

January 14, 2020

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0072

Title: Mitigation Grant Programs

Form Number(s):

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.

This collection of information is necessary to implement grants for the Flood Mitigation Assistance (FMA) program and the Building Resilient Infrastructure and Communities (BRIC) program.

The FMA program is authorized by Section 1366 of the National Flood Insurance Act, 42 U.S.C. 4104c, as amended. The FMA program, under 44 CFR Part 79, provides funding for measures taken to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insured under the National Flood Insurance Program (NFIP). The Biggert-Waters Flood Insurance Reform Act of 2012 eliminated the Repetitive Flood Claims (RFC) and Severe Repetitive Loss (SRL) programs and made significant changes to the FMA program. Cost-share requirements were changed to allow more Federal funds for properties with repetitive flood claims.

The Building Resilient Infrastructure and Communities (BRIC) program is authorized by Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended (Pub. L. No. 93-288) (42 U.S.C. § 5133). The BRIC program makes federal funds available to states, U.S territories, Indian tribal governments, and local communities for pre-disaster mitigation activities. The guiding principles of the program are to (1) support state and local governments, tribes, and territories through capability and capacity-building to enable them to identify mitigation actions and implement projects that reduce risks posed by natural hazards; (2) encourage and enable innovation while allowing flexibility, consistency, and effectiveness; (3) promote partnerships and enable high-impact investments to reduce risk from natural hazards with a focus on critical services and facilities, public infrastructure, public safety, public health, and communities; (4) provide a significant opportunity to reduce future losses and minimize impacts on the Disaster Relief Fund; and (5) support the adoption and enforcement of building codes, standards, and policies that will protect the health, safety, and general welfare of the public, take into account future conditions, and have long-lasting impacts on community risk reduction, including for critical services and facilities and for future disaster costs.

In accordance with 2 C.F.R. 200.203, FEMA requires that all parties interested in receiving FEMA mitigation grants to submit an application package for grant assistance. Applications and subapplications for the BRIC program are submitted via the FEMA Grants Outcome (GO) system. The FEMA GO system has been developed to meet the intent of the e-Government initiative, authorized by Public Law 106–107. This initiative requires that all government agencies both streamline grant application processes and provide for the means to electronically create, review, and submit a grant application via the Internet.

FEMA has posted the Fiscal Year 2020 (FY20) Hazard Mitigation Assistance (HMA) Notice of Funding Opportunities (NOFOs) for the Flood Mitigation Assistance (FMA) grant program and the new Building Resilient Infrastructure and Communities (BRIC) grant program.

FMA and BRIC provide States, local communities, Tribes and Territories (SLTTs) funding for eligible mitigation FMA's highest priority is mitigating repetitive and severe repetitive loss properties. Within that overall strategy, per the FMA FY20 NOFO, once subapplications are determined to be eligible and complete, subapplications for project scoping or community flood mitigation projects receive priority scoring. With the remaining funds, other subapplications are prioritized for technical assistance, flood hazard mitigation planning, and flood hazard mitigation of individual properties based on the NFIP claims history meeting repetitive flood loss definitions and prioritization contained in the NOFO.

For BRIC, subapplications submitted to the national competition that pass the eligibility and completeness programmatic review will be scored with technical evaluation

criteria and may be scored with qualitative evaluation criteria, if applicable. If needed, based on the number of subapplications submitted to the BRIC program, FEMA will use the technical evaluation criteria scoring as a program priority screening tool for the qualitative evaluation review. FEMA will send subapplications valued up to twice the amount of available funding to the BRIC qualitative evaluation panel. FEMA will ensure that at least one eligible subapplication from each Applicant will be sent to the qualitative evaluation panel for review.

In order to increase transparency in decision-making while building capability and partnerships, FEMA will convene a National Review Panel to score subapplications based on qualitative evaluation criteria. The qualitative criteria are narrative submissions to allow subapplicants the flexibility to fully explain the strengths of the proposed project. Qualitative evaluation criteria have graded scales of point scoring.

The BRIC program will solicit volunteers from SLTTs (States, local communities, Tribes, Territories) and OFAs (Other Federal Agencies), to review applications that are routed to the qualitative panel reviews. The volunteers will review, and score applications based on a pre-determined scoring criteria.

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.

For FY20 for BRIC and FMA, FEMA has transitioned from using the electronic system, eGrants, to the FEMA Grants Outcomes (FEMA GO) system, which is an intuitive, user-friendly, web-based application that allows eligible applicants and subapplicants to apply for Grants and Subgrants by using the Internet. The previous eGrants system's functionalities and business processes have been modernized and streamlined in FEMA GO.

