

April 30, 2020

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: [1660-0005](#)

Title: FEMA Inspection and Claims Forms

Form Number(s):

Retaining: [086-0-6](#), [086-0-7](#), [086-0-9](#), [086-0-10](#), [086-0-11](#), [086-0-17](#)

Removing: [086-0-8](#), [086-0-12](#), [086-0-13](#), [086-0-14](#), [086-0-15](#), [086-0-16](#), [086-0-18](#), [086-0-19](#), [086-0-20](#), [086-0-21](#)

Adding: 086-0-22 Proof of Loss - Building & Contents (Adjuster-Prepared), 086-0-23 Advance Payment Request - Building & Contents, 086-0-24 Advance Payment Request - Increased Cost of Compliance, 086-0-25 Claim Appeal, 009-0-143 Onsite Housing Inspections, 009-0-144 Remote Voice Telephony Housing Inspections, 009-0-145 Remote Video Telephony Housing Inspections

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(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

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.

Claims Forms

Congress created the National Flood Insurance Program (NFIP) through enactment of the National Flood Insurance Act of 1968 (NFIA) (Title XIII of Pub. L. 90-448, 82 Stat. 476), codified at 42 USC 4001 et seq. The NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for state and community floodplain management requirements that reduce the risk of future flood damages. Communities participate in the NFIP based on an agreement between the community and FEMA. If a community adopts and enforces a

floodplain management ordinance to reduce future flood risk to new construction in floodplains, FEMA will make flood insurance available within the community as a financial protection against flood losses. Accordingly, the NFIP is comprised of three key activities: flood insurance, floodplain management and flood hazard mapping.

A prospective policyholder may purchase an NFIP flood insurance policy either: (1) directly from the Federal Government through a direct servicing agent (referred to as “NFIP Direct”), or (2) from a participating private insurance company through the Write Your Own (WYO) Program. The Standard Flood Insurance Policy (SFIP) sets out the terms and conditions of insurance. See 44 CFR Part 61, Appendix A. FEMA establishes terms, rate structures, and premium costs of SFIPs. The terms, coverage limits, and flood insurance premiums are the same whether purchased from the NFIP Direct or the WYO Program. See 44 CFR 62.23(a).

All flood loss claims presented under the NFIP are paid directly with U.S. Treasury funds, regardless of whether the policy is issued by the government (FEMA) directly or by a WYO company. The information in this collection includes all the data necessary to adjudicate claims for damages and benefits resulting from flood losses.

In addition to the requirements of the NFIA, section 205 of the Bunning-Bereuter-Blumenauer Flood Insurance Reform Act of 2004 (42 USC 4011 note) required FEMA to establish a claims appeals process. FEMA implemented the claim appeal process at 44 CFR 62.20.

Inspection Instruments

Pertaining to housing inspections, the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended, is the legal basis for the Federal Emergency Management Agency (FEMA) to provide financial assistance and services to individuals applying for disaster assistance benefits in the event of a federally declared disaster. Regulations in 44 CFR, § 206.110 - Federal Assistance to Individuals and Households implement the policy and procedures set forth in Section 408 of the Stafford Act, 42 U.S.C. 5174, as amended.

This program provides financial assistance and, if necessary, direct assistance to eligible individuals and households who, as a direct result of a major disaster or emergency, have uninsured or under-insured, necessary expenses and serious needs, and are unable to meet such expenses or needs through other means.

Individuals and households applying for assistance must provide information detailing their losses and needs through the disaster assistance registration process covered under collection 1660-0002, *Disaster Assistance Registration*. If FEMA determines the applicant had home or personal property damage, has no insurance, or that the applicant’s insurance coverage may not meet their needs, an inspection is issued to verify disaster caused damage.

All pertinent information for a specific applicant is stored under a unique registration identification (ID) within the National Emergency Management Information System (NEMIS). An inspection request occurs due to NEMIS-driven business rules (automatically), applicant request, or FEMA caseworker request. The scope of an inspection for owners includes noting real and personal property (furnishing and appliances) damages to the interior and exterior of the dwelling, addressing special needs, transportation, unmet needs, and miscellaneous purchases. Inspectors do not note real property specifications for renters.

Once the inspector validates the information provided by the applicant during registration intake, the inspector begins an assessment of real and/or personal property damages utilizing Automated Construction Estimator (ACE) software. The same ACE software screens are used regardless of how the inspection occurs (i.e., via onsite, via voice over the phone, or via video). The inspector then uploads this information back to FEMA via the NEMIS through use of a secure connection. The inspector only records observed disaster caused damages and does not determine eligibility or damage award levels. FEMA’s policies and business rules determine eligibility and award levels based upon the damage assessment, and other available information.

- 1. 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.**

Claims Forms

In case of a flood loss to insured property, the Standard Flood Insurance Policy (SFIP) requires NFIP policyholders to submit certain information to their flood insurer. *See* SFIP Sec. VII.J, 44 CFR Part 61, App. A. NFIP policyholders with policies issued by NFIP Direct use the forms described in this document to collect/provide the information needed to meet these requirements – to notify, investigate, document, evaluate and proffer claims against NFIP policies.

Since the last PRA submission of this collection in 2017 (ICR Reference No: [201704-1660-001](#)), FEMA determined that 10 of the 16 current forms do not qualify as “collections of information” under the PRA, as defined at 44 USC 3502(3), because the disclosure requirements satisfied by these forms are not imposed on the public but rather claims adjusters contracted by the NFIP Direct servicing agent. These adjusters are considered “agencies, instrumentalities or employees of the United States” for the purposes of the PRA.

The SFIP expressly places the obligation to submit and prove a claim on the policyholder alone. However, NFIP Direct-hired claims adjusters assist policyholders with meeting these obligations as a matter of courtesy. *See* SFIP VII.J.5. Adjusters are not in privity of contract with the policyholder and have no contractual obligation to submit, investigate or prove a claim on behalf of a policyholder. Adjusters’ responsibility is to investigate claims on behalf of the insurer.

After flooding events, NFIP insurers assign flood claims to adjusters and provide them with policyholder information already available in their underwriting records. This information was originally provided to NFIP insurers by the policyholder when they applied for a flood policy with their insurance agent. NFIP insurers periodically update their records when new information is learned or provided by policyholders during the policy renewal process. At the time of a flood loss, policyholder information is considered to be previously collected information.

During the investigation of a claim, adjusters verify that this information is correct. Therefore, there is no new collection of policyholder information by adjusters, unless the previously provided (collected) information was incorrect, which would warrant notification to the NFIP insurer so they can update their underwriting records. All other information/data gathered (collected) by adjusters during the investigation of a claim pertains to the adjustment process of determining the quantity (scope) and amount (cost) of flood-damaged property or benefits

payable under the SFIP, which is necessary to adjudicate claims for damages and benefits resulting from NFIP flood losses.

The 10 current claims forms that adjusters are responsible for preparing and submitting are: (a) [086-0-8](#), (b) [086-0-12](#), (c) [086-0-13](#), (d) [086-0-14](#), (e) [086-0-15](#), (f) [086-0-16](#), (g) [086-0-18](#), (h) [086-0-19](#), (i) [086-0-20](#), (j) [086-0-21](#). Adjusters are tasked with completing these forms, some of which collect previously collected (duplicative) policyholder information already in the records of an NFIP insurer or information that has nothing to do with submitting, investigating or proving a claim. All the burden to complete these forms is on the adjuster. Individual policyholders never see or complete these forms and are not required to do so in the SFIP. Therefore, there is no time or cost burden to the policyholder. As such, FEMA proposes to remove these 10 forms from the collection (see explanations below and in section 4 of this Supporting Statement).

Note: [086-0-12](#) was previously-proposed for removal (from the collection) and deleted from FEMA's library as part of the 2017 PRA submission (ICR Reference No: [201704-1660-001](#)).

Regarding the remaining six current claims forms being retained: (a) [086-0-6](#), (b) [086-0-7](#), (c) [086-0-9](#), (d) [086-0-10](#), (e) [086-0-11](#) and (f) [086-0-17](#), FEMA has made substantive enhancements to make each form more customer friendly. Unlike previous versions, these revised forms are specifically targeted for NFIP Direct policyholders. They are interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing each form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to properly submit, investigate and prove a claim without the assistance of a third-party claims adjuster, thereby complying with their obligations under the SFIP.

The following is a description of each revised claim form and its purpose:

- (1) **FEMA Form 086-0-6; Personal Property (Contents) Worksheet**, formerly [Worksheet - Contents - Personal Property](#)
NFIP Direct policyholders use this form to list the inventory of flood-damaged personal property (also known as contents), which includes the quantity, description, actual cash value and amount of loss as required by the SFIP sections VII.J.3. and VII.J.4.i. Additionally, in compliance with their duties to document the damages after a flood loss, policyholders take photographs of items listed on this worksheet to support the existence of and verify damage to personal property being claimed.
- (2) **FEMA Form 086-0-7; Building Property Worksheet**, formerly [Worksheet - Building](#)
NFIP Direct policyholders use this form to provide specifications of the damaged building(s) and a detailed repair estimate, which includes an inventory of the flood-damaged building property showing the quantity, description, actual cash value, and amount of loss as required by the SFIP in sections VII.J.3. and VII.J.4.f. Additionally, in compliance with their duties to document the damages after a flood loss, policyholders take photographs of items listed on this worksheet to support the existence of and verify damage to building property being claimed.
- (3) **FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared)**, formerly [Proof of Loss](#)

NFIP Direct policyholders use this form to provide a Proof of Loss to their insurer, which is the policyholder's statement of the amount of money being requested, signed and sworn to by the policyholder, with documentation to support the amount requested as required by SFIP section VII.J.4.

