

February 25, 2022

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - 0062**

**Title: State/Local/Tribal Hazard Mitigation Plans**

**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)(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

**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.**

Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5165, as amended by the Disaster Mitigation Act of 2000 (DMA 2000), Pub. L. No. 106-390, provides the framework for linking pre- and post-disaster mitigation planning and initiatives with public and private interests to ensure an integrated, comprehensive approach to disaster loss reduction. Title 44 CFR Part 201 provides the mitigation planning requirements for state, local, Tribal, and Territorial (SLTT) governments to identify the natural hazards that impact them, to identify actions and activities to reduce any losses from hazards, and to establish a coordinated process to implement the plan, taking advantage of a wide range of resources.

**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 purpose of the hazard mitigation plan (Plan) requirements is to enable SLTT governments to better understand the risks they face from natural hazards and to make decisions and take actions for their reduction. Implementation of planned, pre-identified, cost-effective mitigation measures will streamline the disaster recovery process. The Plan is the demonstration of the goals, priorities, and commitment which serves as a guide for SLTT decision makers as they commit resources to reducing the effects of natural hazards.

In order to be eligible for certain types of Federal Emergency Management Agency (FEMA) non-emergency assistance, SLTT<sup>1</sup> governments are required to have a Plan that meets the criteria established in 44 CFR Part 201. States are required under section 322 of the Stafford Act to have a FEMA-approved Standard State Mitigation Plan, following the criteria established in 44 CFR § 201.4, to be eligible to receive certain Stafford Act assistance. Plan updates for states are required every five years.

Per 44 CFR Part 201, all new Plans are required to include documentation of the planning process, risk assessment, mitigation strategy, and a maintenance process. The update of a Plan for local and Tribal governments is required every five years and must document changes in development, progress in local mitigation efforts, and changes in priorities. Local and Tribal governments use their Plans, particularly the mitigation strategy, to guide decision makers as they commit resources to reducing the effects of natural hazards.

FEMA also receives reviews of Local and Tribal Plans from states which may be in the form of a letter, email, or other format conveying completion of state review and must document that the Local or Tribal Plan meets the requirements of 44 CFR Part 201. States also use these reviews to provide technical assistance and to prioritize project funding.

States, at their discretion, may develop an Enhanced State Mitigation Plan, following the criteria established in 44 CFR § 201.5 in order to be eligible for increased Hazard Mitigation Grant Program (HMGP) funding. The Enhanced Plan is a separate Plan type that is managed at the state and Tribal level. The Enhanced Plan must demonstrate that a state has developed a comprehensive mitigation program, effectively uses available mitigation funding, and is capable of managing the increased funding.

Tribal governments are addressed under a specific planning requirement in 44 CFR § 201.7 that recognizes some of the unique aspects of these governments. Section 201.7 provides for Plans

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<sup>1</sup> In accordance with the definitions at 44 C.F.R. § 201.2, the term “state” is defined “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”.

prepared and approved under the existing rule, either under the state or local requirements, to be recognized as Tribal Mitigation Plans. Tribal governments would then be eligible for FEMA mitigation grants under the Stafford Act and the National Flood Insurance Act of 1968, as amended, 42 U.S.C. 4001 *et seq.* (NFIA).

Plans must be submitted to a State Hazard Mitigation Officer for initial review and coordination. A state will then send the Plan to the appropriate FEMA Regional Office for formal review and approval. FEMA-approved Plans developed under 44 CFR Part 201 have been used by FEMA to determine state and Tribal eligibility for Stafford Act assistance, including HMGP, Building Resilient Infrastructure and Communities (BRIC), Pre-Disaster Mitigation (PDM) grant funds (which has been replaced by BRIC, as established by the Disaster Recovery Reform Act of 2018), High Hazard Potential Dam Rehabilitation Grant Program (HHPD) as authorized by the National Dam Safety Program Act (Pub. L. 92–367), as amended, 33 U.S.C. § 467f-2), and are now also used to establish eligibility for the grant program, Flood Mitigation Assistance (FMA), under the NFIA. .

