

January 9, 2017

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0125**

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

**Form Number(s): FEMA Form 089-1; FEMA Form 089-16; FEMA Form 089-20; FEMA Form 089-0-27**

### **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.**

FEMA’s **Homeland Security Grant Program (HSGP)** supports state and local efforts to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States. The HSGP provides funding to implement investments that build, sustain, and deliver the 31 core capabilities essential to achieving the National Preparedness Goal (the Goal) of a secure and resilient Nation. The building, sustainment, and delivery of these core capabilities are not exclusive to any single level of government, organization, or community, but rather, require the combined effort of the whole community. The HSGP

supports core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response, and Recovery based on allowable costs. HSGP is comprised of three grant programs:

- State Homeland Security Program (SHSP)
- Urban Area Security Initiative (UASI)
- Operation Stonegarden (OPSG)

Together, these grant programs fund a range of activities, including planning, organization, equipment purchase, training, exercises, and management and administration across all core capabilities and mission areas. The authorizing authority of the HSGP is Section 2002 of the *Homeland Security Act of 2002*, as amended (Pub. L. No. 107-296), (6 U.S.C. § 603).

FEMA's **State Homeland Security Program (SHSP)** assists state, Tribal and local preparedness activities that address high-priority preparedness gaps across all core capabilities where a nexus to terrorism exists. All supported investments are based on capability targets and gaps identified during the Threat and Hazard Identification and Risk Assessment (THIRA) process, and assessed in the State Preparedness Report (SPR).

FEMA's **Urban Area Security Initiative (UASI)** assists high-threat, high-density Urban Areas in efforts to build and sustain the capabilities necessary to prevent, protect against, mitigate, respond to, and recover from acts of terrorism.

FEMA's **Operation Stonegarden (OPSG)** supports enhanced cooperation and coordination among Customs and Border Protection (CBP), United States Border Patrol (USBP), and local, Tribal, territorial, state, and Federal law enforcement agencies. The OPSG Program funds investments in joint efforts to secure the United States' borders along routes of ingress from international borders to include travel corridors in states bordering Mexico and Canada, as well as states and territories with international water borders.

\*It is important to note that Operation Stonegarden was a stand-alone program in Fiscal Year 2009 and filed its own PRA filing in 2009. The grant program was merged into the HSGP in Fiscal Year 2010 and therefore is now filed with HSGP.

**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.**

**FEMA Form 089-1, HSGP Investment Justification (SHSP and UASI)** – Submitted on-line via the Grant Reporting Tool, applicants provide narrative detail on proposed

activities (investments) that will be accomplished with HSGP funds. Investment justifications must demonstrate how proposed projects address gaps in current programs and capabilities and how grant funds will thereafter provide enhancements to overall homeland security preparedness. The form has been revised since the last submission. The revision allows applicants to submit project level data at the time of application. Project level data allows FEMA to more accurately report on what recipients are doing with grant funds.

**Urban Area Working Group Overview/Structure, including Point-of-Contact** – The State Administrative Agency (SAA) must confirm a specific POC with the designated Urban Area. The SAA POCs are responsible for identifying and coordinating with the POC for the UAWG. This information must be provided to DHS/FEMA with the grant application. SAAs must work with existing Urban Areas to ensure that information for current POCs is on file with DHS/FEMA.

**Operational Overtime** - States must provide documentation to the Urban Area Working Group (UAWG) and DHS/FEMA upon request demonstrating how any UASI funds retained by the state would directly support the Urban Area.

**Multi-year Training and Exercise Plan** – Recipients are required to develop and maintain a progressive exercise program consistent with HSEEP and the National Exercise Program (NEP). Recipients must conduct a Training and Exercise Planning Workshop (TEPW). Recipients must then develop a multi-year Training and Exercise Plan (TEP) that addresses the priorities identified in the TEPW. The TEP shall be submitted to [hseep@fema.dhs.gov](mailto:hseep@fema.dhs.gov) no later than June 1 annually.

**UASI Governance Charter** – The UAWG must ensure that its approach to critical issues such as membership, governance structure, voting rights, grant management and administration responsibilities, and funding allocation methodologies are formalized in a working group charter or other form of standard operating procedure related to the UASI program governance. The charter must also outline how decisions made in UAWG meetings will be documented and shared with UAWG members. The UAWG charter must be on file with DHS/FEMA prior to drawing down UASI funding and must be available to all UAWG members to promote transparency in decision-making related to the UASI program.