- (4) **FEMA Form 086-0-10; Proof of Loss - Increased Cost of Compliance (ICC)**, formerly [Increased Cost of Compliance Proof of Loss](#)
NFIP Direct policyholders use this form to provide a Proof of Loss to their insurer, which is the policyholder's statement of the amount claimed under Increased Cost of Compliance (ICC), signed and sworn to by the policyholder, with documentation to support the amount requested as required by SFIP section VII.J.4. This form supports calculations to determine the amount of insurance coverage for mitigation activities.
- (5) **FEMA Form 086-0-11; First Notice of Loss**, formerly [Notice of Loss](#)
NFIP Direct policyholders use this form to give prompt written notice of a flood loss to their NFIP insurer as required by SFIP section VII.J.1. This form includes information to aid a policyholder with reporting the loss.
- (6) **FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet**
NFIP Direct policyholders use this form provide specifications of the damaged building(s) and a detailed repair estimate, which includes an inventory of the flood-damaged building property showing the quantity, description, actual cash value and amount of loss as required by the SFIP in sections VII.J.3. and VII.J.4.f. Additionally, in compliance with their duties to document the damages after a flood loss, policyholders take photographs of items listed on this worksheet to support the existence of and verify damage to building property being claimed.

FEMA has created four new claims forms that will further support a policyholder's compliance with their duties after a flood loss. These new forms will be available electronically online. The following is a description of each new claim form and its purpose:

- (1) **FEMA Form 086-0-22; Proof of Loss - Building & Contents (Adjuster-Prepared)**
NFIP Direct policyholders can use this form to assist the adjuster with providing a Proof of Loss to their insurer, which is the policyholder's statement of the amount of money being requested, signed and sworn to by the policyholder, with documentation to support the amount requested as required by SFIP section VII.J.4. This form is used when the adjuster prepares the Proof of Loss as a courtesy to the policyholder, who then reviews and verifies the accuracy of the information and amounts. By signing and dating this Proof of Loss, the policyholder validates and agrees with the amounts prepared by the adjuster.
- (2) **FEMA Form 086-0-23; Advance Payment Request - Building & Contents**
This form will be used by an NFIP Direct policyholder to request an advance payment of the total claim payment for flood damage to eligible insured building property and personal property (if this coverage was purchased). FEMA authorizes advance payments for catastrophic flooding events to ensure fast payments to policyholders while the full adjustment of their claim is processed.
- (3) **FEMA Form 086-0-24; Advance Payment Request - Increased Cost of Compliance (ICC)**

This form will be used by an NFIP Direct policyholder to request an advance payment of the total benefits payable under Increased Cost of Compliance coverage.

(4) **FEMA Form 086-0-25; Claim Appeal**, formerly [NFIP Claims Appeal](#)

As part of the 2017 PRA collection (ICR Reference No: [201704-1660-001](#)), the NFIP Claims Appeal Process was established after being consolidated into this collection from an previous collection ([1660-0095](#)). The [NFIP Flood Insurance Claims Handbook](#) (Handbook) is FEMA's reference for NFIP policyholders to obtain information and instructions on how to submit an appeal of their flood claim. The process by which NFIP policyholders submit an appeal is explained in the Handbook on pages 8-12 of the English version (FEMA F-687) and pages 14-18 of the Spanish version (FEMA F-687S). Policyholders must read and interpret this information and then write a letter to FEMA explaining the nature of their appeal, the names and titles of contact persons, contact information and the details of the issues relevant to their appeal. Policyholders are also required to state the basis for their appeal and submit supporting documentation, including a copy of the insurer's written denial, in whole or in part, of the claim, and photographs (if applicable to the appeal issue). FEMA determined that NFIP policyholders found this process to be confusing, which made it difficult for a lay person to successfully present a proper appeal. As such, FEMA created this new form to replace the NFIP Flood Insurance Claims Handbook in the collection. This new form is interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages where applicable to make it easier for NFIP policyholders to submit an appeal, rather than interpreting what information is needed from the Handbook.

Inspection Instruments

The information gathered through use of the housing inspection instruments added to this collection (*Onsite, Remote Voice, Remote Video*) is used by FEMA to determine eligibility and award levels based upon damage assessment, and other available pertinent information. The FEMA inspector does not determine an applicant's eligibility for disaster assistance. The same ACE inspection software screens are utilized for each inspection type regardless of how the inspection occurs (i.e., via onsite, via voice over the phone, or via video).

During the inspection, the FEMA inspector assesses damage to the disaster-damaged primary residence and personal property such as furniture, appliances, vehicles, and essential equipment for daily household needs.

Individuals and Households Program (IHP) Assistance may be awarded if, during inspection, the inspector determines the damage was caused by the disaster and affects the functionality of the home.

Specifically, the FEMA inspector verifies the applicant's name, address, contact information, and insurance; verifies the applicant's proof of ownership and occupancy status, if not able to verify through automated public records search; and confirms individuals living in the disaster-damaged residence, bedrooms occupied, clothing, medical, dental, transportation, or miscellaneous losses, and items purchased as a result of the disaster (e.g., chainsaw, dehumidifier, etc.).

The following is a description of each new housing inspection instrument and its purpose:

- (1) FEMA Form 009-0-143; Onsite Housing Inspections** – This instrument covers FEMA’s standard loss verification method for initial eligibility determination; an on-site inspection by a FEMA inspector utilizing ACE inspection software. The FEMA inspector photographs damage during the onsite inspection to document disaster-caused losses rendering the applicant's residence uninhabitable, unsafe, or inaccessible; however, FEMA inspectors will not physically inspect areas unsafe for access. Applicants who cannot meet the inspector onsite may write to FEMA authorizing a third party over the age of 18 (e.g., neighbor, landlord) to attend the inspection on their behalf. Applicants whose pre-disaster residence is inaccessible may meet the FEMA inspector at an alternate location. Applicants with disabilities will be provided qualified sign language interpreters and other accommodations for inspections. All inspection information will be collected within FEMA’s ACE inspection software application and stored in NEMIS.
- (2) FEMA Form 009-0-144; Remote Voice Telephony Housing Inspections** – This instrument covers the use of remote voice telephonic inspection, which arose as a result of COVID-19 and CDC guidance relating to social distancing as an alternative to traditional onsite inspections. This FEMA mission critical decision was in response to FEMA Interim Policy FP 104-009-17, authorizing remote inspections until onsite inspections resume. This process allows FEMA inspectors to remotely conduct the inspection via telephone, assuming the disaster survivor or approved third party knows the extent of disaster caused damage to the damaged residence and is willing to conduct the inspection remotely. All program required information will be exchanged or verified verbally to the extent authorized by IHP. The FEMA inspector will not ask the applicant to convey sensitive PII as part of the remote telephonic inspection. All inspection information will continue to only be collected within the same ACE inspection software application, utilizing the same ACE screens as onsite and video inspections, and stored in NEMIS. If the applicant or approved third party does not know the extent of disaster caused damage to the residence or is not willing to conduct a remote inspection, the inspection will be held until pandemic restrictions are lifted or further options are available.
- (3) FEMA Form 009-0-145; Remote Video Telephony Housing Inspections** – This instrument covers the potential use of remote video to conduct housing inspections, which arose as a result of COVID-19 and CDC guidance relating to social distancing as an alternative to traditional onsite inspections until pandemic situation allows for a return to normal FEMA inspection operations. The use of video allows FEMA inspectors to remotely conduct the inspection if the disaster survivor or approved third party has access to a smart phone or tablet and is willing to conduct the inspection remotely. The applicant may utilize technical assistance and/or devices of friends or family members to facilitate the remote inspection via video conference. The video will not be recorded, and no audio or video will be captured or housed in any way. All information will be exchanged verbally or through visual analysis to the extent authorized by IHP. The FEMA inspector will not ask the applicant to display any documents containing PII as part of the video process. All inspection information will continue to only be collected within the same ACE inspection software application, utilizing the same ACE screens as an onsite and voice inspections, and stored in NEMIS. If the applicant or approved third party does not have access to technology/resources to support a remote visual inspection or is not willing to conduct a remote visual inspection, the inspection will be conducted via remote telephone interview or will be returned and held until pandemic restrictions are lifted or further options are available.

With these revisions and additions, FEMA proposes to rename the current IC Titles and Form Names to make it clear that these 13 forms/instruments are specifically targeted for policyholders for NFIP claims and applicants for Individuals and Households Program (IHP) Assistance. See the proposed revisions in the chart below:

Information Collection (IC) List				
Current IC Title (2017)	Proposed IC Title (2020)	Form No.	Current Form Name (2017)	Proposed Form Name (2020)
National Flood Insurance Program Worksheet-Contents-Personal Property Worksheet - Building	Personal Property (Contents) Worksheet	086-0-6	Worksheet-Contents-Personal Property	Personal Property (Contents) Worksheet
	Building Property Worksheet	086-0-7	Worksheet-Building	Building Property Worksheet
Proof of Loss	Proof of Loss - Building & Contents (Policyholder-Prepared)	086-0-9	Proof of Loss	Proof of Loss - Building & Contents (Policyholder-Prepared)
Increase of Compliance Proof of Loss	Proof of Loss - Increased Cost of Compliance (ICC)	086-0-10	Increased Cost of Compliance Proof of Loss	Proof of Loss - Increased Cost of Compliance (ICC)
Notice of Loss	First Notice of Loss	086-0-11	Notice of Loss	First Notice of Loss
Manufactured (Mobile) Home/Travel Trailer Worksheet	Manufactured (Mobile) Home-Travel Trailer Worksheet	086-0-17	Manufactured (Mobile) Home-Travel Trailer Worksheet	Manufactured (Mobile) Home/Travel Trailer Worksheet
Not in current collection	Proof of Loss - Building & Contents (Adjuster-Prepared)	086-0-22	Not in current collection	Proof of Loss - Building & Contents (Adjuster-Prepared)
Not in current collection	Advance Payment Request - Building & Contents	086-0-23	Not in current collection	Advance Payment Request - Building & Contents
Not in current collection	Advance Payment Request - Increased Cost of Compliance (ICC)	086-0-24	Not in current collection	Advance Payment Request - Increased Cost of Compliance (ICC)
NFIP Claims Appeal	Claim Appeal	086-0-25	NFIP Flood Insurance Claims Handbook	Claim Appeal
Not in current collection	Onsite Housing Inspections	009-0-143	Not in current collection	Onsite Housing Inspections
Not in current collection	Remote Voice Telephony Housing Inspections	009-0-144	Not in current collection	Remote Voice Telephony Housing Inspections
Not in current collection	Remote Video Telephony Housing Inspections	009-0-145	Not in current collection	Remote Video Telephony Housing Inspections

- 2. 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.**

Claims Forms

All current NFIP claim forms are accessible to NFIP Direct policyholders online at <http://www.fema.gov/national-flood-insurance-program/claims-adjuster-forms>. FEMA intends to rename the title of this page to “NFIP Claim Forms for Policyholders.”

