

**July 28, 2022**

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660-0076**

**Title: Hazard Mitigation Grant Program (HMGP) Application and Reporting**

**Form Number(s): FEMA Form FF-206-FY-22-154 (formerly 009-0-111A), Quarterly Progress Reports**

### **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 on 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 (give details as to why this information is being collected). 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 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), Pub. L. 100-707, codified under 42 U.S.C. § 5170c, established the Hazard

Mitigation Grant Program (HMGP). Grant requirements and grants management procedures of the program are outlined in 44 CFR Part 206 Subpart N, and 2 CFR Parts 200 and 3002.

Recipients (changed from “Grantees” to “Recipients” per 2 CFR Part 200) administer implementation of the grant awarded under the HMGP, which is a post-disaster program that contributes funds toward the cost of hazard mitigation activities in order to reduce the risk of future damage, hardship, loss or suffering in any area affected by a major disaster. Section 102 of the Stafford Act, 42 U.S.C. § 5122(4), 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. “Recipient”, as provided in 2 CFR 200, means a non-Federal entity that receives a federal award directly from a Federal awarding agency to carry out an activity under a Federal program, or an Indian tribal government that chooses to act as a recipient rather than as a subrecipient. “Subrecipient” refers to a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. The term “Indian tribal government” is defined in Section 102 of the Stafford Act, 42 U.S.C. § 5122(6), 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. In addition, the Sandy Recovery Improvement Act of 2013 (Pub. L. 113-2) amended the Stafford Act to allow 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 codified under 42 U.S.C. § 5170(b).

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, at 2 CFR Part 3002, Federal Register Volume 79, No. 244, Page 75867 (Dec. 19, 2014). This rule eliminates overlapping and duplicative requirements for stakeholders, including states, territories and Indian tribal governments, by using general terms such as “recipient” and “pass-through entity.”

The HMGP regulation describes the application process in 44 CFR 206.436. Information collected through the financial award application is the minimum information necessary for the financial award administration under the HMGP and includes the project narrative, analysis of the measure’s cost-effectiveness referred to as the benefit-cost determination, and environmental review used in conjunction with OMB No. 1660-0025.

Per 44 CFR 206.438(c) progress reports must be submitted by the HMGP Recipient to the Regional Administrator on a quarterly basis, certifying how the funds are being used and reporting on the progress of activities funded under the subrecipient awards made to the Recipient by FEMA. The Regional Administrator and Recipient negotiate the date for submission of the first report. Quarterly progress reports describe the status of those projects on

which a final payment of the Federal share has not been made to the recipient, and outline any problems or circumstances expected to result in noncompliance with the approved award conditions.

Section 404 of the Stafford Act (42 U.S.C. § 5170c), authorizes FEMA, following a presidentially declared disaster, to provide financial assistance to state, local, tribal, and territorial (SLTT) governments and certain private nonprofit organizations for post disaster hazard mitigation measures that reduce the risk of, or increase resilience to, future damage, hardship, loss or suffering in any area affected by a major disaster, or any area affected by a fire for which assistance was provided under Section 420 of the Stafford Act. On March 13, 2020, President Trump declared a nationwide emergency in response to the COVID-19 pandemic pursuant to Sec. 501(b) of the Stafford Act. The disaster declaration included 59 major disaster declarations that covered 50 states, five territories and four Federally-recognized Tribal governments. On August 5, 2021, President Biden authorized \$3.46 billion from the Disaster Relief Fund (DRF) for HMGP. The funding is applicable to the pre-existing 59 COVID-19 major disaster declarations. The additional \$3.46 billion significantly impacts HMGP information collection requirements for FY 2022.

In accordance with 44 CFR § 206.436 (d), states “must submit all local HMGP applications and funding requests for the purpose of identifying new projects to the Regional Administrator within 12 months of the date of disaster declaration.” Furthermore, Section 311 of the Consolidated Appropriations Act, 2022 (Pub. L. 117-103) increased the federal cost share for Stafford Act emergencies and major disaster declarations declared during calendar years 2020 and 2021 to not less than 90 percent of the eligible cost of HMGP assistance. The legislation applies to all current FY 2022 HMGP local and Tribal sub applicants and significantly alters application and program financial management information collection requirements. The Consolidated Appropriations Act, 2022 does not provide additional funding for HMGP COVID-19 relief beyond the already established \$3.46 billion.