The **Benefit Cost Determination** is used to collect data to evaluate the proposed project's cost effectiveness. In short, mitigation projects must be cost effective to be eligible for Hazard Mitigation Assistance, (HMA) funding as demonstrated by a FEMA-validated benefit cost analysis. This cost effectiveness is based on a mix of the initial cost of the project and the life-expectancy of the proposed project as well as the losses expected to be avoided once the project is complete (benefits).

The **Environmental Review** is used to collect information that is needed to ensure that a proposed project is in compliance with all necessary environmental and historic preservation regulations and laws. This information is collected to assure that adverse project impact is minimized as much as possible. For example, if a property is acquired and there is asbestos on the property, FEMA has to assure that it is disposed of according to regulations.

The **Project Narrative-Sub-grant Application** is used to collect the information necessary for FEMA to assess the financial needs of the applicants as well as the projected benefits to be obtained from the use of grant funds for each of its mitigation grant programs. The application provides FEMA information on the scope and scale of the project to determine whether the mitigation activity proposed for funding meets eligibility criteria. In addition, the Applicant provides responses to FEMA to established questions which, combined with the activity eligibility criteria, will be used to objectively evaluate the merits of the application.

The **National Review Panel Solicitation** will be used as part of the BRIC application process to solicit a qualitative panel of volunteers from SLTTs to review and score applications. In order to increase transparency in decision-making while building capability and partnerships, FEMA will convene a National Review Panel to score subapplications based on qualitative evaluation criteria. The qualitative criteria are narrative submissions to allow subapplicants the flexibility to fully explain the strengths of the proposed project. Qualitative evaluation criteria have graded scales of point scoring. Subapplications submitted to the national competition that pass the eligibility and completeness programmatic review will be scored with technical evaluation criteria and may be scored with qualitative evaluation criteria, if applicable. In order to convene a qualitative panel, the BRIC program will put out a solicitation consisting of eleven questions in an “Expression of Interest Form” to be able to collect responses from interested volunteers. This will be done by adding a hyperlink on the FEMA BRIC website, and will allow the interested volunteers to respond to the expression of interest solicitation. After the solicitation period has ended, BRIC will select the volunteers for the review panels based on the response received.

Information from the following Standard Forms (SF) is collected within the sub-grant application. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal government.

SF-424, Application for Federal Assistance, is used by applicants as a required face-sheet for applications submitted for assistance. It is approved under OMB No. 4040-0004.

SF-424A, Budget Information for Non-construction Programs, is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is not construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0006.

SF-424B, Assurances for Non-Construction Programs, is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is not construction. It is approved for use under OMB No.4040-0007.

SF-424C, Budget Information for Construction Programs, is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0008.

SF-424D, Assurances for Construction Programs, is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is construction. It is approved for use under OMB No. 4040-0009.

SF-LLL, Disclosure of Lobbying Activities, is a standard form used by applicants as a required agreement to comply with all requirements of the awarding agency. It is approved for use under OMB No. 4040-0013.

The following Standard Forms are used post award outside of the FEMA GO system. Approval for use of these forms is provided under a government-wide OMB number used throughout the Federal government.

SF-425/425A, Federal Financial Report/Report Attachment, is a standard form used by Recipients to report the status of financial expenditures for FEMA grants awarded in the Payment and Reporting System (PARS); SF-425A is attached when reporting multiple grants. These forms are approved for use under OMB No. 4040-0014.

SF-429, Real Property Status Report, is a standard form used by recipients to provide a listing of inventoried, non-expendable equipment purchased under a grant or cooperative agreement or Federally-owned equipment that is provided by the agency to be used by the recipient. It is approved for use under OMB No. 4040-0016.

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.

Grant applications for the FMA program are submitted via FEMA GO. The use of the FEMA GO electronic system by respondents allows 100% percent of the information required to be submitted electronically. The individual FEMA Forms can be accessed at <http://www.fema.gov/forms/>.

Respondents can access FEMA GO through the Website <https://go.fema.gov/>. New users may access the FEMA GO system by selecting the create an account button and then entering in the required information in order to be approved for a username and password. Additional instructions on how to apply can be found at

<https://www.fema.gov/grants/guidance-tools/fema-go/hazard-mitigation-assistance-grants>.

