

August 22, 2022

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0072

Title: FEMA Mitigation Grant Programs

Form Number(s): FEMA Form FF-206-FY-22-151, Quarterly Progress Report (QPR); **FF-206-FY-22-155, FEMA DTA Request Form**

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 of 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

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A. Justification

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

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

The FMA program is authorized by Section 1366 of the National Flood Insurance Act, 42 U.S.C. 4104c, as amended. The FMA program, under 44 CFR 77 (October 1, 2021) (previously located at 44 CFR Part 79), provides funding for measures taken to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insured under the National Flood Insurance Program (NFIP). The Biggert-Waters Flood Insurance Reform Act of 2012 eliminated the Repetitive Flood Claims (RFC) and Severe Repetitive Loss (SRL) programs and made significant changes to the FMA program. Cost-share requirements were changed to allow more Federal funds for properties with repetitive flood claims.

The Building Resilient Infrastructure and Communities (BRIC) program is authorized by Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended (Pub. L. No. 93-288) (42 U.S.C. § 5133). The BRIC program makes federal funds available to state, local, tribal and territorial entities (SLTT). The guiding principles of the program are to: (1) support state and local governments, tribes, and territories through capability- and capacity-building to enable them to identify mitigation actions and implement projects that reduce risks posed by natural hazards; (2) encourage and enable innovation while allowing flexibility, consistency, and effectiveness; (3) promote partnerships and enable high-impact investments to reduce risk from natural hazards with a focus on critical services and facilities, public infrastructure, public safety, public health, and communities; (4) provide a significant opportunity to reduce future losses and minimize impacts on the Disaster Relief Fund; (5) promote equity, to include helping members of disadvantaged groups and prioritizing 40 percent of the climate change related investments to disadvantaged communities as referenced in Executive Order (EO) 14008 in line with the Administration's Justice40 Initiative; and (6) support the adoption and enforcement of building codes, standards, and policies that will protect the health, safety, and general welfare of the public, taking into account future conditions, prominently including the effects of climate change, and have long-lasting impacts on community risk reduction, including critical services, facilities, and future disaster costs.

The PDM program is authorized under Sec. 203, (42 U.S.C. § 5133) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) (Pub. L. 93-288). The PDM Grant Program makes federal funds available to SLTT governments to plan for and implement sustainable cost-effective measures designed to reduce the risk to individuals and property from future natural hazards, while also reducing reliance on federal funding from future disasters. The purpose of the PDM Grant Program is to administer Congressionally directed spending for pre-disaster hazard mitigation.

The Department of Homeland Security (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). In accordance with 2 CFR 200.203, FEMA requires all parties interested in receiving FEMA mitigation grants to submit an application package for grant assistance.

Applications and subapplications for the BRIC program and FMA are submitted via the FEMA Grants Outcome (GO) system since FY 2020. The FEMA GO system has been developed to meet the intent of the e-Government initiative, authorized by Pub. L. 106–107. This initiative requires that all government agencies both streamline grant application processes and provide for the means to electronically create, review, and submit a grant application via the Internet. PDM applications are submitted through FEMA’s Mitigation eGrant System.

FEMA posts Hazard Mitigation Assistance (HMA) Notice of Funding Opportunities (NOFOs) for the FMA grant program and the new BRIC grant program annually.

FMA and BRIC provide SLTT funding for eligible mitigation projects. FMA aims to implement projects that reduce flood risks to repetitively flooded properties insured under the National Flood Insurance Program (NFIP) by funding priority projects and activities. FMA will also evaluate grant obligations to mitigate SRL (Severe Repetitive Loss) and RL (Repetitive Loss) designated properties to reduce future losses to the NFIP under this award. FMA and BRIC program information is available at [Hazard Mitigation Assistance Grants | FEMA.gov](https://www.fema.gov/grants/mitigation/building-resilient-infrastructure-communities). Once subapplications are determined to be eligible and complete, subapplications for community flood mitigation projects receive priority scoring. With the remaining funds, other subapplications are prioritized for technical assistance, flood hazard mitigation planning, and flood hazard mitigation of individual properties based on the NFIP claims history meeting repetitive flood loss definitions and prioritization contained in the NOFO.

