April 30, 2021

Supporting Statement for

Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0026**

**Title: Administrative Plan for the Hazard Mitigation Grant**

**Program**

**Form Number(s): None**

# General Instructions

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

# Specific Instructions

# A. Justification

1. **Explain the circumstances that make the collection of information necessary.**

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

FEMA regulations in 44 Code of Federal Regulations (CFR) Part 206.437, accessible in the electronic Code of Federal Regulations (e-CFR) at <http://www.ecfr.gov>, require development and updates to the Administrative Plan by Applicants/Recipients[[1]](#footnote-2) as a condition of receiving Hazard Mitigation Grant Program (HMGP) funding under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), 42 United States Code (USC) 5170c.

The Stafford Act defines a “state” as any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.[[2]](#footnote-3) “Grantee” or “recipient”, as stated in 44 CFR 200.431, means the government to which a grant is awarded and which is accountable for the use of the funds provided. *See* 2 CFR 200.86, 44 CFR 206.431 (definition of “grantee”). A Recipient can be any “state”, as defined by the Stafford Act. A “Recipient” can also be an Indian tribal government (federally-recognized) who chooses to be an applicant and become a recipient upon receipt of funds. A federally-recognized tribe also has the choice to apply through a state as a sub-applicant and be a subrecipient. *See* 44 CFR 206.431 (definition of “grantee”). The term “Indian tribal government” is defined in the Stafford Act[[3]](#footnote-4) as the governing body of any Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe under the Federally Recognized Indian Tribe List Act of 1994. See 44 C.F.R. 206.431 (definition of “Indian Tribal government”). In addition, the Sandy Recovery Improvement Act of 2013 (P. L. 113-2) amended the Stafford Act to provide for The Chief Executive of a federally recognized Indian tribe to make a direct request to the President of the United States for a major disaster or emergency declaration.[[4]](#footnote-5) This meant that if it obtained its own major disaster declaration, the Indian tribal government could be a recipient under that declaration. Previously, the Indian tribal government only had the option to be a recipient under the State’s disaster declaration. *See* 44 CFR 206.431 (definition of “grantee”).

DHS adopted in its entirety the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200) on December 26, 2014.[[5]](#footnote-6) This rule eliminates overlapping and duplicative requirements for stakeholders, including states, territories and Indian tribal governments, by using general terms such as “recipient” or “pass-through entity.” FEMA is also avoiding unnecessary duplication, overlap and the demand for maintenance of requirements under HMGP in two documents, the State Administrative Plan and the Tribal Administrative Plan. FEMA instead is offering and referring to one common set of requirements in an “Administrative Plan.” The term “State Administrative Plan” [[6]](#footnote-7) is now referred to “Administrative Plan for the Hazard Mitigation Grant Program”.

The regulation at 44 CFR 206.437 requires a state to have a FEMA-approved Administrative Plan to receive HMGP funding. At its minimum, the Administrative Plan will include the designated State agency or Indian Tribal government that will act as the Recipient, identify the State Hazard Mitigation Officer or Tribal Hazard Mitigation Officer, identify staffing requirements, and establish a guide for implementation activities and procedures to account for non-Federal cost sharing. Additional information requirements are guided by the type of mitigation activities being pursued.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

The Administrative Plan is a procedural guide that details how the State, Territory, or Indian Tribal government will administer the HMGP. The State, Territory, or Indian Tribal government (acting as recipient) must have a current administrative plan approved by the appropriate FEMA Regional Director before receiving HMGP funds.[[7]](#footnote-8) The Administrative Plan may take any form, including a chapter within a comprehensive State, Territory, or Tribal mitigation program strategy. The State, Territory, or Indian Tribal government may forward an Administrative Plan to FEMA for approval at any time prior to or immediately after the request for a disaster declaration. An approved plan is a prerequisite of receiving HMGP funds and is used by FEMA in determining approval for and the amount of each grant.[[8]](#footnote-9)

In the Administrative Plan, the State, Territory, or Indian tribal government must establish procedures to guide the administration of the Hazard Mitigation Grant Program, as outlined in the below listed activities.[[9]](#footnote-10) FEMA will review the information provided to ensure proper documentation of each activity. [[10]](#footnote-11) The activities include:

1. Designation of the State agency that will have responsibility for program administration.
2. Identification of the State Hazard Mitigation Officer responsible for all matters related to the Hazard Mitigation Grant Program.
3. Determination of staffing requirements and sources of staff necessary for the administration of the program.
4. Procedures to identify and notify potential sub-applicants of the availability of HMGP funding.
5. Procedures to establish priorities for selection of mitigation projects.
6. Procedures to provide, as applicable, potential sub-applicants with information on the application process, program eligibility, and deadlines.
7. Procedures to determine sub-applicant eligibility, as applicable.
8. Procedures to provide information for Environmental and Historic Preservation (EHP) and floodplain management reviews in conformance with 44 CFR Part 9 (or FEMA Directive 108-1 and Instruction 108-1-1).
9. Procedures to process requests for advances of funds and reimbursements.
10. Procedures to monitor and evaluate the progress and completion of funded mitigation activities.
11. Process to review and approve cost overruns.
12. Procedures to process appeals.
13. Process to provide technical assistance as required to subrecipients, as applicable.
14. Process to comply with the administrative and audit requirements of 2 CFR Parts 200 and 3002 and 44 CFR Part 206, Subpart N.
15. Procedures to comply with audit requirements of 2 CFR Part 200 Subpart F.
16. Procedures to provide quarterly progress reports to FEMA on funded mitigation activities.
17. Procedures for monitoring and reporting on subrecipient management costs before receiving funding for management costs.[[11]](#footnote-12)
18. Outline of roles and procedures to implement the recipient’s authority to address a subrecipient’s noncompliance with grant requirements by providing an opportunity to subrecipients to bring the grant into compliance, if applicable, or by imposing remedy actions or special conditions as outlined in 2 CFR 200.207 and 2 CFR 200.338.
19. Identification whether the plan has been incorporated into the recipient’s Emergency Operations Plan as a separate annex or chapter as required under 44 CFR 206.437(c).
20. For recipients with a Program Administration by States (PAS), procedures on how the recipient will administer delegated activities as outlined in the Addendum to the HMA Guidance Program Administration by States Pilot (HMGP);
21. For the recipients using a cost share strategy, as outlined in the [HMA Guidance (2015), Part VIII, A.8](https://www.fema.gov/media-library-data/1424983165449-38f5dfc69c0bd4ea8a161e8bb7b79553/HMA_Guidance_022715_508.pdf), an explanation of how the applicant will apply this approach in a fair and impartial manner; monitor the cost share for the overall award throughout the Period of Performance; and address any cost-share shortfalls that may occur during the Period of Performance or at closeout.
22. FEMA has developed a checklist that the applicant must complete and submit together with the Administrative Plan to ensure that all needed elements are addressed. FEMA uses the checklist to verify that the requirements are met. The checklist can be accessed at <https://www.fema.gov/media-library-data/1553880348440-5054ac68689ada7e9b13df07f3bdd50b/Admin_Plan_Checklist_3_25_19_final_508Compliant.pdf>.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

States, Territories, or Indian Tribal governments (federally-recognized) may submit the Administrative Plan to FEMA by e-mailing electronic files(s) containing the plan(s) updates at any time prior to a disaster declaration or immediately after and request approval. The required contents of an Administrative Plan are provided in 44 CFR 206.437. Information on mitigation and FEMA mitigation programs is made available to the public through FEMA’s web site at:

<http://www.fema.gov/hazard-mitigation-assistance>. Please reference the HMA Program Guidance 2015 for specific information for both the HMGP and the Administrative Plan.[[12]](#footnote-13)

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

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

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

The State Administrative Plan under 44 CFR 206.437 is required for grant applicants, who have the primary responsibility for project management and accountability of HMGP.  The State Administrative Plan details how the applicant plans to administer HMGP funds responsibly. For purposes of the information collection, FEMA collects the minimum criteria outlined in the regulation and only other information necessary for the proper administration of the Hazard Mitigation Grant by applicants. While the information collection applies to all applicants, some of which may be federally-recognized tribes meeting the definition of small entities, FEMA always attempts to reduce, to the extent practical and appropriate, the burden on applicants by only collecting the necessary information.  This information collection is a legal requirement and per 44 CFR 206.437, all applicants shall develop a State Administrative Plan as a condition of receiving HMGP funding. For the reasons mentioned above, we do not believe that there are particular impacts on small entities. Additionally, FEMA cannot grant an exception of these requirements for the administration of HGMP.

**6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

The Administrative Plan provides procedural guidance on HMGP administration, and is requisite for States, Territories, or Indian Tribal governments’ requests for HMGP disaster assistance in the event of a major disaster. Without approval of this information collection for the Administrative Plan allowing for preparation and FEMA approval of the Administrative Plan, FEMA would not be able to provide mitigation assistance under the HMGP to States, Territories, Indian tribal governments and local communities where a major Presidential disaster declaration was declared.

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

The special circumstances contained in item 7(a) through (h) of the supporting statement are not applicable to this information collection.

**(a) Requiring respondents to report information to the agency more often**

**than quarterly.**

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

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

**(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

**(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

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

**(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

**(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

**8. Federal Register Notice:**

**a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice inviting public comments was published on November 9, 2020, 85 FR 71351. Two comments were received; only one comment related to mitigation generally, but was not specific to this information collection. The commenter urged that States should address potentially disastrous and readily recognizable conditions in a plan and have the condition corrected before a disaster occurs. The commenter also urged that States do so before underwriting any disaster relief plan. The commenter concluded that any State applying for relief should, at a minimum, submit a plan, which should also be subject to review of basic stewardship verification principals outside the written plan documents.

