

August 30, 2013

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0026**

**Title: State Administrative Plan for the Hazard Mitigation Grant  
Program**

**Form Number(s): None**

### 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.**

FEMA regulations in 44 CFR Part 206.437, accessible at <http://federal.eregulations.us/cfr/section/2002/08/30/44-cfr-206.437>, require development and update of the State Administrative Plan by Grantees as a condition of receiving Hazard Mitigation Grant Program (HMGP) funding under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, 42 U.S.C. 5170c. Grantees can be any State of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands, or an Indian tribal government that chooses to act as a grantee. In addition, the Sandy Recovery Improvement Act of 2013 (P. L. 113-2) amends the Stafford Act to provide for The Chief Executive of a federally recognized Indian tribe to make a direct request to the President of the United States for a major disaster or emergency declaration. A State is defined in 44

CFR Part 13 as any of the several States of the United States, the District of Columbia, the Commonwealth of Puerto Rico, any territory or possession of the United States, or any agency or instrumentality of a State exclusive of local governments. Section 404 mandates FEMA approval of the State Administrative Plan before awarding any project grant assistance to a community or State applicant. The regulations for the State Administrative Plan are codified in 44 CFR 206.437, implementing the provisions to the Robert T. Stafford Disaster Relief and Emergency Assistance Act. At its minimum, the State Administrative Plan will include the designated State agency that will act as the Grantee, identify the State Hazard Mitigation Officer, identify staffing requirements, and establish a guide for implementation activities and procedures to account for non-Federal cost sharing. Additional information requirements are guided by the type of mitigation activities being pursued.

**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 State Administrative Plan is a procedural guide that details how the State will administer the HMGP. The State must have a current administrative plan approved by the appropriate FEMA Regional Director before receiving HMGP funds. The administrative plan may take any form including a chapter within a comprehensive State mitigation program strategy. The State may forward an administrative plan to FEMA for approval at any time prior to or immediately after the request for a disaster declaration. An approved plan is a prerequisite of receiving HMGP funds and is used by FEMA in determining approval for and the amount of each grant.

In the Administrative Plan, the State must establish procedures to guide the following 13 activities, and FEMA will review the information provided to ensure proper documentation of each activity:

1. Identify and notify potential applicants of the program availability.
2. Ensure that potential applicants are provided information on the application process, program eligibility, and key deadlines.
3. Determine applicant eligibility.
4. Provide information for environmental and floodplain management review.
5. Establish priorities for selection of mitigation projects.
6. Process requests for advances of funds and reimbursements.
7. Monitor and evaluate the progress and completion of selected projects.
8. Review and approve cost overruns.
9. Process appeals.
10. Provide technical assistance as required to sub-grantees.
11. Comply with the administrative requirements.
12. Comply with audit requirements.

13. Provide to the Regional Director quarterly progress reports on approved projects.

**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.**

States may submit the plan to FEMA by e-mailing electronic files(s) containing the plan(s) updates at any time prior to a disaster declaration or immediately after and request approval. The required contents of a State Administrative Plan are provided in 44 CFR Part 206.437. Information on mitigation and FEMA mitigation programs is made available to the public through FEMA's web site at <http://www.fema.gov/hazard-mitigation-assistance> . A Hazard Mitigation Grant Program Desk Reference, which provides program guidance for both the HMGP and the State Administrative Plan, is available online at: <http://www.fema.gov/library/viewRecord.do?id=1472> ..

**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 business 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.**

The State Administrative Plan provides procedural guidance on HMGP administration, and is requisite for States' requests for HMGP disaster assistance in the event of a major disaster or emergency declaration. Without approval of this information collection for the State Administrative Plan, allowing for preparation and FEMA approval of the State Administrative Plan, FEMA would not be able to provide disaster assistance for hazard mitigation activities under the HMGP to State and local communities that have been declared under a Presidential Disaster Declaration.

**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 June 12, 2013, volume 78, page 35297, number 113. There were no comments received for this collection of information.