The BRIC program is a competitive grant program focused on mitigating the natural hazard risk to public infrastructure, which helps ensure the continuity of vital services. BRIC information is available at [fema.gov/grants/mitigation/building-resilient-infrastructure-communities](https://www.fema.gov/grants/mitigation/building-resilient-infrastructure-communities).¹ Subapplications submitted to the national competition that pass the eligibility and completeness programmatic review will be scored with technical evaluation criteria and may be scored with qualitative evaluation criteria, if applicable. If needed, based on the number of subapplications submitted to the BRIC program, FEMA uses the technical evaluation criteria scoring as a program priority screening tool for the qualitative evaluation review. FEMA sends subapplications valued up to twice the amount of available funding to the BRIC qualitative evaluation panel. FEMA ensures that at least one eligible subapplication from each Applicant is sent to the qualitative evaluation panel for review.

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

¹ <https://www.fema.gov/grants/mitigation/fy2021-nofo>. Last visited Nov. 22, 2021.

scales of point scoring. The BRIC program solicits volunteers from SLTTs and Other Federal Agencies (OFAs), to review applications that are routed to the qualitative panel reviews. The volunteers review and score applications based on a pre-determined scoring criteria. FEMA ensures that at least one eligible sub application from each Applicant is sent to the qualitative evaluation panel for review.

2 CFR 200.329 requires that all grant awards operation be monitored. Therefore, the recipients must submit a Quarterly Progress Report (QPR) 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. QPRs 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. Under 44 CFR 77.3(a)(6), FEMA is required to "administer and provide oversight to all FEMA-related hazard mitigation programs and grants, including: [...] monitor implementation of awards through quarterly reports." Under 44 CFR 77.3(b)(5) recipients are required to "monitor and evaluate the progress of the mitigation activity in accordance with the approved original scope of work and budget through quarterly reports."

This collection of information is necessary to implement grants for the FMA program, the FMA's "Swift Current" Initiative; the BRIC program, the BRIC Direct Technical Assistance (DTA) initiative and the PDM.

The Infrastructure Investment and Jobs Act (IIJA) (Pub. L. No. 117-58) increased FMA program funding by a factor of five over five years and increases funding for standard FMA program activities from \$175 million to \$875 million over a five-year period starting in FY 2022. Information collection authorizations are necessary to collect application data, cost effectiveness data, environmental and historic preservation data, project monitoring data and data that verifies local project conditions and socioeconomic context.

The IIJA also provided an additional \$60,000,000 for the FMA "Swift Current" Initiative in response to Hurricane Ida in 2021. The intent for the "Swift Current" Initiative is to explore how to make flood mitigation assistance available within the disaster recovery timeframe, for repetitively flooded and substantially damaged buildings insured under the NFIP in advance of the annual grant process. The "Swift Current" Initiative requires program information collection activities to align the flood mitigation assistance and disaster recovery investments as close to disaster impacts as possible. The "Swift Current" Initiative is designed to implement flood mitigation assistance within the near-term disaster recovery timeframe. The program objective targets repetitively flooded and substantially damaged buildings insured under the NFIP to fund projects in advance of the normal annual FMA grant process. FY 2022 "Swift Current" initiative funding will be made available to Louisiana, Mississippi, New Jersey, and Pennsylvania in

response to the 2021 Hurricane Ida disaster for individual flood mitigation “Swift Current” Initiative projects. The IIJA-funded “Swift Current” program prioritizes assistance that benefits disadvantaged communities and is designed to comply with the Justice40 goals under EO 14008. To meet these goals, FEMA is requesting that within 30 days of the application start date, each state provide FEMA with a written summary of actions (e.g., state-specific criteria or initiatives) to prioritize equitable selection of submitted sub-applications under the state allocation and ensure maximization of the number of NFIP-insured properties funded under this opportunity. FEMA posts HMA NOFOs for the FMA “Swift Current” Initiative grant program annually. Information collection authorizations are necessary to collect application data, cost effectiveness data, environmental and historic preservation data, project monitoring data and data that verifies local project conditions and socioeconomic context.

