

January 24, 2021

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 - 0008**

**Title: Elevation Certificate/Floodproofing Certificate**

**Form Number(s): FEMA Form 086-0-33 and FEMA Form 086-0-34**

### **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.**

The National Flood Insurance Program (NFIP) regulations require the elevation or floodproofing of new or substantially improved structures in designated Special Flood Hazard Areas. As part of the agreement for making flood insurance available in a community, the NFIP requires the community to adopt a floodplain management ordinance that meets or exceeds the minimum requirements of the NFIP. These minimum requirements are intended to reduce future flood losses. One such requirement is that the community requires that buildings be elevated to above the base flood elevation, obtain the elevation of the lowest floor (including basement) of all new and substantially improved structures, and maintain a record of all such information. Non-residential buildings can also be floodproofed to the base flood elevation. The building elevation information should be generated and retained as part of the community’s permit records. The Elevation Certificate is one convenient way for a community to document building

compliance. This form can be completed by surveyors, the property owner or by government officials. The Floodproofing Certificate may similarly be used to establish the floodproofed design elevation in those instances when floodproofing of non-residential structures is a permitted. Engineers and architects complete the Floodproofing Certificate.

**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 Elevation Certificate and Floodproofing Certificate are used in conjunction with the NFIP application for flood insurance (OMB collection number 1660-0006, National Flood Insurance Program Policy Forms) in order to properly rate Post-FIRM structures in Special Flood Hazard Areas (44 CFR 61.7,61.8). Post-FIRM buildings are those buildings constructed after publication of the Flood Insurance Rate Map (FIRM). In addition, the Elevation Certificate is needed for Pre-FIRM structures being rated under Post-FIRM flood insurance rules. The standardized format of the Elevation Certificate (FEMA Form 086-0-33) and Floodproofing Certificate for Non-Residential Structures (FEMA Form 086-0-34) provide community officials with needed data in order to verify building elevation information and determine compliance with the community's floodplain management ordinance. The certificate is then used in conjunction with the flood insurance application so that the building can be properly rated for flood insurance. The elevation data is transmitted by the insurance agent, along with the appropriate NFIP policy forms, to the NFIP.

Documentation of certification by a registered professional engineer or architect that the design and methods of construction of a nonresidential building are in accordance with accepted practices for meeting the floodproofing requirements in the community's floodplain management ordinance is required to obtain rating credit for flood insurance. The engineer or architect makes a professional design determination that the building is floodproofed for which they have professional liability. A prudent determination requires: a review of as-built design drawings, that includes wall and floor sections, penetration of utilities into the building; a review of the protection of all openings (such as doors and egress); a review of soil conditions at the site; some calculation of loads and flow-rates of water through the soil; and a site visit to verify this information. Most owners who get this certification will use the services of the original designer of the building who has familiarity with the design.

The information provided on the Elevation Certificate and Floodproofing Certificate assist in FEMA's ability to measure the effectiveness of its regulations in reducing or eliminating damages caused by flooding and the appropriateness of NFIP premium charges for insuring property against the flood hazard.

**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.**

The Elevation Certificate and Floodproofing Certificate for Non-Residential Structures can be downloaded from the Internet as text files or PDF files. The surveyor, engineer, or architect completing these forms is required to provide his or her license information and to affix his or her seal in certifying the information on the form. The completed forms are either mailed in with the flood insurance application or are scanned and submitted as a scanned document if accompanying a flood application which is submitted electronically.

**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 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.**

If the collection of information is not conducted, FEMA will not be able to measure the effectiveness of the regulations in eliminating or decreasing damage caused by flooding. Also, the appropriateness of its premium charges for insuring property against the flood hazard cannot be adequately assessed for each property resulting in possible over or under-charging for flood insurance policies. This information is collected on a property only once, and may then be passed on to subsequent owners. It may also be retained on file in the community

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

The special circumstances contained in item 7(a) thru (h) of the supporting statement are not applicable to this information collection.

- (a) Requiring respondents to report information to the agency more often than quarterly.**
- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**
- (c) Requiring respondents to submit more than an original and two copies of any document.**
- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**
- (e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**
- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**
- (g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**
- (h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

**8. Federal Register Notice:**

- a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice inviting public comments was published on [\[date, Volume FR pp \(example 74 FR 15228\)\]](#). Six comments were received concerning the 2 forms in this information collection.