**Senior Advisory Committee (SAC) Charter** - The governance of the SHSP and UASI programs through the SAC should be directed by a charter. All members of the SAC should sign and date the charter showing their agreement with its content and their representation on the Committee. Revisions to the governing charter must be sent to the recipient's assigned Headquarters Program Analyst. The SAC charter must at a minimum address the following:

- A detailed description of the SAC's composition and an explanation of key governance processes, including how SAC is informed by the state's THIRA

and SPR data reflecting capability gaps and the approach to address gaps in core capabilities;

- A description of the frequency at which the SAC will meet;
- How existing governance bodies will be leveraged by the Committee;
- A detailed description of how decisions on programmatic priorities funded by SHSP and UASI are made and how those decisions will be documented and shared with its members and other stakeholders, as appropriate; and
- A description of defined roles and responsibilities for financial decision making and meeting administrative requirements.

This is a new requirement for HSGP grant recipients.

**UAWG Allocation Methodology** - The SAA must provide written documentation verifying the consensus of the UAWG, or the failure to achieve otherwise, on the allocation of funds and submit it to DHS/FEMA immediately after the 45-day time period allotted for the state to obligate funds to sub-recipients. This information replaces what was previously reported in the UAWG Spending Consensus.

**SHSP and UASI Pass-Through Requirements** - The SAA must obligate at least 80 percent (80%) of the funds awarded under SHSP and UASI to local or Tribal units of government within 45 days of receipt of the funds. 'Receipt of funds' occurs when the recipient accepts the award or 15 days after the recipient is notified of the award, whichever comes first. The signatory authority of the SAA must certify in writing to DHS/FEMA that pass-through requirements have been met. A letter of intent (or equivalent) to distribute funds is not considered sufficient.

**FEMA Form 089-16, OPSG Operations Order Report** – This document is used by USBP Sector Headquarters, in coordination with local / tribal law enforcement agencies and the State SAA, to provide project budget and accompanying project description. The Operations Order includes budgets and operative spending plans in one year increments for the 36 month period of performance. Applicants provide this information in MS Word format at the time of application submission via grants.gov. The information from the Operations Orders is used by reviewers from FEMA, USBP, and the State Administrative Agencies (SAAs) to evaluate applications and making funding decisions.

**FEMA Form 089-20, OPSG Inventory of Operation Orders** - FEMA will provide the SAA with an electronic template for the State to list the names of each jurisdictions applying for funding and the dollar amount being requested by each. This assists FEMA and USBP to ensure that all Operations Orders have been submitted before the application deadline and provides an accounting of the funding amounts being requested.

**Critical Emergency Supplies** – Prior to the allocation of grant funds for stockpiling purposes, each state must have DHS/FEMA's approval of a five-year viable inventory management plan which should include a distribution strategy and related sustainment costs if planned grant expenditure is over \$100,000.

**Homeland Security Exercise and Evaluation Program (HSEEP) After-Action Report (AAR) and Improvement Plan (IP), FEMA Form 091-0-1** – Recipients are required to submit one After Action Report/Improvement Plan (AAR/IP) for each HSGP-funded progressive exercise series; or submit individual AAR/IPs for each HSGP-funded exercise. AAR/IPs should be submitted to [hseep@fema.dhs.gov](mailto:hseep@fema.dhs.gov), no more than 90 days after completion of the exercise. This collection activity is approved under OMB Control Number 1660-0118, which expires 05/31/2017.

**Biannual Strategy Implementation Report (BSIR)** – Post award, Recipients are responsible for completing and submitting BSIRs through the Grants Reporting Tool (GRT). The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report). All required attributes of each project must be included. Updated obligations, expenditures, and significant developments must be provided within the BSIR to show progress of implementation for every project, as well as how expenditures support Planning, Organization, Equipment, Training and Exercises (POETE). The first BSIR will be due January 30, 2016 (30 days after the end of the first reporting period for the award). Subsequent BSIR reports will require recipients to report on a project-by-project basis.

The BSIR data is submitted electronically in a FEMA-sponsored system, the Grants Reporting Tool (GRT). This collection activity is approved under OMB Control Number 1660-0117, which expires 01/31/2017.

