

September 11, 2013

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0115**

**Title: Environmental and Historic Preservation Screening Form**

**Form Number(s): FEMA Form 024-0-1**

### **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 Environmental Policy Act (NEPA) (Public Law 91-190, Sec. 102 (B) and (C), 42 USC § 4332) requires that the Federal government examine the impact of its actions on the environment, look at potential alternatives to that action, inform both decision-makers and the public of those impacts through a transparent process, and pursue mitigation if necessary. Environmental and Historic Preservation (EHP) compliance refers to the process by which the Federal Government ensures that projects financed through Federal grant funding are compliant with NEPA and existing laws and regulations related to environment and historic preservation. Compliance under the National Environmental Policy Act is required whenever Federal funds are expended as listed in Sec. 102(D) of the National Environmental Policy Act (42 U.S.C. § 4332(D)).

Among other environmental laws and Executive Orders, a NEPA compliance review process for FEMA grant programs incorporates compliance with Section 106 of the National Historic Preservation Act (NHPA) (Public Law 89-665, 16 U.S.C. § 470f) which requires that a Federal official, having jurisdiction over awarding of Federal funds, take into consideration the effect that the actions undertaken as a result of the awarded funds have on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.

**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 Environmental and Historic Preservation Screening Form, FEMA Form 024-0-1, is a paper form used by FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to the Grant Programs Directorate for an Environmental and Historic Preservation (EHP) regulatory compliance review.

The information submitted with the Screening Form will be used by FEMA GPD's environmental specialists to determine the extent of the affect that a proposed project will have or could have on the environment, including historic resources. This is how the current collection is being used, i.e., to assess the project-in-question's effect on the environment or historic resources.

The information collected by FEMA GPD will not be disseminated to the public or used to support information that will be disseminated to the public. FEMA GPD is committed to integrating information quality principles into every step of the information life cycle, from the creation or collection of the information through its processing, dissemination, use, storage, and disposition.

**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 Screening Form is a Word document. Although the FEMA Form 024-0-1 may be completed by hand and mailed in, it is designed to be completed and submitted electronically. The document is available in both Word and Adobe Acrobat (pdf) formats at this website: (<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=4802>).

The grantees/subgrantees may email and submit their completed screening forms to [GPDEHPinfo@fema.dhs.gov](mailto:GPDEHPinfo@fema.dhs.gov). FEMA's GPD will review the content of the form, i.e., the project description and the documents submitted with the form and determine if the project will have, or has the potential to have, an adverse effect on the environment. FEMA has determined that some specific types of projects will not have an adverse effect on the environment. These projects have been categorically excluded from an environmental review. If FEMA determines that the project can be categorically excluded, FEMA will approve the project. If FEMA determines that the project could have an adverse effect, FEMA will refer the project to the appropriate FEMA region for

further analysis and possible consultation with the appropriate agency such as the State Historic Preservation Office or the U.S. Fish and Wildlife Service.

Electronic completion and submission will help to increase the efficiency with which grant application materials are received by FEMA GPD, since the transmission time will be greatly shortened versus using regular mail or overnight mail. In addition, it reduces the cost and time burden on grantees who would otherwise have to pay for postage and shipping, and make arrangements to send the materials. Furthermore, the image quality of faxed materials would be substantially lower than electronically submitted materials. Since visual documentation will be a key component of most Screening Form submissions, this would require FEMA GPD to go back to the grantee for further information, and could potentially result in more burden on the applicant as well as project delays.

Designing and implementing a web-based Screening Form may increase efficiencies in processing the Screening Form once submitted, but would not provide any reduction in burden on the applicants. Designing such a system has been determined to be cost-prohibitive at this time.

**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.**

FEMA GPD only requests the EHP information *once* per grant-funded project. If FEMA GPD could not request and obtain this information, FEMA GPD could not comply with comprehensive environmental and historic preservation requirements that are in place and mandated to ensure that the Federal government was informed of the potential effects of its grant-funded projects prior to their implementation. If FEMA GPD was not able to receive information collected from grant recipients, the agency could not fulfill its compliance requirements.

**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.**
- (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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information 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 May 28, 2013, 78 FR 31967. 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 August 19, 2013, 78 FR 50434. 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.**

**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.**

**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 Privacy Threshold Analysis (PTA) was completed and approved by DHS on May 6, 2013. The Environmental and Historic Preservation Screening Form is privacy sensitive and is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-013, Grant Management Programs, July 14, 2009 and an existing System of Records Notice (SORN), DHS/FEMA-004 Grant Management Information Files, August 7, 2009, 74 FR 39705.

There are no assurances of confidentiality provided to the respondents for this information 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.

**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 number of respondents has varied slightly from year to year. In FY 2011, we received 3,100 responses. In FY 2012, we received 3,300 responses. For FY 2013, we are on track to receive 2,800 responses. With the downward trend in FY 2013, we're estimating approximately 3,000 responses per year over the next four years.

