

April 10, 2020

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 – 0113**

**Title: FEMA Preparedness Grants: Tribal Homeland Security Grant Program (THSGP)**

**Form Number(s): FEMA Form 089-22**

### 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.**

FEMA’s Tribal Homeland Security Grant Program (THSGP) (formerly the State Homeland Security Program (SHSP) – Tribal) is authorized by Sections 2004 and 2005 of the Homeland Security Act of 2002, as amended by Section 101, Title I of the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, (6 U.S.C. §605 and 606). THSGP provides supplemental funding to eligible tribes to help strengthen the Nation against risks associated with potential terrorist attacks. THSGP supports building and sustaining capabilities through planning, equipment, training, and exercise activities. The FY 2020 THSGP plays an important role in the implementation of Presidential Policy Directive 8 (PPD-8) by supporting the development and sustainment of core capabilities. Core capabilities are essential for the execution of each of the five mission areas outlined in the *National Preparedness Goal*

(the Goal). The development and sustainment of these core capabilities are not exclusive to any single level of government or organization, but rather require the combined effort of the whole community. The FY 2020 THSGP supports all core capabilities in the Prevention, Protection, Mitigation, Response, and Recovery mission areas based on allowable costs. Files and information on PPD-8 can be found at <http://www.fema.gov/ppd8>.

This law empowers the FEMA Administrator to make grant awards directly to eligible tribes and requires the Administrator to accept appropriate application data submitted by eligible tribes, including:

- the purpose for which the Tribe seeks grant funds and the reasons why the Tribe needs the grant to meet its target capabilities;
- a description of how the Tribe plans to implement the grant funds to fill gaps and address needs;
- an indication of the National Preparedness Goal core capabilities that will be supported
- an indication of the mission areas that will be supported
- a budget showing how the Tribe intends to expend the grant funds; and
- a directly eligible tribe must provide a copy of its application to each State within which any part of the tribe is located for review before the tribe submits such application to the Department.

**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 089-22, Tribal Homeland Security Grant Program (THSGP) Investment Justification Template** – Submitted with the application, this document provides narrative detail on proposed activities (Investments) that will be accomplished with grant funds. Investment Justifications must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the IJ is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers through a national review process. This process results in the scoring of eligible tribal applications based on the anticipated effectiveness of proposed investments and how well the proposed investments address the identified need(s) or capability shortfall(s). The national review is comprised of subject matter experts familiar with tribal issues. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the respective grant program.

**Copy of Application provided to State prior to submission** – Eligible tribes are required to submit a copy of their application for THSGP funds to each State within which any part of the tribe is located for review before the tribe submits it to

<http://www.grants.gov>. This coordination ensures consistency with State plans. This information is used by FEMA to verify applicants' compliance with all administrative and eligibility criteria identified in the THSGP grant guidance.

**Biannual Strategy Implementation Report (BSIR)** – The BSIR serves as the reporting format for the Semiannual Progress Report, formerly known as the Categorical Assistance Progress Report (CAPR). The grantee is responsible for providing FEMA with BSIR reports to account for grant funding. The BSIRs are due within 30 days of the end of the reporting periods (June 30 and December 31), for the life of the award. A close-out BSIR is due 120 days after the end date of the award period. The submission of a completed BSIR satisfies programmatic reporting requirements as outlined in the grant program guidance to ensure legal and prudent use of federal funds. All funds provided to the Tribe must be accounted for and linked to one or more projects. This, in turn, must support specific goals and objectives identified in the Investment Justification, as detailed in the special conditions of the grant award. The BSIR data is submitted electronically in a FEMA-sponsored system, the Grants Reporting Tool (GRT). This collection activity is approved under OMB Control Number 1660-0117, which expires on 5/31/2020.

**FEMA Form 024-0-1, Environmental and Historic Preservation (EHP)**

**Environmental Screening Form (ESF)** - The Environmental and Historic Preservation Environmental Screening Form is a paper form used by FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to GPD for an Environmental and Historic Preservation (EHP) regulatory compliance review. This collection activity is approved under OMB Control Number 1660-0115, which expires on 4/30/2020.

**Homeland Security Exercise and Evaluation Program (HSEEP) After-Action Report (AAR) and Improvement Plan (IP)** –

The information contained within this report identifies areas where expectations for preparedness to respond to an emergency situation are met as well as areas where improvement is required. This information is used by the Secretary of Homeland Security and shared with heads of other Federal Departments including FEMA's National Preparedness Directorate to allow for planning methods to increase levels of preparedness, establishing mechanisms for improved delivery of Federal preparedness assistance to State and local governments, and outlining actions to strengthen preparedness capabilities of Federal, State and local entities.