The current NFIP Flood Insurance Claims Handbooks (English and Spanish) are accessible online at <https://www.fema.gov/media-library/assets/documents/6659>. Upon OMB approval, the four new claims forms will be accessible to NFIP policyholders online.

The electronically available forms may be downloaded by NFIP Direct policyholders and used to report a claim, develop an inventory of damaged property and provide an assessment of the

amount of the loss. Once a policyholder has gathered sufficient documentation to prove their loss (e.g., completed forms, damage estimate(s), supporting documentation, photographs, signed Proof of Loss form (e.g., 086-0-9, 086-0-10, 086-0-22)), the policyholder can mail, fax or email the documents and photos to their NFIP insurer, who reviews the documents and photos to verify the validity of the claim and then issues payment for final disposition, accordingly.

Information on filing a claim and supplying the Proof of Loss form can be found at <https://www.fema.gov/nfip-file-your-claim>, as well as the NFIP Flood Insurance Claims Handbook, which is given out to policyholders at the adjuster's initial visit. An NFIP Direct policyholder must sign a Proof of Loss form and return it to their NFIP insurer for processing.

Inspection Instruments

For the housing inspection instruments (009-0-143 Onsite, 009-0-144 Remote Voice, 009-0-145 Remote Video), damage assessment data is entered into ACE by the FEMA inspector, then uploaded into NEMIS.

The same ACE screens are utilized for each inspection type. NEMIS is an integrated database system which uses business rules to determine eligibility and award levels based upon damage assessments and IHP policies.

- 3. 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.**

Claims Forms

As part of this 2020 PRA collection revision, the following forms have been identified as collecting duplicative information and are proposed for removal from the collection and deletion from FEMA's library:

- (1) [FEMA Form 086-0-8; Worksheet - Building \(Continued\)](#)

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-7; Building Property Worksheet, thereby reducing duplicative information collection.

- (2) [FEMA Form 086-0-12; Statement as to Full Cost to Repair or Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy](#)

This form was removed from the previous 2017 PRA collection (ICR Reference No: [201704-1660-001](#)) as all necessary data collected on this form was incorporated into the previously-revised [FEMA Form 086-0-9; Proof of Loss](#), thereby reducing duplicative information collection. This same information is being collected in newly revised FEMA Form 086-0-9; Proof of Loss (Policyholder-Prepared) and newly created FEMA Form 086-0-22; Proof of Loss (Adjuster-Prepared).

- (3) [FEMA Form 086-0-13; National Flood Insurance Program Preliminary Report](#)

This form is proposed for removal from the collection for the following reasons: (a) all necessary data collected on this form has been incorporated into the newly-revised FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared) and newly created FEMA Form 086-0-22; Proof of Loss - Building & Contents (Adjuster-Prepared), or

(b) data is not required to be collected. The SFIP places no burden on individual policyholders to provide the information on this form as a condition necessary to payment of an NFIP claim. Claims adjusters, while acting as instrumentalities of the Federal Government, are solely responsible for completing this form and collecting information related to flood losses during the adjustment process of a flood claim. As such, removal of this form reduces duplicative information collection.

(4) [FEMA Form 086-0-14; National Flood Insurance Program Final Report](#)

This form is proposed for removal from the collection for the same reasons as described in (3) above.

(5) [FEMA Form 086-0-15; National Flood Insurance Program Narrative Report](#)

This form is proposed for removal from the collection for the same reasons as described in (3) above.

(6) [FEMA Form 086-0-16; Cause of Loss and Subrogation Report](#)

This form is proposed for removal from the collection for the same reasons as described in (3) above.

(7) [FEMA Form 086-0-18; Manufactured \(Mobile\) Home/Travel Trailer Worksheet \(Continued\)](#)

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, thereby reducing duplicative information collection.

(8) [FEMA Form 086-0-19; Increased Cost of Compliance \(ICC\) Report](#)

This form is proposed for removal from the collection for the following reasons: (a) all necessary data collected on this form has been incorporated into the newly-revised FEMA Form 086-0-10; Proof of Loss - Increased Cost of Compliance (ICC), or (b) data is not required to be collected. The SFIP does not require individual policyholders to provide much of the information on this form as a condition necessary to payment of an NFIP claim. Claims adjusters, acting as instrumentalities of the Federal Government, are solely responsible for completing this form and collecting information related to flood losses during the adjustment process of a flood claim. As such, removal of this form reduces duplicative information collection.

(9) [FEMA Form 086-0-20; Adjuster Preliminary Damage Assessment](#)

This form is proposed for removal from the collection for the same reasons as described in (3) above.

(10) [FEMA Form 086-0-21; Adjuster Certification Application](#)

This form is proposed for removal from the collection because it does not solicit information from the public, but rather from adjusters contracted with NFIP Direct. Additionally, the data is not required to be collected from policyholders in the SFIP. This form collects information regarding an adjuster's education, training and experience for the purpose of determining the adjuster's qualifications for adjusting flood claims. None of this has anything to do with a NFIP policyholder submitting, investigating or proving their claim. The SFIP places no burden on individual policyholders to provide any of the information on

this form as a condition necessary for payment of an NFIP claim. As such, removal of this form reduces unnecessary information collection.

Inspection Instruments

(11) FEMA Form 009-0-143; Onsite Inspections

(12) FEMA Form 009-0-144; Remote Voice Inspections

(13) FEMA Form 009-0-145; Remote Video Inspections

Pertaining to the housing inspection instruments (*009-0-143 Onsite, 009-0-144 Remote Voice, 009-0-145 Remote Video*), the applicant's registration data initially gathered in 1660-0002, *Disaster Assistance Registration* is verified during the housing inspection. Specific registration data automatically populates in ACE from NEMIS. The actual damage assessment information gathered during the housing inspection is not collected in any other form, and therefore is not duplicated elsewhere.

- 4. 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.**

Claims Forms

In the month of March 2017, the NFIP had 268,158 (3 percent of program total) non-residential contracts. Of these, about 20 percent were contracts on small businesses (approximately 53,000 total policies). FEMA minimizes the burden on these small businesses and other small entities by providing claims adjusters to assist them with submitting the required information at no additional cost to the policyholder.

Inspection Instruments

The information gathered through use of the housing inspection instruments (*009-0-143 Onsite, 009-0-144 Remote Voice, 009-0-145 Remote Video*) does not impact small business or other small entities.

- 5. 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.**

Claims Forms

The information is required to investigate, evaluate, document and determine the amount of the claim payment owed to a policyholder when a loss occurs. Without this collection, the NFIP could not operate and could not provide necessary flood insurance coverage and claims payments to property owners in communities participating in the NFIP. Further, FEMA would not be able to formally initiate, evaluate and process an NFIP policyholder's appeal.

Inspection Instruments

The damage assessment information gathered through use of the housing inspection instruments (*009-0-143 Onsite, 009-0-144 Remote Voice, 009-0-145 Remote Video*) is only collected when the President declares a major disaster or emergency for FEMA Individual Assistance. To provide disaster assistance to individuals and households within a presidentially declared area,

damage assessment information must be collected to validate individuals' claims in order to meet applicable federal program requirements.

6. 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.

There are no special circumstances that require respondents to report information to the agency more 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 special circumstances that would require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

(c) Requiring respondents to submit more than an original and two copies of any document.

There are no special circumstances that require 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.

There are no special circumstances that require respondents to retain 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.

There are no special circumstances that require respondents to participate in a statistical survey.

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

There are no special circumstances that require respondents to participate in a statistical survey.

(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 are no special circumstances that include a pledge of confidentiality.

- (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 special circumstances that require respondents to submit proprietary trade secret, or other confidential information.

7. 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.**

(i) A 60-day Federal Register Notice inviting public comments was published on [May 14, 2020, 85 FR pp 28968](#). **No comments were received.**

(ii) A 30-day Federal Register Notice inviting public comments was published on [July 31, 2020, 85 FR 46146](#). **No comments were received OR 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.**

A Claims Forms Simplification Project work session was conducted by FEMA to provide insight from NFIP claim professionals with the goal of simplifying the collection of NFIP forms. The session addressed content and needed revisions by program partners. The session was attended by NFIP claim professionals who work directly with policyholders. The goal was to make the forms easier, simpler, and more transparent for policyholders and end users. Attendees included external adjusting firms, internal claims professional, contractors, and FEMA claims staff.

The work group met to discuss all aspects of the NFIP forms that were of concern to them in order to make the process as efficient as possible. The forms used within this collection were the subject of the all-day discussion in which current and future state discussions took place and changes implemented with input from them during the week of November 2, 2018.

