

May 13, 2014

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0062

Title: State/Local/Tribal Hazard Mitigation Plans

Form Number(s): None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 C.F.R. § 1320.5(a)(1)(iv) (2013) 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.

Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. § 5165, as amended by the Disaster Mitigation Act of 2000 (DMA 2000), Pub. L. No. 106-390, provides new and revitalized approaches to mitigation planning. The Stafford Act provides a framework for linking pre-and post-disaster mitigation planning and initiatives with public and private interests to ensure an integrated, comprehensive approach to disaster loss reduction. Title 44 C.F.R. pt. 201 (2013) provides the mitigation planning requirements for State, local, and Indian Tribal governments to identify the natural hazards that impact them, to identify actions and activities to reduce any losses from hazards, and to establish a coordinated process to implement the plan, taking advantage of a wide-range of resources.

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 purpose of the plan requirements is to enable State, local, and Indian Tribal governments to better understand the risks they face from natural hazards and to make decisions and take actions to reduce the risks from those hazards. Implementation of planned, pre-identified, cost-effective mitigation measures will streamline the disaster recovery process. The mitigation plan is the demonstration of the goals, priorities, and commitment to reduce risks from natural hazards and serves as a guide for State, local, and Tribal decision makers as they commit resources to reducing the effects of natural hazards.

In order to be eligible for certain types of Federal Emergency Management Agency (FEMA) mitigation grants, States, local, and Indian Tribal governments are required to have a hazard mitigation plan that meets the criteria established in 44 C.F.R. pt. 201 (2013) for this information collection. States are required under section 322 of the Stafford Act to have a FEMA-approved Standard State Mitigation Plan, following the criteria established in 44 C.F.R. § 201.4 (2013) to be eligible to receive certain Stafford Act assistance.

Per 44 C.F.R. pt. 201 (2013), new mitigation plans (including local and Tribal) are required to include documentation of the planning process, risk assessment, mitigation strategy and a maintenance process. Mitigation plan updates for local and Indian Tribal governments are required every 5 years and must document changes in development, progress in local mitigation efforts, and changes in priorities. Local and Indian Tribal governments use their mitigation plans, particularly the mitigation strategy, to guide decision makers as they commit resources to reducing the effects of natural hazards.

FEMA also receives mitigation plan reviews from States which may be in the form of a letter, email, or other format conveying completion of State review and must document that the Local or Tribal Mitigation Plan meets the requirements of 44 C.F.R. pt. 201 (2013). States also use these reviews to provide technical assistance and to prioritize project funding.

States, at their discretion, may develop an Enhanced State Mitigation Plan, following the criteria established in 44 C.F.R. § 201.5 (2013) in order to be eligible for increased Hazard Mitigation Grant Program (HMGP) funding. The Enhanced Plan is a separate plan type and is a State-level plan. The Enhanced Plan must demonstrate that a State has developed a comprehensive mitigation program, effectively uses available mitigation funding, and is capable of managing the increased funding.

Indian Tribal governments are addressed under a specific planning requirement in 44 C.F.R. § 201.7 (2013) that recognizes some of the unique aspects of these governments. Section

201.7 provides for plans prepared and approved under the existing rule, either under the State or local requirements, to be recognized as Tribal Mitigation Plans. Indian Tribal governments would then be eligible for FEMA mitigation grants under the Stafford Act and the National Flood Insurance Act of 1968, as amended, 42 U.S.C. § 4001 *et seq.* (NFIA).

Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The States will then send the plan to the appropriate FEMA Regional Office for formal review and approval. FEMA-approved hazard mitigation plans developed under 44 C.F.R. pt. 201 (2013) have been used by FEMA to determine State and Tribal eligibility for Stafford Act assistance, including HMGP and Pre-Disaster Mitigation (PDM) grant funds, and are now also used to establish eligibility for the grant program, Flood Mitigation Assistance (FMA), under the NFIA. The Biggert-Waters Flood Insurance Reform Act of 2012, Pub. L. No. 112-141 (July 6, 2012) merged the Severe Repetitive Loss and the Repetitive Flood Claims programs into one grant program, FMA.

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.

FEMA has not implemented a requirement for States, local or Indian Tribal governments to use information technology to submit the Hazard Mitigation Plans; however, FEMA does not preclude States, local, or Indian Tribal governments from e-mailing electronic file(s) containing the plans to the appropriate FEMA Regional Office for review and approval.

These plans may be submitted in any format the jurisdiction chooses, such as Microsoft Word documents (.doc), Adobe Acrobat portable document format (pdf), or in hard paper copy. FEMA encourages States, local, and Indian Tribal governments to use available technology to develop their plans. Approximately 95 percent of the plans in this collection utilize the mail submission option while 5 percent chose to email them in. No plans are faxed. The files are generally too large to send by fax or email. FEMA provides to the State, local, and Indian Tribal governments guidance and instructions on how to properly draft a Mitigation Plan (see attachment).

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. This information collection does not have a significant impact on other small entities. Private non-profit organizations are not required to have a hazard mitigation plan, but may choose to prepare a mitigation plan in order to be eligible for certain types of FEMA mitigation grants. Small government jurisdictions and private non-profit organizations may minimize impacts from this collection, by joining with neighboring governments to develop multi-jurisdictional hazard mitigation plans (i.e., multi-county or watershed) rather than single jurisdictional hazard mitigation plans.