This initiative is managed by FEMA's National Preparedness Directorate (NPD). Grant recipients must report on scheduled exercises and ensure that an HSEEP After-Action Report (AAR) and Improvement Plan (IP) are prepared for each exercise conducted with FEMA support. This information must be submitted to the FEMA within 60 days following completion of an exercise. There are two separate templates that support this data collection effort: (1) **Discussion-Based Exercise template**; 2) **Operations-Based Exercise template**. This collection activity is approved under OMB Control Number 1660-0118, which expires on 7/31/2020.

**Threat and Hazard Identification and Risk Assessment (THIRA) – State Preparedness Report (SPR) Unified Reporting Tool** – States and territories must submit a THIRA every year they receive THSGP grant funding. Urban Areas are required to complete one (1) THIRA for each grant award. This submission is valid for the entire period of performance of the individual grant award. If an Urban Area does not receive additional fiscal year grants, the award year THIRA submission covers the requirement for the entire period of performance. The THIRA is a tool developed and managed by Protection and National Preparedness. Additionally, recipients shall develop and maintain, jurisdiction-wide, all threats and hazards Emergency Operations Plans (EOPs) consistent with CPG 101 v.2. Recipients must update their EOP at least once every two years in the SPR. This collection activity is approved under OMB Control Number 1660-0131, which expires 2/28/2022.

**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 posts most of its grant application packages on [www.Grants.gov](http://www.Grants.gov). This allows applicants to download the application package and complete it offline. After applicants have completed all required forms, they can electronically submit the package to FEMA through [www.Grants.gov](http://www.Grants.gov). Applicants must create their Investment Justifications (IJ) in MS Excel and upload the information as an attachment to the THSGP application, which is electronically submitted via [www.grants.gov](http://www.grants.gov). The copy of the application provided to the State prior to submission is transmitted as an attachment in [www.Grants.gov](http://www.Grants.gov).

Additionally, grant applicants must use the FEMA-sponsored Grants Reporting Tool (GRT) to submit data for the Investment Justification(s) (IJ) and the Biannual Strategy Implementation Report (BSIR) to report on funds awarded. The GRT provides grantees the ability to electronically create and submit these data collection requirements. The GRT homepage is (<https://www.reporting.odp.dhs.gov/>). The GRT is used to capture FEMA's annual award and biannual grant reporting data. The GRT was designed to help the grantees meet all reporting requirements identified by DHS FEMA's Grant Program Directorate (GPD) as well as to streamline the reporting process for grantees. This system was developed in response to customer feedback concerning difficulties using other means of providing progress report data. The Department developed the GRT as a tool to streamline the reporting process for grantees. The GRT is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines. This collection activity is approved under OMB Control Number 1660-0117, which expires on 5/31/2020.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information is not collected in any form, and therefore is not duplicated elsewhere.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.**

This information collection does not have an impact on small businesses 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 FEMA could not request and obtain this information, FEMA could not exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

**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.**

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

**(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

There are no requirements for respondents to prepare a written response to this 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.**

There are no requirements for a respondent 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.**

Generally, records must be retained for three years after close-out. The only exceptions are the following:

- (a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- (b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- (c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- (d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.
- (e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- (f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
- (1) *If submitted for negotiation.* If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.
- (2) *If not submitted for negotiation.* If the proposal, plan, or other computation is not required to be submitted to the Federal Government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.
- (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.**

There is no statistical survey involved with this data collection.

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

There is no use for statistical data classification in this data collection.

**(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.**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

**(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.**

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this data 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 January 22, 2020, 85 FR pp 3711.

**No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on May 14, 2020, 85 FR 28969.

**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 meets with the National Governors Association (NGA), the National Emergency Management Association (NEMA), and the International Association of Emergency Managers (IAEM) national associations that represent these entities, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. Throughout the grant lifecycle

of past years, FEMA met and consulted directly with grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements.

As a result of these consultations, FEMA took the following measures to improve the THSGP Investment Justification template. First, the Introduction page was expanded to provide additional instructions on how to complete the form, application submission instructions and the self-certification requirement. Second, a five point bonus section was added to the Investment Justification template to assist tribes who have not received THSGP funding.

**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 consults on a regular basis with Federal, State, local, tribal stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements that FEMA uses. Reporting requirement tools were streamlined to reduce the number of forms needed to meet the requirements.

**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 completed by FEMA and adjudicated by the DHS Privacy Office on September 24, 2019.

The THSGP Investment Justification, FEMA Form 089-22 is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015. No Privacy Act Statement nor SORN coverage is required for the form.