The BRIC (DTA) initiative is specifically designed to assist economically disadvantaged rural communities, tribal entities, and Justice40 underserved communities. The Justice40 Initiative provides guidance on implementing environmental justice and equitable implementation of program resources. Justice40 establishes equity and environmental justice criteria to guide implementation of EO 14008 by directing climate change investments to Justice40 defined underserved communities. DTA delivers hazard mitigation assistance to communities who face resource barriers that prevent access to Hazard Mitigation grants and other federal assistance grants. DTA is intended to build a community’s capacity and capability to improve its resilience to natural hazards and to ensure stakeholders are capable of building and sustaining successful mitigation programs, submitting high-quality applications, and implementing new and innovative projects that reduce risk from a wide range of natural hazards. The BRIC DTA initiative implements non-financial technical assistance to increase a community’s capacity and capability to conduct mitigation activities, increase the community’s resilience to natural hazards, or identify projects that will holistically improve the community’s resilience and reduce risk. FEMA posts HMA NOFOs for the new BRIC DTA program annually.

The IIJA authorized an additional amount of \$1,000,000,000 for the “Disaster Relief Fund”, \$1,000,000,000, to remain available until expended, in addition to any amounts set aside pursuant to section 203(i) of the Stafford Act (42 U.S.C.5133), for BRIC program grants. The IIJA stipulates that \$200,000,000 remain available until expended for FY 2022 through FY 2026. The substantial increases in funding for BRIC program and the BRIC non-financial Direct Technical Assistance initiative will cause a substantial increase in information collection activities. Information collections are necessary to determine eligibility, program performance and quarterly reporting, cost effectiveness data, project and program evaluation metrics, environment and historical preservation data, project monitoring and closeout requirements.

The FY22 Consolidated Appropriations Act, (Pub. L. No. 117-103) authorizes \$153,922,408 in FY 2022 Congressionally directed spending for the PDM program. Congress is expected to also provide Congressionally mandated spending in FY 2023 and beyond. The objective of the PDM

grant program is to fund annual Congressional community projects for SLTT governments. The PDM grant program makes Federal funds available to SLTT governments to plan for and implement sustainable cost-effective measures designed to reduce the risk to individuals and property from future natural hazards, while also reducing reliance on Federal funding from future disasters. Priorities for Congressional community projects include risk reduction of both acute events and chronic stressors, driven by climate change, which are either observed or expected. Information collection authorizations are necessary to collect application data, cost effectiveness data, environmental and historic preservation data, project monitoring data and data that verifies local project conditions and socioeconomic context. FEMA will post HMA NOFOs for the PDM grant program annually.

Executive Order 14008 and Executive Order 13985 align with the IJIA goals and priorities to advance equity in Hazard Mitigation programs. Information collections are necessary to document socioeconomic conditions and provide data for program evaluation metrics to meet requirements, goals and priorities established in the IJIA and Executive Orders 13985 and 14008. In order to maximize the effectiveness and benefits of these historic investments, agencies are directed to review IJIA investments, programs, projects, and activities for applicability under the Justice40 Initiative. The IJIA includes existing programs already covered under the Justice40 Initiative, as well as new programs within scope of the Justice40 Initiative. OMB outlined reporting criteria in M-21-28 Interim Implementation Guidance for the Justice40 Initiative. Agencies shall report information and data on new and existing investments, programs, projects, and activities identified in the IJIA and implemented under guidelines established in M-21-28. The IJIA provides significant funding to disadvantaged communities that have been historically marginalized, underserved, and overburdened by pollution. The IJIA helps deliver on the President's commitment to use every lever at his disposal to address these historic inequities, and will help secure a healthy, prosperous, equitable future for all. The Administration also recognizes that chronic underfunding of infrastructure has harmed Tribal communities, which is why the IJIA includes significant investments in Indian Country. The Justice40 Initiative, outlined in section 223 of Executive Order 14008², is a critical part of the Administration's whole-of-government approach to environmental justice, and supports the Administration's comprehensive approach to advancing equity for all in line with Executive Order 13985.³ FEMA is committed to prioritizing these communities to meet the climate change and equity goals set by EO 14008.

The Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act") (Pub. L. No. 115-435) emphasizes collaboration and coordination to advance data and evidence-building functions in the Federal Government by statutorily mandating Federal evidence-building activities, open government data, and confidential information protection and statistical

² *Tackling the Climate Crisis at Home and Abroad*, 86 Fed. Reg., 7619 (February 1, 2021).

³ *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 86 Fed. Reg., 7009 (January 25, 2021).

efficiency. Evidence is broadly defined and includes foundational fact finding, performance measurement, policy analysis, and program evaluation. In addition, the Evidence Act mandates a systematic rethinking of government data management to better facilitate access for evidence-building activities and public consumption. The Evidence Act establishes evaluation using systematic data collection and analysis of one or more 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 simply 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 with the PRA, OMB's implementing guidance for the Information Quality Act, and the Performance Framework⁴ outlined in the Government Performance and Results Act Modernization Act of 2010⁵. The Evidence Act advances program evaluation as an essential component of Federal evidence building. Evaluation is an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.

The Evidence Act states that "the Director of the Office of Management and Budget, in consultation with any interagency council relating to evaluation, shall-(A) issue guidance for program evaluation for agencies consistent with widely accepted standards for evaluation; and (B) identify best practices for evaluation that would improve Federal program evaluation." As stated in OMB M-19-23, meeting the requirements of the Evidence Act complements the principles of the PRA and "will necessarily build on activities already underway and, in some cases, require coordination of these activities in new ways." The Evidence Act creates a new paradigm by calling on agencies to significantly rethink how they currently plan and organize evidence building, data management, and data access functions to ensure an integrated and direct connection to data and evidence needs. This paradigm requires engagement and cooperation from multiple actors within agencies (e.g., senior leadership, policy officials, program administrators, performance managers, strategic planners, budget staff, evaluators, analysts, front-line staff, and data professionals) and key external stakeholders.⁶ Information collections are necessary to simply data collection, reduce burden, coordinate data collection across programs, develop performance metrics, and meet goals and priorities as stipulated in the Evidence Act.

⁴ For example, the Information Quality Act, Privacy Act, and Paperwork Reduction Act of 1995. See Office of Mgmt. & Budget, Exec. Office of the President, OMB M-19-15, Improving Implementation of the Information Quality Act (2019), available at <https://www.whitehouse.gov/wp-content/uploads/2019/04/M-19-15.pdf>.

⁵ <https://www.govinfo.gov/content/pkg/PLAW-111publ352/pdf/PLAW-111publ352.pdf>

⁶ M-19-23 MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES
EXECUTIVE OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503, July 10, 2019

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.

Starting with the FY 2020 BRIC and FMA programs, FEMA has transitioned from using the electronic system, Mitigation eGrants, to the FEMA Grants Outcomes (FEMA GO) system, which is an intuitive, user-friendly, web-based application that allows eligible applicants and subapplicants to apply for Grants and Subgrants by using the Internet. The previous Mitigation eGrants system's functionalities and business processes have been modernized and streamlined in FEMA GO.

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

The **Environmental Review** is used to collect information that is needed to ensure that a proposed project is in compliance with all necessary environmental and historic preservation regulations and laws. This information is collected to assure that adverse project impact is minimized according to the National Environmental Preservation Act, the Endangered Species Act, the National Historic Preservation Act, Executive Orders 11988 regarding floodplains and 11990 regarding wetlands and other applicable laws and executive orders. For example, if a property is acquired and there is asbestos on the property, FEMA has to assure that it is disposed of according to regulations.

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

The **FEMA DTA Request Form, FF-206-FY-22-155** is used to apply for non-financial technical assistance offered through the BRIC. Eligible communities request hazard mitigation assistance by completing this form. Each community may only submit one request. A confirmation email will be sent to sub applicants within three business days. The information collected as part of the DTA form will initially be collected in a downloadable form and attached

within the appropriate system until the collection can be fully incorporated into the FEMA GO system.