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.

All Standard and Enhanced State Mitigation Plans must be reviewed, revised, and re-approved every 3 years by the appropriate FEMA Regional office. Local and Tribal Mitigation Plans must be reviewed, revised, and re-approved by FEMA every 5 years. According to the Stafford Act and the NFIA, without an approved mitigation plan, States, local and Indian Tribal governments cannot receive certain FEMA assistance, including HMGP and PDM under the Stafford Act, and FMA under the NFIA.

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 at 77 Fed. Reg. 11,142 (Feb. 24, 2012). **No comments were received.** See attached copy of the published notice included in this package. FEMA withdrew the February 24, 2012 60-day Federal Register notice in the Notice of Proposed Rulemaking (NPRM). The NPRM published on March 1, 2013, 78 Fed. Reg. 13,844. None of the comments received during the NPRM's comment period discussed the information collection. (The NPRM's comments may be found at www.regulations.gov under Docket ID: FEMA-2012-0001.)

A Final Rule inviting the public comments was published on April 25, 2014, 79 FR 22873, 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.

FEMA Mitigation staff is regularly invited to participate in conferences, work groups or other meetings with the American Planning Association, the Association of State Floodplain Managers and the National Emergency Managers Association, to discuss issues related to mitigation planning.

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.

In 2008, FEMA consulted with Tribal representatives during the development of the Tribal Mitigation Planning Guidance which was later issued in February 2010. In 2008, 2009, 2010, 2011, and 2012, FEMA met with the National Emergency Management Association to discuss issues related to Mitigation Planning requirements. In 2010, FEMA created an external stakeholder workgroup consisting of State and local government staff as well as representatives from several associations, as part of an effort to improve the plan review process.

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

There is no payment or gift to respondents 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.

The Privacy Threshold Analysis (PTA) for the State/Local/Tribal Hazard Mitigation Plans (1660-0062) was approved by the DHS Privacy Office on February 15, 2011. On January 27, 2012, the DHS Privacy Office approved the PTA for the Update of FEMA's Mitigation Planning Regulations.

The final results of the PTA have been adjudicated as a privacy sensitive system (rule). This collection is covered by an existing Privacy Impact Assessment (PIA) approved by DHS on January 19, 2007 and an existing System of Records Notice (SORN), 69 Fed. Reg. 75,079 approved by DHS on December 15, 2004.

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

11. Provide additional justification for any questions 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.

To determine the annual burden for this collection, burden hours were calculated separately for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

First, FEMA identifies 56 States, per 44 C.F.R. pt. 201 (2013), as respondents. Next, FEMA estimates an annual Number of Responses per Respondent. Total Number of Responses is calculated by multiplying the Number of Respondents by the Number of Responses per Respondent.

To calculate the Average Burden per Responses (in hours), FEMA uses HMGP and PDM grant awards to estimate mitigation plan development and update costs. These cost estimates are then broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent).¹ FEMA assumes that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$45.33, would develop and review mitigation plans and updates.² Finally, to calculate hour burden, the percent of costs attributed to personnel costs is divided by the Urban and Regional Planner loaded wage rate.

Annual hour burden for each collection is as follows:

- 1) **New Local and Tribal Plans** - FEMA estimates 5 new Local or Tribal Mitigation Plans per respondent will be developed annually for a Total Number of Responses equal to 280 plans (5 new plans per respondent x 56 respondents). FEMA uses HMGP and PDM grant awards to estimate a new mitigation plan average cost of \$57,000. Based on the personnel distribution percentage identified above, FEMA assumes \$13,110 (\$57,000 per new plan x 23 percent of plan) of the average mitigation plan cost to be attributed to personnel costs. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an Average Burden per Response of 289 hours (\$13,110/ \$45.33 per hour (rounded to the nearest hour)). The resulting new local or Tribal plan Total Annual Burden is 80,920 hours (289 hours per new plan x 280 new plans). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total

¹ The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

² The Urban and Regional Planner (Standard Occupational Classification 19-3051) loaded wage rate of \$45.33 is calculated using the Bureau of Labor Statistics 2011 mean hourly wage of \$32.38 times a 1.4 multiplier, to account for benefits, rounded to the nearest cent.

Annual Respondent Cost of \$3,668,104 (80,920 hours x \$45.33 per hour (rounded to the nearest dollar)).³

