**Narrative of Changes**

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

Collection Title: FEMA Preparedness Grants: Homeland Security Grant Program (HSGP)

OMB Control No.: 1660-0125

Current Expiration Date: 12/31/2013

Collection Instruments: FEMA Form 089-1; FEMA Form 089-16; and FEMA Form 089-20

From the last OMB approval, OMB Collection 1660-0119, FEMA Preparedness Grants: Operation Stonegarden (OPSG) Collection was a stand-alone program and had its own PRA collection. This program has since been merged into the FEMA Preparedness Grants: Homeland Security Grant Program (HSGP) collection under OMB Collection 1660-0125 and as a result the burden hours have increased.

For changes to FEMA Form 089-20, please see change request chart.

Supporting Statement:

Question 2 – Updated to include OPSG forms.

Question 8a – Updated to reflect FRN publication information.

Question 10 – Updated to reflect current privacy information.

Question 12 – Number of respondents has increased. See Question 15 for explanation.

Question 14 – Costs to the Federal Government updated.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Estimated Annualized Burden Hours and Costs | | | | | | | | |
| **Type of Respondent** | **Form Name / Form Number** | **No. of Respon-dents** | **No. of Respon-ses per Respon-dent** | **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 | HSGP/SHSP/UASI Investment Justification,  FEMA Form  089-1 | 56 | 1 | 56 | 1488.5 hrs. | 83,356 | $38.14 | $3,179,197 |
| State, Local or Tribal Government | Documentation from SAA on how operational overtime UASI funds held by State would support urban area | 10 | 2 | 20 | 4 hrs. | 80 | $38.14 | $3,051 |
| State, Local or Tribal Government | Multi-year Training & Exercise Plan | 56 | 1 | 56 | 42 hrs. | 2,352 | $38.14 | $89,705 |
| State, Local or Tribal Government | Urban Area Working Group Structure, including Points of Contact | 62 | 2 | 124 | 1354 hrs. | 167,896 | $38.14 | $6,403,553 |
| State, Local or Tribal Government | UASI Governance Charter | 33 | 2 | 66 | 250 hrs. | 16,500 | $38.14 | $629,310 |
| State, Local or Tribal Government | UASI Strategy | 33 | 2 | 66 | 500 hrs. | 33,000 | $38.14 | $1,258,620 |
| State, Local or Tribal Government | UAWG spending consensus | 33 | 2 | 66 | 80 hrs. | 5,280 | $38.14 | $201,379 |
| State, Local or Tribal Government | OPSG Operations Order /  FEMA Form 089-16 | 39 | 1 | 39 | 570 | 22,230 | $38.14 | $847,852 |
| State, Local or Tribal Government | OPSG Inventory of Operation Orders /  FEMA Form 089-20 | 39 | 1 | 39 | 72 | 2,808 | $38.14 | $107,097 |
| **Total** |  | **322** |  | **532** |  | **333,502** |  | **$12,719,764** |

* Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

Question 15 – See explanation below.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **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** |
| HSGP/SHSP/UASI Investment Justification,  FEMA Form  089-1 |  |  |  | 83,356 | 83,356 | 0 |
| Documentation from SAA on how operational overtime UASI funds held by State would support urban area |  |  |  | 80 | 80 | 0 |
| Multi-year Training & Exercise Plan |  |  |  | 2,352 | 2,352 | 0 |
| Urban Area Working Group Structure, including Points of Contact |  |  |  | 167,896 | 167,896 | 0 |
| UASI Governance Charter |  |  |  | 16,500 | 16,500 | 0 |
| UASI Strategy |  |  |  | 33,000 | 33,000 | 0 |
| UAWG spending consensus |  |  |  | 5,280 | 5,280 | 0 |
| OPSG Operations Order /  FEMA Form 089-16 |  | 22,230 | +22,230 |  |  |  |
| OPSG Inventory of Operation Orders /  FEMA Form 089-20 |  | 2,808 | +2,808 |  |  |  |
| **Total(s)** |  | **25,038** | **+25,038** | **308,464** | **308,464** | **0** |

***Explain:***

From the last OMB approval, OMB Collection 1660-0119, FEMA Preparedness Grants: Operation Stonegarden (OPSG) Collection was a stand-alone program and had its own PRA collection. This program has since been merged into the FEMA Preparedness Grants: Homeland Security Grant Program (HSGP) collection under OMB Collection 1660-0125 and as a result the burden hours have increased from 308,464 hours to 333,502 hours.

In 2009, OPSG was no longer its own program, the grant program has been incorporated into the HSGP grant and the forms used for the OPSG program has been included in the collection’s submission which has resulted in an increase of average burden hours.