The proposed FEMA DTA Request Form has the following data fields and questions to be completed by respondents:

Identifiers: “What community or communities do you represent in this DTA application, Point of Contact (Entity Representative), Entity Phone Number, Entity Email Address, Entity Address, City/Town, State, territory, or Tribal government with drop down list, Zip/Postal Code, FEMA Region, Non-federally recognized Tribal Government(s); binary yes/no” : “Are you a federally recognized Tribal Government(s)/Entity?- yes, no, Does your community have or participate in a Hazard Mitigation plan?- yes, no unsure, and a text box question that asks Name the Hazard Mitigation Plan in which your community or communities participates?”

Eligibility: “To be eligible for DTA, you must represent one or more of the options below. Please check all that apply – City, Township, County/Parish, Special District Government, Federally Recognized Tribal Nation Government (s), Non-Federally Recognized Tribal Nation Government (s), consortium of two or more communities that fit the above criteria.”

Hazard Identification: “Please check the box that describes the nature of the hazards(s) you community is facing. Please check all that apply. Avalanche, Dam Failure, Drought, Earthquake, Erosion, Expansive Soils, Extreme Cold, Extreme Heat, Flood, Hail, Hurricane Wind, Landslide, Lightning, Sea Level Rise, Severe Winter Weather, storm Surge, Subsidence, tornado, Tsunami, Wildfire, Pandemic”

DTA Support: “Please indicate a primary Direct Technical Assistance need. Choices include Hazard Mitigation Plan Development/Update, Mitigation of a Specific Hazard/Risk Assessment, Community Outreach & Partnerships, General Hazard Mitigation Capacity Building Workshops, Project Identification & Scoping, Potential Funding Sources Identification, Benefit Cost Analysis (BCA), Grant Writing Workshop, Grants Management Workshop, BRIC Sub-Application Development, Other”

Text box questions that ask: “Please describe any disasters your community has experienced in the past seven years? Please provide a brief description of proposed deliverables and timelines, including duration of technical assistance. A question the determines previous FEMA assistance which states: Have you received a subaward (Project, Advance Assistance, Capability and Capacity Building) under BRIC, the Pre-Disaster Mitigation (PDM) grant program, the Flood Mitigation Assistance (FMA) grant program, or the Hazard Mitigation Grant Program (HMGP) within the past 5 years? - Yes, No, I don’t know”.

Disadvantaged Community Inquiry: “Paragraph: Social Vulnerability refers to the potential negative effects on communities caused by external stresses on human health. Such stresses include natural or human-caused disasters, or disease outbreaks. More information and resources regarding the Social Vulnerability Index can be found here

<https://www.atsdr.cdc.gov/placeandhealth/svi/index.html> - Please briefly describe how your community is disadvantaged below; Is your community 3,000 or fewer individuals?"

Narrative responses: "You can determine if your community falls under the Justice40 Initiative using the Climate and Economic Justice Screening Tool (CEJST) here: [Explore the tool - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#) - Are you designated as a disadvantaged community as defined by [Executive Order 14008](#), including Tribal Nation Government(s)" - Justice40, No, I don't know

A Point of Contact Acknowledgement [Check box]: "By checking this box I confirm that if selected the community or communities referenced in this form agree to a) sign a Memorandum of Understanding with FEMA before non-financial technical assistance can begin and b) actively participate in Direct Technical Assistance (DTA) according to a DTA Plan developed in conjunction with FEMA."

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

Quarterly Progress Report (QPR report): The QPR report describes the status of ongoing projects on which a final payment of the Federal share has not been made to the recipient. Consistent with the requirements outlined in 2 CFR Part 200, and 44 CFR Part 77 (FMA), the Quarterly Progress Report (QPR) instructs the recipient to input the following data into an accompanying excel spreadsheet with corresponding tabbed columns until the information can be fully incorporated into FEMA GO. For purposes of FMA and PDM, the information may also be submitted through the appropriate grant system.

The proposed BRIC, FMA, and PDM program quarterly reporting form has the following fields to be completed by the recipients: Region, Recipient, Fiscal Year, Program, Award #, Subaward #, Subrecipient Application ID, Project Title, Quarter, Status, Date Obligated/Approved, POP Start Date, POP End Date, POP Time Extension, POP Time Extension Date, Comments, Actual

Project Completion Date, Federal Share Obligated, Cost Code, Federal Funds Dispersed, Percentage Work Complete, Sub-grantee Expenditures To Date, Sub-grantee Expenditures to Date, Total Grantee Drawdown, Date Final Payment made to Sub-grantee, Date of Drawdown, and # of Properties Mitigated this Quarter. In addition, BRIC recipients should also complete the required data columns for: Go/No Go Milestone,⁷ Go/No Go Milestone Delay, Go/No Go Milestone, and Time Extension Date/Go/No Go Milestone Comments. The BRIC required data fields appear within the same form as the FMA and PDM data fields.