- 2) **Local and Tribal Plan Updates** – Based on the current inventory of approved plans, FEMA estimates that 9 mitigation plans per respondent would be updated annually for a Total Number of Responses equal to 504 plan updates (9 plan updates per respondent x 56 respondents). FEMA again used HMGP and PDM grant awards to estimate a mitigation plan update average cost of \$49,000. Based on the personnel distribution percentage identified above, FEMA assumes \$11,270 (\$49,000 per plan update x 23 percent of plan) of the average mitigation plan update cost to be attributed to personnel costs. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an Average Burden per Response in hours of 249 (\$11,270/ \$45.33 per hour (rounded to the nearest hour)). The resulting local and Tribal plan update Total Annual Burden is 125,496 hours (249 hours per plan update x 504 plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$5,688,734 (125,496 hours x \$45.33 per hour (rounded to the nearest dollar)).⁴
- 3) **State Review of Local and Tribal Plans** - All States must review local and Tribal plans. Based on the local and Tribal new plan and plan update estimates above, FEMA estimates 14 plans per respondent would be reviewed annually for a Total Number of Responses equal to 784 reviews ((5 new plans per respondent + 9 plan updates per respondent) x 56 respondents). FEMA estimates that it takes 8 hours to review each plan for a Total Annual Burden of 6,272 hours (8 hours per plan x 784 plans). FEMA assumes the equivalent to an Urban and Regional Planner at a loaded wage rate of \$45.33 would review local and Tribal plans. This results in a Total Annual Respondent Cost of \$284,310 (6,272 hours x \$45.33 per hour (rounded to the nearest dollar)).
- 4) **Standard State Mitigation Plan Updates** - All States have existing mitigation plans and have a choice on whether to submit a Standard State Mitigation Plan or an Enhanced State Mitigation Plan. FEMA estimates that 46 States would submit Standard State Mitigation Plans. Mitigation plans are to be updated every 5 years. This results in an annual average Number of Responses per Respondent equal to 0.2 (1 Standard State Mitigation Plan / 5 years). The resulting annual Total Number of Responses equals 9 Standard State Mitigation Plan updates (46 respondents x 0.2 Standard State Mitigation plans per respondent (rounded to the nearest plan)).

³ Due to rounding, Total Annual Burden in hours multiplied by the Urban and Regional Planner loaded wage rate does not equal the average cost attributed to personnel multiplied by Total Number of Responses; the average cost attributed to personnel (\$13,110) multiplied by Total Number of Responses (280) equals \$3,670,800; a difference of +\$2,696.

⁴ Due to rounding, Total Annual Burden in hours multiplied by the Urban and Regional Planner loaded wage rate does not equal the average cost attributed to personnel multiplied by Total Number of Responses; the average cost attributed to personnel (\$11,270) multiplied by Total Number of Responses (504) equals \$5,680,080; a difference of -\$8,654.

Based on HMGP and PDM grant awards, FEMA estimates a Standard State Mitigation Plan update average cost of \$205,000. Using the personnel distribution percentage identified above, FEMA assumes \$47,150 (\$205,000 per Standard State Mitigation Plan update x 23 percent of plan) of the average Standard State Mitigation Plan cost to be attributed to personnel costs. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an Average Burden per Response of 1,040 hours ($\$47,150 / \45.33 per hour (rounded to the nearest hour)). The resulting Standard State Mitigation Plan update Total Annual Burden is 9,360 hours (1,040 hours per standard plan update x 9 standard plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$424,289 (9,360 hours x \$45.33 per hour (rounded to the nearest dollar)).⁵

- 5) **Enhanced State Mitigation Plan Updates** –States may choose to submit an Enhanced State Mitigation Plan. FEMA estimates that 10 States would submit Enhanced State Mitigation Plans. Mitigation plans are to be updated every 5 years. This results in an annual Number of Responses per Respondent equal to 0.2 (1 Enhanced State Mitigation Plan / 5 years). The resulting Total Number of Responses equals 2 Enhanced State Mitigation Plan updates (10 respondents x 0.2 Enhanced plans per respondent).

Based on HMGP and PDM grant awards, FEMA estimates an Enhanced State Mitigation Plan update average cost of \$524,000. Using the personnel distribution percentage identified above, FEMA assumes \$120,520 (\$524,000 per Enhanced State Mitigation plan update x 23 percent of plan) of the average Enhanced State Mitigation Plan cost to be attributed to personnel costs. Dividing this cost by the Urban and Regional Planner loaded wage rate results in an Average Burden per Response of 2,659 hours ($\$120,520 / \45.33 per hour (rounded to the nearest hour)). The resulting Enhanced State Mitigation Plan update Total Annual Burden is 5,318 hours (2,659 hours per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$241,065 (5,318 hours x \$45.33 per hour (rounded to the nearest dollar)).⁶

⁵ Due to rounding, the Total Number of Responses multiplied by the Average Burden per Response and Urban and Regional Planner loaded wage rate does not equal the average cost attributed to personnel multiplied by Total Number of Responses (non rounded); the average cost attributed to personnel (\$47,150) multiplied by the Total Number of Responses (9.2) equals \$433,780; a difference of +\$9,491.

⁶ Due to rounding, Total Annual Burden in hours multiplied by the Urban and Regional Planner loaded wage rate does not equal the average cost attributed to personnel multiplied by Total Number of Responses; the average cost attributed to personnel (\$120,520) multiplied by Total Number of Responses (2) equals \$241,040; a difference of -\$25.

FEMA calculates a Total Annual Burden in hours of 227,366.⁷ The associated Total Annual Respondent Cost is \$10,306,502.⁸

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.

There are no forms involved with this data collection.