The first comment submission (from R. Smith) concerned the Floodproofing Certificate for Non-Residential Structures (FEMA Form 086-0-34), which requires that building and ground elevations as well as the building's floodproofing be certified by a registered professional engineer or architect. The commenter advised that in some states only a professional surveyor can determine and certify elevations. In response, the form has been revised to allow for certification of elevations by a professional surveyor; the certification of the building's floodproofing must still be done by an architect or engineer. The second comment concerned the Elevation Certificate (FEMA Form 086-0-33) advising that in some states only a professional surveyor can determine and certify elevations. The response to this comment is included with the responses to the fifth submission (Becca Fricke-Croft).

The second submission (from Brian Shaw) was an exact duplication of comments on the Elevation Certificate (FEMA Form 086-0-33) that was received in 2012. Some of the recommended changes had already been incorporated in the 2012 revision of the Elevation Certificate. Recommendations to add specific questions concerning the validity or acceptability of engineered flood openings, which are certified by an engineer or architect, were not adopted in 2012 and will not be adopted now; the primary purpose of the Elevation Certificate is to provide building elevations and related information certified by a licensed land surveyor.

The third submission (from John Green) states a need for "a better understanding of building diagrams as pertains to requirements of elevation certificates, map amendments, etc., i.e. crawl spaces considered lowest floor, what diagram to use for a building on a completely enclosed sheet pile wall out in the river." Changes will not be made to the Elevation Certificate in response to this statement; the Elevation Certificate provides 9 building diagrams and the Flood Insurance Manual provides over 70 building diagrams which are provided to clarify which building levels are the lowest floors for rating purposes, etc. The submission also said the Elevation Certificate "should be updated to include an option for the new datum the NGS will soon publish. This will not be done at this time. The Elevation Certificate currently provides an "Other" option that can be selected where a datum other than NGVD or NAVD can be specified and entered. In three years when this form is again up for review, it will be considered if any new datum merits inclusion. The submission also comments on who is permitted to complete Section C of the Elevation Certificate. No change will be made concerning this. Community officials have long been permitted to transfer data from Elevation Certificates and certify this information in Section C; there is no justification to change this longstanding practice. Lastly, the

submission comments that the E-form version of the Elevation Certificate should allow the user to uncheck boxes for units of measurement (feet vs meters). The revised Elevation Certificate will provide this option.

The fourth submission (from Ceil Strauss) recommends that additional photographs be required with the Elevation Certificate. No changes will be made to the photograph requirements of the Elevation Certificate; the Elevation certificate already instructs that a front view and a rear view and, if required, side views be provided. The instructions also specify that photographs must show the foundation with representative examples of the flood openings or vents. It was recommended that the decimal requirements for latitude and longitude be changed to 5 decimal points. This will be done. At this point we will not be adding any field to the Elevation Certificate related to the Limit of Moderate Wave Action (LiMWA). FIMA does not rate structures based on their location in the LiMWA. If a coastal community receives a draft Flood Insurance Rate Map (FIRM) that delineates the LiMWA, the community must agree to show the LiMWA on its final published FIRM. Although showing a LiMWA on a FIRM is voluntary for non-CRS communities, it is a prerequisite for CRS participation. The LiMWA delineation is for informational purposes only. There is no CRS requirement to regulate the area differently, but the series of International Codes has special construction requirements in areas subject to breaking waves of 1.5 feet or higher. Communities are encouraged to meet the criteria for coastal A Zone credit (CAZ) in Activity 430 (Higher Regulatory Standards). It was recommended that a picture of the FIRM legend be included in the instructions to clarify where to get particular information. This will not be done; the FIRM instructions already adequately address this. It was recommended that the wording for Elevation Certificate item C2a be changed. This will not be done; the current wording accurately specifies the information needed. It was recommended that instructions in Section D be modified and moved. This will be done. It was recommended that changes be made to the Building Diagrams Section. No changes to the newly proposed Diagram 2B will be made; Diagram 2B adequately addresses the location of the LAG for buildings with basements and below ground garages with below ground level areas of egress. Other changes and additions to the Building Diagrams Section were suggested. No additional changes will be made to the Building Diagrams Section at this time. The building diagrams already provided are representative of buildings featuring the types of foundations and enclosure walls of interest. It is neither practical nor necessary for the purposes of this form to address all of the variations in construction with building diagrams. The submission made general recommendations concerning the digital version of the form. These will be incorporated to the extent possible. The submission also provided comments on the Floodproofing Certificate. As it recommended, instructions have been added that outline the documentation to be submitted as part of the certification requirements. The questions asked on the certificate are felt to be self-explanatory, so no instructions are added explaining what information is being requested. The submission recommended that re-certification should be required for flood insurance policy rating purposes every 2 years. This is a procedural recommendation and does

