

February 23, 2017

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0062**

**Title: State/Local/Tribal Hazard Mitigation Plans**

**Form Number(s): None**

### 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.**

Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5165, as amended by the Disaster Mitigation Act of 2000 (DMA 2000), Pub. L. No. 106-390, provides the framework for linking pre- and post-disaster mitigation planning and initiatives with public and private interests to ensure an integrated, comprehensive approach to disaster loss reduction. Title 44 C.F.R. Part 201 provides the mitigation planning requirements for State, local, and Indian Tribal governments to identify the natural hazards that impact them, to identify actions and activities to reduce any losses from hazards, and to establish a coordinated process to implement the plan, taking advantage of a wide-range of resources.

**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.**

The purpose of the plan requirements is to enable State, local, and Indian Tribal governments to better understand the risks they face from natural hazards and to make decisions and take actions to reduce the risks from those hazards. Implementation of planned, pre-identified, cost-effective mitigation measures will streamline the disaster recovery process. The mitigation plan is the demonstration of the goals, priorities, and commitment to reduce risks from natural hazards and serves as a guide for State, local, and Tribal decision makers as they commit resources to reducing the effects of natural hazards.

In order to be eligible for certain types of Federal Emergency Management Agency (FEMA) non-emergency assistance, States<sup>1</sup>, local, and Indian Tribal governments are required to have a hazard mitigation plan that meets the criteria established in 44 C.F.R. Part 201. States are required under section 322 of the Stafford Act to have a FEMA-approved Standard State Mitigation Plan, following the criteria established in 44 C.F.R. § 201.4, to be eligible to receive certain Stafford Act assistance. Mitigation plan updates for States are required every 5 years.

Per 44 C.F.R. Part 201, new mitigation plans (including local and Tribal) are required to include documentation of the planning process, risk assessment, mitigation strategy and a maintenance process. Mitigation plan updates for local and Indian Tribal governments are required every 5 years and must document changes in development, progress in local mitigation efforts, and changes in priorities. Local and Indian Tribal governments use their mitigation plans, particularly the mitigation strategy, to guide decision makers as they commit resources to reducing the effects of natural hazards.

FEMA also receives mitigation plan reviews of local or Tribal Mitigation Plans from States which may be in the form of a letter, email, or other format conveying completion of State review and must document that the local or Tribal Mitigation Plan meets the requirements of 44 C.F.R. Part 201. States also use these reviews to provide technical assistance and to prioritize project funding.

States, at their discretion, may develop an Enhanced State Mitigation Plan, following the criteria established in 44 C.F.R. § 201.5 in order to be eligible for increased Hazard

Mitigation Grant Program (HMGP) funding. The Enhanced Plan is a separate plan type and is a State-level plan. The Enhanced Plan must demonstrate that a State has developed a

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<sup>1</sup> In accordance with the definitions at 44 C.F.R. § 201.2, the term “state” is defined “as any State of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands”.

comprehensive mitigation program, effectively uses available mitigation funding, and is capable of managing the increased funding.

Indian Tribal governments are addressed under a specific planning requirement in 44 C.F.R. § 201.7 that recognizes some of the unique aspects of these governments. Section 201.7 provides for plans prepared and approved under the existing rule, either under the State or local requirements, to be recognized as Tribal Mitigation Plans. Indian Tribal governments would then be eligible for FEMA mitigation grants under the Stafford Act and the National Flood Insurance Act of 1968, as amended, 42 U.S.C. 4001 *et seq.* (NFIA).

Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The States will then send the plan to the appropriate FEMA Regional Office for formal review and approval. FEMA-approved hazard mitigation plans developed under 44 C.F.R. Part 201 have been used by FEMA to determine State and Tribal eligibility for Stafford Act assistance, including HMGP and Pre-Disaster Mitigation (PDM) grant funds, and are now also used to establish eligibility for the grant program, Flood Mitigation Assistance (FMA), under the NFIA. The Biggert-Waters Flood Insurance Reform Act of 2012, Pub. L. No. 112-141 (July 6, 2012) merged the Severe Repetitive Loss and the Repetitive Flood Claims programs into one grant program, FMA.

**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.**

While FEMA has not implemented a requirement for States, local or Indian Tribal governments to use information technology to submit the Hazard Mitigation Plans; FEMA encourages States, local, or Indian Tribal governments to submit electronic file(s) containing the plans to the appropriate FEMA Regional Office for review and approval.