The information collected as part of the QPR will initially be collected in a spreadsheet and attached within the appropriate system until the collection can be fully incorporated into the FEMA GO system. At that time, FEMA intends to collect the information in FEMA GO directly.

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

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

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

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

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

⁷ A Go/No-Go milestone is a major milestone in the project. If the milestone is not completed according to schedule the subaward may result in cancellation. Progress towards meeting the Go/No-Go milestones must be reported in the quarterly progress reports submitted to the recipient and FEMA. Mitigation projects submitted under the state/territory allocation or tribal set-aside do not require Go/No-Go milestones.

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-271, Outlay Report and Request for Reimbursement for Construction Programs, is a standard form used by recipients of construction grants to request reimbursements. It is approved for use under OMB Number 4040-0011.

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

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

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

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

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

Since FY 2020, grant applications for the FMA and BRIC programs are submitted via FEMA GO. The use of the FEMA GO electronic system by respondents allows 100% percent of the information required to be submitted electronically. FEMA forms can be accessed through <https://www.reginfo.gov> where the information collection is stored or through the State Hazard Mitigation Officer. FMA applications for FY 2019 and prior years as well as all PDM applications are managed in the MT eGrants system.

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

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

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

FEMA GO enables the following burden reductions for the public:

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

At present, not all of FEMA has yet transitioned to FEMA GO; FEMA GO is currently in operations for BRIC and FMA since FY 2020. MT eGrants continues to process applications for all PDM projects. MT eGrant also processes applications FMA projects that applied for funding from FY 2019 and prior years. The MT eGrants system is an intuitive, user-friendly, web-based application owned and operated by FIMA that allows eligible applicants and sub-applicants to apply for grants and sub-grants through the Internet. MT eGrants is both an internal (FEMA-facing) system and an external facing system.

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

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

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

This information collection has a minimal impact on small businesses or other small entities. Small businesses and “other small entities” are not defined or classified as subapplicants under BRIC, PDM or FMA. Both programs award grant funds to states and local governments. “Local governments” may apply as subapplicants under these programs. Under BRIC, authorized under the Stafford Act, “local governments” has a specific definition per Section 102(8) of the Stafford Act. Under 42 U.S.C. 4104c, which authorizes FMA, “communities” to whom subawards may be made is specifically defined. By policy, communities and local governments are often used interchangeably under FMA.

While subapplicants may submit applications on behalf of small businesses or “small entities” [however they are defined], this information collection does not create any significant change in how “small businesses” or “small entities” are treated under the two programs. Consistent with the past practice of the PDM program, the format of how grants are awarded to local governments or communities under BRIC and FMA, and how entities (small businesses or other kinds) receive funds from subapplicants who apply on their behalf, is not significantly changed by this information collection.

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

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

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

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

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA headquarters and regional staff participate in annual meetings with state and local representatives to discuss updates to mitigation grant programs, including data collection and the change from use of the Mitigation eGrants system to the FEMA GO System. Specifically, these stakeholders have contributed input into the development of the FEMA GO system for FMA and BRIC. It was determined that PDM would continue using MT e-Grants.

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

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

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

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

A Privacy Threshold Analysis (PTA) was completed on December 03, 2021, and is in effect until March 30, 2024. A supplemental PTA for FEMA Form FF-206-FY-22-155, the DTA Request Form was completed on August 22, 2022, and is effect until August 31, 2024. This collection is supported by DHS/ALL/PIA-006 Contact Lists, DHS/FEMA/PIA-006 National Emergency Management Information System Mitigation (MT) Electronic Grants (eGrants) System, and a forthcoming FEMA Go PIA. SORN coverage is provided by DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs and DHS/ALL-004 General Information Technology Access Account Records System. In addition, as required by the Privacy Act, a Privacy Act Statement is provided with any form that asks respondents to provide personal information about themselves, which is then saved into a system of records.