Counterintuitively, the legislative adjustments to cost share and lack of additional funding have the overall impact of providing less money for management costs for states to distribute to each of the current 1,200 local sub applicant projects operating under previous legislative cost share requirements. Therefore, the Federal cost share adjustment will likely cause significant changes to the state distribution of funds to current sub applications and may require changes to application narrative and application review procedures. Additionally, the legislative changes will likely result in a significant increase in requests by local subapplicants who have not yet developed FY 2022 project applications to extend the application deadline beyond the standard 12-month deadline of August 5, 2022. Applications for extensions add additional information collection burden are covered in 44 CFR § 206.436 (e).

The Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act") (Pub. L. 115-435) establishes evaluation using systematic data collection and analysis of programs, policies, and organizations intended to assess their effectiveness and efficiency as an essential program activity. Hazard Mitigation programs are currently revising information collections to simplify data collection, reduce burden, coordinate data collection across programs, develop performance metrics, and meet goals and priorities as stipulated in The Evidence Act. Program implementation of the Evidence Act will necessitate changes to information collections to align. Additionally, The Build America, Buy America Act (BABAA) (Pub. L. 117-58) and Executive Orders 13985 and 14008 establish requirements, goals and priorities that require additional information requirements for FY 2022 HMGP.

**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 programs**

**Project Narrative:** Explains the FEMA application and review process to the respondent and provides instruction as to what detail is required. The Project Narrative describes the proposed activity for which funding is sought. FEMA uses this information to certify that the project meets minimal mitigation eligibility criteria. (44 CFR 206.436)

**Benefit-Cost Determination:** This is a requirement to establish that Federal funds awarded as a grant are applied in a cost-effective manner. This information is used by FEMA to determine if the benefits of the proposed mitigation work exceed the costs of the mitigation activity. (44 CFR 206.434, 206.436)

**Environmental Review:** Respondents are responsible for providing most of the necessary information to complete environmental reviews under the National Environmental Policy Act and other laws and Executive Orders. FEMA works with the respondents to collect environmental information necessary to implement the project. (44 CFR 206.436)

**Quarterly Progress Report (QPR):** The Quarterly Progress Report (QPR) describes the status of ongoing projects on which a final payment of the Federal share has not been made to the Recipient. To be consistent with the requirements outlined in 2 CFR Part 200 and 44 CFR Part 206 (HMGP) and to comply with the Federal reporting regulations the QPR instructs the recipient to input the following data into an accompanying excel spreadsheet with corresponding tabbed columns: Region, State Code, Disaster Number, Application ID, Project Number, Fiscal Year, Quarter Number, Quarter Project Status, Subrecipient Name, Project Title, Approved Period of Performance (POP) Completion Date, POP Time Extension, POP Time Extension Date, Cost Code, Status, Percentage Work Complete, Actual Project Completion Date, Total Properties, Property ID list, Total Recipient Drawdown, Most Recent Drawdown Date, Federal

Funds Disbursed/Obligated, Subrecipient Expenditures To Date, Date Final Payment Made to Subrecipient, Comments, and If in Closeout, where does it reside? Descriptions for each data field are included on a separate tab in the QPR excel spreadsheet.

As directed by OMB, this updated QPR serves to collect the same project specific information as that approved by OMB in 2013. The instructions have been enhanced to provide better clarity to Recipients for the purpose of ensuring consistency as outlined in 2 CFR Part 200, and 44 CFR Part 206 (HMGP). The QPR that was approved in 2013 had fields to collect information using FEMA Form FF-206-FY-22-154 (formerly 009-0-111A), that information is now collected as part of the QPR process through excel spreadsheets. The QPR spreadsheet lists data fields for the total amount paid by the recipient for work accomplished in the performance period, Federal funds drawn down by recipient on a per project basis, date of last drawdown of Federal funds, amount disbursed to the subgrantees by the recipient, final payment made if applicable and status as to whether it is ready for closeout, latest approved period of performance and project completion status including any time extensions, whether time extension has been granted, description of status of project with percentage estimate, and date of project completed if applicable.