**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.**

While FEMA has not implemented a requirement for SLTT governments to use information technology to submit the Plans, FEMA encourages SLTT governments to submit electronic file(s) containing the Plan and associated Plan Review Tool to the appropriate FEMA Regional Office for review and approval.

These Plans may be submitted in any format the jurisdiction chooses, such as Microsoft Word document (.doc, .docx), Adobe Acrobat portable document format (.pdf), web- and client-based file transfer, or as hardcopy. FEMA encourages SLTT governments to use available technology to develop their Plans. All Plans in this collection are submitted electronically, although one region additionally requires a hardcopy version. No plans are faxed. FEMA provides to the SLTT governments guidance and instructions on how to properly draft a Plan.

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

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

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

This information collection does not have an impact on small businesses. Collection requirements for small governmental jurisdictions do not differ from the collection requirements of larger jurisdictions. FEMA and the States are responsible for aiding jurisdictions as they participate in the Program. The burden on small entities can be addressed via training and technical assistance provided by both FEMA and the State. Private non-profit organizations are not required to have a Plan but may choose to do so in order to be eligible for certain types of FEMA mitigation grants.

**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.**

All hazard mitigation plans must be reviewed, revised, and re-approved every five years by the appropriate FEMA Regional Office. According to the Stafford Act, the NFIA and the National Dam Safety Program Act, without an approved Plan, SLTT governments cannot receive certain FEMA assistance, including HMGP, BRIC, PDM under the Stafford Act, HHPD per the National Dam Safety Program Act, and FMA under the NFIA.

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

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

**(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.**

**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.**

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

## **8. Federal Register Notice:**

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

A 60-day Federal Register Notice inviting public comments was published on September 14, 2021, at 86 FR 51174. One public comment was received. FEMA acknowledges and appreciates the comment made; however, the comment was not germane to the program meaning no further action was taken.

A 30-day Federal Register Notice inviting public comments was published on February 25, 2022, at 87 FR 10805. The public comment period is open through March 28, 2022.

**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 Mitigation staff is regularly invited to participate in conferences, work groups or other meetings with the American Planning Association, the Association of State Floodplain Managers, and the National Emergency Managers Association, to discuss issues related to mitigation planning.

**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.**

In 2020, FEMA began an update of its state and local mitigation planning policies, also known as the Plan Review Guides, to reflect recent legislative changes and broader policy updates.

Throughout July 2020, FEMA gathered feedback from states, local governments, and members of the public as it pertains to updating the state and local policies.

FEMA has been conferring with the National Dam Safety Review Board beginning in 2021, as it advises FEMA's Administrator in setting national dam safety priorities and considers the effects of national policy issues affecting dam safety. Review Board members include FEMA, the Chair of the Board, representatives from four Federal agencies that serve on the Interagency Committee on Dam Safety (ICODS), five state dam safety officials, and one member from the private sector.

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

There is no payment or gift to respondents for this information collection.

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

The Privacy Threshold Analysis (PTA) for the State/Local/Tribal Hazard Mitigation Plans was approved by the DHS Privacy Office on April 1, 2021, and is valid through April 16, 2024. There are no assurances of confidentiality provided to the respondents for this information collection. A Privacy Impact Assessment (PIA) is required for this collection as a privacy-sensitive system and coverage is provided by DHS/ALL/PIA-006 DHS General Contacts List. No System of Records Notice (SORN) is required.

The Privacy Threshold Analysis (PTA) for the Risk Analysis and Management (RAM) system was approved by the DHS Privacy Office on September 27, 2019, and is valid through September 27, 2022. There are no assurances of confidentiality provided to the respondents for this information collection as related to OMB Collection 1660-0062. A PIA is required for this collection as a privacy-sensitive system and coverage is provided by DHS/FEMA/PIA-045 Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems. SORN coverage is required and provided under: 1) DHS/FEMA-014 Hazard Mitigation Planning and Flood Mapping Products and Services Records, 2) DHS/FEMA-003 National Flood Insurance Program (NFIP) Files System of Records, and 3) DHS/ALL-004 General Information Technology Access Account Records System (GITAARS).

