

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0076

Title: Hazard Mitigation Grant Program (HMGP) Application and Reporting

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 (give details as to why this information is being collected). 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 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), 42 U.S.C. 5170c, established the Hazard Mitigation Grant Program. Grant requirements, and grants management procedures of the program are outlined in 2 CFR Parts 200 and 3002.

Recipients (changed from “Grantees” to “Recipients” per 2 CFR Part 200) administer implementation of the grant awarded under the HMGP, which is a post-disaster program that contributes funds toward the cost of hazard mitigation activities in order to reduce the risk of future damage, hardship, loss or suffering in any area affected by a major disaster. Section 102 of the Stafford Act defines a “state” 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. “Recipient”, as provided in 2 CFR 200,

means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program, or an Indian tribal government that chooses to act as a Recipient rather than as a subrecipient. “Subrecipient” means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. The term “Indian tribal government” is defined in Section 102 of the Stafford Act as the governing body of any Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe under the Federally Recognized Indian Tribe List Act of 1994. In addition, the Sandy Recovery Improvement Act of 2013 (P. L. 113-2) amended the Stafford Act to allow the Chief Executive of a federally recognized Indian tribe to make a direct request to the President of the United States for a major disaster or emergency declaration.

DHS adopted in its entirety the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200) on December 26, 2014, at 2 CFR Part 3002, Federal Register Volume 79, No. 244, Page 75867 (Dec. 19, 2014). This rule eliminates overlapping and duplicative requirements for stakeholders, including states, territories and Indian tribal governments, by using general terms such as “recipient” or “pass-through entity.”

The 44 CFR 206.436 HMGP regulation describes the application process. Information collected through the financial award applications is the minimum information necessary for the financial award administration under the HMGP and includes the project narrative, analysis of the measure’s cost-effectiveness referred to as the benefit-cost determination, and environmental review used in conjunction with OMB No. 1660-0025.

44 CFR 206.438(c) requires progress reports to be submitted by the HMGP Recipient to the Regional Administrator on a quarterly basis, certifying how the funds are being used and reporting on the progress of activities funded under the subrecipient awards made to the Recipient by FEMA. The Regional Administrator and Recipient negotiate the date for submission of the first report. Quarterly progress reports describe the status of those projects on which a final payment of the Federal share has not been made to the Recipient, and outline any problems or circumstances expected to result in noncompliance with the approved award conditions.

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.

Project Narrative: Explains the FEMA application and review process to the respondent and provides instruction as to what detail is required. The Project Narrative describes the

proposed activity for which funding is sought. FEMA uses this information to certify that the project meets minimal mitigation eligibility criteria. (44 CFR 206.436)

Benefit-Cost Determination: This is a requirement to establish that Federal funds awarded as a grant are applied in a cost-effective manner. This information is used by FEMA to determine if the benefits of the proposed mitigation work exceed the costs of the mitigation activity. (44 CFR 206.434, 206.436)

Environmental Review: Respondents are responsible for providing most of the necessary information to complete environmental reviews under the National Environmental Policy Act and other laws and Executive orders. FEMA works with the respondents to collect environmental information necessary to implement the project. (44 CFR 206.436)

Quarterly Progress Report (Updated): Describes the status of ongoing projects on which a final payment of the Federal share has not been made to the Recipient. The Quarterly Progress Report (QPR) instructs the Recipient to input the following data into an accompanying Excel Spreadsheet with corresponding tabbed columns: Region, State Code, Disaster Number, Application ID, Project Number, Fiscal Year, Quarter Number, Subrecipient Name, Project Title, Approved Period of Performance (POP) Completion Date, POP Time Extension, POP Time Extension Date, Cost Code, Status, Percentage Work Complete, Actual Project Completion Date, Total Properties, Property ID list, Total Recipient Drawdown, Most Recent Drawdown Date, Federal Funds Disbursed, Subrecipient Expenditures To Date, Date Final Payment Made to Subrecipient, and Comments.

This updated QPR serves to collect the same project specific information as that approved by OMB in 2013, but instructions are now enhanced to provide better clarity to Recipients for the purpose of ensuring consistency with 2 CFR 200. The QPR that was approved in 2013 had fields to collect information using former FEMA Form 009-0-111A as described in the supporting statement approved in 2013: Total amount paid by the Grantee for work accomplished in PW, Federal funds drawn down by Grantee on per project basis, date of last drawdown of Federal funds, amount disbursed to the subgrantees by the Grantee, final payment made if applicable and status as to whether it is ready for closeout, latest approved period of performance and project completion status including any time extensions, whether time extension has been granted, description of status of project with percentage estimate, date of project completed if applicable.

