

May 1, 2019

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 - 0022**

**Title: Community Rating System (CRS) Program – Application Letter  
and CRS Quick Check, Community Annual Recertification;  
Environmental and Historic Preservation Certifications**

**Form Number(s): FEMA Form 086-0-35, 086-0-35A, 086-0-35B; 086-0-35C**

### **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 of 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) promotes and implements sound local floodplain management. Communities must adopt minimum floodplain management standards in order to participate in the NFIP and receive the benefits of flood insurance. The Community Rating System (CRS), codified in The National Flood Insurance Reform Act (NFIRA) of 1994 (P.L. 103-325, Sec. 541.) was designed by the Federal Emergency Management Agency (FEMA) to encourage communities to undertake activities that will

mitigate flooding and flood damage beyond the minimum standards for NFIP participation. Respondents (communities) select activities to apply for and receive credit using the Application Letter and Quick Check. The Community Certifications document these activities so that proper credit is applied for each. The Repetitive Loss Update form documents action taken with regard to properties subject to repetitive flooding. Detailed explanations of the program and its activities are available in reference documents. Communities that receive these credits become eligible for flood insurance premium discounts.

**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.**

**FEMA Form 086-0-35, Community Rating System Application Letter and Quick Check and Documentation** – Communities submit a CRS Application Letter of Interest and supporting documentation with a Quick Check to apply for activity points leading up to a CRS rating and commensurate flood insurance premium discounts. To complete the application process, communities are interviewed about their floodplain management activities and submit the completed Letter of Interest and supporting documentation for review to FEMA. The floodplain management and insurance activities available that can be undertaken to reduce flood losses are described in the “CRS Coordinator’s Manual,” the primary reference document for the CRS. Approval of the application results in credits that can be applied to flood insurance rates. The instructions explaining how to apply to CRS, including the CRS Quick Check form, can be found at <https://www.CRSresources.org/200>.

**FEMA Form 086-0-35A, Community Rating System Community Annual Recertifications** – Each year a community must certify that it is continuing to perform the activities that are being credited by the CRS. It does this by certifying a summary of its activities. The summary of activities is provided to the community by FEMA for review and certification by the community. Successful certifications allow for continued qualification for flood insurance credits.

**FEMA Form 086-0-35B, Environmental and Historic Preservation Certifications** – These certifications are completed and signed by community officials in CRS participating communities. These are required to raise awareness and understanding about various laws and regulations related to environmental protection and historic preservation. The information is not shared. It is used to reinforce the importance of community compliance with environmental and historic preservation laws.

**FEMA Form 086-0-35C, Repetitive Loss Update Form** – This form documents changes to any properties in the community that appear on the annual FEMA Repetitive Loss List. Changes to the Repetitive Loss List are reported and certified by a community official as part of Form 086-0-35A. The information is not shared. It is used to support efforts to mitigate property losses due to repeated flooding.

The following documents provide instruction to the respondent as to how to best answer the questions: [CRS Coordinator’s Manual](#), [Elevation Certificate Checklist](#), [Outreach Projects for Credit under the Community Rating System](#), [Preparing a Flood Insurance Assessment for CRS Credit](#), [CRS Credit for Planning Committees](#), [How to Use a Grid Overlay](#), [CRS Credit for Floodplain Management Planning](#), [Developing a Repetitive Loss Area Analysis](#), [Developing a Program for Public Information for CRS Credit](#), [Protecting Building Utilities from Flood Damage](#), [Non-conversion Agreement for Certain Structures in the Floodplain](#), [CRS Credit for Flood Warning and Response](#), [CRS Credit for Drainage System Maintenance](#), [Maps as Cornerstones of Flood Warning and Response](#), [Guidance on Dam Failure Inundation Mapping](#).

NOTE: The Non-conversion Agreement for Certain Structures in the Floodplain is only provided as a possible way for the community to make certain the property characteristics that are in place at the time of the CRS Application remain from that time forward.