**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.**

To determine the annual burden for this collection, burden hours were calculated separately for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

First, FEMA identifies 56 “states”, per 44 CFR Part 201, as respondents. Next, FEMA estimates an annual Number of Responses per Respondent. Total Number of Responses is calculated by multiplying the Number of Respondents by the Number of Responses per Respondent.

To calculate the Average Burden per Response (in hours), FEMA uses Hazard Mitigation Assistance (HMA) grant awards to estimate Plan development and update costs. These cost estimates are then classified as personnel costs (17.5 percent), contracting costs (78 percent), and non-labor costs (4.5 percent).<sup>2</sup> FEMA assumes that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$58.50 would develop and review new Plans and updates.<sup>3</sup> Finally, to calculate hour burden, the percent of costs attributed to personnel costs is divided by the Urban and Regional Planner loaded wage rate.

Annual hour burden for each collection is as follows:

- 1) **New Local and Tribal Plans** – FEMA estimates two (2) new Local or Tribal Plans per respondent will be developed annually for a Total Number of Responses equal to 112 Plans (2 new Plan per respondent x 56 respondents). FEMA uses HMA grant awards to

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<sup>2</sup> The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

<sup>3</sup> The Urban and Regional Planner (Standard Occupational Classification 19-3051) loaded wage rate of \$58.50 is calculated using the Bureau of Labor Statistics, Occupational Employment and Wages, May 2020 mean hourly wage of \$36.11 times a 1.62 multiplier, to account for benefits, rounded to the nearest cent. Available at: <https://www.bls.gov/oes/current/oes193051.htm>.

estimate a new Plan average cost of \$113,611. Based on the personnel distribution percentage identified above, FEMA assumes \$19,882 (\$113,611 per new Plan x 17.5 percent of Plan) of the average Plan cost to be attributed to personnel costs. The estimated Average Burden per Response is 359 hours. The resulting Local or Tribal Plan Total Annual Burden is 40,208 hours (359 hours per new Plan x 112 new Plans). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$2,352,168 (40,208 hours x \$58.50 per hour (rounded to the nearest dollar)).

- 2) **Local and Tribal Plan Updates** – Based on the current inventory of approved Plans, FEMA estimates that eight (8) Local and Tribal Plans per respondent would be updated annually for a Total Number of Responses equal to 448 Plan updates (8 Plan updates per respondent x 56 respondents). FEMA again used HMA grant awards to estimate a Plan update average cost of \$79,502. Based on the personnel distribution percentage identified above, FEMA assumes \$13,913 (\$79,502 per Plan update x 17.5 percent of Plan) of the average Plan update cost to be attributed to personnel costs. The estimated Average Burden per Response in hours of 251. The resulting Local and Tribal Plan Update Total Annual Burden is 112,448 hours (251 hours per Plan update x 448 Plan updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$6,578,208 (112,448 hours x \$58.50 per hour (rounded to the nearest dollar)).
- 3) **State Review of Local and Tribal Plans** – All states must review Local and Tribal Plans. Based on the 1) New Local and Tribal Plan and 2) Plan Update estimates above, FEMA estimates ten (10) Plans per respondent would be reviewed annually for a Total Number of Responses equal to 560 reviews ((2 new Plan per respondent + 8 Plan updates per respondent) x 56 respondents). FEMA estimates that it takes twenty (20) hours to review each Plan for a Total Annual Burden of 11,200 hours (20 hours per Plan x 560 Plans). FEMA assumes the equivalent to an Urban and Regional Planner at a loaded wage rate of \$58.50 would review Local and Tribal Plans. This results in a Total Annual Respondent Cost of \$655,200 (11,200 hours x \$58.50 per hour (rounded to the nearest dollar)).
- 4) **Standard State Mitigation Plan Updates** – All states have existing Plans and have a choice on whether to submit a Standard State Mitigation Plan or an Enhanced State Mitigation Plan. FEMA estimates that 42 states would submit Standard State Mitigation Plans. Standard State Mitigation Plans are to be updated every five (5) years. This results in an annual average Number of Responses per Respondent equal to 0.2 (One (1) Standard State Mitigation Plan/5 years). The resulting annual Total Number of Responses equals eight (8) Standard State Mitigation Plan updates (42 respondents x 0.2 Standard State Mitigation Plans per respondent (rounded to the nearest Plan count)).



