

May 11, 2020

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 – 0114**

**Title: FEMA Preparedness Grants: Port Security Grant Program (PSGP)**

**Form Number(s): FEMA Form 089-5, FEMA Form 088-0-1**

### General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(i)-(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

#### A. Justification

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.**

The **Port Security Grant Program (PSGP)** is a DHS grant program that focuses on infrastructure protection activities. The PSGP is one tool in the comprehensive set of measures authorized by Congress and implemented by the Administration to strengthen the Nation’s critical infrastructure against risks associated with potential terrorist attacks. The bulk of U.S. critical infrastructure is owned and/or operated by State, local and private sector partners.

The PSGP provides funds to state, local, and private sector partners to support increased port-wide risk management and protect critical surface transportation infrastructure from acts of terrorism, major disasters, and other emergencies. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the PSGP supports the goal to Strengthen National Preparedness and Resilience.

Section 102 of the Maritime Transportation Security Act of 2002, as amended (46 U.S.C. § 70107), authorizes the PSGP to provide for the risk-based allocation of funds to implement Area Maritime Transportation Security Plans and facility security plans among port authorities, facility operators, and State and local government agencies required to provide port security services and to train law enforcement personnel under 46 U.S.C. § 70132.

Before awarding a grant under the program, the Secretary shall provide for review and comment by the appropriate Federal Maritime Security Coordinators and the Maritime Administrator. In administering the grant program, the Secretary shall take into account national economic, energy and strategic defense concerns based upon the most current risk assessments available.” In addition, any information collected by FEMA for this program is in accordance with 46 U.S.C. § 70107(g), as amended by section 112(c) of the Security and Accountability For Every (SAFE) Port Act of 2006 (Pub. L. 109-347), which states: “Any entity subject to an Area Maritime Transportation Security Plan may submit an application for a grant under this section, at such time, in such form, and containing such information and assurances as the Secretary may require”; or in accordance with general reporting requirements, *see, for example*, 2 CFR § 200.328.

**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 024-0-1, Environmental and Historic Preservation 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 and should list and document any potential environmental or historic impact. This collection activity is currently in the OMB process for renewal under OMB Control Number 1660-0115; it currently expires on 4/30/2020.

**FEMA Form 089-5, PSGP Investment Justification** – Submitted with the application, this document provides narrative detail on proposed investments. The Investment Justification must demonstrate how proposed projects address gaps and deficiencies in applicant’s 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 Investment Justification (IJ) is collected to assist decision-making at all levels, although it is used primarily by individual application reviewers. The PSGP uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. Review begins at the local level and the highest scoring applications advance to the national review phase. The National Review Panel (NRP) is comprised of officials from FEMA and United States Coast Guard (USCG). Representatives of other Federal stakeholder agencies such as the Transportation Security Administration (TSA) and U.S. Maritime Administration (MARAD) may also be included. These reviewers then

determine whether proposed activities identified in the application and IJ help achieve core missions of the grant program and formulate recommendations for funding to DHS leadership.

**FEMA Form 088-0-1, – Grant Programs Directorate Performance Report (GPD-PR) –** FEMA has developed a replacement to OMB Form SF-PPR (OMB Control Number 0970-0334) designed to collect programmatic information on the use of grant funding as aligned with regulatory and program legislative requirements. The Report addresses performance measures and the activities identified in the Investment Justifications as necessary. In addition, the information provided in the reports will be used by the grantor agency (FEMA) to monitor grantee cash flow to ensure proper use of Federal funds. These semiannual reports are submitted by the grantee into the Non-Disaster Grants (ND Grants) management system within 30 days after the end of the reporting period (July 30 for the Reporting period of January 1 through June 30; and January 30 for the reporting period of July 1 through December 31). In addition, a final progress report is submitted into ND Grants once the grant work is completed or the grant expires. This collection activity previously was approved under OMB Control Number 0970-0334 (Performance Progress Report, SF-PPR). The SF-PPR is being replaced with the GPD-PR, which is used for the Semiannual Progress Report utilizing the ND Grants management system. The grantee also is provided with a “text box” to narrate their progress if they are unable to complete the form. The regulation supporting the completion of the Performance Reports can be found at: 2 CFR § 200.328.