Additional information currently collected from Recipients, but not previously collected from Recipients, is limited to identification of Region, State Code, Disaster Number, Application ID, Project Number, Fiscal Year, Quarter Number, Subrecipient Name and Project Title. This information had previously been input by FEMA.

The following Standard Forms are required for this collection. The forms are approved for use under the OMB Control Number identified for each.

SF-424, Application for Federal Assistance, is a standard form used by applicants as a required face-sheet for pre-applications and applications submitted for Federal assistance. It is used by Federal agencies to obtain application certification, and is approved for use under OMB No. 4040-0004.

SF-424A, Budget Information for Non-construction Programs, is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is not construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0006.

SF-424B, Assurances for Non Construction Programs, is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is not construction. It is approved for use under OMB No.4040-0007.

SF-424C, Budget Information for Construction Programs, is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0008.

SF-424D, Assurances for Construction Programs, is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is construction. It is approved for use under OMB No. 4040-0009.

SF-425/425A, Federal Financial Report/Report Attachment, State, Indian tribal and local governments use this form to report the status of financial expenditures for FEMA grants; SF-425A is attached when reporting multiple grants. It is approved for use under OMB No. 4040-0014.

SF-429, Real Property Status Report, is a standard form used by recipients to provide a listing of any real property acquired or improved under a grant or cooperative agreement. It is approved for use under OMB No. 4040-0016.

SF-LLL, Disclosure of Lobbying Activities, is a standard form used by applicants as a required agreement to comply with all requirements of the awarding agency. It is approved for use under OMB No.4040-0013.

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 information management and grants processing system that presently supports the HMGP programmatic lifecycle processes is the National Emergency Management Information System (NEMIS). Applicants use NEMIS to create the applications and submit them in digital format, or the information can be e-mailed as attachments to the FEMA regional representative for the particular disaster.

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 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.

The Stafford Act established specific eligibility criteria for the use of the HMGP grant program authority. FEMA will not be able to determine eligibility of potential applicants, proposed mitigation activities, cost-effectiveness of the proposed activity, the effect on the environment, or status of the project without the information requested in the data collection. Without approval of this information collection, FEMA will not be able to provide disaster assistance for mitigation activities to State, Indian tribal and local communities that have been declared under a Presidential Disaster Declaration.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

The special circumstances contained in item 7 (a), (b), (c), (d), (e), (f), (g), and (h) of the supporting statement are not applicable to this information collection

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 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.

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 published on October 26, 2016, 81 FR 74463 and no comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments published on June 13, 2017, 82 FR 27071. See attached copy of the published notice included in this package. **No comments were received.**

This collection expired on October 31, 2016 and FEMA is requesting approval from OMB for reinstatement and update, with changes to account for Indian tribal governments as Direct Recipients, of a previously approved information collection for which approval has expired.

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 has received input from States, Indian tribal governments and local governments about information collections for the HMGP through meetings with FEMA. FEMA also has invited various State, Indian tribal and local stakeholders to participate in meetings to discuss program improvements, ways to simplify application requirements to include discussions on data collection and electronic information gathering/processing for FEMA mitigation grant programs. In addition, FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conferences. Respondents are members of NEMA and ASFPM. The results of these consultations are clarifications made in the guidance for the HMGP. This would allow the respondents to better prepare their applications so that FEMA can more efficiently process them.

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's regional offices have discussed the HMGP with our State and Indian tribal government counterparts in training sessions and meetings. FEMA actively solicits national participation of State and Indian tribal representatives to share hazard mitigation related information at events that include hazard mitigation assistance workshops and summits, and has held meetings related to data collection and electronic data processing for FEMA mitigation grant programs. FEMA uses the input to review the guidance and make any necessary updates to it so that respondents can better understand the program requirements and would be incorporated as indicated in Question 8b above.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was approved for this collection on December 11, 2014. A Privacy Impact Assessment (PIA), Hazard Mitigation Grant Program, DHS/FEMA/PIA-025 was approved on June 28, 2012 for this collection. A System of Records Notice (SORN), DHS/FEMA-009 was approved and published for this collection on March 24, 2014, 79 FR 16015.

11. Provide additional justification for any questions 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. 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 59 Respondents affected by this data collection are the 59 HMGP Recipients which are the states and any Indian tribal government choosing to act as a Direct Recipient. As of November, 2016, eight direct tribal declaration requests had been made. This resulted in eight Tribal direct Recipients of a grant under HMGP since the Stafford Act amendment in 2013. This is averaged to an estimated three (3) Tribal direct Recipients per year as a result of receiving a direct Federal disaster declaration. There have been tribal declarations where the state did not receive a Presidential disaster declaration in conjunction with the tribal declaration.