These plans may be submitted in any format the jurisdiction chooses, such as Microsoft Word documents (.doc), Adobe Acrobat portable document format (pdf), or in hard paper copy. FEMA encourages States, local, and Indian Tribal governments to use available technology to develop their plans. Approximately 40 percent of the plans in this collection utilize the mail submission option while 60 percent chose to submit electronically. No plans are faxed. FEMA provides to the State, local, and Indian Tribal governments guidance and instructions on how to properly draft a Mitigation Plan.

**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. This information collection does not have a significant impact on other small entities. Private non-profit organizations are not required to have a hazard mitigation plan, but may choose to prepare a mitigation plan in order to be eligible for certain types of FEMA mitigation grants. Small government jurisdictions and private non-profit organizations may minimize impacts from this collection, by joining with neighboring governments to develop multi-jurisdictional hazard mitigation plans (i.e., multi-county or watershed) rather than single jurisdictional hazard mitigation plans.

**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.**

All Mitigation Plans must be reviewed, revised, and re-approved every 5 years by the appropriate FEMA Regional office. According to the Stafford Act and the NFIA, without an approved mitigation plan, States, local and Indian Tribal governments cannot receive certain FEMA assistance, including HMGP and PDM under the Stafford Act, and FMA under the NFIA.

**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.**

**(b) Requiring respondents to prepare a written response to a 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.**

**(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

**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.**

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

**(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.**

**(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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information 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 7 March 2017, 82 FR 12823. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on 1 June 2017, 82 FR 25298. No comments were received

**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 Mitigation staff is regularly invited to participate in conferences, work groups or other meetings with the American Planning Association, the Association of State Floodplain Managers and the National Emergency Managers Association, to discuss issues related to mitigation planning.

**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.**

In 2016, FEMA opened an outreach and consultation period during the update of the Tribal Mitigation Planning Guidance issued in 2010. In 2008, FEMA consulted with Tribal representatives during the development of the Tribal Mitigation Planning Guidance which was later issued in February 2010. In 2008, 2009, 2010, 2011, and 2012, FEMA met with the National Emergency Management Association to discuss issues related to Mitigation Planning requirements. In 2010, FEMA created an external stakeholder workgroup consisting of State and local government staff as well as representatives from several associations, as part of an effort to improve the plan review process.

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

There is no payment or gift to respondents for this information collection.

**10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.**

The Privacy Threshold Analysis (PTA) for the State/Local/Tribal Hazard Mitigation Plans (1660-0062) was sent to the DHS Privacy Office on February 17, 2017 and is awaiting final adjudication.

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 a 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.**

To determine the annual burden for this collection, burden hours were calculated separately for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

First, FEMA identifies 56 “States”, per 44 C.F.R. Part 201, as respondents. Next, FEMA estimates an annual Number of Responses per Respondent. Total Number of Responses is calculated by multiplying the Number of Respondents by the Number of Responses per Respondent.

To calculate the Average Burden per Responses (in hours), FEMA uses Hazard Mitigation Assistance (HMA) grant awards to estimate mitigation plan development and update costs. These cost estimates are then broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent).<sup>2</sup> FEMA assumes that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$49.61 would develop and review mitigation plans and updates.<sup>3</sup> Finally, to calculate hour burden, the percent of costs attributed to personnel costs is divided by the Urban and Regional Planner loaded wage rate.

Annual hour burden for each collection is as follows:

- 1) **New Local and Tribal Plans** - FEMA estimates 5 new Local or Tribal Mitigation Plans per respondent will be developed annually for a Total Number of Responses equal to 280 plans (5 new plans per respondent x 56 respondents). FEMA uses HMA grant awards to estimate a new mitigation plan average cost of \$55,200. Based on the personnel distribution percentage identified above, FEMA assumes \$12,696 (\$55,200 per new plan x 23 percent of plan) of the average mitigation plan cost to be attributed to personnel costs. No change is made to the estimated Average Burden per Response of 289 hours. The resulting local or Tribal plan Total Annual Burden is 80,920 hours (289 hours per new plan x 280 new plans). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$4,014,441 (80,920 hours x \$49.61 per hour (rounded to the nearest dollar)).

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<sup>2</sup> The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

<sup>3</sup> The Urban and Regional Planner (Standard Occupational Classification 19-3051) loaded wage rate of \$49.61 is calculated using the Bureau of Labor Statistics, Occupational Employment and Wages, May 2015 mean hourly wage of \$33.98 times a 1.46 multiplier, to account for benefits, rounded to the nearest cent. Available at: <https://www.bls.gov/oes/current/oes193051.htm>.