In addition, grantees still submit their quarterly and final financial status reports into the Payment and Reporting System (PARS). This form (Standard Form 425, OMB Control Number 0348-0061) is the same whether it is for a quarterly submission or final report.

**PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) -**

An MOU or MOA is a cooperative agreement for projects that provide layered security. Layered security projects are those projects that impact/affect agencies and entities other than the applicant, and the applicant has agreed to utilize the project to continue to support other agencies or entities (e.g., Improvised Explosive Device (IED) Response vessel purchased by Fire Department XYZ, Fire Department XYZ has an MOU with ABC Police Department to respond to IED incidents). A number of grantees encounter challenges in obtaining an MOU or MOA due to State and local legislative requirements. In lieu of an MOU/MOA, PSGP also will accept a letter from the Captain of the Port stating that the agency/entity is noted within the Area Maritime Security Plan as a layered security provider. An MOU/MOA may not be required for the grantee included in the Area Maritime Security Plan. An MOU or MOA is used by FEMA as assurance that an agreement exists between port partners for layered security projects funded by FEMA. This helps to ensure minimal redundancies where no redundancies are needed, and to minimize duplicative project funding requests in areas where funded capabilities already exist. The MOU/MOA is not a formal template, but rather a suggested format, and does not have a required format. This information may be provided using one of the attachment fields within <https://portal.fema.gov>. FEMA provides an optional Sample MOU/MOA Template for usage. The MOU/MOA is listed in the PSGP program guidance, which is accessible at: <https://www.fema.gov/port-security-grant-program>.

**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 AAR and IP are prepared for each exercise conducted with FEMA support. This information must be submitted to 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 July 31, 2020.

**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 submission of information for the PSGP involves the use of electronic means. All applicants submit through [www.grants.gov](http://www.grants.gov) and upload their Investment Justification and all other required documents as file attachments (in MS Word or other electronic format) into ND Grants System at <https://portal.fema.gov>. This system is approved under OMB Control number 1660-0025, which expires on January 31, 2021. In addition, the grantee submits their quarterly and final financial status reports into the PARS system.

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

The information retained from the previous version of the Form 089-5 IJ template is generally not collected in any other form. Some information, specifically the geographic location of a project may be duplicative of FEMA Form 024-0-1 (EHP), however not to the level of granularity required by EHP. Additionally, an EHP form is not required of every project, thereby necessitating a project location to be identified within Form 089-5. Additional information added to this form includes the detailed budget worksheet. A detailed budget worksheet is required of each applicant; however, a standardized detailed budget worksheet is not currently required. Applicants may use an optional FEMA provided detailed budget worksheet or provide required information in their own format. Lacking a standard detailed budget form, duplicative and/or inconsistent information may be provided. The revised investment justification template will incorporate standard required budget detail and minimize duplicated information. Applicants will no longer be required to provide non-standardized detailed budget worksheets. Although at first glance this form appears to be lengthier than the previous version, it streamlines the information collection and application review process by

consolidating required information from two forms into this single form. Approximately 570 applicants submit this form per year.

Information previously collected in the OMB SF-PPR will be collected in the new FEMA Form 088-0-1, GPD-PR. The GPD-PR will replace the SF-PPR including specialized language to solicit responses necessary to demonstrate performance associated with GPD grants. Approximately 296 grants are awarded under PSGP in any given year and this form is required twice per year and one final report at the end of the period of performance of awards.

**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.**

Between 2017 and 2019, FEMA received PSGP applications from an average of 12 businesses per year and an average of 452 government entities per year. No methods are used to minimize the impact on small businesses or entities because the entirety of the collection meets legislative or regulatory requirements previously noted. Additionally, the PSGP is a competitively administered discretionary grant. Due to the competitive nature of the program, consistent application requirements are necessary to ensure fair and reasonable administration of awards.

**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.**

These data collection elements are required in order to exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. The IJ template supports Section 102 of the Maritime Transportation Security Act of 2002, as amended (46 U.S.C. § 70107), by allowing FEMA to ensure funding awarded to eligible entities in accordance with legislation and program guidance. The GPD-PR supports regulatory guidance and reporting options in 2 CFR § 200.328 and allows FEMA to verify grant performance.