FEMA Form 086-0-33, Elevation Certificate, is required for this collection and is approved separately under OMB Control Number 1660-0008.

**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 instructions explaining how to apply to the CRS, and the Quick Check form can be found at <http://www.CRSresources.org/200>. This process saves time for the local official. The approach allows a verbal submission that is entered into a data-base by a FEMA representative along with necessary supporting documentation. The primary reference document, the CRS Coordinator’s Manual, describes in detail the specific information gathered and allows for strict consistency in how the information is entered.

**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 available through other sources and is not duplicated elsewhere. The detail required is specific to this program.

**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 community information were not provided through this application and verification process, FEMA would not be able to provide the flood insurance premium discount credits mandated by statute. Without these credits, communities would be adversely affected by higher flood insurance premiums.

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

The special circumstances contained in items 7(a) through (h) below 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 was published on January 28, 2020, 85 FR 5005. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on April 1, 2020, 85 FR 18253. 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.**

The ongoing improvements to the CRS and its data collection instruments are the product of an inclusive process designed to generate as much input from stakeholders as possible and integrate their suggestions.

The Community Rating System Task Force is the inter-agency, multidisciplinary advisory body that has provided guidance to FEMA since the inception of the CRS. The CRS Task Force meets twice each year and a portion of every meeting is devoted to garnering the input of state and local officials about improvements to the data collection and other aspects of the program. The CRS Task Force specifically invites comments and routinely collects letters from CRS participants.

In addition, several other forums during the year allow for consultation with local government officials on the CRS application and field verification process. A national conference hosted by the Association of State Floodplain Managers occurs annually. Every year at that conference, a CRS Program Update workshop is held, which fosters an open discussion about the CRS with emphasis on suggestions for improvement. At the

national conference there are abundant opportunities for informal discussions with local officials. Many state floodplain management associations conduct annual state-level forums in which CRS is highlighted, affording time for input.

The CRS hosts webinars throughout the year, facilitating exchange of information about the CRS and allowing for input to be collected from community representatives. For example, during 2018 the CRS held 20 webinars on a variety of CRS-related topics, with a total of about 1,000 participants.

In addition, there are 45 CRS Users Groups active today, encompassing over 850 individuals from CRS-participating communities throughout the nation. These groups have formed voluntarily to share their experiences in implementing the CRS program in their communities and their views are routinely received and incorporated into the program.

Articles in the NFIP/CRS Update newsletter routinely notify program participants when revisions to the guidance manual are in process, and invite their suggestions for changes, corrections, simplifications, and other input.

**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.**

Continuous consultation with respondents is an integral part of CRS program. It includes reviews of feedback from communities through state workshops, professional forums, CRS Users Groups, and direct community contacts. CRS communities receive bi-monthly newsletters, e-mail, and phone contact for updated information on the program. Respondents are offered opportunities to provide feedback through the information provided in these outreach efforts. The CRS Task Force, a working group of individuals that provide input on CRS operations, includes representatives of four CRS participating communities. The views of these CRS community representatives are directly integrated with any changes to the CRS.

**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) for this collection was approved by both DHS and FEMA Privacy offices on 25 March 2020. FEMA identified that a Privacy Impact Assessment (PIA) is needed for this collection.

A System of Record Notices (SORN) was approved and published in the Federal Register on May 19, 2014, at 79 FR 28747.

**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.**

No questions of a sensitive nature are asked.

**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.**

**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 1.4 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.**

For FEMA Form 086-0-35, it is estimated that 350 community engineers will complete the form each year. Every CRS-participating community uses this form once every five years during the cycle verification of its program. Thus, every year about one-fifth of the 1,500 CRS communities uses the form, or 300 communities per year. Added to this is the number of new community applicants, who also use this form. The new applications have been averaging 50 per year. (300 plus 50 = 350 responses per year). Each response requires an estimated 45 hours to complete. This is based on ongoing consultation with and feedback from communities that have used the form and the field personnel who assist them. The total annual hour burden is 350 responses x 45 hours = 15,750 hours.