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

The MT eGrants Privacy Threshold Analysis (PTA) was previously approved with coverage under the DHS/FEMA/PIA-006 FEMA National Emergency Management Information System MT eGrants System Privacy Impact Assessment (PIA) and the DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs System of Records Notice (SORN), 79 Fed. Reg. 16,015 (March 24, 2014).

Both internal and external users access MT eGrants through the FEMA Enterprise Identity Management System (FEIMS) in Authentication and Provisioning Services (APS), which verifies user's identity or rights to access the system. FEMA APS is currently covered by the DHS/FEMA/PIA-031 Authentication and Provisioning Services (APS) PIA and the DHS/ALL 004 General Information Technology Access Account Records System (GITAARS) SORN, 77 Fed. Reg. 70792 (Nov. 27, 2012).

FIMA shares MT eGrants 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 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 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.

The numbers of respondents estimated for each (PDM, FMA, and BRIC) program are listed in the **Estimated Annualized Burden Hours and Costs** table below. There are 56 respondents for each program and 125 respondents estimated for **FF-206-FY-22-155, the FEMA DTA Request Form** application.

BRIC, PDM, FMA, and the FMA Swift Current initiative use the Benefit Cost Determination, the Environmental Review and the Project Narrative Sub-Grant Application, and the SF forms outlined below. All the programs require that QPRs are completed, generally 30 days after the quarter for the program ends. FEMA requires that recipients submit QPRs. Recipients are defined as state, tribal, and territorial governments. QPRs describe the mitigation project status for each activity and compare it to the approved original scope of work, schedule, and budget. Additionally, the BRIC DTA initiative uses FF-206-FY-22-155, the FEMA DTA Request Form.

For the Benefit Cost Determination: This information collection is used by BRIC, BRIC DTA initiative, PDM, FMA, and the FMA Swift Current Initiative.

For purposes of FMA, 56 respondents (State Urban and Regional Planners) completing an average of 50 Benefit-Cost Analyses in support of the grant requests make for a total of 2,800 (56 x 50 = 2,800) responses. It is estimated that each response will require 5 hours to complete.

The total annual burden hours for this information collection activity for FMA will be **14,000 hours** ($2,800 \times 5 = 14,000$).

For purposes of BRIC and PDM, 56 respondents completing an average of 20 Benefit Cost Analyses in support of the grant request make for a total of **1120** ($56 \times 20 = 1120$). It is estimated that each response will require 5 hours to complete. The total annual burden hours for this information collection activity for BRIC will be **5,600 hours** ($1120 \times 5 = 5600$).

The total annual hour burden for this information collection for both programs is 19,600 hours ($14,000 + 5,600 = 19,600$ hours).

The Environmental Review is used by BRIC, PDM, FMA, and the FMA Swift Current Initiative

For BRIC and PDM, it is estimated that 56 respondents (State Urban and Regional Planners) will complete an average of 20 responses in support of the grant requests per program for a total of 1,120 responses ($56 \times 20 = 1,120$) for each program. It is estimated that each response will require 7.5 hours to complete. The total annual burden hours for this information collection activity per program is 8,400 ($1,120 \times 7.5 = 8,400$). The total annual burden hours for both programs for this information collection will be **16,800 hours** ($2 \times 8,400 = 16,800$).

For FMA, it is estimated that 56 respondents (State Urban and Regional Planners) will complete an average of 10 responses in support of the grant requests made per program for a total of 560 responses ($56 \times 10 = 560$). It is estimated that each response will require 7.5 hours to complete. The total annual burden hour for this information collection activity for FMA will be **4,200** ($560 \times 7.5 = 4,200$).

The overall total annual hour burden for this information collection for all three programs will be 21,000 burden hours ($16,800 + 4,200 = 21,000$).

The Project Narrative – Sub-Grant Application is used by BRIC, PDM, FMA, and the FMA Swift Current initiative.