not apply directly to the form itself; periodic re-certification, however, is currently under consideration although how often re-certification will be required has not yet been decided. Guidelines on re-certification will be issued when re-certification is to be implemented. The submission also provided comments for improved training and education. This does not directly impact the collection of information on the Elevation Certificate or the Floodproofing Certificate; however, FEMA continually looks for ways to improve its training and educational materials.

The fifth submission (from Becca Fricke-Croft) makes recommendations concerning the Elevation Certificate. Recommendations were made concerning changes in the photographs required for the Elevation Certificate. No changes will be made in response to the photograph recommendations: The photographs as currently required capture the number and relative heights of the flood opening where they are not obstructed by items such as shrubs, fences, etc., and photographs which are representative of the types of flood openings are already required. It was recommended that photographs of machinery, highest and lowest grades, and the attached garage, if any, be required. These photograph requirements will not be added. The photos already required often capture these features, and even when they do not it is not felt it is necessary to impose the burden of additional photographs since the elevation information requested provides the needed information on these items. It was also recommended that photographs be required with all Elevation Certificates, not just those being used to obtain flood insurance. This recommendation will not be adopted; FEMA Flood Plain Management Branch has determined that it is up to the communities to decide on their own requirements for photographs that must accompany the Elevation Certificate. The submission recommends adding a new building diagram that features a building with a basement where the lowest adjacent grade is the same elevation as the bottom floor, such as a basement-level patio with a retaining wall. A new building diagram 2B is being added which will feature this type of construction. The submission makes additional recommendations for modifications of building diagrams. Additional modifications of the building diagrams will not be made at this time; the current building diagrams on the Elevation Certificate have good distinguishing features representative of the kinds of buildings. It is unnecessary to make further distinctions between building diagrams 7 and 8; both buildings are elevated on foundation walls and will be rated using the same rates. The current building diagrams, showing elevation on a crawl space and on full foundation walls, are determined to be sufficient. The current building diagram 1B depicts stem wall foundation construction; this type of foundation will never feature openings. Building diagram 7 depicts a building elevated on foundation walls, which may or may not have openings. The submission comments on the information requested pertaining to engineered openings, recommending that “zero square inches” should be indicated to be the opening of engineered flood opening when they are not “activated” by the presence of flood water. The Certification for the engineered openings provides the specifications for the area of the engineered openings; this is the figure to be entered in answering the items A8.d and A9.D. No purpose is served by entering “zero” for the area of the certified engineered flood openings. The

