

March 10, 2014

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0072

Title: Mitigation Grants Program/eGrants

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.

This collection of information is necessary to implement grants for the Flood Mitigation Assistance (FMA) program and the Pre Disaster Mitigation (PDM) program.

The FMA program is authorized by Section 1366 of the National Flood Insurance Reform Act, 42 U.S.C. 4104c, as amended. The FMA program, under 44 CFR Part 79, provides funding for measures taken to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insured under the National Flood Insurance Program (NFIP).

The Biggert-Waters Flood Insurance Reform Act of 2012 eliminated the Repetitive Flood Claims (RFC) and Severe Repetitive Loss (SRL) programs, and made significant changes

to the FMA program. Cost-share requirements were changed to allow more Federal funds for properties with repetitive flood claims.

The PDM program was authorized by Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Act), 42 USC 5133, as amended by Section 102 of the Disaster Mitigation Act of 2000 (DMA), Public Law 106–390, 114 Stat. 1552. It provides grants for cost-effective mitigation actions prior to a disaster event to reduce overall risks to the population and structures, while also reducing reliance on funding from actual disaster declarations.

In accordance with OMB Circular A-102, FEMA requires that all parties interested in receiving FEMA mitigation grants to submit an application package for grant assistance. Applications and subapplications for the PDM and FMA programs are submitted via the eGrants system. The eGrants system has been developed and revamped to meet the intent of the e-Government initiative, authorized by Public Law 106–107. This initiative requires that all government agencies both streamline grant application processes and provide for the means to electronically create, review, and submit a grant application via the Internet.

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 Mitigation eGrants System (eGrants) is an intuitive, user-friendly, web-based application that allows eligible applicants and subapplicants to apply for Grants and Subgrants by using the Internet.

A part of the eGovernment initiative, eGrants streamlines the application process by providing the ability to apply for and manage their Grant and Subgrant applications over the Internet. It manages the processing of applications and facilitates FEMA’s review and award process, from submission of an application through the entire Grant life cycle.

The **Benefit Cost Determination** is used to collect data to evaluate the proposed project’s cost effectiveness. In short, mitigation projects must be cost effective to be eligible for Hazard Mitigation Assistance, (HMA) funding as demonstrated by a FEMA-validated benefit cost analysis. This cost effectiveness is based on a mix of the initial cost of the project and the life-expectancy of the proposed project as well as the losses expected to be avoided once the project is complete (benefits).

The **Environmental Review** is used to collect information that is needed to ensure that a proposed project is in compliance with all necessary environmental and historic preservation regulations and laws. This information is collected to assure that adverse project impact is minimized as much as possible. For example, if a property is acquired and there is asbestos on the property, FEMA has to assure that it is disposed of according to regulations.

The **Project Narrative-Sub-grant Application** is used to collect the information necessary for FEMA to assess the financial needs of the applicants as well as the projected benefits to be obtained from the use of grant funds for each of its mitigation grant programs. The application provides FEMA information on the scope and scale of the project to determine whether the mitigation activity proposed for funding meets eligibility criteria. In addition, the Applicant provides responses to FEMA to established questions which, combined with the activity eligibility criteria, will be used to objectively evaluate the merits of the application.

The following forms are used within the grant application process. Approval for the use of these forms is provided for in collection OMB Control Number 1660-0025.

FEMA Form 112-0-3, 112-0-3A, 112-0-3B, and 112-0-3C Summary Sheet for Assurances and Certifications is used by States and other recipients to certify compliance with important Federal requirements.

FEMA Form 112-0-4, Outlay Report and Request for Reimbursement for Construction Program, is used by State and local governments to report outlays for construction grants when directed by FEMA.

FEMA Form 112-0-5, Report of Government Property, is used by grantees to provide a listing of inventoried, non-expendable equipment purchased under a grant or cooperative agreement or Federally-owned equipment that is provided by the agency to be used by the grantee.

FEMA Form 112-0-6, Reconciliation of Grants and Cooperative Agreements, is used by grantees and FEMA personnel to reconcile awards, outlays, and draw downs during and at completion of a grant or cooperative agreement.

FEMA Form 112-0-8, Budget Information—Non-construction Programs, on non-disasters, used by States and other recipients to submit budget data when applying for a grant or cooperative agreement where the major purpose is not construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. On the FEMA disaster grants, this form had been used to compile the information necessary to fill out the SF424 face sheet. However, SF 424 is no longer in use, and a new form will take its place upon approval.