Based on HMA grant awards, FEMA estimates a Standard State Mitigation Plan Update average cost of \$281,000. Using the personnel distribution percentage identified above, FEMA assumes \$49,175 (\$281,000 per Standard State Mitigation Plan Update x 17.5 percent of Plan) of the average Standard State Mitigation Plan cost to be attributed to personnel costs. The estimated Average Burden per Response is 888 hours. For Standard State Mitigation Plan Updates, the resulting Total Annual Burden is 7,104 hours (888 hours per Standard State Plan Update x 8 Standard State Plan Updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$415,584 (7,104 hours x \$58.50 per hour (rounded to the nearest dollar)).

- 5) **Enhanced State Mitigation Plan Updates** – States may choose to submit an Enhanced State Mitigation Plan. FEMA estimates that fourteen (14) states would submit Enhanced State Mitigation Plans. Enhanced State Mitigation Plans are to be updated every five (5) years. This results in an annual Number of Responses per Respondent equal to 0.2 (One (1) Enhanced State Mitigation Plan/5 years). The resulting Total Number of Responses equals 3 Enhanced State Mitigation Plan Updates (14 respondents x 0.2 Enhanced Plans per respondent).

Based on HMA grant awards, FEMA estimates an Enhanced State Mitigation Plan Update average cost of \$524,000. Using the personnel distribution percentage identified above, FEMA assumes \$91,700 (\$524,000 per Enhanced State Mitigation Plan Update x 17.5 percent of Plan) of the average Enhanced State Mitigation Plan cost to be attributed to personnel costs. The estimated Average Burden per Response is 1,656 hours. For Enhanced State Mitigation Plan Updates, the resulting Total Annual Burden is 4,968 hours (1,656 hours per Enhanced State Mitigation Plan Update x 3 Enhanced State Mitigation Plan Updates). Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$290,628 (4,968 hours x \$58.50 per hour (rounded to the nearest dollar)).

FEMA calculates a Total Annual Burden in hours of 175,928.<sup>4</sup> The associated Total Annual Respondent Cost is \$10,291,788.<sup>5</sup>

**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.**

There are no forms involved with this data collection.

**c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

<sup>4</sup> See below for Table entitled “Estimated Annualized Burden Hours and Costs” for details.

<sup>5</sup> See below for Table entitled “Estimated Annualized Burden Hours and Costs” for details.

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
Local or Tribal Government	New Local and Tribal Plans	56	2	112	359	40,208	\$58.50	\$2,352,168
Local or Tribal Government	Local and Tribal Plan Updates	56	8	448	251	112,448	\$58.50	\$6,578,208
State Government	State Review of Local and Tribal Plans	56	10	560	20	11,200	\$58.50	\$655,200
State Government	Standard State Plan Updates	42	0.2	8	888	7,104	\$58.50	\$415,584
State Government	Enhanced State Plan Updates	14	0.2	3	1,656	4,968	\$58.50	\$290,628
<b>Total</b>		224		1,131		175,928		\$10,291,788

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.62.<sup>6</sup> For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.62, and the entry for the “Avg. Hourly Wage Rate” would be \$68.87.**

According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>7</sup>, the May 2020 Occupational Employment and Wage Estimates wage rate for (Urban and Regional Planners (SOC 19-3051) is \$36.11 for State Government. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$58.50 per hour. Therefore, the annual burden hour cost is estimated to be \$10,291,788 annually (\$58.50 x 175,928 hours = \$10,291,788).