Elevation Certificate instructions specify that, when applicable, the Individual Engineered Flood Opening Certification or an Evaluation Report issued by the International Code Council Evaluation Service (ICC ES) is to be attached. The submission asked that instructions be added on using the FIRMs. It is not the purpose of the Elevation Certificate to provide information on how to use FIRMs; this information is available elsewhere and will not be added to the Elevation Certificate. It is recommended that more options be provided for indicating sources for the BFE. This will not be done; the “Other” option on the Elevation Certificate provides for information on the source of the BFE to be added as needed. Comments were made concerning the building elevation information requested on the Elevation Certificate. A comment was made concerning adding the requirement to provide the elevation of the “next-next higher floor.” This will not be done; the Elevation Certificate provides all information needed to validate that the correct top of the bottom floor elevation and the next higher floor elevation are being provided. There is no need to impose the burden of providing the elevation of the “next-next higher floor.” It was commented that instructions are unclear as to whether the list of machinery and equipment provided is “exhaustive” or what kinds of things can be excluded. The example of things that might be excluded was given in the comments as “ductwork, phone and data lines, electrical wires.” It is generally understood that such items as ductwork, phone and data lines, and electrical wires are not considered machinery and equipment that service the building. The instructions will not be revised to elaborate on this distinction. It was recommended that a field be added that records the elevation of the “lowest floor” as defined in the Lowest Floor Guide (of the Flood Insurance Manual). The field will not be added because it is not for the surveyor to establish the lowest floor for rating; this is determined by the insurance underwriter based on the information provided on the flood insurance application and the elevation certificate. The submission commented that it is unclear to users who can complete the form and under what circumstances. The certification instructions on the Elevation Certificate state: “This certification is to be signed and sealed by a land surveyor, engineer, or architect authorized by law to certify elevation information.” Each state regulates which professional(s) may certify elevations; this differs by state. It is up to the certifying professional, i.e., land surveyor, engineer, or architect, to know if he or she is authorized by the state law under which he or she practices to certify the elevation information on the Elevation Certificate. No change will be made to the Elevation Certificate to elaborate on this matter. It was recommended that the words “and all attachments” be added to the instructions in Section D, such that the line that starts “Provide a copy of this Elevation Certificate to...” is revised to read “Provide a copy of this Elevation Certificate and all attachments to...” The Elevation Certificate will be revised according to this recommendation. The submission recommended that the text for Section E be modified and that next higher floor elevations be required, if applicable. These changes will not be adopted; the current instructions accurately specify the information needed. The elevation of the next higher floor is required to determine rates for buildings described by Diagrams 6-9. The unfinished enclosure floor with proper openings is excluded for rating purposes therefore, it is not required. The submission recommends that a series of fields be added in Section F for Community corrections or updates. This will not be done. If an error must be corrected or the building has been modified, a new Elevation Certificate must be submitted by the design



professional or land surveyor. The submission recommends that information be provided on the Elevation Certificate concerning if the completed Elevation Certificate ever expires and is no longer valid, and if there is a phase-in period when a new version of the Elevation Certificate is issued. This information will not be added to the Elevation Certificate. This information is provided in Flood Insurance Manual and is subject to change. This information is relevant to completing the Elevation Certificate.

The sixth submission (from Milver Valenzuela, Syndeste, LLC), argues against adding a check box to the Elevation Certificate to indicate if a property is in a LiMWA area, and requests that it not be added. At this point we will not be adding any field to the Elevation Certificate related to the Limit of Moderate Wave Action (LiMWA). FIMA does not rate structures based on their location in the LiMWA. If a coastal community receives a draft Flood Insurance Rate Map (FIRM) that delineates the LiMWA, the community must agree to show the LiMWA on its final published FIRM. Although showing a LiMWA on a FIRM is voluntary for non-CRS communities, it is a prerequisite for CRS participation. The LiMWA delineation is for informational purposes only. There is no CRS requirement to regulate the area differently, but the series of International Codes has special construction requirements in areas subject to breaking waves of 1.5 feet or higher. Communities are encouraged to meet the criteria for coastal A Zone credit (CAZ) in Activity 430 (Higher Regulatory Standards).

**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.**

NFIP program personnel frequently discuss the certificates at meetings with involved users; e.g., insurance agents, company officials, surveyors, and others. The Mitigation Directorate works very closely with the surveyors, engineers, and architects during the development process.

In June 2008 an Elevation Certificate Workgroup was formed to review the form and make suggestions for its improvement. Subsequent changes to the Elevation Certificate were made as a direct result of the efforts of this workgroup.

In September 2011 FEMA formed a workgroup to review and make recommendations for the improvement of the Elevation Certificate and the Floodproofing Certificate. This workgroup was composed of FEMA Mitigation Directorate staff that had invited and compiled comments on the Elevation Certificate and the Floodproofing Certificate from the private sector, included engineers, surveyors, community officials, floodplain managers, insurance company representatives, insurance producers, underwriters, and others.

In November 2014 FEMA formed a workgroup to review and make recommendations for the improvement of the Elevation Certificate and the Floodproofing Certificate. This workgroup was composed of FEMA Mitigation Directorate staff that had invited and compiled comments on the Elevation Certificate and the Floodproofing Certificate from the private sector, included engineers, surveyors, community officials, floodplain managers, insurance company representatives, insurance producers, underwriters, and others.