A 30-day Federal Register Notice inviting public comments was published on August 30, 2013, volume 78, page 53774, number 169. 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.**

FEMA's regional offices have discussed the HMGP with our State counterparts in annual training sessions and meetings as needed to discuss deficiencies in the program. In addition, FEMA has involved State representatives (as nominated by the National Emergency Management Association) in established meeting sessions regarding data collection and electronic data processing for FEMA mitigation grant programs; and FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conferences.

**c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

FEMA has received input about information collections for the HMGP through meetings between State and local governments and the FEMA Regional Offices which occur at unscheduled times during the year. The 56 Respondents affected by this data collection are the 56 HMGP Grantees which are the States, Territories, plus any Indian tribal government that chooses to act as a grantee.

**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 approved for this collection on February 15, 2012. The Privacy Impact Assessment, Hazard Mitigation Grant Program (HMGP) System, DHS/FEMA/PIA-025 was approved for this collection on June 28, 2012. The HMGP system is covered by existing SORN: DHS/FEMA 009.

**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.**

It has been estimated that out of the 56 States currently having State Administrative Plans in place, 32 States will update the State Administrative Plan in any given year, based on past incidence of declared disasters. The number of Indian tribal governments that will apply in any given year for a disaster declaration and update its Administrative Plan is unknown. States and Indian tribal governments may submit the updated Administrative Plan to FEMA by e-mailing electronic files at any time prior to a disaster declaration or immediately after and request approval. Since the 56 States already have plans in place, no new plans are expected, only updates. FEMA estimates that it will take an average of eight (8) hours per State to review pre-existing information, and to prepare and submit their updated State Administrative Plan to FEMA. Therefore, it is estimated that approximately 32 States will update their plan twice per year, each update will require 8 hours, and the total annual hour burden will be  $32 \times 2 \text{ responses} \times 8 \text{ hours} = 512 \text{ hours}$ .

**b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for "Avg. Hourly Wage Rate". The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

**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](http://www.bls.gov)) the wage rate category for Urban and Regional Planners with State government is averaged to be \$30.48 per hour (non-loaded). Therefore, the estimated hourly wage rate adjusted by the 1.4 multiplier is \$42.67 per hour, and the estimated cost burden to respondents as itemized below is estimated at \$21,847 annually.

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	State Administrative Plan / No Form	32*	2	64	8	512	\$42.67	\$21,847.00
<b>Total</b>		<b>32</b>		<b>64</b>		<b>512</b>		<b>\$21,847</b>

**\* See Item 12a. ... “32 States will update ...”**

- 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

**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.

**Annual Cost Burden to Respondents or Record-keepers**

<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost</b> (investments in overhead, equipment and other one-time expenditures)	<b>*Annual Operations and Maintenance Cost</b> (such as recordkeeping, technical/professional services, ect.)	<b>Annual Non-Labor Cost</b> (expenditures on training, travel and other resources)	<b>Total Annual Cost to Respondents</b>
<b>Total</b>	0	0	0	0

**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**

<b>Item</b>	<b>Cost (\$)</b>
Contract Costs [Describe]	
Staff Salaries* 1 GS 12 , step 5 employee spending approximately 12% of time annually reviewing and approving 64 semi-annual revisions of State Administrative Plans at 4 hours per plan for this data collection (\$84,855/yr. x 1.4 x 0.12 = \$14,256); 1 Regional Director, Exec. Level III reviewing, approving and giving approval notification to at 30 minutes per plan for this data collection (\$165,300/yr. x 1.4 x 0.02 = \$4,628); Total = (\$14,256 + \$4,628 = \$18,884)	\$18,884
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	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
<b>Total</b>	<b>\$18,884</b>

\* 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
<b>Total(s)</b>						

**Explain:** No change in Annual Hour Burden.

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
<b>Total(s)</b>						

**Explain:** No change in Annual Cost Burden.

**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.**

This collection involves no statistical methods.