FEMA Grants Outcomes (FEMA GO) is the new system of record for grants within FEMA. The Grants Management Modernization (GMM) program office is developing FEMA GO using agile development methods, meaning the team ships software iteratively, rather than waiting for the entire system to be developed before launching.

FEMA GO will be a single web-based application for all grants management within FEMA. It will streamline grant programs across the agency and reduce the burden for grant recipients.

FEMA GO will enable the following burden reductions for the public:

- Information sharing across grant programs
- Pre-populating recipient information as appropriate
- Conditional logic so users only need to respond to questions relevant to them
- Algorithms that do financial calculations automatically
- Plain language questions that are easier to understand

At present, while not all of FEMA has yet transitioned to FEMA GO, for FY20 FMA and BRIC, all applications will be submitted via FEMA GO. FEMA GO is currently in operation and effective for FY20 FMA and BRIC.

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 elsewhere in any form, and therefore is not duplicated elsewhere.

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

This information collection has a minimal impact on small businesses or other small entities. Small businesses and “other small entities” are not defined or classified as subapplicants under BRIC or FMA. Both programs award grant funds to states and local governments. “Local governments” may apply as subapplicants under these programs. Under BRIC, authorized under the Stafford Act, “local governments” has a specific definition per Section 102(6) of the Stafford Act. Under 42 U.S.C. 4104c which authorizes FMA, “communities” to whom subawards may be made is specifically defined. By policy, communities and local governments are often used interchangeably under FMA. While subapplicants may submit applications on behalf of small businesses or “small entities” [however they are defined], this information collection does not create any significant change how “small businesses” or “small entities” are treated under the two programs. Consistent with past practice under FMA and BRIC’s predecessor, the

Pre-Disaster Mitigation program (PDM), the format of how grants are awarded to local governments or communities under BRIC and FMA, and how entities (small businesses or other kinds) receive funds from subapplicants who apply on their behalf, is not significantly changed by this information collection.

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.

Without this collection activity, FEMA will not be able to implement its mitigation grant programs that are set forth in legislation and implementing regulations.

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) thru (h) of this 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 October 27, 2020, 85 FR 68084. **number of comments related to (state topic of comments) were received].**

A 30-day Federal Register Notice inviting public comments was published on January 7, 2021, 86 FR 1117. **Two comments related to (state topic of comments) were received].**

This proposed information collection previously published in the Federal Register on October 27, 2020, at 85 FR 68084 with a 60-day public comment period. The comment period closed on December 28, 2020. FEMA received 2 comments via www.regulations.gov in response to Information Collection 1660-0072. A summary of each comment and FEMA’s response is provided below.
Individual Citizen, Docket ID FEMA-2020-0035-0002

This individual citizen posted two comments within one attachment. The initial comment provided that because “community” is used in program descriptions, applications and subapplications submitted by SLTTs for BRIC and FMA grants should include the following information: “1) Evidence of public outreach and education on proposed mitigation activities; 2) Evidence of public comment on the proposed mitigation activities; 3) Evidence that public comments were addressed either by additional outreach/education within the community or incorporation into proposed mitigation/solution in the application/proposal; and 4) Evidence of community representation on the team that developed the application/sub-application.” In response, while FEMA appreciates this comment, the Information Collection Request Federal Register notice was published to solicit feedback about the expression of interest form to solicit potential panelists for the BRIC application review process.

The second comment seeks additional information about the makeup of the qualitative panel, the review process, and whether panelists will be compensated for their participation in the review process. In response, BRIC applications and sub-applications will be reviewed for Eligibility and Completeness (E&C) by FEMA’s respective regional offices. During the E&C review, projects that are submitted to the national competition will also be provided a technical score. Technical scores are made up of 100 points, which are binary points. After applications have gone through the E&C review, they will be forwarded to the National Technical Review (NTR). Projects that are marked as standard NTR during the E&C review will be reviewed by contractors and issued an NTR

memo. Projects that are marked as decentralized will be reviewed by the regional office and issued an NTR memo. After NTR has concluded, the projects that are submitted to the national competition will be sent to the qualitative panels. During the qualitative panels, applications will be reviewed by States, Locals, Tribes, Territories (SLTTs) and other federal agencies and scored based on a gradient scale. Qualitative scoring has a total of 100 possible points. The scoring is made up of 6 criteria, all ranging in different point value. For the qualitative panels, each application will be reviewed and scored by 3 volunteer panel members. The panelists will not be compensated for their participation.