- (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 program personnel discuss the claim forms at annual meetings with the adjusters who are involved with investigating the claims and providing the information. FEMA provides continuous guidance and informational sessions for adjusters.

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

There are no payments or gifts to respondents in this collection.

9. 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 submitted to FEMA Privacy Office for review and approval on 4/17/2020.

Claims Forms

A System of Records Notice (SORN) was published in the Federal Register on May 19, 2014 under Docket No. [DHS-2014-0028](#) [Privacy Act of 1974; Department of Homeland Security Federal Emergency Management Agency-003 National Flood Insurance Program Files System of Records].

A Privacy Impact Assessment (PIA) was published for this collection on March 28, 2018, [DHS/FEMA/PIA-050](#) [National Flood Insurance Program (NFIP) PIVOT System].

Inspection Instruments

The SORN supporting the housing inspections instruments within this collection was published in the Federal Register on April 30, 2013 under Docket No. [DHS-2013-0029](#) [Privacy Act of 1974; Department of Homeland Security Federal Emergency Management Agency--008 Disaster Recovery Assistance Files System of Records].

The PIA supporting the housing inspection instruments within this collection was published on January 11, 2018, [DHS/FEMA/PIA-049](#) [Individual Assistance (IA) Program].

10. 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 requirements for respondents to answer any questions of a sensitive nature.

11. 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.

Claims Forms

As reported in the previous [\(2017\) PRA Supporting Statement](#), NFIP Direct's three-year claim count (2014 to 2016) was 25,184 claims. Comparatively, data from 2017 to 2019 shows NFIP Direct's three-year claim count rose 38% (34,656 claims) compared to the number of claims from the 2014-2016 period (25,184 claims). Yet, NFIP Direct experienced only a slight (2%) increase in policies during that period: 2016 (639,054) to 2019 (649,531).

While a 38% increase in claims relative to a 2% increase of policies over a three-year period might indicate an exponential trend, a closer look at yearly weather events provides greater clarity on the numbers. In 2017, NFIP Direct's year-end claim count was 26,065 claims, which was directly related to three (3) catastrophic hurricanes – Harvey, Irma, and Maria. This represents a 53% increase in claims from 2016 (17,027 claims) to 2017 (26,065 claims). A year later in 2018, NFIP Direct's year-end claim count declined 75% (6,340 claims). This sharp reduction occurred even though two (2) strong hurricanes (Florence and Michael) made landfall in the Southeast. However, the damage to insured buildings was relatively low because the affected areas were predominantly rural and had a low number of flood policies-in-force. Halfway through 2019, NFIP Direct's mid-year claim count was 2,251 claims, or a decrease of 64% in claims from 2018 (6,340 claims).

While it is reasonable to conclude that claim volume would likely increase or decrease as the number of policies-in-force increases or decreases, the primary driver of flood-related claim volume is the weather. Historically, large-scale weather-related events in large metropolitan areas produce the largest volume of claims. Because weather-related events are unpredictable, it is difficult to extrapolate claim volume with any degree of certainty, other than identifying trends based the historical claim counts from years with high-volume claims compared to those from years with low-volume claims. This method of historical trend analysis was used to extrapolate future claim counts in this Supporting Statement.

Regarding policies-in-force, historical data from 2015 to 2019 shows a downward trend of 6% in the number of NFIP Direct policies over this five-year period. For reference, the year-end policies-in-force data is as follows: (a) 688,695 (2015), (b) 639,054 (2016), (c) 657,994 (2017), (d) 656,760 (2018) and (e) 649,531 (as of 6/30/2019). This downward trend occurred during a nationwide FEMA campaign to double the number of flood policies-in-force by 2023, which began in February 2017.

Regarding claim volume, data from 2015 to 2019 shows the number of NFIP Direct claims averaged about 9,973 claims per year over this five-year period. For reference, the year-end claim count data is as follows: (a) 6,340 (2015), (b) 17,027 (2016), (c) 26,065 (2017), (d) 6,340 (2018) and (e) 2,251 (as of 6/30/2019). If data from 2017 were removed, the average number of NFIP Direct claims would be lower (7,990 claims). Because 2017 was a worst-case scenario (three Category 4 hurricanes causing catastrophic damage), its data is considered an anomaly and is not being used in this historical trend analysis. A comparison of the number of claims to the number of policies-in-force shows claims averaged about 1.8% of all policies for any given year. If the data from the catastrophic 2017 hurricane season (4.0%) was removed from the equation, the percentage of claims to policies-in-force would be lower (1.2%).

To forecast future claim volume (i.e., number of respondents who file claims), applying the trend of 1.2% of claims to policies-in-force to the 2019 mid-year policy count (649,531) yields a projected claim count of 7,794 claims for 2020. This mirrors the historical year-end-claim-count trend analysis approach that yields a projected claim count of 7,990 claims for 2020. For this 2020 PRA Supporting Statement, 7,990 is being used as NFIP Direct's projected number of annual claims (respondents) per year for the next three years: 2020, 2021 and 2020.

Of the estimated 7,990 respondents, not all will file all forms. NFIP Direct policyholders (respondents) use only those forms that are relevant to their loss and type of claim reported. Also, technology has supplanted manual labor in many instances. For example, after major flooding events, most WYO Companies and the NFIP Direct operate call centers and have mobile apps available for their policyholders to submit a notice of loss, thereby eliminating the need to download, print, fill-out and fax/email a paper form to their insurer. Additionally, after most large flooding events, FEMA's Federal Insurance Administrator typically exercises his statutory authority by issuing claims-handling bulletins to NFIP insurers authorizing a conditional waiver of the requirement for an NFIP Direct policyholder to sign a Proof of Loss in exchange for payment of their flood claim. In those instances, FEMA will allow an NFIP insurer to issue payment for the undisputed amount of damage to building and personal property, as determined by the claims adjuster during the adjustment process, without having the policyholder submit an executed Proof of Loss.

The public reporting time burden for the collection of information is estimated to average 7.5 hours per respondent. This estimate includes the average time, effort or financial resources expended by a respondent to generate, maintain, retain, disclose or provide information using the most common claim forms/instruments: (a) 086-0-6; Personal Property (Contents) Worksheet, (b) 086-0-7; Building Property Worksheet, (c) 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared), (d) 086-0-11; First Notice of Loss, (e) 086-0-23; Advance Payment Request - Building & Contents and (f) FEMA Form 009-0-143; Onsite Housing Inspection.

The following is an explanation of the estimated time burdens for the revised and new Claims Forms for this 2020 PRA submission:

- (1) **FEMA Form 086-0-6; Personal Property (Contents) Worksheet**, formerly [Worksheet - Contents - Personal Property](#)
Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests about 35%, or 2,797 policyholders (respondents), will complete this worksheet by listing and assessing an inventory of flood-damaged personal property, which is estimated to take 2.25 hours (135 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders, which is estimated to add an additional 0.75 hours (45 minutes) per response. Therefore, the total hour burden to a policyholder would be $2,797 \times 3.00 \text{ hours} = 8,391 \text{ hours}$.
- (2) **FEMA Form 086-0-7; Building Property Worksheet**, formerly [Worksheet – Building](#)
Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests about 65%, or 5,194 policyholders (respondents), will complete this worksheet by

listing the scope and amount of flood-damaged building property, which is estimated to take 2.25 hours (135 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders, which is estimated to add an additional 0.75 hours (45 minutes) per response. Therefore, the total hour burden would be 5,194 x 3.00 hours = 15,582 hours.

(3) [FEMA Form 086-0-8; Worksheet - Building \(Continued\)](#)

This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.

(4) **FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared)**, formerly [Proof of Loss](#)

Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests that about 5%, or 400 policyholders (respondents), will complete the proof of the loss they incurred, which is estimated to take 0.17 hours (10 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be 400 x 0.17 hours = 68 hours.

(5) **FEMA Form 086-0-10; Proof of Loss - Increased Cost of Compliance (ICC)**, formerly [Increased Cost of Compliance Proof of Loss](#)

Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests about 4%, or 320 policyholders (respondents), will complete the proof of the loss they incurred, which is estimated to take 1.75 hours (105 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be 320 x 1.75 hours = 560 hours.

(6) **FEMA Form 086-0-11; First Notice of Loss**, formerly [Notice of Loss](#)

Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests about 70%, or 5,593 policyholders (respondents), will complete this notice of flood damage, which is estimated to take 0.17 hours (10 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are

anticipated for this form. Therefore, the total hour burden would be $5,593 \times .0.17$ hours = 951 hours.

- (7) [FEMA Form 086-0-12; Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy](#)
This form has been removed from the collection. Therefore, the total hour burden is 0 hours.
- (8) [FEMA Form 086-0-13; National Flood Insurance Program Preliminary Report](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (9) [FEMA Form 086-0-14; National Flood Insurance Program Final Report](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (10) [FEMA Form 086-0-15; National Flood Insurance Program Narrative Report](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (11) [FEMA Form 086-0-16; Cause of Loss and Subrogation Report](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (12) [FEMA Form 086-0-17; Manufactured \(Mobile\) Home/Travel Trailer Worksheet](#)
Of the 7,990 projected number of NFIP Direct claims, historical trend analysis suggests about 4%, or 320 policyholders (respondents), will complete this worksheet by listing, assessing and determining the scope, replacement cost and actual cash value to the flood-damaged manufactured (mobile) home or travel trailer, which is estimated to take 0.75 hours (45 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders, which is estimated to add an additional 0.75 hours (45 minutes) per response. Therefore, the total hour burden would be 320×1.50 hours = 480 hours.
- (13) [FEMA Form 086-0-18; Manufactured \(Mobile\) Home/Travel Trailer Worksheet \(continued\)](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (14) [FEMA Form 086-0-19; Increased Cost of Compliance \(ICC\) Adjuster Report](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.
- (15) [FEMA Form 086-0-20; Adjuster Preliminary Damage Assessment](#)
This form is proposed for removal from the collection. Therefore, the total hour burden would be 0.
- (16) [FEMA Form 086-0-21; Adjuster Certification Application](#)

This form is proposed for removal from the collection. Therefore, the total hour burden would be 0 hours.