*The following Standard Forms are required for this collection. The forms are approved for use under the OMB Control Number identified for each.*

**SF-424: Application for Federal Assistance**, is a standard form used by applicants as a required face-sheet for pre-applications and applications submitted for Federal assistance. It is used by Federal agencies to obtain application certification and is approved for use 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 a 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 a 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-425/425A: Federal Financial Report/Report Attachment**, is used by State, Indian tribal and local governments to report the status of financial expenditures for FEMA grants; SF-425A is attached when reporting multiple grants. It is 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 any real property acquired or improved under a grant or cooperative agreement. It is approved for use under OMB No. 4040-0016.

**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.

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

The information management and grants processing system that presently supports the HMGP lifecycle process is the National Emergency Management Information System (NEMIS). Applicants use NEMIS to create the applications and submit them in digital format, or the information can be e-mailed as attachments to the FEMA regional representative for the particular disaster.

FEMA is developing a new system known as FEMA Grants Outcomes (FEMA GO), which will replace NEMIS as the HMGP system of record over the next few years. It is anticipated that new HMGP grants will be supported in FEMA GO beginning in 2023, and that by 2025 all grants from the NEMIS system will be migrated to FEMA GO.

FEMA GO is a single web-based application for grants management within FEMA. When adopted by HMGP, FEMA GO will streamline the grant program across the agency and reduce the burden for grant recipients.

FEMA GO reduces the public burden by:

- Allowing information sharing across grant programs;
- Pre-populating recipient information when appropriate;
- Using conditional logic so users need only to respond to questions relevant to them;
- Utilizing algorithms that do financial calculations automatically; and
- Using plain language questions that are easier to understand.

**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 does not have an impact on small businesses or other small entities.

**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 Stafford Act established specific eligibility criteria for the use of the HMGP grant program authority. The OMB 1660-0076 collection allows FEMA to determine eligibility of potential applicants, proposed mitigation activities, cost-effectiveness of the proposed activity, the effect on the environment, or the status of the project. The OMB 1660-0076 collection allows FEMA to implement HMGP and deliver disaster assistance for mitigation activities to State, Indian tribal and local communities that have been declared under a Presidential Major Disaster Declaration.

**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), (b), (c), (d), (e), (f), (g), and (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.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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.**

As this revised Supporting Statement is being provided to support an Emergency Request, the 60-Day and 30-Day Federal Register Notices (FRNs) will not be utilized at this time due to time constraints.

**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 has received input from SLTT governments about information collections for the HMGP through meetings with FEMA. FEMA also has invited various State, Indian tribal and local stakeholders to participate in meetings to discuss program improvements, ways to simplify application requirements to include discussions on data collection and electronic information gathering/processing for FEMA mitigation grant programs. In addition, FEMA meets with National Emergency Management Agency (NEMA) representatives and the Association of State Flood Plain Managers (ASFPM) at their annual conferences. Respondents are members of NEMA and ASFPM. The results of these consultations are clarifications made in the guidance for the HMGP. This would allow the respondents to better prepare their applications so that FEMA can more efficiently process them.

**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's regional offices have discussed the HMGP with our State and Indian tribal government counterparts in training sessions and meetings. FEMA actively solicits national participation of State and Indian tribal representatives to share hazard mitigation related information at events that include hazard mitigation assistance workshops and summits and has held meetings related to data collection and electronic data processing for FEMA mitigation grant programs. FEMA uses the input to review the guidance and make any necessary updates to it so that respondents can better understand the program requirements and would be incorporated as indicated in Question 8b above.

**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 and the basis for the assurance in statute, regulation, or agency policy.**

A Privacy Threshold Analysis (PTA) was submitted by the Privacy Office for DHS approval for this collection. There are no indications of pending issues that would prevent approval. A Privacy Impact Assessment (PIA) was completed under DHS/FEMA/PIA – 025. A System of Records Notice (SORN), DHS/FEMA – 009 was approved and published for this collection on March 24, 2014, 79 FR 16015.