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Type of Respondent	Form Name/ Form Number	No. of Respondents	No. of Responses per Respondent ¹	Total No. of Responses ²	Avg Burden per Response (hours)	Total Annual Burden (hours)	Avg Hourly Wage Rate ³	Total Annual Respondent Cost ⁴
Local or Tribal Government	New Local and Tribal Plans	56	5	280	289	80,920	\$45.33	\$3,668,104
Local or Tribal Government	Local and Tribal Plan Updates	56	9	504	249	125,496	\$45.33	\$5,688,734
State Government	State Review of Local and Tribal Plans	56	14	784	8	6,272	\$45.33	\$284,310
State Government	Standard State Plan Updates	46	0.2	9	1,040	9,360	\$45.33	\$424,289
State Government	Enhanced State Plan Updates	10	0.2	2	2,659	5,318	\$45.33	\$241,065
Total		56		1,579		227,366		\$10,306,502

1- Standard State Plan Updates and Enhanced State Plan Updates Number of Responses per Respondent represents an annual average over 5 years (1 plan update / 5 years = 0.2).

2- Standard State Plan Updates Total Number of Responses is rounded to the nearest plan.

3- The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a loaded wage rate and rounded to the nearest cent.

4- Rounded to the nearest dollar.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov), the wage rate category for Urban and Regional Planners is estimated to

⁷ Total Annual Burden in hours = 80,920 New Local and Tribal Plan hours + 125,496 Local and Tribal Plan Update hours + 6,272 State Review of Local and Tribal Plan hours + 9,360 Standard State Plan Update hours + 5,318 Enhanced State Plan Update hours = 227,366 hours.

⁸Total Annual Respondent Cost = \$3,668,104 (New Local and Tribal Plans) + \$5,688,734 (Local and Tribal Plan Updates) + \$284,310 (State Review of Local and Tribal Plans) + \$424,289 (Standard State Plan Updates) + \$241,065 (Enhanced State Plan Updates) = \$10,306,502. However, due to rounding, the Total Annual Respondent Cost based on the average cost attributed to personnel multiplied by Total Number of Responses (non rounded) is \$10,310,010 (\$3,670,800 (New Local and Tribal Plans) + \$5,680,080 (Local and Tribal Plan Updates) + \$284,310 (State Review of Local and Tribal Plans) + \$433,780 (Standard State Plan Updates) + \$241,040 (Enhanced State Plan Updates)); a difference of +\$3,508 (\$10,310,010 - \$10,306,502).

be \$45.33 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Urban and Regional Planners is estimated to be \$10,306,502 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.**

To determine the annual cost for this collection, separate estimates were calculated for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMGP and PDM grant awards. These cost estimates are broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent).⁹ FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs.

- 1) **New Local and Tribal Plans** - FEMA estimates an average new Local or Tribal Mitigation Plan average cost of \$57,000. As the development of a new plan is a one-time cost, FEMA categorizes such costs as Start-Up Costs. Based on the contracting and non-labor cost distribution identified above, FEMA estimates the start-up cost for new local or Tribal plans to be \$43,890 (\$57,000 per plan x 66

⁹ The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

percent of plan contracting + \$57,000 per plan x 11 percent of plan non-labor). Multiplying this average costs by the local and Tribal new plan Total Number of Responses results in a total Annual Start-Up Cost of \$12,289,200 (\$43,890 Start-Up Cost per plan x 280 plans).

- 2) **Local and Tribal Plan Updates** – FEMA estimates an average local or Tribal mitigation plan update cost of \$49,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$32,340 (\$49,000 per plan update x 66 percent of plan update) and the non-labor costs to be \$5,390 (\$49,000 per plan update x 11 percent of plan update). Multiplying these average costs by the local and Tribal plan update Total Number of Responses results in an Annual Operations and Maintenance Cost of \$16,299,360 (\$32,340 operations and maintenance cost per plan update x 504 plan updates) and an Annual Non-Labor Cost of \$2,716,560 (\$5,390 non-labor cost per plan update x 504 plan updates). As a result, the Total Annual Cost to Respondents for local and Tribal plan updates is \$19,015,920.
- 3) **State Review of Local and Tribal Plans** – No annual cost burden is associated with State review of local and Tribal plans.
- 4) **Standard State Mitigation Plan Updates** – FEMA estimates an average Standard State Mitigation Plan update cost of \$205,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$135,300 (\$205,000 per Standard State Mitigation Plan update x 66 percent of plan update) and the non-labor costs to be \$22,550 (\$205,000 per Standard State Mitigation Plan update x 11 percent of plan update). Multiplying these average costs by Standard State Mitigation Plan update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$1,217,700 (\$135,300 operations and maintenance cost per Standard State Mitigation Plan update x 9 Standard State Mitigation Plan updates)¹⁰ and an Annual Non-Labor Cost of \$202,950 (\$22,550 non-labor cost per Standard State Mitigation Plan update x 9 Standard State Mitigation Plan updates)¹¹. As a result, the Total Annual Cost to Respondents for Standard State Mitigation Plan updates is \$1,420,650.
- 5) **Enhanced State Mitigation Plan Updates** – FEMA estimates an average Enhanced State Mitigation Plan update cost of \$524,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$345,840 (\$524,000 per Enhanced State Mitigation Plan update x 66 percent of plan update) and the non-labor costs to be \$57,640 (\$524,000 per Enhanced State Mitigation Plan update x 11 percent of plan update). Multiplying these average costs by Enhanced State Mitigation Plan

¹⁰ Calculating annual operations and maintenance costs using a non rounded Total Number of Responses (9.2) would result in Standard State Mitigation Plan Operations and Maintenance Cost of \$1,244,760 (9.2 Standard State Mitigation Plans x \$135,300); a difference of +\$27,060.