The basis of the annualized projection of Number of Responses per Respondent is the actual number of HMGP projects processed for FY 2006 through FY 2015. The number of responses (projects) per respondent (recipient) correlates with the number of declared disasters impacting the recipients' jurisdiction. Since the number of disasters greatly varies by FEMA Region, the number of projects varies widely. This is illustrated in the table below.

HMGP Projects Submitted for FY2006 through FY2015		
Region	Program Area	Number of Projects
1	HMGP	796
2	HMGP	1,195
3	HMGP	781
4	HMGP	4,922

5	HMGP	1,183
6	HMGP	2,852
7	HMGP	1,365
8	HMGP	778
9	HMGP	513
10	HMGP	405

Total: 14,790

An annual average of 26 responses per respondent was calculated based on the total number of HMGP projects processed nationally during this recent period of ten years, FY 2006 through FY 2015. It has been projected that 59 respondents, 56 States and the annual average of 3 Tribal direct Recipients, will complete the Project Narrative and each respondent will provide 26 narratives each year. Each narrative is estimated to require 12 hours to complete, and the calculation for the total annual hour burden for the Project Narrative is 59 respondents X 26 responses per year x 12 hours per response = 18,408 hours burden.

The 59 respondents will complete the Benefit Cost Determination and each respondent will provide 26 determinations each year. Each determination is estimated to require 5 hours to complete, and the calculation for the total annual hour burden for the Benefit Cost Determination is 59 respondents X 26 responses per year x 5 hours per response = 7,670 hours burden.

The 59 respondents will complete the Environmental Review and each respondent will provide 26 determinations each year. Each review is estimated to require 7.5 hours to complete, and the calculation for the total annual hour burden for the Environmental Review is 59 respondents X 26 responses per year x 7.5 hours per response = 11,505 hours burden.

Quarterly Progress Reports - During the event of a disaster FEMA requires that State and Indian tribal Recipients submit Quarterly Progress Reports. These reports describe the status of each disaster related project for the particular declared disaster (as opposed to separate reports for each separate project). It is estimated that 59 respondents x 4.6 (average) reports annually = 271.4 (rounded to 271) total responses. Each report is estimated to take 50 hours. The burden hours per response is estimated to be 271 reports x 50 hours = 13,550 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 Item13 of OMB Form 83-I.

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate

categories. The cost 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	Project Narrative Section /No Form	59	26	1,534	12	18,408	\$44.40	\$817,315
State, Local or Tribal Government	Benefit-Cost Determination/No Form	59	26	1,534	5	7,670	\$44.40	\$340,548
State, Local or Tribal Government	Environmental Review/No Form	59	26	1,534	7.5	11,505	\$44.40	\$510,822
State, Local, or Tribal Government	Quarterly Reporting Tool	59	4.6	271	50	13,550	\$44.40	\$601,620
Total		59		4,873		51,133		\$2,270,305

- 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 (www.bls.gov) the wage rate category for State Emergency Management Director mean wage is \$30.41 per hour and was estimated to be \$44.40 per hour including the wage rate multiplier. The estimated annual respondent costs for each of the four program collection instruments are \$817,315 for Project Narrative; \$340,548 for Benefit-Cost Determination; \$510,822 for Environmental Review; and \$601,620 for Quarterly Reporting Tool, after multiplying the respective hour burdens by the fully-loaded hourly wage rate of \$44.40 for each of the four program collection instruments. The resulting

annual respondent cost for each is added for the total Annual Respondent Cost of \$2,270,305.

The following Standard Forms (SF) are utilized for the FEMA grant programs. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal government; burden hours specific to these forms are not submitted for approval of this collection:

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Number 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	Application for Federal Assistance, SF-424	59	26	1,534	1.1	1,687.4		
State, Local or Tribal Government	Budget Information for Non-construction Programs, SF-424A	59	26	1,534	1.8	2,761.2		
State, Local or Tribal Government	Assurances for Non-construction Programs, SF-424B	59	26	1,534	0.8	1,227.2		
State, Local or Tribal Government	Budget Information for Construction Programs, SF-424C	59	26	1,534	2.0	3,068		
State, Local or Tribal Government	Assurances for Construction Programs, SF-424D	59	26	1,534	0.5	767		
State, Local or Tribal Government	Real Property Status Report, SF-429	59	26	1,534	4.0	6,136		
State, Local or Tribal Government	Certifications Regarding Lobbying, SF-LLL	59	26	1,534	0.2	306.8		
Total		59		10,738		15,954		

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:

There are no annual capital, start-up, maintenance or operation costs associated with this 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 [Describe]	
Staff Salaries* See description below	\$1,976,015
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	\$1,976,015

* Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate.