**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.**

These forms are supplied to insurance agents, community officials, surveyors, engineers, architects and NFIP policyholders/applicants. Surveyors, engineers, and architects complete the Elevation Certificate. Engineers and architects complete the Floodproofing Certificate. Community officials are provided the building elevation information required to document and determine compliance with the community's floodplain management ordinance. NFIP policyholder/applicants provide the appropriate certificate to insurance agents. The certificate is then used in conjunction with the flood insurance application so that the building can be properly rated for flood insurance. NFIP personnel frequently discuss the certificates at meetings with these involved users.

The changes recommended and adopted by the FEMA workgroup are reflected in the revision of the Elevation Certificate and Floodproofing Certificate, which are submitted for approval with this submission. The changes for the Elevation Certificate are (1) addition of a question asking if the building is in a Limit of Moderate Wave Action (LiMWA) area, (2) instructions for answering this questions, (3) addition of a new building diagram to the Building Diagrams section, (4) updates to URL links in the Instructions section, and (5) the removal of a reference to a software program that is no longer in use. The changes to the Floodproofing Certificate are (1) revisions to wording on the certificate so that it now indicates that all elevations must be based on finished construction, (2) revision of the certification section so that the elevations and the floodproofing are now certified separately, allowing the elevations to be certified by a professional land surveyor, and (3) the addition of an Instructions section which outlines the documentation that must be submitted with the form. Previously these instructions appeared only in the NFIP Flood Insurance Manual.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

**10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.**

A Privacy Threshold Analysis (PTA) was approved on (insert date). A PIA for this collection (select: was or was not) determined to be needed and has been forwarded to the FEMA Privacy Office for review. [Note: A PTA was submitted to Lavar Sykes on April 10, 2015.]

**11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature requested for this information collection.

**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 burden hours for FEMA Form 086-0-33 include the time required for the respondent to gather all information and provide responses on form. The burden hours also include the time required by the architect or surveyor who is hired by the respondent to perform the work necessary to respond to some of the questions contained on FEMA Form 086-0-33. The burden hours for FEMA Form 086-0-33 also include the time required to view the Web-based training module. Based on the numbers of new elevation-rated policies for buildings in designate flood

hazard areas issued by the NFIP for the past 12 months, FEMA estimates a total of 9,307 respondents submitting FEMA Form 086-0-33 (Elevation Certificate) times 3.75 hours per response equaling 34,901 hours burden.

The burden hours for FEMA Form 086-0-34 represent the time required by the respondent to gather and review all necessary maps, construction/building codes and other data as well as inspecting the site prior to certifying the building meets the requirements set forth for floodproofing. Based on the numbers of new elevation-rated policies for non-residential buildings in designate flood hazard areas issued by the NFIP for the past 12 months and on available data keyed into the flood insurance policy information system that indicates rating based on floodproofing, FEMA estimates a total of 15 respondents submitting FEMA Form 086-0-34 (Floodproofing Certificate) at 3.25 hours per response equaling 48.75 hours burden.

**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.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent (per structure)	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Surveyors (contracted by the property owners)	Elevation Certificate FEMA 086-0-33 and Instructions	9,307	1	9,307	3.75	34,901	\$40.60	\$ 1,416,991
Architects / Engineers (contracted by the property owners)	Flood-proofing Certificate FEMA 086-0-34	15	1	15	3.25	49	\$54.87	\$ 2,675
<b>Total</b>		9322		9,322		34,950		\$ 1,419,666

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

"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

**Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.4. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4, and the entry for the "Avg. Hourly Wage Rate" would be \$59.51.**

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for surveyors is estimated to be \$40.60 (\$29.00 X 1.4) per hour including the wage rate multiplier, therefore, the estimated burden hour cost to surveyors is estimated to be \$1,416,991 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for architects/engineers is estimated to be \$54.87 (\$39.19 x 1.4) per hour including the wage rate multiplier, therefore, the estimated burden hour cost to architects/engineers is estimated to \$2,479 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.