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

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

<sup>6</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at [https://www.bls.gov/news.release/archives/ecec\\_09162021.pdf](https://www.bls.gov/news.release/archives/ecec_09162021.pdf). Accessed September 14, 2021. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$53.59 by Wages and salaries for State and local government workers of \$33.09 per hour yielding a benefits multiplier of approximately 1.62

<sup>7</sup> 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/2020/may/oes\\_nat.htm](https://www.bls.gov/oes/2020/may/oes_nat.htm)

**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.**

To determine the annual cost for this collection, separate estimates were calculated for 1) New Local and Tribal Plans, 2) Local and Tribal Plan Updates, 3) State Review of Local and Tribal Plans, 4) Standard State Mitigation Plan Updates, and 5) Enhanced State Mitigation Plan Updates.

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation Plan development and update costs estimates based on HMA grant awards. These cost estimates are broken out between personnel costs (17.5 percent), contracting costs (78 percent), and non-labor costs (4.5 percent).<sup>8</sup> FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs.

New Local and Tribal Plans – FEMA estimates a new average Local or Tribal Mitigation Plan cost of \$113,611, an increase from the prior estimate of \$55,200. As the development of a new Plan is a one-time cost, FEMA categorizes such costs as Start-Up Costs. Based on the contracting and non-labor cost distribution identified above, FEMA estimates the start-up cost for New Local and Tribal Plans to be \$93,729 ( $(\$113,611 \text{ per plan} \times 78 \text{ percent of Plan contracting}) + (\$113,611 \text{ per Plan} \times 4.5 \text{ percent of Plan non-labor})$ ). Multiplying the average costs by the New Local and Tribal Plan Total Number of Responses results in a total Annual Start-Up Cost of \$10,497,648 ( $\$93,729 \text{ Start-Up Cost per Plan} \times 112 \text{ Plans}$ ).

Local and Tribal Plan Updates – FEMA estimates a new average Local and Tribal Plan Update cost of \$79,502, an increase from the prior estimate of \$65,500. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$62,012 ( $\$79,502 \text{ per Plan update} \times 78 \text{ percent of Plan update}$ ) and the non-labor costs to be \$3,578 ( $\$79,502 \text{ per Plan update} \times 4.5 \text{ percent of Plan update}$ ). Multiplying these average costs by the Local and Tribal Plan Update Total Number of Responses results in an Annual Operations and Maintenance Cost of \$27,781,376 ( $\$62,012 \text{ operations and maintenance cost per Plan update} \times 448 \text{ Plan updates}$ ) and an Annual Non-Labor Cost of \$1,602,944 ( $\$3,578$

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<sup>8</sup> The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

non-labor cost per Plan update x 448 Plan updates). As a result, the Total Annual Cost to Respondents for Local and Tribal Plan Updates is \$29,384,320 (\$27,781,376 + \$1,602,944).

State Review of Local and Tribal Plans – No annual cost burden for FEMA is associated with State Review of Local and Tribal Plans.

Standard State Mitigation Plan Updates – FEMA estimates an average Standard State Mitigation Plan Update cost of \$281,000, no change from the prior estimate. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$219,180 (\$281,000 per Standard State Mitigation Plan Update x 78 percent of Plan update) and the non-labor costs to be \$12,645 (\$281,000 per Standard State Mitigation Plan Update x 4.5 percent of Plan update). Multiplying these average costs by Standard State Mitigation Plan Update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$1,753,440 (\$219,180 operations and maintenance cost per Standard State Mitigation Plan Update x 8 Standard State Mitigation Plan Updates) and an Annual Non-Labor Cost of \$101,160 (\$12,645 non-labor cost per Standard State Mitigation Plan Update x 8 Standard State Mitigation Plan Updates). As a result, the Total Annual Cost to Respondents for Standard State Mitigation Plan Updates is \$1,854,600 (\$1,753,440 + \$101,160).