The staff salaries were calculated as a GS 11 Step 5, employee reviewing the project narrative for two hours, ($\$36.12/\text{hr} \times 1.46 \text{ multiplier} = \52.74), $\$52.74 \times 2 = \$105.48 \times 1,534 \text{ total narratives} = \mathbf{\$161,806}$; a GS 11 Step 5 employee reviewing and recalculating the benefit-cost determination for 3 hours, ($\$36.12/\text{hr} \times 1.46 \text{ multiplier} = 52.74$), $\$52.74 \times 3 = 158.22 \times 1,534 \text{ cost/benefit determinations received} = \mathbf{\$242,709}$; a GS 12 Step 5 employee managing an environmental review for 13 hours, ($\$43.29/\text{hr} \times 1.46 \text{ multiplier} = \63.20), $\$63.20 \times 13 = \$821.60 \times 1,534 \text{ reviews received} = \mathbf{\$1,260,334}$; and four GS 11 Step 5 employee conducting an audit at 25 hours each, ($\$36.12/\text{hr} \times 1.46 \text{ multiplier} = 52.74$), $\$52.74 \times 25 = \$1318.50 \times 59 \text{ audits received} = \$7,7791.50 \times 4 = \mathbf{\$311,166}$. The total cost is **\$ 1,976,015**.

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
Project Narrative Section /No Form	12,096	18,408	6,312	12,096	17,472	5,376
Benefit-Cost Determination/No Form	5,040	7,670	2,630	5,040	7,280	2,240
Environmental Review/No Form	7,560	11,505	3,945	7,560	10,920	3,360
Quarterly Progress Report/No Form	12,900	13,550	650	12,900	No adjustment	0
Total(s)	37,596	51,133*	13,537	37,596	35,672*	10,976*

** The Total Program Change incorporates Adjustment based on pre-factoring of increased responses per respondent, as shown above under Item 12; The Total Adjustment is incorporated into the Program Change.*

Explain: The Adjusted Burden Hours resulting from additional responses per respondent was calculated based on the ten-year average of 26 responses per respondent described in question 12 a. The resulting change from 18 responses to 26 responses per respondent affecting burden hours for Project Narrative, Benefit-Cost Determination and Environmental Review, is factored into an Adjustment calculation for each of these three non-form program collections. Adjustment did not apply to the Quarterly Progress Report because average responses per respondent did not change.

The adjustment from 18 to 26 responses per respondent is factored with the programmatic change from 56 to 59 respondents, to calculate the Program Change. The resulting annual burden hour increases of: 6,312 hours to Project Narrative; 2,630 hours to Benefit-Cost Determination; 3,945 hours to Environmental Review, and 650 to Quarterly Progress Report (formerly FEMA Form 009-0-111A - Quarterly Reporting Tool) combine for a **Program Increase** of 13,537 annual burden hours. The Program

Increase results from the annual average number of Indian Tribal Government Direct Recipients representing three additional respondents, as authorized by statutory change and described in Section A-Justification, question 1.

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
Project Narrative Section /No Form	\$452,995	\$817,315	\$364,320			
Benefit-Cost Determination/No Form	\$188,748	\$340,548	\$151,800			
Environmental Review/No Form	\$283,122	\$510,822	\$227,700			
Quarterly Progress Report/No Form	\$482,356	\$601,620	\$119,264			
Total(s)	\$1,407,221	\$2,270,305	\$863,084			

Explain: After multiplying hour burdens by the fully-loaded hourly wage rate of \$44.40 for each of the four program collection instruments, (18,408 x \$44.40; 7,670 x \$44.40; 11,505 x \$44.40; 13,550 x \$44.40), the resulting annual respondent cost for each data collection instrument was then added, (\$817,315 + \$340,548 + \$510,822 + \$601,620), the grand total estimated annual burden hour cost is \$2,270,305. Annual cost burden increases of: \$364,320 to Project Narrative; \$151,800 to Benefit-Cost Determination; \$227,700 to Environmental Review, and \$119,264 to Quarterly Progress Report are combined program and adjustment-related burden hour increases as explained above under Itemized Changes in Annual Burden Hours. The total increase in annual cost burden is \$863,084.

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.

This information collection will not be published for statistical purposes.

17. If seeking approval to not 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.

The collection of information for HMGP does not employ statistical methods.