(17) **FEMA Form 086-0-22; Proof of Loss - Building & Contents (Adjuster-Prepared)**

This form is used when the adjuster prepares the Proof of Loss as a courtesy to the policyholder, who then reviews and verifies the accuracy of the information and amounts. By signing and dating this Proof of Loss, the policyholder validates and agrees with the amounts prepared by the adjuster. Of the 7,990 projected number of NFIP Direct claims, it is estimated that about 65%, or 5,194 policyholders (respondents), will review and sign this adjuster-prepared form as validation of the proof of the loss they incurred, which is estimated to take 0.08 hours (5 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be $5,194 \times 0.08$ hours = 416 hours.

(18) **FEMA Form 086-0-23; Advance Payment Request - Building & Contents**

Of the 7,990 projected number of NFIP Direct claims, it is estimated that about 70%, or 5,593 policyholders (respondents), will complete this new form to request an advance payment of the total amount payable under the Building Property and Personal Property coverages of their flood claim, which is estimated to take 0.17 hours (10 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be $5,593 \times 0.17$ hours = 951 hours.

(19) **FEMA Form 086-0-24; Advance Payment Request - Increased Cost of Compliance (ICC)**

Of the 7,990 projected number of NFIP Direct claims, it is estimated that about 4%, or 320 policyholders (respondents), will complete this new form request to request an advance payment of the total benefits payable under the Increased Cost of Compliance coverage portion of their flood claim, which is estimated to take 0.25 hours (15 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be 320×0.25 hours = 80 hours.

(20) **FEMA Form 086-0-25; Claim Appeal**, formerly [NFIP Claims Appeal \(NFIP Flood Claims Insurance Handbook\)](#)

With the rollout of a new System of Records in 2018, FEMA can quantify the number of appeals filed during a calendar year. After two years of operation, System of Records data revealed FEMA received 875 appeals in 2018 (following the unprecedented 2017 storm season) and 734 appeals in 2019. These amounts (875 and 734) reflect the actual number of policyholders (respondents) who submitted appeals. These actual amounts provide a better idea of how many appeals can be anticipated going forward rather than using an estimated amount (1,200), which was the basis for the Claims Appeal calculation in the 2017 PRA submission. These actual amounts represent decreases of -27% and -39%, respectively, from the 2017 estimated amount. Based on these actual amounts, it is expected that about 750 policyholders (respondents) will utilize the appeals process (per year) by using this form, which is estimated to take 1.50 hours (90 minutes) per response. Additionally, in response to COVID-19 and CDC's guidance relating to social distancing, NFIP will be accepting photos and/or videos from policyholders. However, since the burden of taking photographs and videos of flood-damaged property is accounted for in FEMA Form 086-0-6; Personal Property (Contents) Worksheet, FEMA Form 086-0-7; Building Property Worksheet and FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet, no additional burden hours for photos or videos are anticipated for this form. Therefore, the total hour burden would be $750 \times 1.50 \text{ hours} = 1,125 \text{ hours}$.

Inspection Instruments

Pertaining to housing inspection instruments (*009-0-143 Onsite*, *009-0-144 Remote Voice*, *009-0-145 Remote Video*) added to this collection, based on historical data from 2014 through 2019 it is estimated 285,545 housing inspections will be completed annually.

With the addition of remote voice telephony and remote video telephony as applicant options for inspection completion as a result of COVID-19, it is anticipated 60% of future inspections will be performed onsite, 30% will be performed via remote voice, and 10% will be performed via remote video.

The following is an explanation of the estimated time burdens for the new Inspection Instruments for this 2020 PRA submission:

(21) **FEMA Form 009-0-143; Onsite Housing Inspection**

New instrument proposed for addition to this collection which involves the inspector entering the damage assessment information into ACE while onsite (in person at the applicant's damaged residence). It is estimated 171,327 applicants will receive an onsite inspection, and the inspection takes approximately 1 hour (60 minutes) to complete. Therefore, the total hour burden would be $171,327 \times 1 \text{ hour} = 171,327 \text{ hours}$.

(22) **FEMA Form 009-0-144; Remote Voice Telephony Housing Inspection**

New instrument proposed for addition to this collection which involves the inspector entering the damage assessment information into ACE while interacting over the phone with an applicant. It is estimated 85,664 applicants will receive a remote voice inspection as a result of COVID-19, and the inspection takes approximately 1 hour (60 minutes) to complete. Therefore, the total hour burden would be $85,664 \times 1 \text{ hour} = 85,664 \text{ hours}$.

(23) FEMA Form 009-0-145; Remote Video Telephony Housing Inspection

New instrument proposed for addition to this collection which involves the inspector entering the damage assessment information into ACE while interacting with the applicant via video conferencing. It is estimated 28,554 applicants will receive a remote video inspection as a result of COVID-19, and the inspection takes approximately 1 hour (60 minutes) to complete. Therefore, the total hour burden would be 28,554 x 1 hour = 28,554 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 1.46 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 No.	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
Individual and Household	086-0-6	2,797	1	2,797	3.00	8,391	\$37.55	\$315,082
Individual and Household	086-0-7	5,194	1	5,194	3.00	15,582	\$37.55	\$585,104
Business or other for-profit	086-0-8	Removal Proposed	0	0	0	0	\$0.00	\$0
Individuals, households, businesses, or other for profit	086-0-9	400	1	400	0.17	68	\$37.55	\$2,553
Individuals, households, businesses, or other for profit	086-0-10	320	1	320	1.75	560	\$37.55	\$21,028
Individuals, households, businesses, or other for profit	086-0-11	5,593	1	5,593	0.17	951	\$37.55	\$35,703
Business or other for-profit	086-0-12	Removed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-13	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-14	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-15	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-16	Removal Proposed	0	0	0	0	\$0.00	\$0

Individuals, households, businesses, or other for profit	086-0-17	320	1	320	1.50	480	\$37.55	\$18,024
Business or other for-profit	086-0-18	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-19	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-20	Removal Proposed	0	0	0	0	\$0.00	\$0
Business or other for-profit	086-0-21	Removal Proposed	0	0	0	0	\$0.00	\$0
Individuals, households, businesses, or other for profit	086-0-22	5,194	1	5,194	0.08	416	\$37.55	\$15,603
Individuals, households, businesses, or other for profit	086-0-23	5,593	1	5,594	0.17	951	\$37.55	\$35,703
Individuals, households, businesses, or other for profit	086-0-24	320	1	320	0.25	80	\$37.55	\$3,004
Individuals, households, businesses, or other for profit	086-0-25	750	1	750	1.5	1,125	\$37.55	\$42,244
Individual and Household	009-0-143	171,327	1	171,327	1	171,327	\$37.55	\$6,433,329
Individual and Household	009-0-144	85,664	1	85,664	1	85,664	\$37.55	\$3,216,683
Individual and Household	009-0-145	28,554	1	28,554	1	28,554	\$37.55	\$1,072,203
Total		312,026		312,026		314,149		\$11,796,263

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$62.06.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2019 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) is \$25.72. Including the wage rate multiplier of 1.46, the fully-loaded wage rate is \$37.55 per hour. Therefore, the annual burden hour cost is estimated to be \$11,796,263 (\$37.55 x 314,149 hours).

12. 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

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2019.” Available at http://www.bls.gov/news.release/archives/ecec_06182019.pdf. Accessed March 10, 2020. The wage multiplier is calculated by dividing total compensation for all workers of \$36.77 by wages and salaries for all workers of \$25.22 per hour yielding a benefits multiplier of approximately 1.46

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

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.**

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

13. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: The contract costs for claims processing is estimated to be an average of \$143.13 per claim based on an estimated 28,604 annual burden hours. Therefore, the total cost would be $\$143.13 \times 28,604 = \$4,094,090.52$. The contract costs for housing inspections is estimated to be an average of \$213.33 per inspection, and the contract accounts for up to 450,000 inspections per year if needed. Therefore, the total cost for housing inspections would be $\$213.33 \times 450,000 = \$95,998,500$. The total contract costs for the collection would be $\$4,094,091 + \$95,998,500 = \$100,092,591$.	\$100,092,591
Staff Salaries ¹ : 1 GS 14 Step 5 employees spending approximately 20% of time annually monitoring the program, including quality review of selected claims and adherence to program guidelines ($\$137,491 \times 0.20 \times 1.46^2 = \$40,147.37$). 35 GS 11 Step 5 employees spending approximately 25% of time annually performing quality control and/or independent housing inspections as disaster and contracting circumstances dictate [$(\$81,634 \times 0.25 \times 1.46^2) \times 35 = \$1,042,874.35$] The total Staff Salaries cost for this collection would be $\$40,147 + \$1,042,874 = \$1,083,021$.	\$1,083,022
Facilities: N/A	\$0
Computer Hardware and Software: Government owned, contractor operated ACE software pads estimated at \$400 per unit for 1,000 units refreshed annually. $\$400 \times 1,000 = \$400,000$	\$400,000
Equipment Maintenance: Estimated 10% of the Computer Hardware and Software cost. $\$400,000 \times 0.10 = \$40,000$	\$40,000
Travel: 35 QC Inspectors traveling for approximately 150 days per year to perform	\$2,100,000

housing inspections. Daily average travel rate of \$400 per day (capturing airfare, rental car, lodging, meals & incidentals). (\$400 x 150) x 35 = \$2,100,000	
Total	\$103,715,613
¹ Office of Personnel Management 2020 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx . Accessed March 10, 2020.	
² Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.	