For FEMA Form 086-0-35A, it is estimated that there will be 1,500 responses from community engineers every year because every participating CRS community uses this form once a year for its recertification process. Each response requires an estimated 23.5 hours to complete. This estimate is based on ongoing consultation with and feedback from communities that use the form and the field personnel who assist them. The total annual hour burden is 1,500 responses x 23.5 hours = 35,250 hours.

For FEMA Form 086-0-35B, it is estimated that 120 community engineers will use the form each year. This form is used only by the 600 communities who are receiving CRS credit for certain activities under the CRS. Each of those communities uses the form once every five years, so in any given year one-fifth of the 600 communities (120 communities) responds. Each response requires an estimated 1.6 hours to complete. This estimate is based on ongoing consultation with and feedback from communities that use the form and the field personnel who assist them. The total annual hour burden is 120 responses x 1.6 hours = 192 hours.

For FEMA Form 086-0-35C, about 200 communities use the form every year. This form is used only by those CRS communities that have updates to their list of properties that have experienced repetitive flood losses. A community uses one form for each property whose status needs updating. Over the past few years, these communities have submitted an average of 11 forms (responses) each. The total number of annual responses is 200 x 11 or 2,200. Each response is estimated to require about 0.5 hour to complete. This estimate is based on ongoing consultation with and feedback from communities that use the form and the field personnel who assist them. The total annual hour burden is 2,200 x 0.5 = 1,100 hours.



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	086-0-035 Community Rating System Application Letter, Quick Check, & Documentation	350	1	350	45	15,750	\$72.98	\$1,149,372
State, Local, or Tribal Government	086-0-035A Community Rating System Annual Certification	1,500	1	1,500	23.5	35,250	\$72.98	\$2,572,404
State, Local, or Tribal Government	086-0-035B Environmental and Historic Preservation Certifications	120	1	120	1.6	192	\$72.98	\$14,011
State, Local, or Tribal Government	086-0-035C Repetitive Loss Update Form	200	11	2,200	0.5	1,100	\$72.98	\$80,274
Total		2,170		4,170		52,292		\$3,816,061

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.60<sup>1</sup>. For**

<sup>1</sup> 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, March 2019.” Available at [http://www.bls.gov/news.release/archives/ecec\\_06182019.pdf](http://www.bls.gov/news.release/archives/ecec_06182019.pdf). Accessed December 19, 2019. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$50.89 by Wages and salaries for State and local government workers of \$31.75 per hour yielding a benefits multiplier of approximately 1.6.

**example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.60, and the entry for the “Avg. Hourly Wage Rate” would be \$68.02.**

According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>2</sup> the May 2018 Occupational Employment and Wage Estimates for a local government Civil Engineer (SOC 17-2051) working in local government is \$45.61 per hour. Including the wage rate multiplier of 1.60, the fully-loaded wage rate is estimated at \$72.98 per hour. Therefore, the estimated annual burden hour cost to respondents for all applications is estimated to be \$3,816,061 (\$72.98 x 52,292).

**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.)**

There are no recordkeeping, capital, start-up, or maintenance costs associated with this information collection.

**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.**

<b>Annual Cost Burden to Respondents or Record Keepers</b>				
<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)</b>	<b>*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc)</b>	<b>Annual Non-Labor Cost (expenditures on training, travel and other resources)</b>	<b>Total Annual Cost to Respondents</b>
Total	\$0	\$0	\$0	\$0

<sup>2</sup> May 2018 State Occupational Employment and Wage Rates, Civil Engineers (SOC: 17-2051, Average, Column Title: Hourly Mean). Accessed January 21, 2020. <https://www.bls.gov/oes/2018/may/oes172051.htm>.