**FEMA Form 024-0-1, Environmental and Historic Preservation (EHP) Environmental Screening Form (ESF)** - The Environmental and Historic Preservation Environmental Screening Form is a paper form used by DHS/FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to GPD for an Environmental and Historic Preservation (EHP) regulatory compliance review. This collection activity is approved under OMB Control Number 1660-0115, which expires 01/31/2017.

**UASI Strategy** – UASI recipients are no longer required to submit this data as decided by GPD leadership.

**UAWG Spending Consensus** – Recipients are no longer required to submit this data per GPD leadership. It has been replaced by the UASI Allocation Methodology requirement.

**Threat and Hazard Identification and Risk Assessment (THIRA) – State Preparedness Report (SPR) Unified Reporting Tool** – States and territories must submit a THIRA every year they receive HSGP grant funding. Urban Areas are required to complete one (1) THIRA for each grant award. This submission is valid for the entire period of performance of the individual grant award. If an Urban Area does not receive additional fiscal year grants, the award year THIRA submission covers the requirement for the entire period of performance. The THIRA is a tool developed and managed by

Protection and National Preparedness. Additionally, recipients shall develop and maintain, jurisdiction-wide, all threats and hazards Emergency Operations Plans (EOPs) consistent with CPG 101 v.2. Recipients must update their EOP at least once every two years in the SPR. This collection activity is approved under OMB Control Number 1660-0131, which expires 10/31/2018.

**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 expires 4/30/2016.

**FEMA Form 089-0-27, Daily Activity Report (DAR) Form** - The DAR, is to be used to submit the ongoing results and outputs from OPSG operations conducted. The information and statistics included in the DAR will be delineated by agency (friendly forces). The DAR must be submitted to the USBP sector, or the participating agency’s OPSG coordinator within 48-hours of the conclusion of each OPSG shift. The coordinator will compile the results from each DAR at the end of the month and submit a monthly report to the USBP sector.

**SAFECOM Compliance Letter** – 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.

**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.**

Applicants initiate their application on grants.gov, where forms and instructions are available. To access these materials, applicants must go to <http://www.grants.gov>, select “Applicants” then “Apply for Grants,” read the registration requirements and register if necessary (Allow up to 7-10 business days after you submit before your registration is active in SAM, then an additional 24 hours for [Grants.gov](http://www.grants.gov) to recognize your information). In order to obtain the application package, applicants must select “Download a Grant Application Package”, enter the CFDA and/or the funding opportunity number located on the cover of the Notice of Funding Opportunity (NOFO), select “Download Package,” and then follow the prompts to download the application package.

Applicants must submit their applications materials on the Non-Disaster Grants Management System (ND Grants). The materials include the identification of the Urban Area Working Group (UAWG) POC. The UASI Governance Charter must be submitted in the Unified Report Tool (URT). Finally, SHSP and UASI grant applicants must use the FEMA-sponsored Grants Reporting Tool (GRT) to submit data for their Investment Justification (IJ). The GRT provides grantees the ability to electronically create and submit their IJs and BSIRs throughout the life of the grant. The GRT homepage is (<https://www.reporting.odp.dhs.gov/>). The GRT is used to capture DHS/FEMA's annual award and biannual grant reporting data. The Department developed the GRT as a tool to streamline the reporting process for grantees. The module is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines. The Grants Reporting Tool (GRT) collection activity is approved under OMB Control Number 1660-0117, which expires 01/31/2017. Applicants complete their application by taking the IJ created in the GRT and submitting it in ND Grants.

In addition, post award OPSG grant Recipients and Sub-recipients must use the U.S. Border Patrol-sponsored MAX.GOV system (MAX). The MAX.GOV homepage is, <https://www.MAX.GOV/>. MAX was developed by the Office Management and Budget (OMB) and will be used as a tool to streamline the operational management of the OPSG grant program. The U.S. Border Patrol, FEMA, recipients and sub-recipients will utilize the MAX to facilitate and track the Campaign Plan/ Operation Order submission and approval process. The module is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines. MAX is also used for the daily submission of DARs.

**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 DHS/FEMA could not request and obtain this information, DHS/FEMA could not exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If DHS/FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

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

**(a) Requiring respondents to report information to the agency more often than quarterly.**

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application. However, for clarity "Daily" as it relates to OPSG data collection means operational patrols occurring on a law enforcement shift. The FEMA – HSGP - Notice of Funding Opportunity (NOFO) requires the submission of the enforcement/patrol related data occurring on the OPSG shift, within 48 hours of the end of the shift.

