**Narrative of Changes**

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

Collection Title: The Declaration Process: Requests for Preliminary Damage Assessment (PDA), Requests for Supplemental Federal Disaster Assistance, Appeals, and Requests for Cost Share Adjustments

OMB Control No. 1660-0009

Current Expiration Date: March 31, 2016

Collection Instruments: FEMA Form 010-0-13

The following are the changes to the collection:

FEMA has updated the burden hour on FEMA Form 010-0-13 from an average of 9 hours to an average of 9.057 hours per response (in paperwork burden disclosure notice statement).

Supporting Statement:

Question 1 – Updated to reflect legal authority for the Notice of Proposed Rulemaking that is updating this collection.

Question 2 – Updated to reflect that the collection was previously approved in March 2013 via a normal processing request.

Question 8a – Updated to reflect that this is an initial submission to OMB for a 60 day Federal Register Notice for 1660-0009 and thus no Federal Register citations are available.

Question 10 – Updated to reflect that a Privacy Threshold Analysis was completed and approved by DHS Privacy Office on December 5, 2013 for this collection.

Question 12 – Burden hours has increased. See question 15 below for an explanation.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 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 | Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form 010-0-13 | 622 | .5707 | 355 | 9.057  hours | 3,215 | $73.42 | $236,045.30 |
| State, Local or Tribal Government | Initial Data Gathering for Governor’s Request / No Form | 622 | .57 | 355 | 24 hours | 8,520 | $33.57 | $286,016.40 |
| **Total** |  | **622** |  | **710** |  | **11,735** |  | **$522,061.70** |

Question 15

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **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** |
| Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form 010-0-13 | 3,195 | 3,215 | +20 |  |  |  |
| Initial Data Gathering for Governor’s Request / No Form |  |  |  | 8,520 | 8,520 | 0 |
| **Total(s)** | **3,195** | **3,215** | **+20** | **8,520** | **8,520** | **0** |

***Explain:***

Due to the proposed changes in the NPRM, the time burden on respondents and potential respondents is changed by 30 minutes for each State request for a major disaster declaration that authorizes IA. The total time for the information collection burden change is 20 additional hours. Tribal governments’ requests for major disasters declarations that authorize IA are not subject to change in the time burden.

***Itemized Changes in Annual Cost Burden***

***Explain:***

There is no cost burden for this collection.