

January 30, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0114

Title: FEMA Preparedness Grants: Port Security Grant Program (PSGP)

Form Number(s): FEMA Form 089-5

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 **Port Security Grant Program (PSGP)** is a DHS grant program that focuses on infrastructure protection activities. The PSGP is one tool in the comprehensive set of measures authorized by Congress and implemented by the Administration to strengthen the Nation’s critical infrastructure against risks associated with potential terrorist attacks. The vast bulk of U.S. critical infrastructure is owned and/or operated by State, local and private sector partners. PSGP funds support increased port-wide risk management; enhanced domain awareness; training and exercises; and further capabilities to prevent, detect, respond to, and recover from attacks involving improvised explosive devices (IEDs) and other non-conventional weapons.

Section 102 of the Maritime Transportation Security Act of 2002, as amended (46 U.S.C. §70107), established the PSGP to provide for the establishment of a grant program for a risk-based allocation of funds to implement Area Maritime Transportation Security Plans and

facility security plans among port authorities, facility operators, and State and local government agencies required to provide port security services.

Before awarding a grant under the program, the Secretary shall provide for review and comment by the appropriate Federal Maritime Security Coordinators and the Maritime Administrator. In administering the grant program, the Secretary shall take into account national economic and strategic defense concerns based upon the most current risk assessments available.” In addition, any information collected by FEMA for this program is in accordance with 46 U.S.C. §70107(g), as amended by section 112(c) of the Security and Accountability For Every (SAFE) Port Act of 2006 (P.L. 109-347), which states: “Any entity subject to an Area Maritime Transportation Security Plan may submit an application for a grant under this section, at such time, in such form, and containing such information and assurances as the Secretary may require.”

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 089-5, PSGP Investment Justification – Submitted with the application, this document provides narrative detail on proposed investments. The Investment Justification must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the Investment Justification (IJ) is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers. The PSGP uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. Review begins at the local level and the highest scoring applications advance to the national review phase. The National Review Panel (NRP) is comprised of officials from FEMA and United States Coast Guard (USCG). Representatives of other Federal stakeholder agencies such as the Transportation Security Administration (TSA), Customs and Border Patrol (CBP), U.S. Maritime Administration (MARAD) may also be included. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the grant program and formulate recommendations for funding to DHS leadership.

PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) - An MOU or MOA is a cooperative agreement for projects that provide layered security. Layered security projects are those projects that impact/affect agencies and entities other than the applicant, and the applicant has agreed to utilize the project to continue to support other agencies or entities (i.e. Improvised Explosive Device (IED) Response vessel purchased by Fire Department XYZ, Fire Department XYZ has an MOU with ABC Police Department to respond to IED incidents). A number of grantees encounter challenges in obtaining an MOU or MOA due to state and local legislative requirements. In lieu of an MOU/MOA, PSGP also will accept a letter from the Captain of the Port stating that the agency/entity is noted within the Area Maritime Security Plan as a layered security provider. An MOU/MOA may not be required for Group 1 and 2 port areas participating in the Fiduciary Agent process, in which the

grantee and all sub-recipients are included in the Area Maritime Security Plan and Port-wide Risk Management Plan. An MOU or MOA is used by FEMA as assurance that an agreement exists between port partners for layered security projects funded by FEMA. This helps to ensure minimal redundancies where no redundancies are needed, and to minimize duplicative project funding requests in areas where funded capabilities already exist. The MOU/MOA is not a formal template, but rather a suggested format, and does not have a required format. This information may be provided using one of the attachment fields within <https://portal.fema.gov>. FEMA provides a Sample MOU/MOA Template for usage. The MOU/MOA is listed in the PSGP program guidance, which is accessible at: <https://www.fema.gov/media-library/assets/documents/114444>.

FEMA Form 024-0-1, Environmental and Historic Preservation Screening Form

(ESF) - The Environmental and Historic Preservation Environmental Screening Form is a paper form used by 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 and should list and document any potential environmental or historic impact. This collection activity is currently in the OMB process for approval under OMB Control# 1660-0115, which expires on 1/31/2017.

Standard Form – Semiannual Progress Report, SF-PPR – The Semiannual Progress Report provides programmatic information on the use of grant funding. The Report should also address performance measures and the activities identified in the Investment Justifications as necessary. In addition, the information provided in the reports will be used by the grantor agency to monitor grantee cash flow to ensure proper use of Federal funds. These semiannual reports are submitted by the grantee into the ND Grants system within 30 days after the end of the reporting period (July 30 for the Reporting period of January 1 through June 30; and January 30 for the reporting period of July 1 through December 31). In addition, a final progress report is submitted into ND grants once the grant work is completed or the grant expires. This collection activity is approved under OMB Control Number 0970-0334 (Performance Progress Report, SF-PPR). The SF-PPR is used for the Semiannual Progress Report utilizing the Non-Disaster Grants (NDGrants) management system. The grantee is also provided with a “text box” to narrate their progress if they are unable to complete the SF-PPR. The guidance for the completion of the Performance or Progress Reports can be found at: 2 CFR Part 200.328 or at the following web address: http://www.ecfr.gov/cgi-bin/text-idx?SID=4e7021107d0e1024f7a21edb6fdbbd71&mc=true&node=se2.1.200_1328&rgn=div8

In addition, the grantee still submits their quarterly final financial status reports into the Payment and Reporting System (PARS). This form (Standard Form 425) is the same whether it is for a quarterly submission or final report.