**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.**

<b>Annual Cost to the Federal Government</b>	
Item	Cost (\$)
<b>Contract Costs:</b> ISO service contract to review applications for completeness and make recommendations for appropriate actions. The full, 100% of the contract cost is associated with this action.	\$ 6,450,000
<b>Staff Salaries:</b> -One GS 14, step 9 employee (at Washington, D.C. office) spending approximately 10% of time annually verifying and approving CRS classes for this data collection $153,665^1 \times 1.46 \text{ multiplier}^2 \times 10\% = \$22,435$ -Ten GS 12, step 5 employees (one in each FEMA Regional Office) spending approximately 10% time annually providing informational resources to respondents and reviewing data for this data collection $96,821^3 \times 1.46 \times 10\% = \$14,136$ $100,473^4 \times 1.46 \times 10\% = \$14,669$ $97,848^5 \times 1.46 \times 10\% = \$14,2869$ $91,609^6 \times 1.46 \times 10\% = \$13,375$ $96,431^7 \times 1.46 \times 10\% = \$14,079$ $93,724^8 \times 1.46 \times 10\% = \$13,684$ $87,837^9 \times 1.46 \times 10\% = \$12,824$ $95,336^{10} \times 1.46 \times 10\% = \$13,919$ $106,067^{11} \times 1.46 \times 10\% = \$15,486$ $95,254^{12} \times 1.46 \times 10\% = \$13,907$	\$ 162,799
<b>Equipment maintenance [cost of annual maintenance/service agreements for equipment]</b>	0
<b>Travel</b>	0
<b>Total</b>	<b>\$ 6,612,799</b>
<sup>1</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf</a> . <sup>2</sup> Wage rates include a 1.46 multiplier to reflect the fully-loaded wage rate. <sup>3</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Boston-Worcester-Providence, MA-RI-NH-ME locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/BOS.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/BOS.pdf</a> . <sup>4</sup> Office of Personnel Management 2020 Pay and Leave Tables for the New York-Newark, NY-NJ-CT-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/NY.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/NY.pdf</a> . <sup>5</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf</a> . <sup>6</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Atlanta-Athens-Clarke County-Sandy Springs, GA-AL-locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/ATL.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/ATL.pdf</a> . <sup>7</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Chicago-Naperville, IL-IN-WI locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/CHI.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/CHI.pdf</a> . <sup>8</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Dallas-Forth Worth, TX-OK locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DFW.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DFW.pdf</a> . <sup>9</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Kansas City-Overland Park-Kansas City, MO-KS locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/KC.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/KC.pdf</a> . <sup>10</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Denver-Aurora, CO locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DEN.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DEN.pdf</a> . <sup>11</sup> Office of Personnel Management 2020 Pay and Leave Tables for the San Jose-San Francisco-Oakland, CA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SF.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SF.pdf</a> . <sup>12</sup> Office of Personnel Management 2020 Pay and Leave Tables for the Seattle-Tacoma, WA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SEA.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SEA.pdf</a> .	

**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.*

<b>Itemized Changes in Annual Hour Burden</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
FEMA Form 086-0-35, Community Rating System (CRS) Application Letter, Quick Check & Documentation	14,850			14,850.0	15,750.0	+900.0
FEMA Form 086-0-345A, Community Rating System Community Certifications	26,880			26,880.0	35,250.0	+8,370.0
FEMA Form 086-0-35B, Environmental and Historic Preservation Certification	206.4			206.4	192.0	-14.4
FEMA Form 086-0-035C, Repetitive Loss Update Form	0			0.0	1,100.0	+1,100.0
<b>Total</b>	<b>41,936</b>	<b>0</b>	<b>0</b>	<b>41,936</b>	<b>52,292</b>	<b>+10,356</b>

***Explain:***

For FEMA Forms 086-0-35 and 086-0-35A there is an upward adjustment in the annual hour burden due to the growth in the number of communities joining the CRS. Although some communities have stated that they use more hours for Form 086-0-35A when they voluntarily increase or broaden their activities, nationwide this is offset by the CRS program’s expanding use of electronic collection and other efficiencies.

