

October 6, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0023

**Title: Effectiveness of a Community's Implementation of the NFIP
Community Assistance Program CAC and CAV Reports**

Form Number(s): FEMA Form 086-0-28(E); FEMA Form 086-0-29(E)

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 National Flood Insurance Program (NFIP) codified as 42 U.S.C. 4001, *et seq.* is authorized by Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP), and a major objective of the NFIP is to assure that participating communities are achieving the flood loss reduction objectives through implementation and enforcement of adequate land use and control measures. Sections 1315 and 1361 provide the basis for FEMA's process to evaluate how well communities are implementing their floodplain management programs. Title 44 CFR 59.22 directs the respondent to submit evidence of the corrective and preventive measures taken to meet the flood loss reduction objectives.

The two key methods FEMA uses in determining community assistance needs are through the Community Assistance Contact (CAC) and Community Assistance Visit (CAV), which serve to provide a systematic means of monitoring community NFIP compliance. Through the CAC and CAV, FEMA can also determine to what extent communities are achieving the flood loss reduction objectives of the NFIP. By providing assistance to communities, the CAC and CAV also serve to enhance FEMA's goals of reducing future flood losses, thereby achieving the cost-containment objective of the NFIP.

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.

Community Visit Report, is a scheduled visit to a NFIP community for the purposes of conducting a comprehensive assessment of the community's floodplain management program, to assist the community in understanding the NFIP and its requirements, and implementing effective flood loss reduction measures. The Community Visit Report provides a simplified method to notate what, if any, problems exist with a community's floodplain management process, what actions the community might need to undertake to correct the problem(s), and how FEMA can possibly assist in any corrective action.

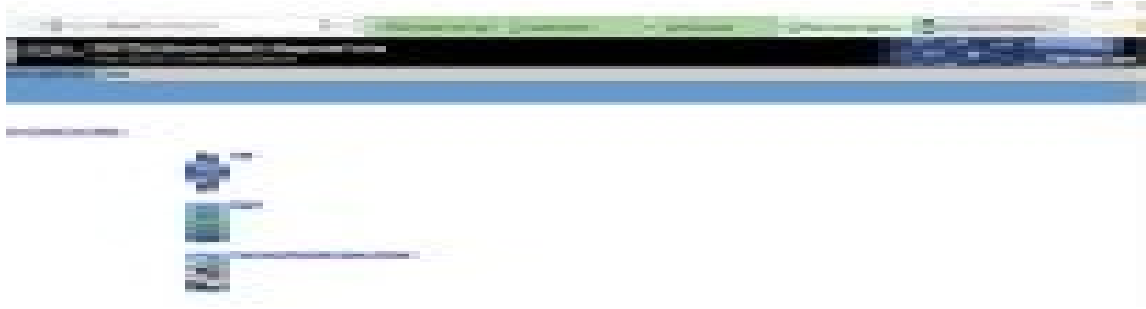
Community Contact Report, is a brief call or visit with a NFIP community for the purpose of establishing or reestablishing contact to determine if program-related problems exist and to offer assistance. The Community Contact Report provides the actions that the community will take, if required, to resolve any minor issues with their floodplain management processes, and the report also will determine if a full Community Visit Report is required.

FEMA shares the information with the State partners, who collect the information for FEMA under an annual cooperative agreement.

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.

FEMA has converted Forms 086-0-28(E) and 086-029(E) into on-line database (DHS Integrated Security and Access Control System), the Community Information System (CIS). The CIS allows for direct entry of the information into the on-line Account and Password Protected system at URL <https://portal.fema.gov/famsVuWeb/home>. Screenshots are provided for how the information is entered on-line. Below is a screenshot of the opening screen at log-in for the Community Information System. Once the

user clicks on the Community Information System, they go to the next screen which is the same for FEMA Form 086-0-28E Community Assistance Visits (CAVs) and for FEMA Form 086-0-29E for Community Assistance Contacts (CACs), because they first have to select what community in the NFIP they want to “Search” for to record information for under a CAC or CAV. Therefore, once the user search and select the community, they then choose from a drop down menu whether they want to enter a CAV (FEMA Form 086-0-28E) – starting at the 4th screen of the provided Screenshots or a CAC (info from FEMA Form 086-0-29E) – starting at the 5th screen of the provided screenshots.



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.

The information collected is not duplicated by any other means. The details of the reports uniquely measure community effectiveness at implementing flood loss practices and are not available 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.

If the information discussed above is not collected, FEMA would not know the extent to which approximately 22,000 communities participating in the NFIP are adhering to the obligation of implementing a floodplain management program as agreed to when joining the NFIP. The core of this agreement is that FEMA, as a requirement under the Flood Insurance Act, will provide flood insurance coverage if communities enforce safe building development practices in floodplains.