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, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Elevation Certificate FEMA 086-0-33	0	\$3,257,450	0	\$ 3,257,450
Flood-proofing Certificate FEMA 086-0-34	0	\$5,250	0	\$ 5,250
<b>Total</b>	\$ -	\$ 3,262,700	\$ -	\$ 3,262,700

The cost to the respondent (i.e., applicants for flood insurance for whose building the certificate is being completed) is estimate to be a fee of \$350 charged to the applicant by the private sector professional completing the Elevation Certificate of Floodproofing Certificate.

The annual cost to 9,307 respondents x and average cost of \$350 per FEMA form 086-0-33 (Elevation Certificate) is estimated to be \$3,257,450.

The annual cost to 15 respondents x and average cost of \$350 per FEMA form 086-0-34 (Floodproofing Certificate) is estimated to be \$5,250.

**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.**

<b>Annual Cost to the Federal Government</b>	
Item	Cost (\$)
Contract Costs: Data Entry Clerks processing forms and Underwriter Specialists to review forms. (See Note 1 below for breakdown of cost)	27,053
Staff Salaries*: Two GS-12; Two GS-13; Two GS 14 spending approximately 1.9% of time annually reviewing certificates. (See Note 2 below for breakdown of cost)	11,822
Facilities: Annual cost for warehouse storage for certificates (See Note 3 below for breakdown of cost)	240
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing annual printing cost for Calendar Year 2011 (See Note 4 below).	1,445
Postage [annual number of data collection instruments x postage] (See Note 5 below).	1,740
Other annual updating of web-based training module	1,000
<b>Total</b>	<b>\$ 43,300</b>

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

The total Annualized Cost to the Federal Government is estimated to be \$43,300. The approximate cost is determined as follows:

Note 1: The total Contract Cost associated with this information collection is \$27,053, which is equal to the \$7,221 cost of the contractor Data Entry Clerks to process the forms plus the \$19,832 cost of the contractor Underwriting Specialists to review the information on the forms, which are submitted in conjunction with applications for flood insurance . These costs were determined as follows:

Hourly wage of a contractor Underwriting Specialist: \$25.20

Time an Underwriting Specialist spends reviewing an Elevation Certificate or Floodproofing Certificate (submitted in conjunction with an application for NFIP flood insurance): 5 minutes per form

Number of Elevation Certificates/Floodproofing Certificates reviewed in one hour by an Underwriting Specialist: 12

Total number of Elevation Certificates and Floodproofing Certificates processed annually: 9,322

Total hours spent annually by Underwriting Specialists reviewing Elevation Certificates and Floodproofing Certificates equals the total number of forms processed annually divided by the number of forms processed per hour, which is: 9,322 forms divided by 12 forms per hour, which equals 786.6 hours... rounded to 787 hours.

Total annual cost for contractor Underwriting Specialists to review Elevation Certificates and Non-Residential Floodproofing Certificates equals the hours spent by contractor Underwriting Specialists times the hourly wage of an Underwriting Specialist, which is 787 hours times the Underwriting Specialists wage of \$25.20 per hour, which equals \$19,832.

Hourly wage of a contractor Data Entry Clerk: \$15.30

Time a Data Entry Clerk spends processing an Elevation Certificate or Floodproofing Certificate (submitted in conjunction with an application for NFIP flood insurance): 3 minutes per form

Number of Elevation Certificates/Floodproofing Certificates processed in one hour by a Data Entry Clerk: 20

Total number of Elevation Certificates and Floodproofing Certificates processed annually: 9,322

Total hours spent annually by contractor Data Entry Clerks processing Elevation Certificates and Floodproofing Certificates equals the total number of forms processed annually divided by the number of forms processed per hour, which is: 9,322 forms divided by 20 forms per hour, which equals 472 hours.

Total annual cost for contractor Data Entry Clerks to process Elevation Certificates and Non-Residential Floodproofing Certificates equals the hours spent by contractor Data Entry Clerks times the hourly wage of a Data Entry Clerk, which is 472 hours times the Data Entry Clerks wage of \$15.30 per hour, which equals \$7,221.