- 2) **Local and Tribal Plan Updates** – Based on the current inventory of approved plans, FEMA estimates that 9 mitigation plans per respondent would be updated annually for a Total Number of Responses equal to 504 plan updates (9 plan updates per respondent x 56 respondents). FEMA again used HMA grant awards to estimate a mitigation plan update average cost of \$65,500. Based on the personnel distribution percentage identified above, FEMA assumes \$15,065 (\$65,500 per plan update x 23 percent of plan) of the average mitigation plan update cost to be attributed to personnel costs. No change is made to the estimated Average Burden per Response in hours of 249. The resulting local and Tribal plan update Total Annual Burden is 125,496 hours (249 hours per plan update x 504 plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$6,225,857 (125,496 hours x \$49.61 per hour (rounded to the nearest dollar)).
- 3) **State Review of Local and Tribal Plans** - All States must review local and Tribal plans. Based on the local and Tribal new plan and plan update estimates above, FEMA estimates 14 plans per respondent would be reviewed annually for a Total Number of Responses equal to 784 reviews ((5 new plans per respondent + 9 plan updates per respondent) x 56 respondents). FEMA estimates that it takes 8 hours to review each plan for a Total Annual Burden of 6,272 hours (8 hours per plan x 784 plans). FEMA assumes the equivalent to an Urban and Regional Planner at a loaded wage rate of \$49.61 would review local and Tribal plans. This results in a Total Annual Respondent Cost of \$311,154 (6,272 hours x \$49.61 per hour (rounded to the nearest dollar)).
- 4) **Standard State Mitigation Plan Updates** - All States have existing mitigation plans and have a choice on whether to submit a Standard State Mitigation Plan or an Enhanced State Mitigation Plan. FEMA estimates that 46 States would submit Standard State Mitigation Plans. Mitigation plans are to be updated every 5 years. This results in an annual average Number of Responses per Respondent equal to 0.2 (1 Standard State Mitigation Plan / 5 years). The resulting annual Total Number of Responses equals 9 Standard State Mitigation Plan updates (46 respondents x 0.2 Standard State Mitigation plans per respondent (rounded to the nearest plan)).

Based on HMA grant awards, FEMA estimates a Standard State Mitigation Plan update average cost of \$281,000. Using the personnel distribution percentage identified above, FEMA assumes \$64,630 (\$281,000 per Standard State Mitigation Plan update x 23 percent of plan) of the average Standard State Mitigation Plan cost to be attributed to personnel costs. No change is made to the estimated Average Burden per Response of 1,040 hours. The resulting Standard State Mitigation Plan update Total Annual Burden is 9,360 hours (1,040 hours per standard plan update x 9 standard plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$464,350 (9,360 hours x \$49.61 per hour (rounded to the nearest dollar)).<sup>4</sup>

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<sup>4</sup> Due to rounding, the Total Number of Responses multiplied by the Average Burden per Response and Urban and Regional Planner loaded wage rate does not equal the average cost attributed to personnel multiplied by Total



- 5) **Enhanced State Mitigation Plan Updates** –States may choose to submit an Enhanced State Mitigation Plan. FEMA estimates that 10 States would submit Enhanced State Mitigation Plans. Mitigation plans are to be updated every 5 years. This results in an annual Number of Responses per Respondent equal to 0.2 (1 Enhanced State Mitigation Plan / 5 years). The resulting Total Number of Responses equals 2 Enhanced State Mitigation Plan updates (10 respondents x 0.2 Enhanced plans per respondent).

Based on HMA grant awards, FEMA estimates an Enhanced State Mitigation Plan update average cost of \$524,000. Using the personnel distribution percentage identified above, FEMA assumes \$120,520 (\$524,000 per Enhanced State Mitigation plan update x 23 percent of plan) of the average Enhanced State Mitigation Plan cost to be attributed to personnel costs. No change is made to the estimated Average Burden per Response of 2,659 hours). The resulting Enhanced State Mitigation Plan update Total Annual Burden is 5,318 hours (2,659 hours per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of 263,826 (5,318 hours x \$49.61 per hour (rounded to the nearest dollar)).