There is no assurance of confidentiality in that the government will monitor all actions within the National Emergency Management Information System (NEMIS) or FEMA Go. As stated in the DHS/FEMA/PIA – 025, recipients and sub-recipients applying for the grant on behalf of the individual property owner, whose property will be affected by the grant program, have the option to voluntarily opt in or opt out of the grant programs. Participation in the program requires individual property owners to provide information to support eligibility for grant funding. By providing the information, individuals consent to FEMA's use of their information for the primary purpose of determining eligibility for grant funding. The disclosure of property information to the State is voluntary; however, failure to provide the information requested may delay or prevent you from receiving HMA funds for the property.

The HMGP program is scheduled to transition to the FEMA Go electronic system in 2023. The Privacy Act Statement that appears in the FEMA Go log in page states that: "FEMA is authorized to collect the information requested pursuant to 44 U.S.C. § 3101; Executive Order 9397, as amended by Executive Order 13487; and 44 U.S.C. § 3534. This information is collected so that FEMA can process grant awards through the FEMA Grants Outcomes (GO) system. The information on this form may be disclosed as generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes using this information as

necessary and authorized by the routine uses published in DHS/ALL – 004 General Information Technology Access Account Records System of Records, 77 Fed. Reg. 70792, (Nov. 27, 2012), and upon written request, by agreement, or as required by law. The Department of Homeland Security’s Systems of Records notices may be found at <https://www.dhs.gov/system-records-notices-sorns>. The disclosure of information on this form is voluntary, however failure to provide the information requested could delay or prevent FEMA from granting access to FEMA GO.”<sup>1</sup>

FEMA’s Federal Insurance and Mitigation Administration (FIMA) shares information with the FEMA Enterprise Data Warehouse (EDW). EDW replicates source system-provided data from other operational FEMA systems and provides a simplified way of producing Agency reports for internal use as well as for external stakeholders. FIMA shares this information with EDW for storage and reporting purposes. The FEMA EDW is currently covered by the DHS/FEMA/PIA-026 Operational Data Store and Enterprise Data Warehouse PIA.

**11. Provide additional justification for any questions 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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

The 59 Respondents affected by this data collection are the annual average number of HMGP Recipients which can be states, territories, and any Indian tribal government choosing to act as a Direct Recipient. As of January 2022, 22 direct tribal declaration requests had been made since

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<sup>1</sup> [FEMAGO - Login](https://go.fema.gov/login?redirect=%2F) <https://go.fema.gov/login?redirect=%2F>

the Stafford Act amendment in 2013. This is averaged to an estimated two (2) Tribal direct Recipients per year as a result of receiving a direct Federal disaster declaration. There have been tribal declarations where the state did not receive a Presidential disaster declaration in conjunction with the tribal declaration.

Information pulled from a weekly HMGP report supplied by Data Analytics shows a total of 586 declarations over a 10-year period from FY 2012-2021, including those from Indian tribal governments. Averaging over those 10 years gives an annual average of 58.6 responses per year. Rounding up provides us with an annual average of 59 responses per year.

The basis of the annualized projection of Number of Responses per Respondent is the actual number of HMGP projects processed for FY 2012 through FY 2021. The number of responses (projects) per respondent (recipient) correlates with the number of declared disasters impacting the recipients' jurisdiction. Since the number of disasters greatly varies by FEMA Region, the number of projects varies widely.

This is illustrated in the table below.