**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 collection elements are required 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.**

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.**

Records must be retained for at least three years or longer in accordance with 2 CFR § 200.333.

**(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 Feb 11, 2020, 85 FR 7779. **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on May 14, 2020, 85 FR 28970. **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 American Association of Port Authorities (AAPA) national association and other public/non-profit maritime organizations, as well as past and current grantee recipients, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are widely used in advance of submission deadlines. These consultations focus on the nature of information needed by FEMA to manage the grant programs as well as sharing FEMA/DHS mission priorities for PSGP.

FEMA consults on a regular basis with Federal, State, local, tribal stakeholders, private for-profit and non-profit entities on a variety of issues, particularly on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by FEMA to administer and manage the grant programs. Partners offer comments and suggestions about their reporting practices.

Previous recommendations or comments provided most commonly are the challenges with submitting progress reports into the ND Grants system. This issue has been corrected by the ND Grants systems staff. Most recently, a common concern noted from applicants was the difficulty in using Investment Justification (IJ) in the required Adobe format, in which users were unable to save information in the provided template. One solution to this challenge is to provide this revised IJ template in Excel format as currently submitted for consideration in this collection.

**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, particularly on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. A common concern noted from applicants was the difficulty in using Investment Justification (IJ) in the required Adobe format, in which users were unable to save information in the provided template. One solution to this challenge is to provide this revised IJ template in Excel format as currently submitted for consideration in this collection.

**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) form was approved on May 26, 2020.

The PSGP Investment Justification, FEMA Form 089-5 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 PSGP is an existing grant program that uses the forms outlined in this collection. The bulk of U.S. critical infrastructure is owned and/or operated by State, local and private sector partners.

The PSGP provides funds to state, local, and private sector partners to support increased port-wide risk management and protect critical surface transportation infrastructure from acts of terrorism, major disasters, and other emergencies. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the PSGP supports the goal to Strengthen National Preparedness and Resilience.



The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The total burden to collect the necessary information is estimated to be 17,450 total annual burden hours. This total is based on an average 570 applications received per year and 296 grants awarded each year.

**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. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State, Local, or Tribal Government	PSGP Investment Justification / FEMA Form 089-5	570	2	1,140	15.0	17,100	\$81.97	\$1,401,687
State, Local, or Tribal Government	FEMA Form – FEMA Form 088-0-1, Grant Programs Directorate Performance Report (GPD-PR)	296	2	592	0.5	296	\$81.97	\$24,263
State, Local, or Tribal	PSGP - Memorandum of	27	1	27	2.0	54	\$81.97	\$4,426

Government	Understanding (MOU) or Memorandum of Agreement (MOA)							
<b>Total</b>		<b>893</b>		<b>1,759</b>		<b>17,450</b>		<b>\$1,430,377</b>

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.6<sup>1</sup>. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.6, 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 wage rate for Administrative Services Manager (Standard Occupational Classification 11-3010) is \$51.23. Including the wage rate multiplier of 1.6, the fully-loaded wage rate is estimated at \$81.97 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$1,430,377 (\$81.97 x 17,450 hours = \$1,430,376.50).

**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. Note that the higher rate of \$65.66 (mean Local wage rate) by default since the majority of applications received are from local government entities.**

Port Security Grant Program (PSGP) (97.056)								
Standard Forms								
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,	Application for Federal Assistance / SF 424 Grants.gov	570	1	570	1.0	570	\$30.00	\$17,100

<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 May 8, 2020. 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

<sup>2</sup> Information on the mean wage rate from the U.S. Department of Labor is available online at: <https://www.bls.gov/oes/tables.htm>.