FEMA calculates a Total Annual Burden in hours of 227,366.<sup>5</sup> The associated Total Annual Respondent Cost is \$11,279,628.<sup>6</sup>

**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.**

There are no forms involved with this data collection.

**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 1.46<sup>7</sup> and this total**

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Number of Responses (not rounded); the average cost attributed to personnel (\$64,630) multiplied by the Total Number of Responses (9.2) equals \$594,596; a difference of +\$130,246.

<sup>5</sup> Total Annual Burden in hours = 80,920 New Local and Tribal Plan hours + 125,496 Local and Tribal Plan Update hours + 6,272 State Review of Local and Tribal Plan hours + 9,360 Standard State Plan Update hours + 5,318 Enhanced State Plan Update hours = 227,366 hours.

<sup>6</sup>Total Annual Respondent Cost = \$4,014,441 (New Local and Tribal Plans) + 6,279,628 (Local and Tribal Plan Updates) + \$311,154 (State Review of Local and Tribal Plans) + \$464,350 (Standard State Plan Updates) + \$263,826 (Enhanced State Plan Updates) = \$11,279,627.

<sup>7</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation-September 2016. Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, September 2016.” Available at: <http://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed January 12, 2017. Calculated by dividing 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								
Type of Respondent	Form Name/ Form Number	No. of Respondents	No. of Responses per Respondent <sup>1</sup>	Total No. of Responses <sup>2</sup>	Avg Burden per Response (hours)	Total Annual Burden (hours)	Avg Hourly Wage Rate <sup>3</sup>	Total Annual Respondent Cost <sup>4</sup>
Local or Tribal Government	New Local and Tribal Plans	56	5	280	289	80,920	\$49.61	\$4,014,441
Local or Tribal Government	Local and Tribal Plan Updates	56	9	504	249	125,496	\$49.61	\$6,225,857
State Government	State Review of Local and Tribal Plans	56	14	784	8	6,272	\$49.61	\$311,154
State Government	Standard State Plan Updates	46	0.2	9	1,040	9,360	\$49.61	\$464,350
State Government	Enhanced State Plan Updates	10	0.2	2	2,659	5,318	\$49.61	263,825
<b>Total</b>		<b>56</b>		<b>1,579</b>		<b>227,366</b>		<b>\$11,279,627</b>

1- Standard State Plan Updates and Enhanced State Plan Updates Number of Responses per Respondent represents an annual average over 5 years (1 plan update / 5 years = 0.2).

2- Standard State Plan Updates Total Number of Responses is rounded to the nearest plan.

3- The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a loaded wage rate and rounded to the nearest cent.

4- Rounded to the nearest dollar.

Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

“Type of Respondent” should be entered exactly as chosen in Question 3 of the OMB Form 83-I

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$59.51.**

According to the U.S. Department of Labor, Bureau of Labor Statistics website (<https://www.bls.gov/oes/current/oes193051.htm>), the wage rate category for Urban and Regional Planners is estimated to be \$49.61 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents is estimated to be \$11,279,627 annually.

**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.)**

compensation for all workers of \$34.15 by wages and salaries for all workers of \$23.42 per hour (yields a benefits multiplier of approximately 1.46 x wages).

**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.**

To determine the annual cost for this collection, separate estimates were calculated for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMA grant awards. These cost estimates are broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent).<sup>8</sup> FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs.

- 1) **New Local and Tribal Plans** - FEMA estimates a new average local or Tribal Mitigation Plan average cost of \$55,200, a decrease from the prior estimate of \$57,000. As the development of a new plan is a one-time cost, FEMA categorizes such costs as Start-Up Costs. Based on the contracting and non-labor cost distribution identified above, FEMA estimates the start-up cost for new local or Tribal plans to be \$42,504 (\$55,200 per plan x 66 percent of plan contracting + \$55,200 per plan x 11 percent of plan non-labor). Multiplying this average costs by the local and Tribal new plan Total Number of Responses results in a total Annual Start-Up Cost of \$11,901,120 (\$42,504 Start-Up Cost per plan x 280 plans).
- 2) **Local and Tribal Plan Updates** – FEMA estimates a new average local or Tribal mitigation plan update cost of \$65,500, an increase from the prior estimate of \$49,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$43,230 (\$65,500 per plan update x 66 percent of plan update) and the non-labor costs to be \$7,205 (\$65,500 per plan update x 11 percent of plan update). Multiplying these average costs by the local and Tribal plan update Total Number of Responses results in an Annual Operations and Maintenance Cost of \$14,179,440 (\$43,230 operations and maintenance cost per plan update x 328 plan updates) and an Annual Non-Labor Cost of \$2,363,240 (\$7,205 non-labor cost per plan update x 328 plan updates). As a result, the Total Annual Cost to Respondents for local and Tribal plan updates is \$16,542,680.