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 routinely consults with State/local representatives and national organizations to discuss FEMA mitigation grant programs. The timing of these discussions varies and is often conducted on an as needed basis. FEMA holds periodic conference calls with both the National Emergency Management Association (NEMA) and the Association of State Floodplain Managers (ASFPM). In addition, FEMA staff participates actively in annual conferences of both these organizations.

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 headquarters and regional staff participate in annual meetings with State and local representatives to discuss updates to mitigation grant programs, including data collection and the change from use of the eGrants system to the FEMA Go System. Specifically, these stakeholders have contributed input into the development of the eFEMA GO system for FMA and BRIC.

In addition to the above, FEMA sought feedback from various stakeholders on the implementation of BRIC by way of letters, emails, and through virtual and in-person engagements. That feedback led to the addition of a qualitative criteria scoring which FEMA will implement by convening a panel. This will: offer a more streamlined application process to address existing complexities, increase transparency regarding how and why final project decisions are made, and use a universal baseline grant application system for all programs and activities under BRIC.

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

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

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

A Privacy Threshold Analysis (PTA) was October 28, 2020.

System covered by existing SORN DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs, March 24, 2014 79 FR 16015; DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) November 27, 2012, 77 FR 70792

There is no assurance of confidentiality in that the government will monitor all actions within their system (FEMA G)). However, the Privacy Act does allow protection of the data, specifically, PII.

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

There are no questions of sensitive nature.

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

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

There are 56 respondents for each of the forms within the two programs. Each of the programs uses the Benefit-Cost Determination, Environmental Review, and Project Narrative – Sub-grant Application. The responses under the Flood Mitigation Assistance (FMA) Program, now include responses that would have been made under the old SRL and RFC programs, has a total of 1,904 responses and the total annual hour burden for this program is 16,408 (2,800 + 4,200 + 9,408 = 16,408).

For the Benefit-Cost Determination, it is estimated that 56 State Urban and Regional Planners will complete an average of 30 Benefit Cost Analyses in support of the grant requests made. It is estimated that each response will require 5 hours to complete and will be completed 1,680 times per year among the 2 grant programs. The total annual hour burden for this information collection activity will be (56 x 30 x 5 hours) = 8,400 hours.

For the Environmental Review, it is estimated that 56 State Urban and Regional Planners will complete an average of 30 Environmental Reviews in support of the grant requests made. It is estimated that each response will require 7.5 hours to complete and will be completed 1,680 times a year among the 2 grant programs. The total annual hour burden for this information collection activity will be (56 x 30 x 7.5 hours) = 12,600 hours.

For the Project Narrative – Sub-grant Application, it is estimated that 56 State Urban and Regional Planners will complete an average of 34 Narratives in support of the grant requests made. It is estimated that each response will require 12 hours to complete and will be completed 1,904 times a year among the 2 grant programs. The total annual hour burden for this information collection activity will be (56 x 34 x 12 hours) = 22,848 hours.

For the BRIC review panels, it is estimated they will be comprised mostly of Life, Physical, and Social Science Occupations (SOC-19-000) working in State, local, or Tribal governments with an annual average wage of \$33.14. Including the wage rate multiplier of 1.6, the fully-loaded wage rate is \$53.02 per hour. Therefore, the annual burden hour cost is estimated to be \$763,488 (53.02 x 14,400 hours = \$763,488). The total annual burden for this information collection activity is estimated at \$3,324,211 (\$2,560,723 + \$763,488)

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.

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	Avg. Hourly Wage Rate	Total Annual Respondent Cost

						Hours)		
Flood Mitigation Assistance								
State, local, or Tribal government	Benefit-Cost Determination	56	10	560	5	2,800	\$58.40	\$163,520
State, local, or Tribal government	Environmental Review	56	10	560	7.5	4,200	\$58.40	\$245,280
State, local, or Tribal government	Project Narrative-Sub-grant Application	56	14	784	12	9,408	\$58.40	\$549,427
Pre-Disaster Mitigation								
State, local, or Tribal government	Benefit-Cost Determination	56	20	1,120	5	5,600	\$58.40	\$327,040
State, local, or Tribal government	Environmental Review	56	20	1,120	7.5	8,400	\$58.40	\$490,560
State, local, or Tribal government	Project Narrative-Sub-grant Application	56	20	1,120	12	13,440	\$58.40	\$784,896
State, local, or Tribal government	BRIC Review Panel	100	1	100	144	14,400	\$53.02	\$763,488
Total		436		5,364		58,248		\$3,324,211

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 Urban and Regional Planners working for local governments (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 \$1,240.00 (\$58.40 x 43,848 hours = \$2,560,723).