14. 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).

An "**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
FEMA Form 86-0-6 Personal Property (Contents) Worksheet	5,418	8,391	+2,973			
FEMA Form 86-0-7 Building Property Worksheet	14,458	15,582	+1,124			
FEMA Form 086-0-8 Worksheet - Building (Continued)	5,783	0	-5,783			
FEMA Form 086-0-9 Proof of Loss - Building & Contents (Policyholder-Prepared)	570	68	-502			
FEMA Form 086-0-10 Proof of Loss - Increased Cost of Compliance (ICC)	114	560	+446			
FEMA Form 086-0-11 First Notice of Loss	498	951	+453			

FEMA Form 086-0-12 Statement as to Full Cost of Repair or Replacement under Replacement Cost Coverage	0	0	0			
FEMA Form 086-0-13 National Flood Insurance Program Preliminary Report	498	0	-498			
FEMA Form 086-0-14 National Flood Insurance Program Final Report	498	0	-498			
FEMA Form 086-0-15 National Flood Insurance Program Narrative Report	325	0	-325			
FEMA Form 086-0-16 Cause of Loss and Subrogation Report	715	0	-715			
FEMA Form 086-0-17 Manufactured (Mobile) Home-Travel Trailer Worksheet	196	480	+284			
FEMA Form 086-0-18 Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued)	98	0	-98			
FEMA Form 086-0-19 Increased Cost of Compliance (ICC) Adjuster Report	24	0	-24			
FEMA Form 086-0-20 Adjuster Preliminary Damage Assessment	14	0	-14			
Adjuster Certification Application	69	0	-69			
FEMA Form 086-0-22 Proof of Loss - Building & Contents (Adjuster- Prepared)	0	416	+416			
FEMA Form 086-0-23 Advance Payment Request - Building & Contents	0	951	+951			
FEMA Form 086-0-24 Advance Payment Request - Increased Cost of Compliance (ICC)	0	80	+80			
FEMA Form 086-0-25 Claim Appeal	2,400	1,125	-1,275			
FEMA Form 009-0-143 Onsite Housing Inspection	0	171,327	+171,327			
FEMA Form 009-0-144 Remote Voice Telephony Housing Inspection	0	85,664	+85,664			
FEMA Form 009-0-145 Remote Video Telephony Housing Inspection	0	28,554	+28,554			
Total	31,678	314,149	+282,471	0	0	0

Explain:

Claims Forms

As part of FEMA’s continuing effort to transform the NFIP by improving the customer experience, several forms that the policyholder utilize and is required to complete have been simplified for easier use, thereby decreasing the overall number of hours to complete.

Also, as mentioned in Section 2 of this Supporting Statement, FEMA determined that 10 of the 16 current forms do not impose burdens on the public. Rather, they reflect obligations on adjusters acting as an instrumentality of the Federal Government. Since individual policyholders never complete these forms and are not required to do so in the SFIP, there is no time or cost burden on the policyholder (respondent).

FEMA proposes to remove these 10 claims forms from the collection. FEMA also proposes to replace the NFIP Flood Claims Handbook (from this collection) with a newly-created Claim Appeal form, and to add three additional newly-created claims forms – (a) Advance Payment Request - Building & Contents, (b) Advance Payment Request - Increased Cost of Compliance (ICC) and (c) Proof of Loss – Building & Contents (Adjuster-Prepared).

The following are the reasons for the program changes and the time burdens for the new and revised Claims Forms for the 2020 collection:

(1) **[FEMA Form 086-0-6; Personal Property \(Contents\) Worksheet, formerly Worksheet - Contents - Personal Property](#)**

This form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate and prove a claim without the assistance of a third-party claims adjuster. Because the form is dynamic, any user-input data or text that exceeds one page will automatically create a new page, thereby allowing text to “flow” to the next page, and subsequent pages thereafter, without limits, if needed. This eliminates the need to download and print additional forms, as was required in previous versions. As such, the time burden to complete the form is expected to increase from 2.50 hours (150 minutes) to 3.00 hours (180 minutes).

Meanwhile, historical trend analysis suggests that more NFIP Direct policyholders (2,797) will use this form than what was estimated in the prior 2017 PRA submission (2,167). These changes yield a Program Increase in annual burden hours from 5,418 hours to 8,391 hours, or an increase of +2,973 hours (+55%).

(2) **[FEMA Form 086-0-7; Building Property Worksheet, formerly Worksheet - Building](#)**

Like the Personal Property (Contents) Worksheet above, this form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate and prove a claim without the assistance of a third-party claims adjuster. Because the form is dynamic, any user-input data or text that exceeds one page will automatically create a new page, thereby allowing text to “flow” to the next page, and subsequent pages thereafter, without limits if needed. This eliminates the need to download and print additional forms (i.e., [FEMA Form 086-0-8; Worksheet – Building \(Continued\)](#)), thereby making this additional form obsolete and duplicative. As

such, the time burden to complete the form is expected to increase from 2.50 hours (150 minutes) to 3.00 hours (180 minutes). Also, historical trend analysis suggests that less NFIP Direct policyholders (5,194) will use this form than what was estimated in the prior 2017 PRA submission (5,783). These changes yield a Program Increase in annual burden hours from 14,458 hours to 15,582 hours, or an increase of +1,124 hours (+8%).

(3) **FEMA Form 086-0-8; Worksheet - Building (Continued)**

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-7; Building Property Worksheet, thereby reducing the need for this form. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 5,783 hours to 0 hours, or a reduction of -5,783 hours (-100%).

(4) **FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared), formerly Proof of Loss**

This form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate, and prove a claim without the assistance of a third-party claims adjuster. Although the form appears to collect more information than on prior versions, it's plain-language format makes it easier for a policyholder to understand what information is required to submit a proper Proof of Loss when requesting payment for a flood loss to building and/or personal property, especially since most of the required information can be selected from the many drop-down lists. Due to an increase in the amount of information collected, the time burden to complete the form is expected to increase slightly from 0.08 hours (5 minutes) to 0.17 hours (10 minutes). However, historical trend analysis suggests that less NFIP Direct policyholders (400) will use this form than what was estimated in the prior 2017 PRA submission (7,121). These changes yield a Program Decrease in annual burden hours from 570 hours to 68 hours, or a decrease of -502 hours (-88%).

(5) **FEMA Form 086-0-10; Proof of Loss - Increased Cost of Compliance (ICC), formerly Increased Cost of Compliance Proof of Loss**

Like the Proof of Loss form above, this form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate, and prove a claim without the assistance of a third-party claims adjuster. Although the form appears to collect more information than on prior versions, its plain-language format makes it easier for a policyholder to understand what information is required to submit a proper Proof of Loss when requesting payment for eligible benefits under Increased Cost of Compliance coverage, especially since most of the required information can be selected from the many drop-down lists. As such, the time burden to complete the form is expected to decrease from 2.00 hours (120 minutes) to 1.75 hours (105 minutes). However, historical trend analysis suggests that more NFIP Direct policyholders (320) will use this form than what was estimated in the prior 2017 PRA submission (57). These changes yield a Program Increase in annual burden hours from 114 hours to 560 hours, or an increase of +446 hours (+391%).

(6) **FEMA Form 086-0-11; First Notice of Loss, formerly Notice of Loss**

Like the Proof of Loss forms and the worksheets above, this form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate, and prove a claim without the assistance of a third-party claims adjuster. Because the form is dynamic, any user-input data or text that exceeds one page will automatically create a new page, thereby allowing text to “flow” to the next page, and subsequent pages thereafter, without limits if needed. This eliminates the need to download and print additional forms, as was required in previous versions. Although the form appears to collect more information than on prior versions, its plain-language format makes it easier for a policyholder to understand what information is required to submit a proper Notice of Loss, especially since most of the required information can be selected from the many drop-down lists. The information on this paper form may be collected telephonically or electronically. Regardless of the format, the time burden to complete this form is expected to increase slightly from 0.07 hours (4 minutes) to 0.17 hours (10 minutes) to account for a more realistic assessment of time needed to complete a Notice of Loss due to an increase in the amount of information collected. However, historical trend analysis suggests that less NFIP Direct policyholders (5,593) will use this form than what was estimated in the prior 2017 PRA submission (7,121). These changes yield a Program Increase in annual burden hours from 498 hours to 951 hours, or an increase of +453 hours (+91%).

- (7) **FEMA Form 086-0-12; Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy**
This form has been removed from the collection. The hour burden in the previous 2017 PRA collection was 0 hours. As there is no intent to reuse this form, there are no Program Increases or Decreases. FEMA has deleted this form from its library. The annual burden hours remain 0 hours.
- (8) **FEMA Form 086-0-13; National Flood Insurance Program Preliminary Report**
This form is proposed for removal from collection for the following reasons: (a) all necessary data collected on this form has been incorporated into the newly-revised FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared), or (b) some data is not required to be collected. The SFIP places no burden on individual policyholders to provide much of the information on this form as a condition necessary to payment of an NFIP claim. Claims adjusters are solely responsible for completing this form and collecting information related to flood losses during the adjustment process of a flood claim. As such, removal of this form reduces duplicative and unnecessary information collection. Due to the discontinuation of information collection, this yields in a Program Decrease in annual burden hours from 498 hours to 0 hours, or a reduction of -498 hours (-100%).
- (9) **FEMA Form 086-0-14; National Flood Insurance Program Final Report**
This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 498 hours to 0 hours, or a reduction of -498 hours (-100%).
- (10) **FEMA Form 086-0-15; National Flood Insurance Program Narrative Report**
This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 325 hours to 0 hours, or a reduction of -325 hours (-100%).

(11) **FEMA Form 086-0-16; Cause of Loss and Subrogation Report**

This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 715 hours to 0 hours, or a reduction of -715 hours (-100%).