For FEMA Form 086-0-35, the current annual hour burden is 14,850 hours. The new hour burden is 15,750 hours, or an increase of 900 annual hours.

For FEMA Form 086-0-35A, the current annual hour burden is 26,880 hours. The new hour burden is 35,250 hours, or an increase of 8,370 annual hours.

For FEMA Form 086-0-35B, there is a slight downward adjustment in the annual hour burden. This form is used only by communities that earn credit for certain voluntary

activities (retrofitting, levee safety, and drainage system maintenance). In the past three years, some participating communities have chosen to minimize or discontinue their efforts under these categories, hence fewer responses are expected.

For FEMA Form 086-0-35B, the current annual hour burden is 206.4 hours. The new hour burden is 192 hours, or a decrease of 14.4 annual hours.

The burden hours for the new Form 086-0-35C had been reflected in prior years as part of the burden for Form 086-0-35A. Thus, the burden hours for Form 086-0-35A were adjusted downward slightly to account for the movement of those responses to the new form, but then were adjusted upward due to growth, as noted above.

For FEMA Form 086-0-35C, there is no current annual hour burden (in prior years it was included in the burden for Form 086-0-35A.) The new hour burden is 1,100 annual hours.

The overall increase in burden hours for the CRS is a result of two types of program growth. First, more communities participate every year, resulting in an increase in the number of hours expended on information collection nationwide. Second, participating communities voluntarily expand the number of activities they undertake under the CRS program, resulting in an accompanying increase in the hours they spend providing information about those activities.

The CRS monitors and solicits feedback from participating communities about the amount of time they spend providing information for different parts of the program and on different information collection forms. Based on this, the burden hours for specific forms are adjusted upward or downward as needed but decreases so far have been offset by the overall program growth.

The overall increase in CRS cost burden is a result of the program’s growth (more participation) and the increase in labor rates.

There has been no change in the information being collected.

<b>Itemized Changes in Annual Cost Burden</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
FEMA Form 086-0-35, Community Rating System (CRS) Application Letter, Quick Check & Documentation	\$865,013	0	0	\$865,013	\$1,149,372	\$284,359
FEMA Form 086-0-35A, Community Rating System Community	\$1,545,760	0	0	\$1,565,760	\$2,572,404	\$1,006,644

Certifications						
FEMA Form 086-0-35B, Environmental and Historic Preservation Certification	\$12,023	0	0	\$12,023	\$14,011	\$1,988
FEMA Form 086-0-35C, Repetitive Loss Update Form	0	0	0	\$0	\$80,274	\$80,274
Total	0	0	0	\$2,442,795	\$3,816,061	\$1,373,265

***Explain:***

For FEMA Form 086-0-35, the current annual cost burden is \$865,013. The new cost burden is \$1,149,372, or an increase of \$284,359 annually. This increase reflects the increase in the number of communities participating coupled with the increased Bureau of Labor and Statistics hourly labor rates for the respondents.

For FEMA Form 086-0-35A, the current annual cost burden is \$1,565,760. The new cost burden is \$2,572,404, or an increase of \$1,006,644 annually. This increase reflects the increase in the number of communities participating coupled with the increased Bureau of Labor and Statistics hourly labor rates for the respondents. The increase has been partially offset by the shift of a portion of the cost burden to the new FEMA Form 086-0-035C, as noted below.

For FEMA Form 086-0-35B, the current annual cost burden is \$12,023. The new cost burden is \$14,011, or an increase of \$1,988 annually. This increase reflects the increased Bureau of Labor and Statistics hourly labor rates for the respondents.

For FEMA Form 086-0-35C, the current annual cost burden is zero (in prior years it was included in the burden for Form 086-0-35A). The new cost burden is \$80,274, or an increase of \$80,274 annually.

There has been no change in the information being collected.

**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 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.