¹¹ Calculating annual non-labor costs using a non rounded Total Number of Responses (9.2) would result in Standard State Mitigation Plan Non-Labor Cost of \$207,460 (9.2 Standard State Mitigation Plans x \$22,550); a difference of +\$4,510.

update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$691,680 (\$345,840 operations and maintenance cost per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates) and an Annual Non-Labor Cost of \$115,280 (\$57,640 non-labor cost per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates). As a result, the Total Annual Cost to Respondents for Enhanced State Mitigation Plans is \$806,960.

FEMA estimates the Total Annual Cost to Respondents as \$33,532,730 (\$12,289,200 (New Local and Tribal Plans) + \$19,015,920 (Local and Tribal Plan Updates) + \$1,420,650 (Standard State Plan Updates) + \$806,960 (Enhanced State Plan Updates)).¹²

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
Development of New Local and Tribal Plans	\$12,289,200			\$12,289,200
Local and Tribal Plan Updates		\$16,299,360	\$2,716,560	\$19,015,920
State Review of Local and Tribal Plans				\$0
Standard State Mitigation Plan Updates		\$1,217,700	\$202,950	\$1,420,650
Enhanced State Mitigation Plan Updates		\$691,680	\$115,280	\$806,960
Total	\$12,289,200	\$18,208,740	\$3,034,790	\$33,532,730

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.

As all States have existing Mitigation Plans, FEMA staff review and approve State Standard and Enhanced Mitigation Plan updates. FEMA estimates an average 11 Standard and Enhanced State Mitigation Plans (9 Standard State Mitigation Plans updates

¹² Calculating total annual cost using a non rounded Total Number of Responses for Standard State Mitigation Plans (9.2) would result in Total Annual Cost of \$33,564,300; a difference of +\$31,570 (\$27,060 (Standard State Mitigation Operations and Maintenance Cost adjustment) + \$4,510 (Standard State Mitigation Non-Labor Cost adjustment)).

+ 2 Enhanced State Mitigation Plan updates) are submitted and reviewed annually. FEMA estimates that the equivalent of a GS 13, Step 1 Federal employee at a loaded wage of \$48.08 (\$34.34 per hour x 1.4 multiplier (rounded to the nearest cent)) would spend an average of 120 work hours reviewing each State Mitigation Plan. The estimated annualized cost to the Federal Government to review Standard and Enhanced State Mitigation Plan updates is \$63,465.60 (11 plan updates x 120 hours per plan x \$48.08).

In addition, FEMA estimates 784 local and Tribal plans (280 new local or Tribal plans + 504 local and Tribal plan updates) are submitted for review annually. FEMA estimates that the equivalent of a GS 13, Step 1 Federal employee at a loaded wage of \$48.08 (\$34.34 per hour x 1.4 multiplier (rounded to the nearest cent)) would spend an average of 40 work hours reviewing each local or Tribal mitigation plan. The estimated annual cost to the Federal Government to review local and Tribal mitigation plans is \$1,507,788.80 (784 plans x 40 hours per plan x \$48.08).

The Total Annual Cost to the Federal Government is estimated at \$1,571,254 (\$63,465.60 + \$1,507,788.80 (rounded to the nearest dollar)).

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs	
Staff Salaries [GS13/1 employees (\$34.34 per OPM 2012 General Schedule (Base) x 1.4 multiplier = \$48.08 (rounded to the nearest cent)) spending approximately 120 hours to review and approve 11 State plans, and 40 hours to review and approve 784 local plans for this data collection] (\$48.08 x ((120 x 11)+(40 x 784))) rounded to the nearest dollar	\$1,571,254
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	
Total	\$1,571,254

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.

There has been no change to the information being collected. However, there have been a number of adjustments on how hour burden was estimated, the separation of State Mitigation Plan Updates (Standard and Enhanced) from local and Tribal plan updates, and a program change impacting the frequency of State reporting. These changes are discussed in more detail below.

First, an adjustment was made to the methodology used to estimate the number of collections. FEMA has separated out the burden for State Mitigation Plan updates (Standard and Enhanced) from the existing mitigation plan update category thus creating two new categories, one for Standard State Mitigation Plan updates and one for Enhanced State Mitigation Plan updates.

Second, an adjustment was made to the methodology used to estimate hour burden based on HMGP and PDM grant awards. Using HMGP and PDM grant awards, FEMA estimates an average cost for State, local, and Tribal Plans and updates. These cost estimates are broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent).¹³ To calculate hour burden, the percent of costs attributed to personnel costs is divided by an updated Urban and Regional Planner loaded wage rate.¹⁴

The associated changes to the Number of Responses per Respondent and burden hour adjustments are as follows:

- 1) New Local and Tribal Plans:¹⁵ The previously approved New Local and Tribal Plan total annual burden hour estimate was 582,400 hours. There are no changes to the Number of Responses per Respondent. However, FEMA uses HMGP and PDM grant awards to calculate a New Local or Tribal plan development time estimate of 289 hours per response compared to the previous 2080 hour estimate. This change results in New Local and Tribal plan total annual burden of 80,920 hours (280 new plans x 289 hours per plan); a **decrease of 501,480 burden hours** (582,400 total annual burden hours - 80,920 total annual burden hours). This

¹³ The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM State Mitigation Plan grants awards (rounded to the nearest percent); however, only those grant awards that provided a sufficient breakdown of such costs were used to estimate the distribution.