FEMA Form 112-0-10, Application for Federal Assistance - is a form used by applicants as a required face-sheet for pre-applications and applications submitted for assistance. It is also used by FEMA to obtain application certification

The following Standard Forms (SF) are used within the grant application process. Approval for use of these forms is provided under a government-wide OMB number used throughout the Federal government.

SF-425, Federal Financial Report, State and local governments had used this form to report the status of financial expenditures for FEMA grants. It is no longer approved for use under OMB No. 0348-0061. A draft form will replace SF-425 pending approval.

SF-LLL, Disclosure of Lobbying Activities, is a standard form used by applicants as a required agreement to comply with all requirements of the awarding agency. It is approved for use under OMB No. 0348-0046.

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.

Grant applications for the PDM and FMA programs are submitted via eGrants. The use of the eGrants system by respondents allows for 100% of the information required to be submitted electronically. The individual FEMA Forms can be accessed at <http://www.fema.gov/forms/>.

Respondents can access eGrants through the Website <https://portal.fema.gov/famsVuWeb/home>. New users may access the eGrants system by selecting the new user button and then entering in the required information in order to be approved for a user name and password. Step-by-step directions to receive a user name and password for the eGrants system is located on page 12 of the Grant Applicants Quick Reference Guide located on the FEMA.gov website at the following link: <http://www.fema.gov/library/viewRecord.do?id=3266>.

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 elsewhere in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Without this collection activity, FEMA will not be able to implement its mitigation grant programs that are set forth in legislation. As a result, FEMA will be unable to expend its annual appropriations for the PDM and FMA programs.

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 this 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 December 22, 2014, volume 76, number 14, page 3606. There were no comments received for this collection.

A 30-day Federal Register Notice inviting public comments was published on April 1, 2014, volume 79, number 62, Page 18303. There were no comments received for this collection.

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 routinely consults with State/local representatives and national organizations to discuss FEMA mitigation grant programs. The timing of these discussions varies and is often conducted on an as needed basis. FEMA holds periodic conference calls with both the National Emergency Management Association (NEMA) and the Association of State Floodplain Managers (ASFPM). In addition, FEMA staff participates actively in annual conferences of both these organizations.

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 headquarters and regional staff participate in annual meetings with State and local representatives to discuss updates to mitigation grant programs, including data collection and use of the eGrants system. Specifically, these stakeholders have contributed input into the development of the eGrants system.

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.

The National Emergency Management Information System – Mitigation Electronic Grants Management System (NEMIS-MT eGrants) was published in the Federal Register on Wednesday, December 15, 2004 (Vol. 69, No. 240, pp 75079-75081). The SORN is

currently being revised/updated and renamed. The review of the MT eGrants Privacy Threshold Analysis (PTA) was completed by DHS Privacy Office on November 6, 2012.

The MT eGrants Privacy Impact Assessment (PIA) was approved January 19, 2007; its update by the FEMA Privacy Office is pending.

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 sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

The total number of respondents for each of the two programs is 56. Each of the programs uses the Benefit-Cost Determination, Environmental Review, and Project Narrative – Sub-grant Application. The responses under the **FMA** Program, now including responses that would have been made under the old SRL and RFC programs, has a total of 1,904 responses and the total annual hour burden for this program is 16,408. The **PDM** has a total of 3,360 responses and the total annual hour burden for this program is 27,440. The figures leading to the total hour burden of 43,848, for the two programs together, are calculated immediately below, and itemized in the table below under ‘c.’

For the Benefit-Cost Determination, it is estimated that 56 State Urban and Regional Planners will complete an average of 30 Benefit Cost Analyses in support of the grant requests made. It is estimated that each response will require 5 hours to complete and will be completed 1,680 times per year among the 2 grant programs. The total annual hour burden for this information collection activity will be $(56 \times 30 = 1,680) \times (5 \text{ hours}) = 8,400 \text{ hours}$.

For the Environmental Review, it is estimated that 56 State Urban and Regional Planners will complete an average of 30 Environmental Reviews in support of the grant requests made. It is estimated that each response will require 7.5 hours to complete and will be completed 1,680 times a year among the 2 grant programs. The total annual hour burden for this information collection activity will be $(56 \times 30 = 1,680) \times (7.5 \text{ hours}) = 12,600$ hours.