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<sup>8</sup> The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

- 3) **State Review of Local and Tribal Plans** – No annual cost burden for FEMA is associated with State review of local and Tribal plans.
- 4) **Standard State Mitigation Plan Updates** – FEMA estimates a new average Standard State Mitigation Plan update cost of \$281,000, an increase from the prior estimate of \$205,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$185,460 (\$281,000 per Standard State Mitigation Plan update x 66 percent of plan update) and the non-labor costs to be \$30,910 (\$281,000 per Standard State Mitigation Plan update x 11 percent of plan update). Multiplying these average costs by Standard State Mitigation Plan update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$1,669,140 (\$185,460 operations and maintenance cost per Standard State Mitigation Plan update x 9 Standard State Mitigation Plan updates) and an Annual Non-Labor Cost of \$278,190 (\$30,910 non-labor cost per Standard State Mitigation Plan update x 9 Standard State Mitigation Plan updates). As a result, the Total Annual Cost to Respondents for Standard State Mitigation Plan updates is \$1,947,330.
- 5) **Enhanced State Mitigation Plan Updates** – FEMA estimates an average Enhanced State Mitigation Plan update cost of \$524,000 (no change from the prior estimate). Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$345,840 (\$524,000 per Enhanced State Mitigation Plan update x 66 percent of plan update) and the non-labor costs to be \$57,640 (\$524,000 per Enhanced State Mitigation Plan update x 11 percent of plan update). Multiplying these average costs by Enhanced State Mitigation Plan update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$691,680 (\$345,840 operations and maintenance cost per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates) and an Annual Non-Labor Cost of \$115,280 (\$57,640 non-labor cost per Enhanced State Mitigation Plan update x 2 Enhanced State Mitigation Plan updates). As a result, the Total Annual Cost to Respondents for Enhanced State Mitigation Plans is \$806,960.

FEMA estimates the Total Annual Cost to Respondents as \$31,198,090 (\$11,901,120 (New Local and Tribal Plans) + \$16,542,680 (Local and Tribal Plan Updates) + \$1,947,330 (Standard State Plan Updates) + \$806,960 (Enhanced State Plan Updates)).

<b>Annual Cost Burden to Respondents or Record Keepers</b>				
<b>Data Collection Activity/ Instrument</b>	<b>*Annual Capital Start-Up Cost</b> (investments in overhead, equipment and other one-time expenditures)	<b>*Annual Operations and Maintenance Cost</b> (such as recordkeeping, technical/professional services, etc.)	<b>Annual Non-Labor Cost</b> (expenditures on training, travel and other resources)	<b>Total Annual Cost to Respondents</b>
Development of New Local and Tribal Plans	\$11,901,120			\$11,901,120
Local and Tribal Plan Updates		\$14,179,440	\$2,363,240	\$16,542,680
State Review of Local and Tribal Plans				\$0
Standard State Mitigation Plan Updates		\$1,669,140	\$278,190	\$1,947,330
Enhanced State Mitigation Plan Updates		\$691,680	\$115,280	\$806,960
<b>Total</b>	<b>\$11,901,120</b>	<b>\$16,540,260</b>	<b>\$2,756,710</b>	<b>\$31,980,090</b>

**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.**

As all States have existing Mitigation Plans, FEMA staff review and approve State Standard and Enhanced Mitigation Plan updates. FEMA estimates an average 11 Standard and Enhanced State Mitigation Plans (9 Standard State Mitigation Plans updates + 2 Enhanced State Mitigation Plan updates) are submitted and reviewed annually. FEMA estimates that the equivalent of a GS 13, Step 1 Federal employee at a loaded wage of \$52.18 (\$35.74 per hour x 1.46 multiplier (rounded to the nearest cent)) would spend an average of 120 work hours reviewing each State Mitigation Plan. The estimated annualized cost to the Federal Government to review Standard and Enhanced State Mitigation Plan updates is \$68,877 (11 plan updates x 120 hours per plan x \$52.18).