¹⁴ The Urban and Regional Planner loaded wage rate was updated from \$43.54 to \$45.33 (including a 1.4 multiplier to account for benefits).

¹⁵ New Local and Tribal Plans was formerly referred to as New Plan Development (includes local and Tribal).

change is due to the adjustment in FEMA's estimate for New Local and Tribal Plan development time, as well as the updated wage rate.

- 2) Local and Tribal Plan Updates:¹⁶ The previously approved local and Tribal plan updates total burden hours estimate was 179,200 hours. However, by separating out State Mitigation Plans, the number of responses per respondent of local and Tribal plan updates was reduced from 10 to 9. This resulted in new Total Number of Responses of 504 (56 respondents x 9 Responses per Respondent), an annual decrease of 56 responses (560 Total Number of Responses - 504 Total Number of Responses).

FEMA uses HMGP and PDM grant awards to calculate a new local or Tribal update estimate of 249 hours per response compared to the previous 320 hour estimate. This change results in local and Tribal plan update total annual burden of 125,496 hours (504 plan updates x 249 hours per update), a **decrease of 53,704 burden hours** (179,200 total annual burden hours - 125,496 total annual burden hours). This change is due to the reduction in the number of responses per respondent by moving State Mitigation Plans into new categories, adjustment in FEMA's estimate for local and Tribal plan updates, as well as the updated wage rate.

- 3) State Reviews of Local and Tribal plans: The previously approved State review of local and Tribal plans total burden hours estimate was 6,720 hours. However, by separating out State Mitigation Plans, the number of responses per respondent of was reduced from 15 to 14. This resulted in new Total Number of Responses of 784 (56 respondents x 14 Responses per Respondent); an annual decrease of 56 responses (840 Total Number of Responses - 784 Total Number of Responses). This change results in a State review of local and Tribal plan annual burden of 6,272 hours, a **decrease of 448 burden hours** (6,720 total annual burden hours – 6,272 total annual burden hours).

- 4) Standard State Mitigation Plan updates: This collection item was previously embedded with local and Tribal updates and has been separated out as a new category. Therefore it has a previously approved total annual hour burden of 0.

FEMA estimates that 46 of the 56 States would submit Standard State Mitigation Plan updates. With the current 3 year State update cycle, this would result in an annual Number of Responses per Respondent of 1/3 (1 Standard State Mitigation Plan update / 3 years) for a Total Number of Annual Responses equal to 15 Standard State Mitigation Plan updates (46 Standard State Mitigation Plan Updates/3 years (rounded to the nearest plan)). FEMA uses HMGP and PDM grant awards to calculate a 1,040 hour burden estimate per Standard State

¹⁶ Local and Tribal Plan Updates was formerly referred to as Mitigation Plan Updates (includes local and Tribal) and included State, local, and Tribal plans.

Mitigation Plan update.¹⁷ This results in an estimated total annual burden of 15,600 hours (15 Standard State Mitigation Plan updates x 1,040 hours per plan).

However, due to the program change, changing Standard State Mitigation Plan updates from every 3 years to every 5 years, would alter the estimated annual Number of Responses per Respondent from 1/3 to 0.2 (1 State Mitigation Plan / 5 years). This would result in an annual Total Number of Responses equal to 9 rather than 15.¹⁸ This change results in a total annual burden of 9,360 (9 Standard State Mitigation Plan updates x 1,040 hours per Standard Mitigation Plan update), a decrease in annual burden by 6,240 hours (15,600 total burden hours - 9,360 total burden hours).¹⁹ The overall result is a total annual burden **increase of 9,360 hours**. The increase in estimated burden hours results from adding a new category for Standard State Mitigation Plan updates as well as the change in response frequency.

- 5) Enhanced State Mitigation Plan updates: This collection item was previously embedded with local and Tribal updates and has been separated out as a new category. Therefore it has a previously approved total annual hour burden of 0.

FEMA estimates that 10 of the 56 States would submit Enhanced State Mitigation Plan updates. With the current 3 year State update cycle, this would result in an annual Number of Responses per Respondent of 1/3 (1 Enhanced State Mitigation Plan update/ 3 years) for a total number of annual responses equal to 3 (10 Enhanced State Mitigation Plan updates / 3 years (rounded to the nearest plan)). FEMA uses HMGP and PDM grant awards to calculate a 2,659 hour burden estimate per Enhanced State Mitigation Plan update.²⁰ This results in an estimated total annual burden of 7,977 hours (3 Enhanced State Mitigation Plans x 2,659 hours per Enhanced State Mitigation Plan update).