HMGP Projects Submitted for FY2012 through FY2021 <sup>2</sup>		
Region	Program Area	Number of Projects
1	HMGP	413
2	HMGP	1,216
3	HMGP	627
4	HMGP	2,887
5	HMGP	528
6	HMGP	1,648
7	HMGP	670
8	HMGP	705
9	HMGP	1,053
10	HMGP	562
Total		10,309

Please refer to the table below question 12 c under the Estimated Annualized Burden Hours and Cost table to explain the origin of the figures discussed below. Between FY 2012 and FY 2021 FEMA received 10,309 project submissions. The annual average over the ten years calculates to 1,031 annual projects ( $10,309 \div 10$ ). Current applications to HMGP funding for COVID-19 stand at approximately 1,500 projects, and the program estimates that up to 1,000 more applications may enter the system, prompted by application deadline extensions and legislative changes to cost share. These additional 2,500 applications drive the total anticipated number of projects to 3,531. FEMA rounded this figure up to 3,540 and divided it by the annual average number of respondents (59) to get the annual average number of projects submitted per respondent; an average of 60 responses per respondent ( $3,540 \div 59 = 60$ ). So, in any given year we can expect any single declaring state, tribe, or territory to submit 60 projects.

Please refer to the table below question 12 c under the Estimated Annualized Burden Hours and Cost table. Each project requires a **Project Narrative**, **Benefit Cost Determination**, and **Environmental Review**. **Quarterly Progress Reports** are required to be submitted quarterly by the Recipient covering all projects. The **Project Narrative** is estimated to require 12 hours to complete making for a total of 42,480 annual burden hours.<sup>3</sup> Each **Benefit Cost Determination** is estimated to require 5 hours to complete making for a total of 17,700 annual burden hours.<sup>4</sup> Each **Environmental Review** is estimated to require 7.5 hours to complete making for a total of

<sup>2</sup> New figures supplied through EDW query by HMGP projects over the last 10 fiscal years broken out by application status, region, and state/territory. One thing to note is that the numbers don't seem to include tribes. These are preliminary numbers. A total of 6,719 was shown in VizHub—a marked difference.

<sup>3</sup> The calculation for the total annual hour burden for the Project Narrative is 59 respondents x 60 responses per year x 12 hours per response = 42,480 annual hours burden.

26,550 burden hours.<sup>5</sup> FEMA requires that State and Indian tribal recipients submit **Quarterly Progress Reports** detailing the status of each disaster related project for the disaster (as opposed to separate reports for each project). It is estimated that respondents submit 4.6 reports annually and that each report is estimated to take 50 hours to complete making for a total of 13,550 hours burden.<sup>6</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.**

See above calculations.

**c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	Project Narrative Section /No Form	59	60	3,540	12	42,480	\$61.24	\$2,601,475
State, Local or Tribal Government	Benefit-Cost Determination/ No Form	59	60	3,540	5	17,700	\$61.24	\$1,083,948
State, Local or Tribal Government	Environmental Review/No Form	59	60	3,540	7.5	26,550	\$61.24	\$1,625,922
State, Local, or Tribal Government	Quarterly Progress Report FEMA Form FF-206-FY-	59	4.6	271	50	13,550	\$61.24	\$829,802

<sup>4</sup> The calculation for the total annual hour burden for the Benefit Cost Determination is 59 respondents x 60 responses per year x 5 hours per response = 17,700 hours burden.

<sup>5</sup> The calculation for the total annual hour burden for the Environmental Review is 59 respondents x 60 responses per year x 7.5 hours per response = 26,550 hours burden.

<sup>6</sup> The calculation for the total annual hour burden for the Quarterly Progress Report is: 59 respondents x 4.6 average annual reports = 271 annual responses. Each response requires 50 hours, resulting in 271 responses x 50 hours = 13,550 annual burden hours.

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<b>Total</b>		236		<b>10,891</b>		<b>100,280</b>		<b>\$6,141,147</b>

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.61.<sup>7</sup> For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.61, and the entry for the “Avg. Hourly Wage Rate” would be \$68.44.**

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates wage rate category for Urban and Regional Planners (SOC 19-3051) working for local governments is \$38.04.<sup>8</sup> Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$61.24 per hour. Therefore, the burden hour cost is estimated to be \$2,335,939 (\$61.24 x 38,144).