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.**
- (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.**
- (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 other pledge, or which unnecessarily impedes sharing of data with 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 March 7, 2017, 82 FR 12824. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on June 20, 2017, 82 FR 28083. 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 regularly receives input on the information collected during Community Assistance Contacts (CAC) and Community Assistance Visits (CAV) from State officials involved with floodplain management. In 2010, FEMA updated guidance on the CAC/CAV process, and received State participation through a working group to ensure maximum improvement to the process. Over the past six years, 6 workshops have occurred to gain feedback on the process and the subject forms. FEMA also hosts bi-annual policy meetings through which State partners such as the Association of State Floodplain Managers (ASFPM) assist FEMA in identifying improvements to the CAC/CAV process. Through these meetings, policy issues on the process are discussed and, when appropriate, incorporated into future year's guidance.

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.

Local officials administering floodplain management programs from whom we obtain information are represented by (and are members of) the professional association ASFPM. At the annual meeting of the ASFPM, FEMA has offered workshops to local officials to explain the CAC/CAV process and to obtain feedback from those officials on ways to improve the processes. When appropriate, FEMA then incorporates those recommended changes into the guidance. States officials, acting of FEMA's behalf through the CAP-SSSE grant program, likewise conduct similar workshops in their states and provide any feedback to FEMA.

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) was approved by the DHS Privacy Office on December 17, 2014 and is still valid.

The Privacy Impact Assessment (PIA) is covered under the DHS/FEMA/PIA-011a - National Flood Insurance Program Information Technology System, approved by DHS on August 25, 2016 and the existing System of Records Notice (SORN), is DHS/FEMA-003 National Flood Insurance Program Files System of Records 79 FR 28747 approved by DHS on May 19, 2014.

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.

For FEMA form 086-0-28(E), it is estimated that 1000 Community Officials will complete the form, that it will take an estimated 2 hours per form and that it will be completed only once. The total annual hour burden will be 1000 responses times 2 hours = 2,000 hours.

For FEMA form 086-0-29(E), it is estimated that 2,000 Community Officials will complete the form, that it will take an estimated 1 hour per form and that it will be completed only once. The total annual hour burden will be 2,000 responses times 1 hour = 2,000 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. NOTE: The wage-rate category for each respondent must be multiplied by 1.58¹ and this 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	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, local or Tribal Government	FEMA Form 086-0-28 (E) / Community Visit Report	1000	1	1000	2	2,000	\$92.75	\$185,500
State, local or Tribal Government	FEMA Form 086-0-29 (E) / Community Contact Report	2,000	1	2,000	1	2,000	\$92.75	\$185,500
Total		3,000		3,000		4,000		\$371,000

- Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.58 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (<http://www.bls.gov/oes/current/oes111021.htm>) the 2016 mean hourly wage rate for Community Official (General and Operations Manager SOC 11-1021) is estimated to be (\$58.70 x 1.58=) \$92.75 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondent Community Official is estimated to be \$371,000 annually.

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, 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 compensation for State and local government of \$45.93 by wages and salaries for State and local government of \$29.06 per hour (yields a benefits multiplier of approximately 1.58 x wages).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [States receive funding through a FEMA Cooperative Agreement. States perform 90% of projected respondent work i.e. 900 CAVs (198 hours) and 1800 CACs (8.8 hours) x a fully loaded state hourly average salary of \$42.88*. 900 CAVs x 198 hours + 1,800 CACs x 8.8 hours = 194,040 hours x \$42.88 per hour = \$8,320,435	\$8,320,435
Staff Salaries* 8 of GS-12, step 5 employees spending approximately 34.375% of time annually performing the community contact; monitor, review and approving the reports for this data collection. (5,720 hours x (\$33.72 x 1.46** = \$46.75) = \$267,410) GS 12, Step 5 = 33.72 x 1.46 = \$49.23 x 8 employees = \$93.85 x (2080 x 34.375%) = \$281,603	\$281,603
Facilities [cost for renting, overhead, etc. for data collection activity]	0
Computer Hardware and Software [5% x \$372,000 (floodplain management database) = \$18,600]	\$18,600
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel [1,000 x \$500 = \$500,000]	\$500,000
Printing [number of data collection instruments annually]	0

Postage [3,000 CAVs & CACs x \$1 (approx. based on weight) = \$3,000]	\$3000
Other	0
Total	\$9,123,637

*Hourly mean wage for all occupations (SOC 00-0000), Industry: State Government, including schools and hospitals, May 2015. Estimated to be (\$27.14 x 1.58 =) \$42.88.** Wage multiplier for Federal Employees is determined using the total compensation for all employees (\$34.15) divided by wages and salaries for all employees (\$23.42) for a multiplier of 1.46. Available at <http://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed January 12, 2017

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
FEMA Form 086-0-28 (E) / Community Visit Report				2,000	2,000	0
FEMA Form 086-0-29 (E) / Community Contact Report				2,000	2,000	0
Total(s)				4,000	4,000	0

Explain:

There are no changes to the annual hour burden previously reported. There have been no changes in the information being collected.

Itemized Changes in Annual Cost Burden

Explain:

There is no change to the annual cost burden for this collection.

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 publish the information collection in any format.

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.