

## 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: Nonprofit Security Grant Program (NSGP)

OMB Control No.: 1660-0110

Current Expiration Date: 12/31/2016

Collection Instruments: FEMA Form 089-24; FEMA Form 089-25

The following are the changes to the collection:

Supporting Statement:

Question 2- Following requirement removed:

**Preparedness Comprehensive Assessment Support Tool (PrepCAST) formerly known as the National Incident Management System Compliance Assistance Support Tool (NIMSCAST)** – PrepCAST facilitates and reports State, Territory, tribal and local jurisdictions' compliance with the National Incident Management System (NIMS). PrepCAST allows incident management authorities and resource managers to assess their current capabilities as well as to determine what additional measures should be taken and what resources are needed to effectively implement the NIMS nationwide. The State Preparedness Report provides information on the readiness of states to respond to disaster situations. The capability based data in this report is used in conjunction with other data to create documents such as the National Preparedness Report. This collection activity is approved under OMB Control Number 1660-0087, which expires on 4/30/2016.

Explanation: PrepCAST was a portal through which the State, Territory, and Tribal jurisdiction access various online reporting systems, including NIMSCAST. PrepCAST and NIMSCAST were discontinued at the end of 2012.

Since 2012, the State, Territory, and Tribal jurisdiction have reported their NIMS implementation status using the Unified Report Tool (URT). The URT contains the Threat and Hazard Identification and Risk Assessment (THIRA) and the State Preparedness Report (SPR).

This is a requirement of the Homeland Security Grant Program and no longer required for NSGP thus this language has been removed.

Question 8a – Will be updated to reflect FRN publication information.

Question 10 – Will be updated to reflect current privacy information.

Question 12 – Updated to reflect the number of State Government Respondents eligible for NSPG. See table below.

Question 14 – Costs to the Federal Government updated. Contract not renewed additional staff hired. Updated to reflect Fiscal Year 2016 payscale.

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
Not-for-profit Institutions	NSGP Investment Justification and Selection Criteria / FEMA Form 089-25	1,100	1	1,100	84 hrs.	92,400	\$35.42	\$3,272,808
State, Local or Tribal Government	NSGP Prioritization of the Investment Justifications / FEMA Form 089-24	29	1	29	75 hrs.	2,175	\$49.64	\$107,967
<b>Total</b>		<b>1,129</b>		<b>1,129</b>		<b>94,575</b>		<b>\$3,380,775</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.

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
NSGP Investment Justification and Selection Criteria / <b>FEMA Form 089-25</b>				92,400	92,400	0
NSGP State – UAWG Prioritization of Investment Justifications <b>FEMA Form 089-24</b>				2,475	2,175	-300
<b>Total(s)</b>				<b>94,875</b>	<b>94,575</b>	<b>-300</b>

***Explain:***

There has been no change to the information being collected. However, the number of respondents for FEMA Form 089-24 decreased from 33 to 29 respondents because the number of eligible applicants decreased.

In order to be eligible for NSGP, the nonprofits have to be in an eligible urban area as defined by the Urban Area Security Initiative Program for the current year. The number of eligible urban areas decreased since the last PRA submission.