

## 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: Port Security Grant Program (PSGP)

OMB Control No.: 1660-0114

Current Expiration Date: 1/31/2017

Collection Instruments: FEMA Form 089-5

There has been changes to the collection form:

FEMA Form 089-5 changed in format to reflect required content outlined in form instructions. The form was outdated containing lengthy, confusing instructions to a concise, easy to follow template that includes pre-selected answers such as drop-down boxes. See the Forms Revision Chart for FEMA Form 089-5 uploaded in ROCIS for the recent changes.

The following are the changes to the collection:

Supporting Statement:

Question 8a – Updated to reflect FRN publication information.

Question 10 – Updated to reflect current privacy information.

Question 12 – Updated to reflect the decrease in burden hours and updated the current wage rate. See table below.

Question 14 – Costs to the Federal Government updated.

### State Table

Table A.12: 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 Government   | PSGP Investment Justification / FEMA Form 089-5                           | 84                 | 2                               | 224                    | 15 hrs.                             | 2,520                          | \$58.90                | \$148,428.00                 |
| State Government   | PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) | 4                  | 1                               | 4                      | 2 hrs.                              | 8                              | \$58.90                | \$471.20                     |
| <b>Total</b>       |   | <b>88</b>          |                                 | <b>228</b>             |                                     | <b>2,528</b>                   |                        | <b>\$148,899.20</b>          |

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

## Local Table

Table A.12: 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 |
|----------------------------|---|--------------------|---------------------------------|------------------------|-------------------------------------|--------------------------------|------------------------|------------------------------|
| Local or Tribal Government | PSGP Investment Justification / FEMA Form 089-5                           | 346                | 2                               | 692                    | 15 hrs.                             | 10,380                         | \$61.02                | \$633,388                    |
| Local or Tribal Government | PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) | 17                 | 1                               | 17                     | 2 hrs.                              | 34                             | \$61.02                | \$2,075                      |
| <b>Total</b>               |   | <b>363</b>         |                                 | <b>709</b>             |                                     | <b>10,414</b>                  |                        | <b>\$635,463</b>             |

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

## Business or other for-profit Table

Table A.12: 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 |
|------------------------------|---|--------------------|---------------------------------|------------------------|-------------------------------------|--------------------------------|------------------------|------------------------------|
| Business or other for-profit | PSGP Investment Justification / FEMA Form 089-5                           | 140                | 2                               | 280                    | 15 hrs.                             | 4,200                          | \$73.54                | \$308,868                    |
| Business or other for-profit | PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) | 6                  | 1                               | 6                      | 2 hrs.                              | 12                             | \$73.54                | \$882.48                     |
| <b>Total</b>                 |   | <b>146</b>         |                                 | <b>286</b>             |                                     | <b>4,212</b>                   |                        | <b>\$309,750.48</b>          |
| <b>Grand Total</b>           |   | <b>597</b>         |                                 | <b>1,223</b>           |                                     | <b>17,154</b>                  |                        | <b>\$1,094,112.60</b>        |

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

Question 15 – See explanation below.

| <b>Itemized Changes in Annual Burden Hours</b>                            |  |                             |                   |  |                         |                   |
|---|--|-----------------------------|-------------------|--|-------------------------|-------------------|
| <b>Data collection Activity/Instrument</b>                                | <b>Program Change (hours currently on OMB Inventory)</b> | <b>Program Change (New)</b> | <b>Difference</b> | <b>Adjustment (hours currently on OMB Inventory)</b> | <b>Adjustment (New)</b> | <b>Difference</b> |
| PSGP Investment Justification/ FEMA Form 089-5                            |  |                             |                   | 17,360   | 17,154                  | -206              |
| PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) |  |                             |                   | 54   | 54                      | 0                 |
| <b>Total(s)</b>   |  |                             |                   | <b>17,414</b>  | <b>17,154</b>           | <b>-206</b>       |

***Explain:***

There has been a decrease from the previous submission in the annual burden hours in this collection due to the revision of the PSGP Investment Justification and removal of SF-269 (replaced by SF-425). FEMA Form 089-5 has changed in format to reflect required content outlined in form instructions.

The burden and cost have increased due to an increased number of applicants and a more accurate account of form submission requirements since the last OMB review. The burden hours remain largely the same per applicant, however this update reflects a greater number of applicants (597). Additionally the forms required at the time of application are required of all applicants while the reporting forms are required only by grant recipients (296) during reporting. Additionally, of the grant recipients some forms are only required for certain types of projects (e.g. SF-424C for construction projects). The aggregate result of demonstrating those forms also required by applicants (not just grant recipients) greatly increases the number of burden hours and cost previously reported for most Standard Forms (SF), such as the SF-424 which is required by all applicants. Additionally, overall costs were impacted by increased wage rates.