In addition, FEMA estimates 784 local and Tribal plans (280 new local or Tribal plans + 504 local and Tribal plan updates) are submitted for review annually. FEMA estimates that the equivalent of a GS 13, Step 1 Federal employee at a loaded wage of \$52.18 (\$35.74 per hour x 1.46 multiplier (rounded to the nearest cent)) would spend an average of 40 work hours reviewing each local or Tribal mitigation plan. The estimated annual

cost to the Federal Government to review local and Tribal mitigation plans is \$1,636,365 (784 plans x 40 hours per plan x \$52.18).

The Total Annual Cost to the Federal Government is estimated at \$1,705,242 (\$68,877 + 1,636,365 (rounded to the nearest dollar)).

<b>Annual Cost to the Federal Government</b>	
<b>Item</b>	<b>Cost (\$)</b>
Contract Costs	
Staff Salaries* [GS13/1 employees (\$35.74 per OPM 2017 General Schedule (Base) x 1.46 multiplier = \$52.18 (rounded to the nearest cent)) spending approximately 120 hours to review and approve 11 State plans, and 40 hours to review and approve 784 local plans for this data collection] (\$52.18 x ((120 x 11)+(40 x 784))) rounded to the nearest dollar	\$1,705,242
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	
<b>Total</b>	<b>\$1,705,242</b>

\* Note: The "Salary Rate" includes a 1.46 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 an 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.*

**Explain:** There has been no change to the information being collected or in how the hour burden was estimated. Adjustments were made to hourly wage rates and plan costs.

There has been no change in the way hour burden was reported from 2014. As such, the associated current OMB cost inventory is 227,366 hours.

There has been an adjustment in wage rates and estimated plan costs. To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMA grant awards. These cost estimates are broken out between personnel costs (23 percent), contracting costs (66 percent), and non-labor costs (11 percent). FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs. The new cost estimates are as follows:

- 1) New Local and Tribal Plans: The new local and Tribal plan annual cost estimate, based on the cost estimates from supporting statement question 13, is \$11,901,120. This is a decrease of \$388,080.
- 2) Local and Tribal Plan Updates: The new local and Tribal update annual cost estimate, based on the cost estimates from supporting statement question 13, is \$16,542,680. This is a decrease of \$2,473,240.
- 3) State Reviews of Local and Tribal plans: There are no costs for FEMA associated with State review of local and Tribal plans.
- 4) Standard State Mitigation Plan updates: Based on the cost estimates from supporting statement question 13, the annual cost is estimated at \$1,947,330. This is an increase of \$526,680.
- 5) Enhanced State Mitigation Plan updates: Based on the cost estimates from supporting statement question 13, the annual cost is estimated at \$806,960. There is no change from the prior estimate.

The total annual costs for New Local and Tribal Plans, Local and Tribal Plan Updates, and State Review of Local and Tribal plans is \$28,443,800 ( $\$11,901,120 + \$16,542,680 + \$0$ ). This is a decrease of \$2,861,320 ( $-\$388,080 + -\$2,473,240$ ).

The total annual cost for Standard State Plan Updates and Enhanced State Plan updates is \$2,754,290 ( $\$1,947,330 + \$806,960$ ). This is an increase of \$526,680.

The overall result is an estimated annual cost of \$31,198,090 ( $\$28,443,800 + \$2,754,290$ ). This is a decrease of \$2,334,640 from the currently approved OMB inventory.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
New Plans (Local and Tribal)				\$12,289,200	\$11,901,120	-\$388,080
Plan Updates (Local and Tribal)				\$19,015,920	\$16,542,680	-\$2,473,240
State Reviews of Local and Tribal Plans				\$0	\$0	\$0
Standard State Plan Updates				\$1,420,650	\$1,947,330	+\$526,680
Enhanced State Plan Updates				\$806,960	\$806,960	\$0
<b>Total(s)</b>				<b>\$33,532,730</b>	<b>\$31,198,090</b>	<b>-\$2,334,640</b>

In summary, OMB’s current cost inventory was \$33,532,730. However, based on adjustments to how annual costs were calculated, the new annual cost estimate is \$31,198,090; a decrease of \$2,334,640.

The overall estimated cost of this collection is \$42,477,718 (\$11,279,627 + \$31,198,090), including monetized annual hour burden and annual costs.

**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.**

There are no outline plans for tabulation and publication of data 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.**

This collection does not seek approval to not display the expiration date for OMB approval.

**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. There is no statistical methodology involved in this collection.