Homeland Security Exercise and Evaluation Program (HSEEP) After-Action Report

(AAR) and Improvement Plan (IP) – The information contained within this report identifies areas where expectations for preparedness to respond to an emergency situation are met as well as areas where improvement is required. This information is used by the Secretary of Homeland Security and shared with heads of other Federal Departments including FEMA's National Preparedness Directorate to allow for planning methods to increase levels of

preparedness, establishing mechanisms for improved delivery of Federal preparedness assistance to State and local governments, and outlining actions to strengthen preparedness capabilities of Federal, State and local entities.

This initiative is managed by FEMA's National Preparedness Directorate (NPD). Grant recipients must report on scheduled exercises and ensure that an HSEEP After-Action Report (AAR) and Improvement Plan (IP) are prepared for each exercise conducted with FEMA support. This information must be submitted to the FEMA within 60 days following completion of an exercise. There are two separate templates that support this data collection effort: (1) **Discussion-Based Exercise template**; 2) **Operations-Based Exercise template**. This collection activity is approved under OMB Control Number 1660-0118, which expires on 5/31/2017.

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 submission of information for the FY 2016 PSGP involves the use of electronic means. For all applicants submit through www.grants.gov and upload their Investment Justification and all other required documents as file attachments (in MS Word or other electronic format) into ND Grants System at <https://portal.fema.gov>. This system is approved under OMB Control number 1660-0025, which expires on 9/30/2017. In addition, the grantee submits their quarterly and final financial status reports into the PARS system.

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.

These data collection elements are required in order to exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill its requirement to ensure funding is provided in a fair and equitable manner to eligible entities as described in the law, to ensure that the funding is being used only for the allowable costs within the grant regulations, and to fulfill our federal monitoring requirements. Failure to

collect this data could result in unfair and uninformed granting of funds, grantees utilizing funds for unallowable costs, and the inability to carry out the program as is statutorily outlined.

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 collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application and during the final report closeout period.

(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 in accordance with 2 CFR §200.333 Retention requirements for records. 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 October 12, 2016, 81 FR 70431. FEMA received several requests for a copy of the proposed information collection via email and telephone, as well as from participants at a public meeting. FEMA provided these requesters with a copy of the proposed collection. FEMA also received one comment with formatting suggestions for the form. See attached document – Federal Register Inquiries and FEMA Responses listed under Public Comments section in ROCIS.

A 30-day Federal Register Notice inviting public comments was published on January 6, 2017, 82 FR 1749. 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.

FEMA mainly meets with the American Association of Port Authorities (AAPA) national association that represents this entity, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. These consultations focus on the nature of information needed by FEMA to manage the grant programs.

FEMA consults on a regular basis with Federal, State, local, tribal stakeholders on a variety of issues. In particular, on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by 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 FEMA uses.

As far as any recent recommendations or comments provided, the most common one is the recent challenges with submitting progress reports into the new ND Grants system. This issue is currently being corrected by the ND Grants systems staff.

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. In particular, on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by 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 FEMA uses.

As far as any recent recommendations or comments provided, the most common one is the recent challenges with submitting progress reports into the new ND Grants system. This issue is currently being corrected by the ND Grants systems staff.

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) form was approved on January 25, 2017.

The THSGP Investment Justification, FEMA Form 089-5 is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form 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 form.

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 PSGP is an existing grant program that uses the forms outlined in this collection. The vast bulk of U.S. critical infrastructure is owned and/or operated by State, local and private sector partners. PSGP funds support increased port-wide risk management; enhanced domain awareness; training and exercises; and further capabilities to prevent, detect, respond to and recover from attacks at our nation's ports involving improvised explosive devices (IEDs) and other non-conventional weapons. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden to collect the necessary information has estimated to be 17,154 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. 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.

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	168	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
Total		88		172		2,528		\$148,899.20

* 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 Web site (http://www.bls.gov/oes/current/naics4_999200.htm) the mean wage rate for Administrative Services Managers is estimated to be \$42.07 per hour (\$58.90 with the 1.4 multiplier) for completing and submitting the FEMA grant information to FEMA for review and approval. Average burden response hours reduced from 16 to 15 hours due to simplification of form. Therefore, the estimated total burden hour cost for the median State Management Analysts is estimated to be **\$148,899.20** annually.