Business or other for-profit	OMB Control # 4040-0001							
State, Local or Tribal Government, Business or other for-profit	Budget Information - Non-Construction Programs / SF 424A Grants.gov OMB Control # 4040-0006	570	1	570	1.0	570	\$30.00	\$17,100
State, Local or Tribal Government, Business or other for-profit	Assurances - Non-Construction Programs / SF 424B Grants.gov OMB Control # 4040-0007	570	1	570	0.50	285	\$30.00	\$8,550
State, Local or Tribal Government, Business or other for-profit	Budget Information - Construction Programs / SF 424C Grants.gov OMB Control # 4040-0008	100	1	100	1	100	\$30.00	\$3,000
State, Local or Tribal Government, Business or other for-profit	Assurances - Construction Programs / SF 424D Grants.gov OMB Control # 4040-0009	100	1	100	0.5	50	\$30.00	\$1,500
State, Local or Tribal Government, Business or other for-profit	Disclosure of Lobbying Activities / SF LLL Grants.gov OMB Control # 4040-0013	570	1	570	1.0	570	\$30.00	\$17,100
State, Local or Tribal Government, Business or other for-profit	Direct Deposit Sign-Up Form / SF 1199A Dept. of Treasury OMB	296	1	296	0.1667	49.34	\$24.98	\$1,233

	Control # 1530-0006							
State, Local or Tribal Govern- ment, Business or other for-profit	Federal Financial Report / SF 425 Grants.gov OMB Control # 4040-0014	296	4	1,184	1	1,184	\$30.00	\$35,520
Total		2,776		3,960		3,378		101,103

Other FEMA Forms Used, but Captured in Other Information Collections								
State, Local or Tribal Govern- ment, Business or other for-profit	EHP - Environment al Screening Form / FEMA Form 024-0-1, OMB Control # 1660-0115	200	2	400	8.0	3,200	\$49.77	\$159,264
State, Local or Tribal Govern- ment, Business or other for-profit	Homeland Security Exercise & Evaluation Program (HSEEP) After Action Report (AAR) and Improve- ment Plan (IP) / FEMA Form 091-0 OMB Control # 1660-0118	20	1	20	40.0	800	\$64.42	\$51,536
Total				420		4,000		\$210,800

**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:**

- 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. All applications and recipient reports are sent and stored electronically.

**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>	
<b>Item</b>	<b>Cost (\$)</b>
Contract Costs	
Staff Salaries [11 GS-13, step 3 employees spending approximately 60% of time annually for this administrative and financial data collection] $11 \times \$109,508 \times 0.60 \times 1.46^2$	\$1,055,219
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>\$1,055,219</b>
<small><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/20Tables/html/DCB.aspx">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx</a>. Accessed January 28, 2020.</small>	
<small><sup>2</sup> Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.</small>	

The total cost to FEMA is \$1,055,219. Approximately 11 staff members with an estimated average grade level of GS-13 step 3 will commit 60 percent of their time annually to review and analyze the information collected by this program. The previous submission did not include the 1.46 multiplier in the estimate. The addition of 1 staff member, annual wage increases, and 1.46 multiplier increased the reflected cost to FEMA.

**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
PSGP Investment Justification / FEMA Form 089-5	12,900	12,900	0	0	0	0
FEMA Form – 088-0-1, Grant Programs Directorate Performance Report (GPD-PR)	0	0	0	0	251	251
PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA)	136	42	-94			
<b>Total(s)</b>	13,036	12,942	-94	0	251	251

**Explain:**

The total increase of 157 in burden hours from the last renewal resulted from both program changes and from adjustments. The program changes resulted from PSGP adding the GPD-PR form, FEMA Form 088-0-1. This form takes the place of the previously used SF-PPR.

The adjustments resulted from the number of respondents changing. Specifically, respondents to FEMA Form 089-5 remained the same, but the number of respondents to the MOU decreased by 47 since the last renewal.

FEMA Form 089-5 has changed to incorporate detailed budget information that is required to accurately complete the form. The burden for the detailed budget information was captured in the last renewal. Only the format for presenting that information has changed in this renewal.

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
PSGP Investment Justification/ FEMA Form 089-5	\$0	\$0	\$0	\$781,636	\$960,405	\$178,769
FEMA Form – 088-0-1, Grant Programs Directorate Performance Report (GPD-PR)	\$0	\$0	\$0	\$0	\$0	\$0
PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA)	\$0	\$0	\$0	\$2,456	3,127	\$581
<b>Total(s)</b>	\$0	\$0	\$0	\$784,182	\$963,532	\$179,350

**Explain:**

Wage rates have slightly increased since the previous review. These higher wage rates have caused a cost increase of \$179,350.

**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.