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 2020.” Available at https://www.bls.gov/news.release/archives/ecec_06182020.pdf. Accessed October 13, 2020. 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.

²

Data Collection Activity	Supporting Authority	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
Benefit Cost Determination	FMA (97.029) and BRIC Programs	56	30	1,680	5	8,400
Environmental Review	FMA (97.029) and BRIC Programs	56	30	1,680	7.5	12,600
Project Narrative-Sub-Grant Application	FMA (97.029) and BRIC Programs	56	34	1,904	12	22,848
Total		168		5,264		43,848

Information from the following Standard Forms (SF) is collected within the sub-grant application. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal government.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
Flood Mitigation Assistance (FMA) (97.029)						
State, Local or Tribal Government	Application for Federal Assistance FEMA Form 112-0-10	56	3	168	0.75	126
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	3	168	9.7	1630
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3, A, B, C	56	1	56	1.7	95
State, Local or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs / FEMA Form 112-0-4	56	10	560	17.2	9,632

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	1	56	4.2	235
State, Local or Tribal Government	Reconciliation of Grants and Cooperative Agreements / FEMA Form 112-0-6	56	1	56	0.084	5
Total		336		1,064		11,723
Pre-Disaster Mitigation (PDM) (97.047)						
State, Local or Tribal Government	Application for Federal Assistance/FEMA Form 112-0-10	56	2	112	0.75	84
State, Local or Tribal Government	Budget Information - Non-construction Programs / FEMA Form 112-0-8	56	2	112	9.7	1,086
State, Local or Tribal Government	Obligating Document for Awards/Amendments / FEMA Form 112-0-7	56	2	112	1.2	134
State, Local or Tribal Government	Assurances and Summary Sheet for Assurances / FEMA Forms 112-0-3, A, B, C	56	2	112	1.7	190
State, Local or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs / FEMA Form 112-0-4	56	20	1,120	17.2	19,264
State, Local or Tribal Government	Report of Government Property / FEMA Form 112-0-5	56	2	112	4.2	470
State, Local or Tribal Government	Reconciliation of Grants and Cooperative	56	2	112	0.084	9

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
	Agreements / FEMA Form 112-0-6					
Total		392		1,792		21,237

The following Standard Forms are utilized for the FEMA grant programs, but the burden hours are not calculated nor submitted for approval within this collection.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
Flood Mitigation Assistance (FMA) (97.029)						
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	1	56	0.167	9
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336
Total		112		448		471
Pre-Disaster Mitigation (PDM) (97.047)						
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	56	2	112	0.167	19
State, Local or Tribal Government	Federal Financial Report / SF 425	56	4	224	1.5	336
Total		112		448		439

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost

burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

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

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

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

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
N/A				
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.

The total cost to FEMA is \$7,586,635. Approximately 30 staff members with an estimated grade level of GS-13 step 5 in Washington, DC review and make determinations for these grant programs.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: FEMA contracts the maintenance and enhancements to the eGrant	\$3,000,000

data collection. The annual cost of this maintenance contract with IBM, Inc. is \$3,000,000.00 for the sustainment/maintenance of the eGrants system.	
Staff Salaries: 26 GS 13, step 5 employees spending approximately 100% of their time annually to collect data/survey individuals for this data collection. [26 x \$116,353 x 1 x 1.46 ¹ = \$4,416,760] 4 GS 13, Step 5 employees spending approximately 25% of their time on planning, review, and evaluation of BRIC panels. [4 x \$116,353 x 0.25 x 1.461 = \$169,875] [\$4,416,760 + \$169,875= \$4,586,635]	\$4,586,635
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	\$7,586,635
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 October 13, 2020.	
² Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.	

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

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

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
BRIC Review Panels	0	0	0	0	14,400	14,400
Total	0	0	0	0	14,400	14,400

Explain:

The additional hours are being added due to the addition of the qualitative review panel. Per the NOFO we will convene a national panel to review and score applications.

Itemized Changes in Annual Cost 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
BRIC Review Panels	\$0	\$0	\$0	\$0	\$763,488	\$763,488
Total	\$0	\$0	\$0	\$0	\$763,488	\$763,488

Explain:

The additional hours are being added due to the addition of the qualitative review panel. Per the NOFO we will convene a national panel to review and score applications.

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

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

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

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

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

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

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.