Enhanced State Mitigation Plan Updates – FEMA estimates an average Enhanced State Mitigation Plan Update cost of \$524,000, no change from the prior estimate. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$408,720 (\$524,000 per Enhanced State Mitigation Plan Update x 78 percent of Plan update) and the non-labor costs to be \$23,580 (\$524,000 per Enhanced State Mitigation Plan Update x 4.5 percent of Plan update). Multiplying these average costs by Enhanced State Mitigation Plan Update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$1,226,160 (\$408,720 operations and maintenance cost per Enhanced State Mitigation Plan Update x 3 Enhanced State Mitigation Plan Updates) and an Annual Non-Labor Cost of \$70,740 (\$23,580 non-labor cost per Enhanced State Mitigation Plan Update x 3 Enhanced State Mitigation Plan Updates). As a result, the Total Annual Cost to Respondents for Enhanced State Mitigation Plan Updates is \$1,296,900 (\$1,226,160 + \$70,740).

FEMA estimates the Total Annual Cost to Respondents as \$43,033,468 (\$10,497,648 (New Local and Tribal Plans) + \$29,384,320 (Local and Tribal Plan Updates) + \$1,854,600 (Standard State Plan Updates) + \$1,296,900 (Enhanced State Plan Updates)).

<b>Annual Cost Burden to Respondents or Recordkeepers</b>				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents

	other one-time expenditures	services, etc.)		
Development of New Local and Tribal Plans	\$10,497,648	\$0	\$0	\$10,497,648
Local and Tribal Plan Updates	\$0	\$27,781,376	\$1,602,944	\$29,384,320
State Review of Local and Tribal Plans	\$0	\$0	\$0	\$0
Standard State Mitigation Plan Updates	\$0	\$1,753,440	\$101,160	\$1,854,600
Enhanced State Mitigation Plan Updates	\$0	\$1,226,160	\$70,740	\$1,296,900
<b>Total</b>	<b>\$10,497,648</b>	<b>\$30,760,976</b>	<b>\$1,774,844</b>	<b>\$43,033,468</b>

**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.**

As all states have existing Mitigation Plans, FEMA staff review and approve State Standard and Enhanced Mitigation Plan Updates. FEMA estimates an average 11 Standard and Enhanced State Mitigation Plans (8 Standard State Mitigation Plans Updates + 3 Enhanced State Mitigation Plan Updates) are submitted and reviewed annually. FEMA estimates that the equivalent of a GS 13, Step 5 Federal employee at a loaded wage of \$81.65 (\$56.31 per hour x 1.45 multiplier (rounded to the nearest cent)) would spend an average of 120 work hours reviewing each State Mitigation Plan. The estimated annualized cost to the Federal Government to review Standard and Enhanced State Mitigation Plan Updates is \$107,778 (11 plan updates x 120 hours per plan x \$81.65).

In addition, FEMA estimates 560 Local and Tribal Plans (112 new Local and Tribal Plans + 448 Local and Tribal Plan Updates) are submitted for review annually. FEMA estimates that the equivalent of a GS 13, Step 5 Federal employee at a loaded wage of \$81.65 (\$56.31 per hour x 1.45 multiplier (rounded to the nearest cent)) would spend an average of 40 work hours reviewing each Local and Tribal Plan. The estimated annual cost to the Federal Government to review Local and Tribal Plans is \$1,828,960 (560 Plans x 40 hours per Plan x \$81.65).

The Total Annual Cost to the Federal Government is estimated at \$1,936,738 (\$107,778 + \$1,828,960 (rounded to the nearest dollar)).

