appropriations and are not contingent upon one another. Therefore, the AFG Grant Program could receive an appropriation while the SAFER Grant Program may not. The Fire Prevention and Safety (FP&S) Grant Program is authorized through the AFG Grant Program authorization and for that reason, the AFG and FP&S grants remain as one collection. The authority for AFG and SAFER is derived from the Sections 33 and 34 of the Federal Fire Prevention and Control Act of 1974, as amended (15 U.S.C. §2229a et seq.). The result of this change is the elimination of respondents for FEMA form 080-7, FEMA form 080-8, and FEMA form 080- 10.

There is a significant decrease in the number of respondents from 51,500 to 28,010. We attribute this decrease to a reduction in available funding and as a result reduction in the amount of awards granted. This has decrease the interest in the funding opportunity.

There is a significant increase in burden hours per respondent from 4.5 hours to 7.2. This increase was realized by the restructuring of our survey question to include not only the burden hours required to fill out the forms, but also the time to gather the information that

is necessary to complete the forms. Through our survey we found that some of our rural respondents were going through a more lengthy process to gather information that was readily available to some of the urban respondents. The 2.7 hours increase per respondent represents the additional time necessary to gather relevant information.

The result of all changes is a burden hour decrease of 26, 095 hours.

| 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 080-2 (Local) | \$7,212,004.80 | \$5,234,760.00 | -\$1,977,244.80 | | | |
| FEMA Form 080-2 (Not for Profit) | \$76,230.00 | \$0 | -\$76,230.00 | | | |
| FEMA Form 080-3 (Local) | \$707,840.00 | \$2,292,631.00 | +\$1,584,791.00 | | | |
| FEMA Form 080-4 (Local) | \$1,150,240.00 | \$1,716,807.40 | +\$566,567.40 | | | |
| FEMA Form 080-5 (Local) | \$190,232.00 | \$205,997.50 | +\$15,765.50 | | | |
| FEMA Form 080-5 (Not for Profit) | \$23,100.00 | \$36,352.50 | +\$13,252.50 | | | |
| FEMA Form 080-3a (Local) | \$0 | \$205,997.50 | +\$205,997.50 | | | |
| FEMA Form 080-3a (Not for Profit) | \$0 | \$36,352.50 | +\$36,352.50 | | | |
| FEMA Form 080-6 (Not for Profit) | \$41,387.50 | \$18,987.10 | -\$22,400.40 | | | |
| SAFER FEMA Form 080-7(Local) | \$130,065.60 | \$0 | -\$130,065.60 | | | |
| SAFER FEMA Form 080-7 (Not for Profit) | \$2,310.00 | \$0 | -\$2,310.00 | | | |
| SAFER FEMA Form 080-8 (Local) | \$331,800.00 | \$0 | -\$331,800.00 | | | |
| SAFER FEMA Form 080-10 (Local) | \$155,946.00 | \$0 | -\$155,946.00 | | | |
| SAFER FEMA Form 080-10(Not for Profit) | \$8,662.50 | \$0 | -\$8,662.50 | | | |
| Total | \$10,029,818.40 | \$9,747,885.50 | -\$281,932.90 | | | |

Explain: There is a cost burden decrease of \$76,230.00 due to not for profit organizations no longer being eligible for funding under the AFG program. The result of this change is the elimination of not for profit respondents for FEMA form 080-2.

There is a cost burden decrease of \$628,784.00 due to the Staffing for Adequate Fire and Emergency Response (SAFER) grant collection since it has been separated from the AFG collection. This separation was necessary due to the fact that SAFER and AFG are authorized separately, and therefore have separate appropriations and are not contingent upon one another. Therefore, the AFG Grant Program could receive an appropriation while the SAFER Grant Program may not. The Fire Prevention and Safety (FP&S) Grant Program is authorized through the AFG Grant Program authorization and for that reason, the AFG and FP&S grants remain as one collection. The authority for AFG and SAFER is derived from the Sections 33 and 34 of the Federal Fire Prevention and Control Act of 1974, as amended (15 U.S.C. §2229a et seq.). The result of this change is the elimination of respondents for FEMA form 080-7, FEMA form 080-8, and FEMA form 080- 10.

There is a cost burden increase of \$423,081.10 due to the increase of wages and burden hours per respondent.

The result of all changes is a cost burden decrease of \$281,932.90.

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.

This information collection will not be published for statistical purposes.

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.

There is no statistical survey methodology in this grant application, and no Part B is included.