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
Total		363		709		10,414		\$635,463

* 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 Web site (<http://www.bls.gov/oes/current/oes113011.htm>) the mean wage rate for Administrative Services Managers is estimated to be \$43.59 per hour (\$61.02 with the 1.4 multiplier) for completing and submitting the FEMA grant information to FEMA for review and approval. Average burden response hours reduced from 16 to 15 hours due to simplification of form. Therefore, the estimated total burden hour cost for the median Local Management Analysts is estimated to be **\$635,463** annually.

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
Total		146		286		4,212		\$309,750.48
Grand Total		597		1,167		17,154		\$1,094,112.60

* 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 Web site (http://www.bls.gov/oes/current/naics4_551100.htm) the wage rate category for the mean Administrative Services Managers is estimated to be \$52.53 per hour (\$73.54 with the 1.4 multiplier) for completing and submitting the FEMA grant information to FEMA for review and approval. Therefore, the estimated total burden hour cost to Management Analysts is estimated to be **\$309,750.48** annually.

Note: The estimated grand total burden hour cost for all three tables annually is **\$1,094,112.60**. This includes a change in the average burden hours estimated to be 1 hour lower. There is also an increased average hourly wage rate based on the change in job category to Administrative Service Manager which currently most closely reflects the role affected.

The Standard Forms listed in the table below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF). Other data collection activities approved by OMB are also identified in the table below. Note that the higher rate of \$61.02 (mean Local wage rate) by default since the majority of applications received are from local government entities.

Port Security Grant Program (PSGP) (97.056)								
Standard Forms								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual Burden (in hours)	Avg. Burden per Response (in hours)	Annual No. of Responses	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government, Business or other for-profit	Application for Federal Assistance / SF 424	570	1	427.5	0.75	570	\$61.02	\$26,086.05
State, Local or Tribal Government, Business or other for-profit	Budget Information - Non-Construction Programs / SF 424A	570	1	1710	3	570	\$61.02	\$104,344.20
State, Local or Tribal Government, Business or other for-profit	Assurances - Non-Construction Programs / SF 424B	570	1	142.5	0.25	570	\$61.02	\$8,695.35
State, Local or Tribal Government, Business or other for-profit	Budget Information - Construction Programs / SF 424C	100	1	300	3	100	\$61.02	\$18,306.00
State, Local or Tribal Government, Business or other for-profit	Assurances - Construction Programs / SF 424D	100	1	25	0.25	100	\$61.02	\$1,525.50

State, Local or Tribal Government, Business or other for-profit	Disclosure of Lobbying Activities / SF LLL	570	1	95.19	0.167	570	\$61.02	\$5,808.49
State, Local or Tribal Government, Business or other for-profit	Direct Deposit Sign-Up Form / SF 1199A	296	1	49.432	0.167	296	\$61.02	\$3,016.34
State, Local or Tribal Government, Business or other for-profit	Federal Financial Report / SF 425	296	4	1776	1.5	1184	\$61.02	\$108,371.52
State, Local or Tribal Government, Business or other for-profit	Semiannual Progress Report, SF-PPR (Performance)	296	2	296	0.5	592	\$61.02	\$18,061.92
Total				4,822		4,552		\$294,215
Other Departments/ Agencies Data Collection Activities								
State, Local or Tribal Government, Business or other for-profit	EHP - Environmental Screening Form / FEMA Form 024-0-1, FEMA OMB Number 1660-0115	200	2	800	2	400	\$61.02	\$48,816.00
State, Local or Tribal Government, Business or other for-profit	Homeland Security Exercise & Evaluation Program (HSEEP) After Action Report (AAR) and Improvement Plan (IP) / FEMA OMB Number 1660-0118	20	1	80	4	20	\$61.02	\$4,881.60
Total				880		420		\$53,697.60

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

The cost estimates should be split into two components:

a. **Operation and Maintenance and purchase of services component.** These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

b. **Capital and Start-up-Cost** should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

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

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The total cost to FEMA is \$770,401. Approximately 10 staff members with an estimated average grade level of GS-13 step 1 (\$92,145 annually) will commit 60% of time annually to review and analyze the information collected by this program.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs The Grant Operations Support Contract is ending and will not be extended.	
Staff Salaries [10 GS-13, step 1 employees spending approximately 60% of time annually for this administrative and financial data collection] $10 \times \$92,145 \times 1.4 = \$1,290,030 \times .60 =$ \$770,401	\$774,018
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$774,018

* Note: The "Avg. Hourly Wage Rate" for each respondent 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
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
Total(s)	17,360	17,154	-206	54	54	0

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.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
PSGP Investment Justification/ FEMA Form 089-5				\$918,517.60	\$1,090,684	\$172,166.40
PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA)				\$2,857.14	\$3,428.68	\$571.54
Total(s)				\$921,374.74	\$1,094,112.60	\$172,737.94

Explain:

The labor hours are estimated to have been reduced from 16 to 15 per form. Although the number of forms per applicant remain the same, the estimated burden hours per form has decreased and the number of respondents has significantly increased due to including the total number of applicants (including recipients). Additionally the wage rate has slightly increased since the previous review. The combined affect is an overall increase in the cost.

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.