In response, FEMA reiterates that FEMA regulations in 44 CFR 206.437 require development and updates to the State Administrative Plan by State Applicants/Recipients, as a condition of receiving HMGP funding under section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5170c. The State Administrative Plan is a procedural guide that details how the State administers the HMGP. The State, Territory, or Indian Tribal government (who acts as a recipient) must have a current administrative plan approved by the appropriate FEMA Regional Administrator before receiving HMGP funds. The administrative plan may take any form including a chapter within a comprehensive State mitigation program strategy. Additionally, states, territories, and Indian tribal governments are required to have an approved hazard mitigation plan as outlined in 44 CFR part 201. This hazard mitigation planning process identifies risks and vulnerabilities associated with natural disasters and establish a long-term strategy for protecting people and property in future hazards events.

A 30-day Federal Register Notice inviting public comments was published on February 10, 2021, 86 FR 8920. No comments were received.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

FEMA’s regional offices generally discuss the HMGP, including the Administrative Plan requirements with its State, Territory and Tribal counterparts in annual training sessions and meetings, as needed, to address deficiencies in the program. FEMA actively solicits national participation of State, Territorial and Tribal representatives to share hazard mitigation related information at events, such as hazard mitigation assistance workshops and summits, and Tribal consultations, and has held meetings related to data collection and electronic data processing for FEMA mitigation grant programs; and FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conferences.

**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 has received input about information collections for the HMGP through meetings between State, Territory and Indian Tribal governments and local governments and the FEMA Regional Offices, which occur at unscheduled times during the year. The 59 Respondents affected by this data collection are the 59 HMGP Recipients, which are the states, and any Indian tribal government choosing to act as a Recipient either under its own disaster declaration or the State’s disaster declaration.

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

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

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

A Privacy Threshold Analysis (PTA) for this collection was approved by DHS on October 9, 2020.  FEMA Privacy recommends that the collection has coverage under the DHS/ALL/PIA-006 General Contacts List Privacy Impact Assessment (PIA) and that this collection is not a system of record and does not require a System of Records Notice (SORN) as prescribed by the Privacy Act of 1974, as amended.

**11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated 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.**

Average number of respondents – 35

Frequency of response – twice annually

Annual hour burden – 8 hour per Administrative Plan

FEMA estimates that out of the 56 States and Territories that currently have Administrative Plans in place, plus 3 Tribal direct Applicants/Recipients, 35 States/Territories/Indian tribal governments (federally-recognized) will update their Administrative Plan each year. As of July 2020, fifteen (15) tribal Presidential disaster declaration requests had been approved under HMGP since the Stafford Act amendment in 2013. Thirteen (13) Tribes were recipients under the State’s disaster declaration while two (2) Tribes (Pueblo of Santa Clara and Soboba Indian Reservation) were each recipient under two of their own disaster declarations. States, Territories, and Indian tribal governments may submit the updated Administrative Plan to FEMA by e-mailing electronic files at any time prior to a disaster declaration or immediately after and request approval.

Since the 59 States/Territories/Indian tribal governments already have plans in place, no new plans are expected, only updates. FEMA estimates that it will take an average of eight (8) hours per State/Territory/Indian Tribal government to review pre-existing information, and to prepare and submit their updated Administrative Plan to FEMA. Therefore, it is estimated that approximately 35 States/Territories/Indian tribal governments will update their plan twice per year, each update will require 8 hours, and the total annual hour burden will be 35 x 2 responses x 8 hours = 560 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** | | | | | | | |
| 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 |
| Administrative Plan / No Form | 35 | 2 | 70 | 8 | 560 | $58.40 | $32,704 |
| **Total** | 35 |  | 70 |  | 560 |  | $32,704 |

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.6[[13]](#footnote-14). For example, a non-loaded BLS table wage rate of $42.51 would be multiplied by 1.6, and the entry for the “Avg. Hourly Wage Rate” would be $68.02.**

According to the U.S. Department of Labor, Bureau of Labor Statistics[[14]](#footnote-15), the May 2019 Occupational Employment and Wage Estimates wage rate for State and local governments Urban and Regional Planner (SOC 19-3051) is $36.50. Including the wage rate multiplier of 1.6, the fully-loaded wage rate is $58.40 per hour. Therefore, the annual burden hour cost is estimated to be $32,704 (58.40 x 560 hours = $32,704).