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.**

The THSGP is an existing grant program that uses the forms outlined in this collection. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden estimated to collect the necessary information has estimated to be 18,010 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 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.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Responses	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	Tribal Homeland Security Grant Program (THSGP) Investment Justification Template / FEMA Form 089-22	60	1	60	300 hours	18,000	\$40.60	\$730,800
State, Local or Tribal Government	Copy of Application provided to State prior to submission / No Form	60	1	60	0.167 hr (10 minutes)	10	\$40.60	\$406
<b>Total</b>		<b>60</b>		<b>120</b>		<b>18,010</b>		<b>\$731,206</b>

• Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics Web site ([http://www.bls.gov/oes/current/naics4\\_999300.htm#1-0000](http://www.bls.gov/oes/current/naics4_999300.htm#1-0000)) the wage rate category for Local Representatives is estimated to be \$27.81 per hour, with the addition of the 1.46 multiplier, the total wage rate is \$40.60 for completing and submitting the FEMA grant information to FEMA for review and approval. Therefore, the estimated total burden hour cost to Local Representatives is estimated to \$731,206 annually.

**Local** government salaries

[http://www.bls.gov/oes/current/naics4\\_999300.htm#11-0000](http://www.bls.gov/oes/current/naics4_999300.htm#11-0000)

43-0000 [Office and Administrative Support Occupations](#)

43-1011	<a href="#">First-Line Supervisors of Office and Administrative Support Workers</a>	detail	58,270	1.2%	1.09%	\$26.79	\$27.81	\$57,840	0.5%
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**The Standard Forms listed in the table below are used in FEMA administration of grant programs collections of information. These burden estimates are captured under the OMB government-wide collections of information for Standard Forms (SF). Other data collection activities approved by OMB are also identified in the table below.**

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 (\$)
<b>Standard Forms</b>								
State, Local or Tribal Government	Application for Federal Assistance / SF 424	60	1	60	0.75	45	\$40.60	\$1,827
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A	60	1	60	3	180	\$40.60	\$7,308
State, Local or Tribal Government	Assurances - Non-Construction Programs / SF 424B	60	1	60	0.25	15	\$40.60	\$609
State, Local or Tribal Government	Budget Information - Construction Programs / SF 424C	60	1	60	3	180	\$40.60	\$7,308
State, Local or Tribal Government	Assurances - Construction Programs / SF 424D	60	1	60	0.25	15	\$40.60	\$609
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	60	1	60	0.167	10	\$40.60	\$406
State, Local or Tribal Government	Direct Deposit Sign-Up Form / SF 1199A	60	1	60	0.167	10	\$40.60	\$406
<b>Total</b>				<b>420</b>		<b>455</b>		<b>\$18,473</b>
<b>Other Departments/</b>								

Agencies Data Collection Activities								
State, Local or Tribal Government	Biannual Strategy Implementation Report (BSIR) / No Form; FEMA OMB Number 1660-0117	60	2	120				
State, Local or Tribal Government	EHP - Environmental Screening Form / FEMA Form 024-0-1; OMB Number 1660-0115	60	1	60				
State, Local or Tribal Government	Threat and Hazard Identification and Risk Assessment (THIRA) – State Preparedness Report (SPR) Unified Reporting Tool / FEMA Form 008-0-20 (SPR) / FEMA OMB Number 1660-0131	60	1	60				
State, Local or Tribal Government	Homeland Security Exercise & Evaluation Program (HSEEP) After Action Report (AAR) and Improvement Plan (IP) / FEMA Form 091-0; FEMA OMB Number 1660-0118	60	1	60				
<b>Total</b>				<b>300</b>				

**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.**

The total cost to FEMA is \$399,576.50. Approximately 15 staff members with an estimated grade level of GS-13 review and analyze the information collected by these forms.

**Annual Cost to the Federal Government**

Item	Cost (\$)
<b>Contract Costs</b> There are 2 contracts that support this effort: The Technical Assistance and Program Development Contract and the Grant Operations Support Contract. These contracts support the development of the programs & provide guidance/assistance to grantees, collect & review information, and the cost for these contracts are: Technical Assistance and Program Development: \$119,192.00 Grant Operations Support: \$86,880.00 <b>Total: \$206,072.00</b>	\$206,072
<b>Staff Salaries*</b> 15 GS-13, step 1 employees spending approximately 10% of time annually for this administrative and financial data collection] $= 15 \times \$92,145 = \$1,382,175.00 \times 1.46 = \$2,017,975 \times .10 = \$201,797$	\$201,797
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	
<b>Total</b>	<b>\$407,869</b>

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

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

*A "Program increase" is an additional burden resulting from 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
Tribal Homeland Security Grant Program (THSGP) Investment Justification Template / FEMA Form 089-22						
Copy of Application provided to State prior to submission / No Form						
<b>Total(s)</b>						

**Explain:**

There are no changes to the annual hour burden previously reported and there has been no change to the information being collected. However, the Law Enforcement Terrorism Activities (LETPA) are no longer required. Applicants were previously required to dedicate 25% of federal funds awarded, to LETPA. This requirement was entered into Section V. under the investment tabs (this reduces the sections in investment tabs from VI. to V.)

**Itemized Changes in Annual Cost Burden**

**Explain:**

There is no 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 employ the use of statistics or the publication thereof for this information collection.

**17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.**

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.