*The following Standard Forms (SF) are utilized for the FEMA grant programs. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal government; burden hours specific to these forms are not submitted for approval of this collection:*

**Estimated Annualized Burden Hours and Costs**

Type of Respondent	Form Name / Form Number	No. of Respondents	Responses per Respondent	Total Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate (\$)	Total Annual Respondent Cost (\$)
State, Local or Tribal Government	Application for Federal Assistance, SF-424 (OMB No. 4040-0004)	59	60	3,540	1.1	3,894	\$61.24	\$238,469
State, Local or Tribal Government	Budget Info Non-Construction Programs, SF-	59	60	3,540	1.8	6,372	\$61.24	\$390,221
State, Local or Tribal Government	Assurances for Non-construction Programs, SF-	59	60	3,540	0.8	2,832	\$61.24	\$173,432

<sup>7</sup> State and local government wage multiplier: Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at [https://www.bls.gov/news.release/archives/ecec\\_03182022.pdf](https://www.bls.gov/news.release/archives/ecec_03182022.pdf). Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$54.96 by Wages and salaries for State and local government workers of \$34.09 per hour yielding a benefits multiplier of approximately 1.61.

<sup>8</sup> Bureau of Labor Statistics Occupational Employment Wages, May 2021, Urban and Regional Planners (SOC 19-3051) working for local governments. Hourly mean wage. [https://www.bls.gov/oes/2021/may/oes\\_nat.htm](https://www.bls.gov/oes/2021/may/oes_nat.htm)

State, Local or Tribal Government	Budget Information for Construction Programs, SF-	59	60	3,540	2.0	7,080	\$61.24	\$433,579
State, Local or Tribal Government	Assurances for Construction Programs, SF-424D	59	60	3,540	0.5	1,770	\$61.24	\$108,395
State, Local or Tribal Government	Attachment SF-425/425A (OMB 4040-0014)	59	15	885	1.5	1,328	\$61.24	\$81,327
State, Local or Tribal Government	Real Property Status Report, SF-429 (OMB 4040-	59	60	3,540	4.0	14,160	\$61.24	\$867,158
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL	59	60	3,540	0.2	708	\$61.24	\$43,358
<b>Total</b>		<b>472</b>		<b>26,665</b>		<b>38,144</b>		<b>\$2,335,939</b>

**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: 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 quantifiable record keeping, capital, start-up or maintenance costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and**

**any other expense that would have been incurred without this collection of information.  
You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.**

<b>Annual Cost to the Federal Government</b>	
<b>Item</b>	<b>Cost (\$)</b>
<b>Contract Costs:</b> [Describe]	\$0
<p><b>Staff Salaries:</b></p> <p>One GS 11, Step 5 employee (\$40.70/hour x 1.45 multiplier = \$59.02) reviewing the project narrative for two hours per narrative (\$59.02 x 2 hours = \$118.04) for 1,534 total narratives (\$118.04 x 1,534 = <b>\$181,073</b>)</p> <p>One GS 11, Step 5 employee (\$40.70/hour x 1.45 multiplier = \$59.02) reviewing and recalculating the cost-benefit determinations for three hours per determination (\$59.02 x 3 hours = \$177.06) for 1,534 total determinations (\$177.06 x 1,534 = <b>\$271,610</b>)</p> <p>One GS 12, Step 5 employee (\$48.78/hour x 1.45 multiplier = \$70.73) managing an environmental review for 13 hours (\$70.73 x 13 = \$919.49) for 1,534 reviews (\$919.49 x 1,534 = <b>\$1,410,498</b>)</p> <p>Four GS 11, Step 5 employees (\$40.70/hour x 1.45 multiplier = \$59.02) conducting audits for 25 hours (\$59.02 x 25 = \$1,475.50) for 59 audits (\$1,475.50 x 59 = \$87,054.50) each (4 x \$87,054.50 = <b>\$348,218</b>)</p> <p><math>\\$181,073 + \\$271,610 + \\$1,410,498 + \\$348,218 = \mathbf{\\$2,211,399}</math></p>	<b>\$2,211,399</b>
<b>Facilities</b> [cost for renting, overhead, etc. for data collection activity]	\$0
<b>Computer Hardware and Software</b> [cost of equipment annual lifecycle]	\$0
<b>Equipment Maintenance</b> [cost of annual maintenance/service agreements for equipment]	\$0
<b>Travel:</b>	\$0
<b>Printing:</b> [number of data collection instruments annually]	\$0
<b>Postage:</b> [annual number of data collection instruments x postage]	\$0
<b>Other:</b>	\$0
<b>Total</b>	<b>\$2,211,399</b>
<p>* Office of Personnel Management 2022 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/2022/DCB_h.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf</a>. Accessed January 27, 2022</p> <p>* Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate. Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at <a href="https://www.bls.gov/news.release/archives/ecec_12162021.pdf">https://www.bls.gov/news.release/archives/ecec_12162021.pdf</a>. Accessed December 17, 2021. The wage multiplier is calculated by dividing total compensation for all workers of \$39.55 by wages and salaries for all workers of \$27.35 per hour yielding a benefits multiplier of approximately 1.45.</p>	