**13.** **Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

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

**The cost estimates should be split into two components:**

**a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

**b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **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 |

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

|  |  |
| --- | --- |
| **Annual Cost to the Federal Government** | |
| Item | Cost ($) |
| Contract Costs [Describe] | $0 |
| Staff Salaries: 1 GS 12, step 5 employee in Washington DC spending approximately 13% of their time annually to reviewing and approving 70 Administrative Plans revisions at 4 hours each for this data collection [$98,8271 x 0.13 x 1.462 = $18,577.36]. 1 Regional Director, Exec. Level III reviewing and giving approval notification at 30 minutes per plan for this data collection ($183,3003/yr. x 1.46 x 0.02 = $5,352.36); Total = ($18,577.36 + $5,352.36 = $23,929.72) | $23,930 |
| Facilities [cost for renting, overhead, etc. for data collection activity] | $0 |
| Computer Hardware and Software [cost of equipment annual lifecycle] | $0 |
| Equipment Maintenance [cost of annual maintenance/service agreements for equipment] | $0 |
| Travel | $0 |
| **Total** | $23,930 |
| 1 Office of Personnel Management 2021 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/pdf/2021/DCB.pdf>. Accessed January 29, 2021.  2 Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate for Federal employees. 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 2020.” Available at <https://www.bls.gov/news.release/archives/ecec_06182020.pdf>. Accessed January 29, 2021. The wage multiplier is calculated by dividing total compensation for all workers of $37.73 by wages and salaries for all workers of $25.91 per hour yielding a benefits multiplier of approximately 1.46  3 Office of Personnel Management 2021 Pay and Leave Tables for Executives <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/EX.pdf> | |

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

*A* ***"Program increase"*** *is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

*A* ***"Program decrease",*** *is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).*

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

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Itemized Changes in Annual Burden Hours** | | | | | | |
| Data Collection Activity/Instrument | Program Change (hours currently on OMB inventory) | Program Change (new) | Difference | Adjustment (hours currently on OMB inventory) | Adjustment (new) | Difference |
| Administrative Plan | 560 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 560 | 0 | 0 | 0 | 0 | 0 |

***Explain:***There is no change to the information being collected for this collection. There is no change in Annual Burden Hours for this collection.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **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 / Administrative Plan | $0 | $0 | $0 | $19,553 | $23,930 | $4,377 |
| **Total** | $0 | $0 | $0 | $19,553 | $23,930 | $4,377 |

***Explain:***No change in Annual Cost Burden for the recipient. There is an adjustment increase in Annual Cost Burden for FEMA of $4,377. This increase occurred due to the pay of a GS 12 step 5 and Executive Level III increasing from the last information collection extension. There continues to be no record keeping, capital start-up or maintenance costs associated with this information collection, as documented in Item 14 of OMB Form 83-I.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection

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

FEMA will display the expiration date for OMB approval of this information collection.

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

FEMA does not request an exception to the certification of this information collection.

**B. Collections of Information Employing Statistical Methods.**

This collection involves no statistical methods.

1. In accordance with the principles outlined in 2 CFR 200, FEMA no longer uses the term “Grantee” in this document but refers to grantees as “Recipients.” [↑](#footnote-ref-2)
2. *See* Stafford Act, Section 102(4), 42 U.S.C. 5122(4). [↑](#footnote-ref-3)
3. *See* Stafford Act, Section 102(6), 42 U.S.C. 5122(6). [↑](#footnote-ref-4)
4. *See* Stafford Act, Section 102(6) and (8). [↑](#footnote-ref-5)
5. S*ee* at 2 CFR 3002.10, as published in the 79 Federal Register (FR) 75867, (Dec. 19, 2014). [↑](#footnote-ref-6)
6. *See* 44 CFR 206.437. [↑](#footnote-ref-7)
7. *See* 44 CFR 206.437(c). [↑](#footnote-ref-8)
8. *See* 44 CFR 206.437(d). [↑](#footnote-ref-9)
9. *See* 44 CFR 206.437. [↑](#footnote-ref-10)
10. *See* 44 CFR 206.437(a)(4). [↑](#footnote-ref-11)
11. *See* section 324 of the Stafford Act. [↑](#footnote-ref-12)
12. The HMA Guidance (2015) is available on FEMA’s website at: https://www.fema.gov/media-library-data/1424983165449-38f5dfc69c0bd4ea8a161e8bb7b79553/HMA\_Guidance\_022715\_508.pdf [↑](#footnote-ref-13)
13. State and local government wage multiplier: 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 2020.”  Available at <https://www.bls.gov/news.release/archives/ecec_06182020.pdf>.  Accessed January 29, 2021.  The wage multiplier is calculated by dividing total compensation for State and local government workers of $52.45 by Wages and salaries for State and local government workers of $32.62 per hour yielding a benefits multiplier of approximately 1.6. [↑](#footnote-ref-14)
14. 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/2019/may/oes193051.htm> [↑](#footnote-ref-15)