

Narrative of Changes

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

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

OMB Control No.: 1660-0125

Current Expiration Date: 04/30/2017

Collection Instruments: FEMA Form 089-1; FEMA Form 089-16; FEMA Form 089-20;
FEMA Form 089-0-27

For changes to the FEMA Forms 089-1 and 089-16, see Forms Revision Charts attached under the supplementary documents. FEMA Form 089-0-27 and SAFECOM Compliance Letter has been added to the collection.

The following are the changes to the collection:

Supporting Statement:

Question 1 – Updated to reflect current program descriptions.

Question 2 – Updated to reflect current collection instruments and requirements.

Question 3 – Updated to reflect current application submission information.

Question 10 – Updated to reflect current privacy information.

Question 12 – Number of forms respondents has increased. However, the overall burden total has decreased. See Question 15 for explanation.

Question 14 – Costs to the Federal Government updated.

Question 15 – Burden hour explained.

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
State, Local or Tribal Government	HSGP/SHSP/UASI Investment Justification, FEMA Form 089-1	56	1	56	1488.5 hrs.	83,356	\$61.53	\$5,128,895
State, Local or Tribal Government	Urban Area Working Group Structure, including Points of Contact	28	2	28	1354 hrs.	75,824	\$61.53	\$4,665,450
State, Local or Tribal Government	Documentation from SAA on how operational overtime UASI funds held by State would support urban area	56	2	112	4 hrs.	448	\$61.53	\$27,565

State, Local or Tribal Government	Multi-year Training & Exercise Plan	56	1	56	42 hrs.	2,352	\$61.53	\$144,719
State, Local or Tribal Government	UASI Governance Charter	28	2	56	250 hrs.	14,000	\$61.53	\$861,420
State, Local or Tribal Government	Senior Advisory Committee (SAC) Charter	56	1	56	250 hrs.	14,000	\$61.53	\$861,420
State, Local or Tribal Government	UAWG Allocation Methodology	28	1	28	4 hrs.	112	\$61.53	\$6,891
State, Local or Tribal Government	SHSP and UASI Pass-Through Requirements	56	1	56	4 hrs.	224	\$61.53	\$13,783
State, Local or Tribal Government	OPSG Operations Order / FEMA Form 089-16	39	1	39	571 hrs.	22,269	\$61.53	\$1,370,212
State, Local or Tribal Government	OPSG Inventory of Operation Orders / FEMA Form 089-20	39	1	39	72 hrs.	2,808	\$61.53	\$172,776
State, Local or Tribal Government	OPSG Daily Activity Report / FEMA Form 089-0-27	146	365	53,290	1 hr.	53,290	\$61.53	\$3,278,934
State, Local or Tribal Government	Critical Emergency Supplies Inventory Plan	20	1	20	42 hrs.	840	\$61.53	\$51,685
State, Local or Tribal Government	SAFECOM Compliance Letter	56	1	56	1 hr.	56	\$61.53	\$3,446
Total		664		53,920		269,579		\$16,587,196

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

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Local Representation is estimated to be \$43.95 per hour including the wage rate multiplier of the 1.4 multiplier, the total wage rate is **\$61.53** for completing and submitting grant information to DHS/FEMA for review and approval. Therefore, the estimated total burden hour cost to State and Local Representatives is estimated to be **\$16,587,196** annually.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
HSGP/SHSP/UASI Investment Justification, FEMA Form 089-1				83,356	83,356	0
Documentation from SAA on how operational overtime UASI funds held by State would support urban area				80	448	+368
Urban Area Working Group Structure, including Points of Contact				167,896	75,824	-92,072
Multi-Year Training & Exercise Plan				2,352	2,352	0
UASI Governance Charter				16,500	14,000	-2,500
Senior Advisory Committee (SAC) Charter	0	14,000	+14,000			
UAWG Allocation Methodology	0	112	+112			
SHSP and UASI Pass Through Requirement	0	224	+224			
OPSG Operations Order / FEMA Form 089-16				22,230	22,269	+39
OPSG Inventory of Operation Orders / FEMA Form 089-20				2808	2808	0
Critical Emergency Supplies Inventory Plan	0	840	+840			
Daily Activity Report / FEMA Form 089-0-27	0	53,290	+53,290			
SAFECOM Compliance Letter	0	56	+56			
Total(s)	0	68,522	+68,522	295,222	201,057	-94,165

Explain:

From the last OMB approval, various reporting requirements have been added and removed from the HSGP. The burden hours have decreased from 333,502 hours to 269,579 hours.

For FEMA Forms 089-20 and 089-1, there is no change in annual burden hours. For FEMA Form 089-16, there is a slight increase in the annual hour burden for this form due to revisions to the form.

For FEMA Form 089-16, the current annual hour burden was 22,230 hours, the new hours burden is 22,269 for an increase of 39 annual burden hours.

There has been a decrease in the annual burden hours in this collection due to the removal of the following collection instruments:

UASI Strategy – UASI recipients are no longer required to submit this data as decided by GPD leadership (current burden hours on inventory 33,000).

UAWG Spending Consensus – Recipients are no longer required to submit this data per GPD leadership. It is replaced by the UASI Allocation Methodology (current burden hours on inventory 5,280).

Initial Strategy Implementation Plan (ISIP) – Recipients are no longer required to submit this data per GPD leadership. This collection activity was approved under FEMA OMB Control Number 1660-0117, which expires 1/31/2017.

Preparedness Comprehensive Assessment Support Tool (PrepCAST) – Recipients are no longer required to submit this data per GPD leadership. This collection activity was approved under FEMA OMB Control Number 1660-0087, which expired on 4/30/2016 and was discontinued on 5/12/2016.

The following collection instruments have been added but have not resulted in an increase of the annual burden hours:

Senior Advisory Committee (SAC) Charter – This is a new requirement for HSGP to ensure grant recipients administer and implement projects that involve the entire preparedness community.

SHSP-UASI Pass Through Requirement – This is a new requirement for HSGP to ensure grant recipients transfer at least 80% of awarded grant funds to local jurisdictions.

Critical Emergency Supplies Inventory Plan – This is a new requirement for HSGP and is only required if grant recipients use funds to purchase critical emergency supplies. The Plan ensures supplies are used within the appropriate shelf life and are accounted for.

MAX.Gov: The U.S. Border Patrol, FEMA, Recipients and Sub-recipients will utilize MAX.Gov to facilitate the Campaign Plan/ Fragmented Operation Order submission and approval process.

Daily Activity Report Form, FEMA Form 089-0-27 – This form has been added to this collection. The DAR is used to submit the ongoing results and outputs from OPSG operations conducted. The annual burden hours are 53,290.

SAFECOM Compliance Letter – This document has been added to this collection. The compliance letter certifies that the applicant will comply with SAFECOM Guidance when implementing interoperable communications projects. The letter will be attach in the ND Grants system as part of the HSGP application.