**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.

<b>Itemized Changes in Annual Burden Hours</b>						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Project Narrative Section /No Form	N/A	N/A	N/A	18,408	42,480	24,072
Benefit-Cost Determination /No Form	N/A	N/A	N/A	7,670	17,700	10,030
Environmental Review /No Form	N/A	N/A	N/A	11,505	26,550	15,045
Quarterly Progress Report	N/A	N/A	N/A	13,550	13,550	0
<b>Total(s)</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>51,133</b>	<b>100,280</b>	<b>49,147</b>

**Explain:** The Adjusted Burden Hours resulting from a reduction in responses per respondent was calculated based on the ten-year average of responses per respondent described in question 12a. The resulting change in responses per respondent affecting burden hours for Project Narrative, Benefit-Cost Determination and Environmental Review, is factored into an adjustment calculation for each of these three non-form program collections. The Adjustment did not apply to the Quarterly Progress Report because average responses per respondent did not change.

Explanations for adjustments: On August 5, 2021, President Biden authorized \$3.46 billion to be available for the Hazard Mitigation Grant Program (HMGP) under the 59 COVID-19 major disaster declarations. The 59 additional disaster declarations significantly changed burden hours as reflected in the Itemized Changes in Annual Burden Hours table. Furthermore, the Consolidated Appropriations Act, 2022, Pub. Law 117-103 Sec. 311 changed the federal share of assistance for HMGP Covid-19 disaster assistance. The legislation applies to all current FY 2022 HMGP local and Tribal sub applicants and significantly alters application and program

financial management information collection requirements. The numbers reflected in the Annual Burden Hours table reflect these adjustments.

The adjustments per respondent is factored with the annual average of 59 respondents, to calculate the Program Change. The resulting annual burden hour **increases** of 24,072 to Project Narrative; **10,030** hours to Benefit-Cost Determination; **15,045** hours to Environmental Review, and no change to the Quarterly Progress Report combine for an **Adjustment** of **49,147** annual burden hours. The adjustment results from an **increase** in the annual average number of responses.

Itemized Changes in Annual Burden Hours						
Data collection Activity /Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Project Narrative Section /No Form	N/A	N/A	N/A	\$452,995	\$2,601,475	\$2,148,480
Benefit-Cost Determination /No Form	N/A	N/A	N/A	\$188,748	\$1,083,948	\$895,200
Environmental Review /No Form	N/A	N/A	N/A	\$283,122	\$1,625,922	\$1,342,800
Quarterly Progress Report /No Form	N/A	N/A	N/A	\$482,356	\$829,802	\$347,446
<b>Total(s)</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>\$1,407,221</b>	<b>\$6,141,147</b>	<b>\$4,733,926</b>

**Explain:** After multiplying hour burdens by the fully loaded hourly wage rate of \$61.24 for each of the four program collection instruments, the resulting annual respondent cost for each data collection instrument was then added. **The total adjustment in annual cost burden is a net total of \$4,733,926. The previously discussed increases in burden hours are also increasing 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.**

This information collection will not be published for statistical purposes.

**17. If seeking approval to not 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.**

The collection of information for HMGP does not employ statistical methods.