The Daily Activity Report (DAR) serves as a multipurpose document that has to be submitted by Operation Stonegarden grant sub-recipients and friendly forces during the execution of border security operations on a daily basis.

Due to the complexity and variability of threats and vulnerabilities on our nation's borders and to increase the efficiency of joint (Federal and Local Partners) border security operations, daily collection, processing, analysis, and dissemination of information is necessary.

The DAR is one of the mechanisms that provides essential information to assist with operational decision making on specific areas of responsibility of the border.

The DAR is instrumental in collecting daily operational statistical information to be used for performance measures analysis, assisting in oversight and accountability as well as in criminal or enforcement trend analysis.

In conclusion, the DAR provides a daily manpower roster, specific law enforcement activities, intelligence reports, statistical data, and the location of law enforcement assets deployment during border security operations. This information is indispensable to have appropriate oversight of how funding is being expended on a daily basis and for accountability purposes.

**(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

There are no requirements for respondents to prepare a written response to this 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.**

There are no requirements for a respondent 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.**

Records must be retained for three years after close-out. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.

**(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.**

There is no statistical survey involved with this data collection.

**(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

There is no use for statistical data classification in this data collection.

**(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.**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

**(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.**

There are no requirements for respondents to submit proprietary trade secret or other confidential information for this data collection.

**8. Federal Register Notice:**

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

A 60-day Federal Register Notice inviting public comments was published on September 26, 2016, 81 FR 66051 (republished to include the SAFECOM Compliance Letter). No comments were received. See attached copy of the published notice included in this package.

A 60-day Federal Register Notice inviting public comments was published on December 4, 2015, 80 FR 75870. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on December 12, 2016, 81 FR 89490 (republished to include the SAFECOM Compliance Letter). No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on February 17, 2016, 81 FR 8089. No comments were received. See attached copy of the published notice included in this package.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

DHS/FEMA meets with both the National Emergency Management Association (NEMA) and the National Governors Association (NGA) national associations that represent these entities, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. During the grant guidance development process in past years, DHS/FEMA meets and consults directly with grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements.

**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 consults on a regular basis with Federal, State, local, tribal stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by DHS/FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements that DHS/FEMA uses.

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

DHS/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 completed by FEMA and adjudicated by the DHS Privacy Office on October 21, 2016.

The DHS Privacy Office finds that this is a privacy-sensitive collection that collects PII from members of the public. That PII includes contact information from State, Local, or Tribal Government POCs.

This collection is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015. No Privacy Act Statement nor SORN coverage is required for the forms.

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

**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 HSGP is an existing grant program that uses the forms outlined in this collection. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden estimated to collect the necessary information has estimated to be **269,579** total annual burden 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.**

**Estimated Annualized Burden Hours and Costs**

<b>Type of Respondent</b>	<b>Form Name / Form Number</b>	<b>No. of Respondents</b>	<b>No. of Responses per Respondent</b>	<b>Total No. of Responses</b>	<b>Avg. Burden per Response (in hours)</b>	<b>Total Annual Burden (in hours)</b>	<b>Avg. Hourly Wage Rate</b>	<b>Total Annual Respondent Cost</b>
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	56	1354 hrs.	75,824	\$61.53	\$4,665,450
State, Local or Tribal Government	Documentation from SAA on how <b>operational overtime</b> 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
<b>Total</b>		<b>664</b>		<b>53,920</b>		<b>269,579</b>		<b>\$16,587,196</b>

**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](http://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.



Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate (\$)	Total Annual Respondent Cost (\$)
<b>Standard Forms</b>								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	56	1	56	0.75	42	\$61.53	\$2,584
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A	56	1	56	3	168	\$61.53	\$10,337
State, Local or Tribal Government	Assurances - Non-Construction Programs / SF 424B	56	1	56	0.25	14	\$61.53	\$861
State, Local or Tribal Government	Budget Information - Construction Programs / SF 424C	56	1	56	3	168	\$61.53	\$10,337
State, Local or Tribal Government	Assurances - Construction Programs / SF 424D	56	1	56	0.25	14	\$61.53	\$861
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	10	\$61.53	\$615
State, Local or Tribal	Direct Deposit	56	1	56	0.167	10	\$61.53	\$615

