

Narrative of Changes

The purpose of the Narrative of Changes is to clearly indicate changes to a collection since the previous approval.

Collection Title:
OMB Control No.: 1660-0062
Current Expiration Date:
Collection Instruments: not applicable

Supporting Statement:

Question 3 – Updated to reflect that the collection of information electronically versus by mail.

Question 8a – 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

Question 10 – 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.

Questions 12a and c – Estimated wage rate increased. Updated estimated plan costs for new Local and Tribal Plans, Local and Tribal Plan Updates, Standard State Mitigation Plan Updates.

Question 13c – Estimated wage rate increased. Updated estimated plan costs for new Local and Tribal Plans, Local and Tribal Plan Updates, Standard State Mitigation Plan Updates.

Question 14 – Costs to the Federal Government updated.

Question 15 – Cost burden increase explained.

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 \$25,419,240. This is an increase of \$6,403,320.
- 3) State Reviews of Local and Tribal plans: There are no costs 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 \$37,320,360 (\$11,901,120 + \$25,419,240 + \$0). This is an increase of \$6,015,240 (- \$388,080 + \$6,403,320). 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 \$40,074,650 (\$37,320,360 + \$2,754,290). This is an increase of \$6,403,320 from the currently approved OMB inventory.

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
New Plans (Local and Tribal)				\$12,289,200	\$11,901,120	-\$388,080
Plan Updates (Local and Tribal)				\$19,015,920	\$25,419,240	+\$6,403,320
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
Total(s)				\$33,532,730	\$40,074,650	+\$6,541,920