However, due to the program change, changing Enhanced State Mitigation Plan updates from every 3 years to every 5 years, would alter the estimated annual Number of Responses per Respondent from 1/3 to 0.2 (1 State mitigation plan / 5 years). This would result in an annual Total Number of Responses equal to 2 rather than 3. This change results in a total annual burden of 5,318 (2 Enhanced State Mitigation Plan updates x 2,659 hours per Enhanced State Mitigation Plan update), a decrease of 2,659 hours (7,977 total burden hours - 5,318 total burden hours).²¹ The overall result is a total annual burden **increase of 5,318 hours**. The

¹⁷ Standard State Mitigation Plan update hour estimate is rounded to the nearest hour.

¹⁸ Total Number of Responses is rounded to the nearest whole plan.

¹⁹ Calculating this reduction without rounding number of Standard State Mitigation Plan updates or hours per Standard State Mitigation Plan update equals 6,380 hours ((46/3 Standard State Mitigation Plan updates – 46/5 Standard State Mitigation Plan updates) x ((\$205,000 per Standard State Mitigation Plan update x 23 percent personnel costs)/\$45.33) rounded to the nearest hour).

²⁰ Enhanced State Mitigation Plan update is rounded to the nearest whole plan.

²¹ Calculating this reduction without rounding total number of Enhanced State Mitigation Plan updates or hours per Enhanced State Mitigation Plan updates equals 3,545 hours ((10/3 Enhanced State Mitigation Plan updates – 10/5 Enhanced State Mitigation Plan updates) x ((\$524,000 per Enhanced State Mitigation

increase in estimated burden hours results from adding a new category for Enhanced State Mitigation Plan updates, as well as the change in response frequency.

The adjusted total burden hours for New Local and Tribal Plans, Local and Tribal Plan Updates, and State Review of Local and Tribal plans is 212,688 hours (80,920 hours + 125,496 hours + 6,272 hours). This is a decrease of 555,632 hours (768,320 annual burden hours (current OMB inventory) – 212,688 annual burden hours (from adjustments)). However, it should be noted that some of the costs previously accounted for in hour burden have shifted to State Mitigation Plan updates, as well as annual costs estimates.

The new total burden hours for Standard State Mitigation Plan Updates and Enhanced State Mitigation Plan updates is 14,678 hours (9,360 hours + 5,318 hours). This is an increase of 14,678 hours. However, this also includes a decrease of 8,899 hours (6,240 Standard State Mitigation Plan update reduction + 2,659 Enhanced State Mitigation Plan update reduction) due to the change of State Mitigation Plan update frequency for 3 to 5 years.²²

The overall result is an estimated annual hour burden of 227,366 hours (212,688 hours + 14,678 hours). This is a decrease of 540,954 hours (768,320 hours – 227,366 hours) from the currently approved OMB inventory.

Itemized Changes in Annual Hour 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
New Plans (Local and Tribal)				582,400	80,920	-501,480
Plan Updates (Local and Tribal)				179,200	125,496	-53,704
State Reviews of Local and Tribal plans				6,720	6,272	-448
Standard State Plan Updates	0	9,360	+9,360			
Enhanced State Plan Updates	0	5,318	+5,318			
Total(s)	0	14,678	+14,678	768,320	212,688	-555,632

Plan update x 23 percent personnel costs)/\$45.33) rounded to the nearest hour).

²² Calculating this reduction without rounding equals 9,925 hours (6,380 Standard State Mitigation Plan update hour reduction + 3,545 Enhanced State Mitigation Plan update hour reduction).

There has been a change in the way cost burden was reported in 2011 to 2012.²³ As such, the associated current OMB cost inventory is \$0. However, FEMA now estimates costs in question 13 of the supporting statement which includes contract support from the private sector in developing, updating, and reviewing plans.

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMGP and PDM grant awards. These cost estimates are broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent). FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs. The new cost estimates are as follows:

- 1) New Local and Tribal Plans:²⁴ The new local and Tribal plan annual cost estimate, based on the cost estimates from supporting statement question 13, is \$12,289,200. This is an increase of \$12,289,200.
- 2) Local and Tribal Plan Updates:²⁵ The local and Tribal update annual cost estimate, based on the cost estimates from supporting statement question 13, is \$19,015,920. This is an increase of \$19,015,920.
- 3) State Reviews of Local and Tribal plans: There are no costs associated with State review of local and Tribal plans.
- 4) Standard State Mitigation Plan updates: This collection item was previously embedded with local and Tribal updates and has been separated out as a new category. Therefore it is included as a program change. Based on the cost estimates from supporting statement question 13, the annual cost is estimated at \$1,420,650. This is an increase of \$1,420,650. This includes a \$947,100 reduction ((15 Standard State Mitigation Plan updates – 9 Standard State Mitigation Plan updates) x ((\$205,000 per Standard State Mitigation Plan update x (66 percent contracting costs + 11 percent non-labor costs) (rounded to the nearest dollar))²⁶ based on the change from a 3 year State Mitigation Plan update cycle to 5 years.
- 5) Enhanced State Mitigation Plan updates: This collection item was previously embedded with local and Tribal updates and has been separated out as a new

²³ Annual cost burden was previously derived from multiplying total annual burden hours for each collection identified in supporting statement question 12 by the associated wage rates.