(12) **FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet**

Like the Personal Property (Contents) Worksheet and the Building Property Worksheet above, this form has been revised to be dynamically interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable, to assist users in completing the form. These enhancements will remove confusion over what information is required and will empower NFIP Direct policyholders to submit, investigate, and prove a claim without the assistance of a third-party claims adjuster. Because the form is dynamic, any user-input data or text that exceeds one page will automatically create a new page, thereby allowing text to “flow” to the next page, and subsequent pages thereafter, without limits if needed. This eliminates the need to download the second page of the Manufactured (Mobile) Home damage assessment, [FEMA Form 086-0-18; Manufactured \(Mobile\) Home/Travel Trailer Worksheet \(Continued\)](#)), thereby making this additional form obsolete and duplicative. The time burden to complete this revised form is expected to increase slightly from 0.50 hours (30 minutes) to 1.50 hours (90 minutes) to account for a more realistic assessment of time needed to complete this worksheet due to an increase in the amount of information collected as all necessary data collected on FEMA Form 086-0-18; Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued) has been incorporated into this form. However, historical trend analysis suggests that less NFIP Direct policyholders (320) will use this form than what was estimated in the prior 2017 PRA submission (392). These changes yield a Program Increase in annual burden hours from 196 hours to 480 hours, or an increase of +284 hours (+145%).

(13) **FEMA Form 086-0-18; Manufactured (Mobile) Home/Travel Trailer Worksheet (continued)**

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet (Policyholder-Prepared), thereby reducing duplicative information collection. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 98 hours to 0 hours, or a reduction of -98 hours (-100%).

(14) **FEMA Form 086-0-19; Increased Cost of Compliance (ICC) Adjuster Report**

This form is proposed for removal from the collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 24 hours to 0 hours, or a reduction of -24 hours (-100%).

(15) **FEMA Form 086-0-20; Adjuster Preliminary Damage Assessment**

This form is proposed for removal from the collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 14 hours to 0 hours, or a reduction of -14 hours (-100%).

(16) **FEMA Form 086-0-21; Adjuster Certification Application**

This form is proposed for removal from the collection because the data is not required to be collected. This form collects information on an adjuster's education, training, and experience for determining the adjuster's qualifications for adjusting flood claims. None of this has as nothing to do with a NFIP Direct policyholder submitting, investigating or proving a claim. The SFIP places no burden on individual policyholders to provide any of the information on this form as a condition necessary to payment of an NFIP claim. As such, removal of this form reduces unnecessary information collection. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden hours from 69 hours to 0 hours, or a reduction of -69 hours (-100%).

(17) **FEMA Form 086-0-22; Proof of Loss – Building & Contents (Adjuster-Prepared)**

The time burden to complete this newly created form is expected to take 0.08 hours (5 minutes). The number of NFIP Direct policyholders who are expected to use this form is 5,194. Due to an increase in information collection, this yields a Program Increase in annual burden hours from 0 hours to 416 hours, or an increase of +416 hours.

(18) **FEMA Form 086-0-23; Advance Payment Request - Building & Contents**

The time burden to complete this newly created form is expected to take 0.17 hours (10 minutes) per response. Also, the number of NFIP Direct policyholders who are expected to use this form is 5,593. Due to an increase in information collection, this yields a Program Increase in annual burden hours from 0 to 932 hours, or an increase of +932 hours.

(19) **FEMA Form 086-0-24; Advance Payment Request - Increased Cost of Compliance (ICC)**

The time burden to complete this newly created form is expected to take 0.25 hours (15 minutes). Also, the number of NFIP Direct policyholders who are expected to use this form is 320. Due to an increase in information collection, this yields a Program Increase in annual burden hours from 0 hours to 80 hours, or an increase of +80 hours.

(20) **FEMA Form 086-0-25; Claim Appeal**, formerly [NFIP Claims Appeals \(NFIP Flood Claims Insurance Handbook\)](#)

By policyholders using this newly created form rather than drafting a letter, the time burden to complete the appeals process is expected to decrease from 2.00 hours (120 minutes) to 1.50 hours (90 minutes). Also, recent appeals data suggests the number of policyholders (respondents) who complete the appeals process is expected to decrease from 1,200 to 750 year over year. These changes yield a Program Decrease in annual burden hours from 2,400 hours to 1,125 hours, or a reduction of -1,275 hours (-53%).

Inspection Instruments

In addition, the collection is being updated to include three (3) methods used to perform the housing inspections process when federally declared disasters for Individual Assistance occur. The inclusion of these instruments ensures the burden placed on applicants undergoing a housing inspection for IHP assistance consideration is accurately captured.

The following are the reasons for the program changes and the time burdens for the new Inspection Instruments for the 2020 collection:

(21) **FEMA Form 009-0-143; Onsite Housing Inspection**

The time burden to complete an onsite housing inspection is approximately 1 hour (60

minutes). The number of applicants estimated to have an onsite housing inspection completed annually is 171,327. The addition of this collection instrument yields a Program Increase in annual burden hours from 0 hours to 171,327 hours.

(22) FEMA Form 009-0-144; Remote Voice Telephony Housing Inspection

The time burden to complete a remote voice telephony housing inspection is approximately 1 hour (60 minutes). The number of applicants estimated to have a remote voice telephony housing inspection completed annually is 85,664. The addition of this collection instrument yields a Program Increase in annual burden hours from 0 hours to 85,664 hours.

(23) FEMA Form 009-0-145; Remote Video Telephony Housing Inspection

The time burden to complete a remote video telephony housing inspection is approximately 1 hour (60 minutes). The number of applicants estimated to have a remote video telephony housing inspection completed annually is 28,554. The addition of this collection instrument yields a Program Increase in annual burden hours from 0 hours to 28,554 hours.

Collectively, all revisions and additions to the Claims Forms and the addition of the Inspection Instruments result in a net Program Increase of +282,471 hours, or a +891% hourly increase in annual time burden.

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
FEMA Form 86-0-6 Personal Property (Contents) Worksheet	\$244,514	\$315,082	+\$70,568			
FEMA Form 86-0-7 Building Property Worksheet	\$652,490	\$585,104	-\$67,386			
FEMA Form 086-0-8 Worksheet - Building (Continued)	\$260,987	\$0	-\$260,987			
FEMA Form 086-0-9 Proof of Loss - Building & Contents (Policyholder-Prepared)	\$25,724	\$2,553	-\$23,171			
FEMA Form 086-0-10 Proof of Loss - Increased Cost of Compliance (ICC)	\$5,145	\$21,028	+\$15,883			
FEMA Form 086-0-11 First Notice of Loss	\$22,475	\$35,703	+\$13,228			
FEMA Form 086-0-12 Statement as to Full Cost of Repair or Replacement under Replacement Cost Coverage	\$0	\$0	\$0			
FEMA Form 086-0-13 National Flood Insurance Program Preliminary Report	\$22,475	\$0	-\$22,475			
FEMA Form 086-0-14 National Flood Insurance Program Final Report	\$22,475	\$0	-\$22,475			
FEMA Form 086-0-15 National Flood Insurance Program Narrative Report	\$14,667	\$0	-\$14,667			
FEMA Form 086-0-16	\$32,268	\$0	-\$32,268			

Cause of Loss and Subrogation Report						
FEMA Form 086-0-17 Manufactured (Mobile) Home- Travel Trailer Worksheet	\$8,845	\$18,024	+\$9,179			
FEMA Form 086-0-18 Manufactured (Mobile) Home/Travel Trailer Worksheet (Continued)	\$4,423	\$0	-\$4,423			
FEMA Form 086-0-19 Increased Cost of Compliance (ICC) Adjuster Report	\$1,083	\$0	-\$1,083			
FEMA Form 086-0-20 Adjuster Preliminary Damage Assessment	\$632	\$0	-\$632			
FEMA Form 086-0-21 Adjuster Certification Application	\$3,114	\$0	-\$3,114			
FEMA Form 086-0-22 Proof of Loss - Building & Contents (Adjuster-Prepared)	\$0	\$15,603	+\$15,603			
FEMA Form 086-0-23 Advance Payment Request - Building & Contents	\$0	\$35,703	+\$35,703			
FEMA Form 086-0-24 Advance Payment Request - Increased Cost of Compliance (ICC)	\$0	\$3,004	+\$3,004			
FEMA Form 086-0-25 Claim Appeal	\$108,312	\$42,244	-\$66,068			
FEMA Form 009-0-143 Onsite Housing Inspection	\$0	\$6,433,329	+\$6,433,329			
FEMA Form 009-0-144 Remote Voice Telephony Housing Inspection	\$0	\$3,216,683	+\$3,216,683			
FEMA Form 009-0-145 Remote Video Telephony Housing Inspection	\$0	\$1,072,203	+\$1,072,203			
Total	\$1,429,629	\$11,796,263	+\$10,366,634	\$0	\$0	\$0

Explain:

Due to the changes of information collection related to the new and revised forms, the “Type of Respondent” warrants a change.

In prior Claims Forms PRA collections, the “Type of Respondent” was listed as “Business or other for-profit” (OMB Form 83-I, Section 11.b.), showing the forms were targeted for claims adjusters (affected public). Because the new and revised claims forms in this 2020 PRA collection are specifically targeted for NFIP Direct policyholders, the “Type of Respondent” is changed to “Individuals, households, businesses, or other for profit” (OMB Form 83-I, Section 11.a.) to show that individual policyholders (respondents) are the “affected public” who bear all the burden to complete these forms. For the new inspection instruments added to this 2020 PRA collection, which are specifically targeted for applicants under the Individuals and Households Program Assistance (IHP), the “Type of Respondent” is “Individuals and households” to show that individual applicants are the “affected public” who bear all the burden to provide the data needed to determine an their eligibility and award for disaster assistance.