Government	Sign-Up Form / SF 1199A							
State, Local or Tribal Government	Financial Status Report / Standard Form 269	56	4	224	1	224	\$61.53	\$13,783
<b>Total</b>		<b>56</b>		<b>616</b>		<b>650</b>		<b>\$39,993</b>

**Other Departments/  
Agencies Data Collection Activities**

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Number of Responses
State, Local or Tribal Government	Biannual Strategy Implementation Report (BSIR) / No Form; FEMA OMB Number 1660-0117	56	2	112
State, Local or Tribal Government	Threat and Hazard Identification and Risk Assessment (THIRA) – State Preparedness Report (SPR) Unified Reporting Tool/ FEMA Form 008-0-19 (THIRA); FEMA Form 008-0-20 (SPR); FEMA Form 008-0-23 / FEMA OMB Number 1660-0131	84	1	84
State, Local or Tribal Government	EHP - Environmental Screening Form / FEMA Form 024-0-1; FEMA OMB Number 1660-0115	56	1	56
State, Local or Tribal Government	Homeland Security Exercise & Evaluation Program (HSEEP) After Action Report	56	1	56



	(AAR) and Improvement Plan (IP) / FEMA Form 091-0-1; FEMA OMB Number 1660-0118				
<b>Total</b>		<b>56</b>		<b>308</b>	

**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 capital, start-up, or operations and maintenance costs associated with this information collection.

**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.**

### Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs <b>[Describe]</b>	
Staff Salaries* <b>[ 35_#_ of GS _13_ , step_1_ employees spending approximately __60__% of time annually ....(description)..... for this data collection] [show calculations for this here and erase this] 35 x \$94,969 = 3,323,915 x 1.4=4,653,481 x .60 = \$2,792,089</b>	\$2,792,089
Facilities <b>[cost for renting, overhead, etc. for data collection activity]</b>	
Computer Hardware and Software <b>[cost of equipment annual lifecycle]</b>	
Equipment Maintenance <b>[cost of annual maintenance/service agreements for equipment]</b>	
Travel	
Printing <b>[number of data collection instruments annually]</b>	
Postage <b>[annual number of data collection instruments x postage]</b>	
Other	
<b>Total</b>	<b>\$2,792,089</b>

\* 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 a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

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

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

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			
<b>Total(s)</b>	<b>0</b>	<b>68,522</b>	<b>+68,522</b>	<b>295,222</b>	<b>201,057</b>	<b>-94,165</b>

***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.

<b>Itemized Changes in Annual Cost Burden</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
HSGP/SHSP/UASI Investment Justification, FEMA Form 089-1				\$3,179,197	\$5,128,895	+\$1,949,698
Documentation from SAA on how operational overtime UASI funds held by State would support urban area				\$3,051	\$27,565	+\$24,514
Urban Area Working Group Structure, including Points of Contact				\$6,403,553	\$4,665,450	-\$1,738,103
Multi-year Training & Exercise Plan				\$89,705	\$144,719	+\$55,014
UASI Governance Charter				\$629,310	\$861,420	-\$232,110
Senior Advisory Committee (SAC) Charter	0	\$861,420	+\$861,420			
SHSP-UASI Pass Through Requirement	0	\$13,783	+\$13,783			
UAWG Allocation Methodology	0	\$6,891	+\$6,891			
OPSG Operations Order / FEMA Form 089-16				\$847,852	\$1,370,212	+\$522,360
OPSG Inventory of Operation Orders / FEMA Form 089-20				\$107,097	\$172,776	+\$65,679
Critical Emergency Supplies Inventory Plan	0	\$51,685	+\$51,685			
Daily Activity Report / FEMA Form 089-0-27	0	\$3,278,934	+\$3,278,934			
SAFECOM Compliance Letter	0	\$3,446	+\$3,446			
<b>Total(s)</b>		<b>\$4,216,159</b>	<b>\$4,216,159</b>	<b>\$11,259,765</b>	<b>\$12,371,037</b>	<b>\$1,111,272</b>

**Explain:**

In 2009, OPSG was no longer its own program. The grant program has been incorporated into the HSGP grant, and the forms used for the OPSG program are included in the collection's submission. Additionally, some reporting requirements for the HSGP have changed since the last submission, which resulted in a change in the burden costs.

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 SAFECOM Compliance Letter has also been added to this collection. The annual cost burden hours is \$3,282,380.

**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.