For the Project Narrative – Sub-grant Application, it is estimated that 56 State Urban and Regional Planners will complete an average of 34 Narratives in support of the grant requests made. It is estimated that each response will require 12 hours to complete and will be completed 1,904 times a year among the 2 grant programs. The total annual hour burden for this information collection activity will be $(56 \times 34 = 1,904) \times (12 \text{ hours}) = 22,848$ 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) 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 total cost burden to respondents as itemized below is estimated to be \$1,870,994 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
FMA								
State, local or Tribal Government	Benefit-Cost Determination	56	10	560	5	2800	\$42.67	\$119,476

State, local or Tribal Government	Environmental Review	56	10	560	7.5	4200	\$42.67	\$179,214
State, local or Tribal Government	Project Narrative-Sub-grant Application	56	14	784	12	9408	\$42.67	\$401,439
Subtotal		56		1,904		16,408		\$700,129
PDM								
State, local or Tribal Government	Benefit-Cost Determination	56	20	1,120	5	5600	\$42.67	\$238,952
State, local or Tribal Government	Environmental Review	56	20	1,120	7.5	8400	\$42.67	\$358,428
State, local or Tribal Government	Project Narrative-Sub-grant Application	56	20	1,120	12	13,440	\$42.67	\$573,485
Subtotal		56		3,360		27,440		\$1,170,865
Total		56		5,264		43,848		\$1,870,994

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

Estimated Annualized Burden Hours and Costs							
Data Collection Activity	Supporting Authority	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	
Benefit Cost Determination	FMA (97.029) and PDM (97.047) Programs	56	30	1,680	5	8,400	
Environmental Review	FMA (97.029) and PDM (97.047) Programs	56	30	1,680	7.5	12,600	
Project Narrative-Sub-Grant Application	FMA (97.029) and PDM (97.047) Programs	56	34	1,904	12	22,848	
Total				5,264		43,848	

The following forms are utilized for the FEMA grant programs, but the burden hours are not calculated nor submitted for approval within this collection. The following forms are approved for use in collection OMB Control Number 1660-0025.

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
Flood Mitigation Assistance (FMA) (97.029)								
State, Local or Tribal Government	Application for Federal Assistance FEMA Form 112-0-10	56	3	168	0.75	126		
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	3	168	9.7	1630		
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	1	56	1.7	95		
State, Local or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs / FEMA Form 112-0-4	56	10	560	17.2	9632		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	1	56	4.2	235		
State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	1	56	0.084	5		
Total				1064		11723		
Pre-Disaster Mitigation (PDM) (97.047)								
State, Local or Tribal Government	Application for Federal Assistance/FEMA Form 112-0-10	56	2	112	0.75	84		
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	2	112	9.7	1086		
State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	2	112	1.2	134		

State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3,A,B,C	56	2	112	1.7	190		
State, Local or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs / FEMA Form 112-0-4	56	20	1120	17.2	19264		
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	2	112	4.2	470		
State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	2	112	0.084	9		
Total				1792		21237		

The following Standard Forms are utilized for the FEMA grant programs, but the burden hours are not calculated nor submitted for approval within this collection.

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
Flood Mitigation Assistance (FMA) (97.029)								
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		
Total				448		471		
Pre-Disaster Mitigation (PDM) (97.047)								
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	2	112	0.167	19		
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336		

Total		448		439	
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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

- a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**
- b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

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

Annual Cost Burden to Respondents or Record-keepers

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, ect.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Total	0	0	0	0

There are no operation and maintenance, or capital and start-up costs associated with this the collection of information.

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.

The total cost to FEMA is \$6,240,801.20. Approximately 26 staff members with an estimated grade level of GS-13 review and make determinations for these grant programs.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Describe] FEMA contracts the maintenance and enhancements to the eGrant data collection. The annual cost of this maintenance contract with IBM, Inc. is \$3,000,000.00 for the sustainment/maintenance of the eGrants system. Total cost: \$3,000,000.00	\$3,000,000.00
Staff Salaries* [26 GS-13, step 1 employees spending approximately 100% of their time annually reviewing and making determinations for the grant programs]. 26 x \$89,033.00 = \$2,314,858.00 x 1.4 = \$3,240,801.20	\$3,240,801.20
Facilities [cost for renting, overhead, ect. 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	\$6,240,801.20

* 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.

Explain: No change in respondents' Annualized Hour Burden for Reporting and/or Recordkeeping affects this collection for Mitigation eGrants, as shown in the table below.

Itemized Changes in Annual Burden Hours
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Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
N/A						
TOTAL						

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
NA				-0-	-0-	NA
Total(s)				-0-	-0-	NA

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

FEMA will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.