It has been our experience, having worked with the grantees on the submissions of this form over the last several years that it takes a total of eight (8) hours to fill out the form and compile the requisite supporting documentation which comprises the collection. Grantees are only required to submit one screening form per project.

FEMA has estimated that approximately 2,800 respondents will complete the **FEMA Form 024-0-1**. There will be 1 response for a total of 2,800. Each form is estimated to take 8 hours to complete. The total annual burden is estimated to be 2,800 responses x 8 hours per response = 22,400 burden hours.

FEMA has estimated that approximately 200 respondents will complete the **FEMA Form 024-0-1**. There will be 1 response for a total of 200. Each form is estimated to take 8 hours to complete. The total annual burden is estimated to be 200 responses x 8 hours per response = 1,600 burden 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.**

This request only involves one form (FEMA Form 024-0-1).

**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	Environmental and Historic Preservation Screening Form / FEMA Form 024-0-1	2,800	1	2,800	8 hours	22,400	\$42.10	\$943,040
Not-for-Profit Institutions	Environmental and Historic Preservation Screening Form / FEMA Form 024-0-1	200	1	200	8 hours	1,600	\$42.10	\$67,360
<b>Total</b>		<b>3,000</b>		<b>3,000</b>		<b>24,000</b>		<b>\$1,010,400</b>

• 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 (<http://www.bls.gov/ncs/ocs/sp/nctb1495.pdf>) the average hourly wage rate category for an Environmental Specialist under the Life, Physical, and Social Life Categories, is estimated to be \$30.07 per hour or \$42.10 fully-loaded. Therefore, the estimated burden hour cost to respondents is estimated to \$1,010,400 annually when multiplied by 24,000 total annual burden hours.

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

The Screening Form is in Microsoft Word format. It requires neither maintenance nor any developmental costs. If an applicant wishes a copy of the form, the form is emailed electronically at no cost to the government; the form is not printed.

**Annual Cost to the Federal Government**

Item	Cost (\$)
Contract Costs [Describe]	
Staff Salaries* [ _#_ of GS __ , step__ employees spending approximately ___% of time annually ....(description)..... for this data collection] see explanation below.	\$3,144,630
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	\$2,250,000
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
<b>Total</b>	<b>\$5,394,630</b>

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

**Explanation:**

If FEMA did not collect this information via the Screening Form, the staff would have to conduct site visits to gather the information. The annual costs of the collection would include salaries of 30 full-time staff members plus travel expenses. We estimate that a staff member could conduct two site visits/assessments per week including travel time. We conduct 3,000 reviews per year, so 30 staff members would be necessary to conduct the visits/assessments (3,000 reviews divided by 30 staff equals 100 reviews per staff member or 2 reviews each week for 50 weeks). A GS-12 Step 1 earns \$74,872 per year. Using the Salary Rate multiplier, the annual cost per staff would be \$104,821. We estimate that travel would be \$750 per review which would include airfare, per diem, and two nights lodging.

The use of contractor support is also an option, however far more expensive than the use of Federal staff. It is estimated that contractors' overhead and profit could almost double the \$5,394,630 costs listed above.

**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 a 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
Environmental and Historic Preservation Screening Form / FEMA Form 024-0-1				10,584	24,000	+13,416
<b>Total(s)</b>				<b>10,584</b>	<b>24,000</b>	<b>+13,416</b>

**Explanation of the increased burden:** The increase/adjustment is due to the fact that we have more respondents. As the Federal grantees become more familiar with EHP regulations and requirements, the grantees are more apt to comply with the regulations and requirements and submit the Screening Form in order for FEMA to conduct the EHP review. The previous declaration of burden was submitted before full implementation of the EHP review process and there was no history by which the submitters could estimate the number of respondents. Now, after three years' experience, we are very comfortable in our estimation of 3,000 respondents.

**Explanation of the adjustment in the type of respondents:** In the previous submission for this collection, FEMA indicated that there were two types of respondents: 1) "State Local Tribal Governments" and 2) "Business or other for-profit" respondents. FEMA does not provide preparedness grants to businesses or other for-profit organizations. It is believed that that box was checked in error and the box that should have been checked is the "Not for Profit Institution" box. This document correctly reflects the types of respondents for this collection.

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
Environmental and Historic Preservation Screening Form / FEMA Form 024-0-1				\$347,441	\$0	-\$347,441
<b>Total(s)</b>				<b>\$347,441</b>	<b>\$0</b>	<b>-\$347,441</b>

**Explanation:** There is no change in the cost from the last submission; however the way cost is reported in this table is now changed as it comes from question 13 which has values of zero. Therefore, negative costs are now reflected to account for a change in how cost was previously recorded.

**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.