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$0
Staff Salaries: [GS13/5 employees (\$56.31 per OPM 2021 General Schedule for Washington- Baltimore- Arlington- DC x 1.45 multiplier = \$81.65 (rounded to the nearest cent)) spending approximately 120 hours to review and approve 11 State Standard and Enhanced Mitigation Plan Updates, and 40 hours to review and approve 560 New and Updated Local and Tribal Plans for this data collection] [[(\$81.65 x 120 x 11) + (\$81.65 x 560 x 40)] = \$1,936,738 (rounded to the nearest dollar)	\$1,936,738
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
<b>Total</b>	<b>\$1,936,738</b>
<sup>1</sup> Office of Personnel Management 2021 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf</a> . Accessed August 25, 2021. <sup>2</sup> Wage rate includes a 1.45 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.

**Explain:** There has been no change to the information being collected or in how the hour burden was estimated. Adjustments were made to hourly wage rates, Plan types, and Plan costs.

There has been no change in the way the hourly burden was reported from 2017. As such, the associated current OMB cost inventory is 175,928 hours.

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)	Adjustment (new)	Difference

				inventory)		
[Form Name/#]						
<b>Total</b>	0	0	0	0	0	0

There has been an adjustment in wage rates, Plan types, and estimated Plan costs. To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation Plan development and update costs estimates based on HMA grant awards. These cost estimates are broken out between personnel costs (17.5 percent), contracting costs (78 percent), and non-labor costs (4.5 percent). FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs. The new cost estimates are as follows:

- 1) New Local and Tribal Plans: The new Local and Tribal Plan annual cost estimate, based on the cost estimates from supporting statement Question 13, is \$10,497,648. This is a decrease of \$1,403,472.
- 2) Local and Tribal Plan Updates: The new Local and Tribal Update annual cost estimate, based on the cost estimates from supporting statement Question 13, is \$29,384,320. This is an increase of \$12,841,640.
- 3) State Reviews of Local and Tribal Plans: There are no costs for FEMA associated with State review of Local and Tribal Plans.
- 4) Standard State Mitigation Plan Updates: Based on the cost estimates from supporting statement Question 13, the annual cost is estimated at \$1,854,600. This is a decrease of \$92,730.
- 5) Enhanced State Mitigation Plan Updates: Based on the cost estimates from supporting statement Question 13, the annual cost is estimated at \$ 1,296,900. This is an increase of \$489,940.

The total annual costs for New Local and Tribal Plans, Local and Tribal Plan Updates, and State Review of Local and Tribal Plans is \$39,881,968 (\$10,497,648 + \$29,384,320 + \$0). This is an increase of \$11,438,168 (-\$1,403,472+ \$12,841,640).

The total annual cost for Standard State Plan Updates and Enhanced State Plan Updates is \$3,151,500 (\$1,854,600 + \$1,296,900). This is an increase of \$397,210.

The overall result is an estimated annual cost of \$43,033,468 (\$39,881,968 + \$3,151,500). This is an increase of \$11,835,378 from the currently approved OMB inventory.

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	Adjustment (new)	Difference

				OMB inventory)		
New Plans (Local and Tribal)				\$11,901,120	\$10,497,648	-\$1,403,472
Plan Updates (Local and Tribal)				\$16,542,680	\$29,384,320	\$12,841,640
State Reviews of Local and Tribal Plans				\$0	\$0	\$0
Standard State Plan Updates				\$1,947,330	\$1,854,600	-\$92,730
Enhanced State Plan Updates				\$806,960	\$1,296,900	\$489,940
<b>Total(s)</b>				<b>\$31,198,090</b>	<b>\$43,033,468</b>	<b>\$11,835,378</b>

In summary, OMB’s current cost inventory was \$31,198,090. However, based on adjustments to how annual costs were calculated, the new annual cost estimate is \$43,033,468; an increase of \$11,835,378.

The overall estimated cost of this collection is \$53,325,256 (\$43,033,468 + \$10,291,788), including monetized annual hour burden and annual costs.

**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.**

There are no outline plans for tabulation and publication of data 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.**

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

**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. There is no statistical methodology involved in this collection.