²⁴ New Local and Tribal Plans formerly referred to as New Plan Development (includes local and Tribal).

²⁵ Local and Tribal Plan Updates formerly referred to as Mitigation Plan Updates (includes local and Tribal) and included State, local, and Tribal plans.

²⁶ Calculating this reduction without rounding Standard State Mitigation Plan updates equals \$968,147 ((46/3 Standard State Mitigation Plan updates – 46/5 Standard State Mitigation Plan updates) x ((\$205,000 per Standard State Mitigation Plan update x (66 percent contracting costs + 11 percent non-labor costs) (rounded to the nearest dollar)).

category. Therefore it is included as a program change. Based on the cost estimates from supporting statement question 13, the annual cost is estimated at \$806,960. This is an increase of \$806,960. This includes a \$403,480 reduction ((3 Enhanced State Mitigation Plan updates – 2 Enhanced State Mitigation Plan updates) x ((\$524,000 per Enhanced State Mitigation Plan update x (66 percent contracting costs + 11 percent non-labor costs) (rounded to the nearest dollar))²⁷ based on the change from a 3 year State Mitigation Plan update cycle to 5 years.

The total annual costs for New Local and Tribal Plans, Local and Tribal Plan Updates, and State Review of Local and Tribal plans is \$31,305,120 (\$12,289,200 + \$19,015,920 + \$0). This is an increase of \$31,305,120. However, it should be noted that some of the costs previously accounted for in hour burden have likely shifted to annual costs.

The total annual cost for Standard State Plan Updates and Enhanced State Plan updates is \$2,227,610 (\$1,420,650 + \$806,960). This is an increase of \$2,227,610. However, this also includes a decrease of \$1,350,580 (\$947,100 Standard State Mitigation Plan update reduction + \$403,480 Enhanced State Mitigation Plan update reduction) due to the change of State Mitigation Plan update frequency for 3 to 5 years.²⁸

The overall result is an estimated annual cost of \$33,532,730 (\$31,305,120 + \$2,227,610). This is an increase of \$33,532,730 from the currently approved OMB inventory.

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
New Plans (Local and Tribal)				\$0	\$12,289,200	+\$12,289,200
Plan Updates (Local and Tribal)				\$0	\$19,015,920	+\$19,015,920
State Reviews of Local and Tribal Plans				\$0	\$0	-\$0
Standard State Plan Updates	\$0	\$1,420,650	+\$1,420,650			
Enhanced State Plan Updates	\$0	\$806,960	+\$806,960			
Total(s)	\$0	\$2,227,610	+\$2,227,610	\$0	\$31,305,120	+\$31,305,120

²⁷ Calculating this reduction without rounding equals \$537,973 ((10/3 Enhanced State Mitigation Plan updates – 10/5 Enhanced State Mitigation Plan updates) x ((\$524,000 per Enhanced State Mitigation Plan update x (66 percent contracting costs + 11 percent non-labor costs) (rounded to the nearest dollar)).

²⁸ Calculating this reduction without rounding equals \$1,506,120 (968,147 Standard State Mitigation Plan update cost reduction + \$537,973 Enhanced State Mitigation Plan update cost reduction).

In summary, OMB's current hour burden estimate was 768,320 hours. Based on this update, the hour burden estimate was reduced to 227,366 hours; a decrease of 540,954 hours (768,320 hours - 227,366 hours). However, some of the hours previously accounted for have likely shifted FEMA's annual costs estimates. The monetized cost of this hour burden is \$10,306,502.²⁹

OMB's current cost inventory was \$0. However, based on adjustments to how annual costs were calculated, specifically the use of HMGP and PDM grants awards which included contractor and non-labor costs, the new annual cost estimate is \$33,532,730; an increase of \$33,532,730.

The overall estimated cost of this collection is \$43,839,232 (\$10,306,502 + \$33,532,730), including monetized annual hour burden and annual costs. The reduction associated with the change in State Mitigation Plan update frequency from 3 to 5 years results in a 8,899 hour reduction (6,240 Standard State Mitigation Plan update hour reduction + 2,659 Enhanced State Mitigation Plan update hour reduction), \$403,392 monetized³⁰, and \$1,350,580 (\$947,100 Standard State Mitigation Plan update reduction + \$403,480 Enhanced State Mitigation Plan update reduction) annual cost reduction for a total annual cost reduction of \$1,753,970.³¹

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 to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This collection does not seek approval to not display the expiration data for 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.

²⁹ Monetized cost of hour burden equals \$3,668,104 in New and Local Tribal Plans + \$5,688,734 in Local and Tribal Plan Updates + \$284,310 in State Review of Local and Tribal Plans + \$424,289 in Standard State Mitigation Plan updates + \$241,065 in Enhanced State Mitigation Plan updates.

³⁰ Monetized cost of hour burden reduction equals 8,899 multiplied by the Urban and Regional Planner loaded wage rate (\$45.33) rounded to the nearest dollar.

³¹ Due to rounding State Mitigation Plan updates and hour burden per State Mitigation Plan update estimates, the total annual reduction is \$202,209 less than the value that would be derived (\$1,956,000) without rounding the State Mitigation Plan updates or hour burden per State Mitigation Plan update.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.