Due to the change in respondent type (affected public), the wage rate warrants a change, accordingly. This change requires a correction of errors in cost burden estimates. In the 2017 PRA submission (ICR Reference No: [201704-1660-001](#)), the average wage rate for adjusters (affected public) was \$45.13 per hour, which was the Bureau of Labor Statistics' wage rate for "business or other-for-profit" respondents (with the 1.46 multiplier included). For this 2020 PRA submission, the average wage rate is \$25.72 per hour, or \$37.55 per hour (with the 1.46 multiplier), which is the May 2019 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) for Individuals, households, businesses, or other for profit respondents (affected public), as discussed in 12.(c) above.

The proposed removal of 10 unnecessary/duplicative claims forms, the replacement of the NFIP Flood Claims Handbook with the newly created Claim Appeal, the addition of three additional newly created claims forms (i.e., Proof of Loss - Building & Contents (Adjuster-Prepared), Advance Payment Request - Building & Contents, Advance Payment Request - Increased Cost of Compliance (ICC)), and the addition of three newly created housing inspection instruments (i.e., Onsite Housing Inspection, Remote Voice Telephony Housing Inspection and Remote Video Telephony Housing Inspection) result in a net Program Increase of +\$ 10,366,634, or a +725% increase in annual cost burden.

The following are the reasons for the program changes and the cost burdens for the new and revised forms/instruments for the 2020 collection using the fully-loaded May 2018 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) of \$37.55 per hour (with the 1.46 multiplier):

(1) FEMA Form 086-0-6; Personal Property (Contents) Worksheet, formerly [Worksheet - Contents - Personal Property](#)

The expected increase in time burden to complete this form combined with an expected increase in the number of NFIP Direct policyholders who will use it yields a Program Increase in annual burden costs from \$244,514 to \$315,082, or an increase of +\$70,568 (+29%).

(2) FEMA Form 086-0-7; Building Property Worksheet, formerly [Worksheet - Building](#)

The expected increase in time burden to complete this form combined with an expected decrease in the number of NFIP Direct policyholders who will use it yields a Program Decrease in annual burden costs from \$652,490 to \$585,104, or a decrease of -\$67,386 (-10%).

(3) [FEMA Form 086-0-8; Worksheet - Building \(Continued\)](#)

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-7; Worksheet-Building (Policyholder-Prepared), thereby reducing the need for this form. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden costs from \$260,987 to \$0, or a reduction of -\$260,987 (-100%).

(4) FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared), formerly [Proof of Loss](#)

The expected decrease in time burden to complete this form combined with an expected decrease in the number of NFIP Direct policyholders who will use it yields a Program Decrease in annual burden costs from \$25,475 to \$2,553, or a reduction of -\$23,171 (-90%).

- (5) **FEMA Form 086-0-10; Proof of Loss - Increased Cost of Compliance (ICC)**, formerly [Increased Cost of Compliance Proof of Loss](#)
The expected increase in time burden to complete this form combined with an expected increase in the number of NFIP Direct policyholders who will use it yields a Program Increase in annual burden costs from \$5,145 to \$21,028, or an increase of +\$15,883 (+309%).
- (6) **FEMA Form 086-0-11; First Notice of Loss**, formerly [Notice of Loss](#)
The expected increase in time burden to complete this form combined with an expected increase in the number of NFIP Direct policyholders who will use it yields a Program Increase in annual burden costs from \$22,475 to \$35,703, or an increase of +\$13,228(+59%).
- (7) [FEMA Form 086-0-12; Statement as to Full Cost of Repair or Replacement under the Replacement Cost Coverage, Subject to the Terms and Conditions of this Policy](#)
This form has been removed from collection. The cost burden in the previous 2017 PRA collection was \$0. As there is no intent to reuse this form, there are no Program Increases/Decreases or Adjustments. FEMA has deleted this form from its library. The annual burden cost remains \$0.
- (8) [FEMA Form 086-0-13; National Flood Insurance Program Preliminary Report](#)
This form is proposed for removal from collection for the following reasons: (a) all necessary data collected on this form has been incorporated into the newly-revised FEMA Form 086-0-9; Proof of Loss - Building & Contents (Policyholder-Prepared), or (b) some data is not required to be collected. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden costs from \$22,475 to \$0, or a reduction of -\$22,475 (-100%).
- (9) [FEMA Form 086-0-14; National Flood Insurance Program Final Report](#)
This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden costs from \$22,475 to \$0, or a reduction of -\$22,475 (-100%).
- (10) [FEMA Form 086-0-15; National Flood Insurance Program Narrative Report](#)
This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Decrease in annual burden costs from \$14,667 to \$0, or a reduction of -\$14,667 (-100%).
- (11) [FEMA Form 086-0-16; Cause of Loss and Subrogation Report](#)
This form is proposed for removal from collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Increase in annual burden costs from \$32,268 to \$0, or a reduction of -\$32,268 (-100%).
- (12) [FEMA Form 086-0-17; Manufactured \(Mobile\) Home/Travel Trailer Worksheet](#)
The expected increase in time burden to complete this form combined with an expected decrease in the number of NFIP Direct policyholders who will use it yields a Program Increase in annual burden costs from \$8,845 to \$18,024, or an increase of +\$9,179 (+104%).
- (13) [FEMA Form 086-0-18; Manufactured \(Mobile\) Home/Travel Trailer Worksheet \(continued\)](#)

This form is proposed for removal from the collection as all necessary data collected on this form has been incorporated into the newly revised FEMA Form 086-0-17; Manufactured (Mobile) Home/Travel Trailer Worksheet (Policyholder-Prepared), thereby reducing duplicative information collection. Due to the discontinuation of information collection, this yields a Program Increase in annual burden costs from \$4,423 to \$0, or a reduction of -\$4,423 (-100%).

(14) [FEMA Form 086-0-19; Increased Cost of Compliance \(ICC\) Adjuster Report](#)

This form is proposed for removal from the collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Increase in annual burden costs from \$1,083 to \$0, or a reduction of -\$1,083 (-100%).

(15) [FEMA Form 086-0-20; Adjuster Preliminary Damage Assessment](#)

This form is proposed for removal from the collection for the same reasons as described in (8) above. Due to the discontinuation of information collection, this yields a Program Increase in annual burden costs from \$632 to \$0, or a reduction of -\$632 (-100%).

(16) [FEMA Form 086-0-21; Adjuster Certification Application](#)

This form is proposed for removal from the collection because the data is not required to be collected. Due to the discontinuation of information collection, this yields a Program Increase in annual burden costs from \$3,114 to \$0, or a reduction of -\$3,114 (-100%).

(17) FEMA Form 086-0-22; Proof of Loss - Building & Contents (Adjuster-Prepared)

As mentioned in Section 2 of this Supporting Statement, FEMA is proposing to add this new form to allow adjusters to prepare a proper Proof of Loss as a courtesy to the policyholder, who then reviews and verifies the accuracy of the information and amounts. Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$15,603, or an increase of +\$15,603.

(18) FEMA Form 086-0-23; Advance Payment Request - Building & Contents

As mentioned in Section 2 of this Supporting Statement, FEMA is proposing to add this new form as a method for policyholders to request an advance payment of the total amount payable under the Building Property and Personal Property coverages of their flood claim. Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$35,703, or an increase of +\$35,703.

(19) FEMA Form 086-0-24; Advance Payment Request - Increased Cost of Compliance (ICC)

As mentioned in Section 2 of this Supporting Statement, FEMA is proposing to add this new form as a method for policyholders to request an advance payment of the total benefits payable under the Increased Cost of Compliance coverage portion of their flood claim. Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$3,004, or an increase of +\$3,004.

(20) FEMA Form 086-0-25; Claim Appeal, formerly [NFIP Claims Appeals \(NFIP Flood Claims Insurance Handbook\)](#)

As mentioned in Section 2 of this Supporting Statement, FEMA is proposing to add this new form to replace the NFIP Flood Claims Insurance Handbook, which will make it easier for policyholders to submit claim appeals rather than interpreting what information is needed from the NFIP Flood Claims Insurance Handbook. The decrease in time burden to complete

this form combined with an expected decrease in the number of policyholders who will use it yields a Program Decrease in annual burden costs from \$108,312 to \$42,244, or a reduction of -\$66,068 (-61%).

(21) FEMA Form 009-0-143; Onsite Housing Inspections

As mentioned in Section 2 of this Supporting Statement, this instrument is being added to the collection to outline an onsite housing inspection which aids in the determination of applicant eligibility for assistance as a result of a Presidentially declared disaster. The expected time burden to complete an onsite housing inspection is 1 hour (60 minutes). Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$6,433,329.

(22) FEMA Form 009-0-144; Remote Voice Telephony Housing Inspections

As mentioned in Section 2 of this Supporting Statement, this instrument is being added to the collection to outline a remote voice telephony housing inspection which aids in the determination of applicant eligibility for assistance as a result of a Presidentially declared disaster. The expected time burden to complete a remote voice telephony housing inspection is 1 hour (60 minutes). Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$3,216,683.

(23) FEMA Form 009-0-145; Remote Video Telephony Housing Inspections

As mentioned in Section 2 of this Supporting Statement, this instrument is being added to the collection to outline a remote video telephony housing inspection which aids in the determination of applicant eligibility for assistance as a result of a Presidentially declared disaster. The expected time burden to complete a remote video telephony housing inspection is 1 hour (60 minutes). Due to an increase in information collection, this yields a Program Increase in annual burden costs from \$0 to \$1,072,203.

15. 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.

There are no outline plans for tabulation and publication of data for this information collection.

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

This collection does not seek approval to not display the expiration date for OMB approval.

17. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

Adjust this sentence as necessary: [This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”](#). This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology "is not applicable" Question #3 in the supporting statement justifies the non-use of information technology.