Note 2: Federal Employees are estimated to spend a total of 200 hours annually in reviewing Elevation Certificates and Non-Residential Floodproofing Certificates, for an annual approximate cost of \$11,822 in Staff Salary. The approximate cost is determined as follows:

The number and grades and annual cost of each of these Federal Employees reviewing the forms are estimated as follows:



- Two GS-12s, paid \$86,564 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$3,289 per year
- Two GS-13s, paid \$102,932 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$3,911 per year
- Two GS-14s, paid \$121,635 annually, each spending about 34 hours a year or 1.9% percent of their time annually reviewing certificates, results in an approximate cost of \$4,622 per year

The total of \$3,289, \$3,911, and \$4,622 is \$11,822.

Note 3: The annual warehouse storage cost associated with the Elevation Certificate and Non-Residential Floodproofing Certificate is \$240. This is based on a cost of \$10 per month per form for twelve months, or \$10 per month times 2 forms times 12 months.

Note 4: The annualized printing cost of the Elevation Certificate and Non-Residential Floodproofing Certificate forms is calculated to be \$1,445, which is determined as follows:

The cost of printing the Elevation Certificate form for calendar year 2013 was \$3,511. The cost of printing the Non-Residential Floodproofing form for calendar year 2013 was \$823. The sum of these two is \$4,334. These forms were not reprinted in 2014 or 2015, because the supply on hand from the 2013 printing is considered sufficient to meet the demand for the forms through the 2015 calendar year. Therefore, averaging the printing cost of the forms over the three years results in an estimated annual printing cost of \$1,445.

Note 5: The annualized mailing cost associated with the Elevation Certificate and Non-Residential Floodproofing Certificate is estimated to be approximately \$1,740. This is based on a 2014 mailing cost for the Elevation Certificate of \$1,634 and a 2014 mailing cost for the Non-Residential Floodproofing Certificate of \$106.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

*A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or*

expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Elevation Certificate FEMA Form 086-0-33 and Instructions	0	0	0	24,600	34,901	10301
Floodproofing Certificate FEMA Form 086-0-34	0	0	0	49	49	0
			0			0
			0			0
			0			0
			0			0
<b>Total</b>	0	0	0	24,649	34,950	10,301

**Explain:**

The burden hour per response for FEMA Form 086-0-33 and FEMA Form 086-0-34 has remained the same. However the burden hours for this collection increased from 24,649 to 34,950 hours, an adjustment increase of +10,301 hours.

This increase is due to an increase in the number of flood insurance applications being submitted to the NFIP Direct Servicing Agent, which are rated based on elevation data provided on the certificates. Since the Elevation Certificate and Floodproofing Certificate are submitted in conjunction with an application for flood insurance, more applications being submitted results in more Elevation Certificates and Floodproofing Certificates being submitted. The total number of responses for the Elevation Certificate has increased from 6,560 to 9,307 (+4,370 responses). The number of responses for the Floodproofing Certificate has remained that same at 15 responses.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Elevation Certificate FEMA Form 086-0-33 and Instructions		\$ -	\$ -	\$2,960,000	\$3,257,450	\$ 297,450.00
Floodproofing Certificate FEMA Form 086-0-34		\$ -	\$ -	\$5,250	\$5,250	\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
			\$ -			\$ -
<b>Total</b>		\$ -	\$ -	\$ 2,965,250.00	\$ 3,262,700.00	\$ 297,450.00

**Explain:**

This collection has an adjustment in Annual Cost Burden due to:

The change in the Annual Cost Burden is an adjustment increase due to an increase in the number of respondents for FEMA Form 086-0-33, from 6,560 to 9,307. (9,307 respondents x \$350 for professional surveyor = \$3,257,450) The number of respondents for FEMA Form 086-0-34 remained the same at 15 respondents. (15 respondents x \$350 for professional engineer/architect = \$5,250). The adjustment due to the increase in the total number of forms submitted accounts for the total +\$297,450 change in Annual Cost Burden.

This increase is due to an increase in the number of flood insurance applications being submitted to the NFIP Direct Servicing Agent, which are rated based on elevation data provided on the certificates. Since the Elevation Certificate and Floodproofing Certificate are submitted in conjunction with an application for flood insurance, more applications being submitted results in more Elevation Certificates and Floodproofing Certificates being submitted.

The total annual cost burden for this collection has increased from \$2,965,250 to \$3,262,700.

**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 does not intend to employ the use of statistics or the publication thereof 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.**

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.