For purposes of FMA, it is estimated that 56 respondents (State Urban and Regional Planners) will complete an average of 50 information collections for a total of 784 responses ($56 \times 50 = 2800$). It is estimated that each response will require 12 hours to complete. The total annual burden hours for this information collection activity for FMA is **33,600 hours** ($2800 \times 12 = 33,600$).

For purposes of BRIC and PDM, it is estimated that 56 respondents (State Urban and Regional Planners) will complete an average of 20 narratives in support of the grant requests made for a

total of 1,120 responses ($56 \times 20 = 1,120$). It is estimated that each response will require 12 hours to complete. The total annual burden hours for the information collection activity for BRIC will be 13,440 hours ($1,120 \times 12 = 13,440$).

The total annual burden hours for both programs for this information collection activity will be **47,040 hours** ($33,600 + 13,440 = 47,040$).

FEMA DTA Request Form, FF-206-FY-22-155 is used by the BRIC Direct Technical Assistance (DTA) initiative.

For purposes of the BRIC DTA initiative, it is estimated that 125 respondents comprised mostly of Life, Physical, and Social Science Occupations (SOC-19-000) working in State, local, or Tribal governments with a mean wage of \$33.86⁸ will apply on an annual basis. Including the wage rate multiplier of 1.62,⁹ the fully-loaded wage rate is \$54.85 per hour ($\33.86×1.62). It is estimated that 125 respondents will provide 1 response ($1 \times 125 = 125$). It is further estimated that each response will require 5 hours. The total annual burden hours for this information collection is 625 hours ($125 \times 5 = 625$). Therefore, the annual burden hour cost is estimated to be \$34,281 ($\$54.85 \times 625 \text{ hours} = \$34,281$).

For the **BRIC Review Panels, (National Review Panel Solicitation)** it is estimated they will be comprised mostly of Life, Physical, and Social Science Occupations (SOC-19-000) working in State, local, or Tribal governments with a mean wage of \$33.86.¹⁰ Including the wage rate multiplier of 1.62,¹¹ the fully-loaded wage rate is \$54.85 per hour ($\33.86×1.62). It is estimated that 100 respondents will provide 1 response ($1 \times 100 = 100$). It is further estimated that each response will require 144 hours. The total annual burden hours for this information collection is 14,400 hours ($100 \times 144 = 14,400$). Therefore, the annual burden hour cost is estimated to be \$763,488 ($\$54.85 \times 14,400 \text{ hours} = \$789,840$).

⁸ Bureau of Labor Statistics. Occupational Employment Wages, May 2020. 19-0000 Life, Physical, and Social Science Occupations (Major Group). Industry Profile, Local Government, excluding schools and hospitals (OEWS Designation). Hourly mean wage. <https://www.bls.gov/oes/2020/may/oes190000.htm>

⁹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs for Employee Compensation by ownership, June 2021.” Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed November 19, 2021. FEMA calculates the wage multiplier by dividing total compensation for State and local government workers of \$53.59 by wages and salaries of \$33.09 per hour yielding a benefits multiplier of approximately 1.62 ($53.59 \div 33.09$).

¹⁰ Bureau of Labor Statistics. Occupational Employment Wages, May 2020. 19-0000 Life, Physical, and Social Science Occupations (Major Group). Industry Profile, Local Government, excluding schools and hospitals (OEWS Designation). Hourly mean wage. <https://www.bls.gov/oes/2020/may/oes190000.htm>

¹¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs for Employee Compensation by ownership, June 2021.” Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed November 19, 2021. FEMA calculates the wage multiplier by dividing total compensation for State and local government workers of \$53.59 by wages and salaries of \$33.09 per hour yielding a benefits multiplier of approximately 1.62 ($53.59 \div 33.09$).

For the **Quarterly Performance Report (QPR)** added to this information collection: The information collection is used by BRIC, FMA, and PDM. For FMA it is estimated that an average of 56 respondents x 4 reports annually, which equates to 224 total responses (56 x 4 = 224) Each report is estimated to take 60 hours.¹² The burden hours attributed to the FMA program including FMA “Swift Current” is 13,440 hours. The PDM and BRIC programs estimate a total of 448 annual respondents. Each report will take 60 hours. The total annual burden for the PDM and BRIC program is 26,880 hours. The total annual burden hours for this information collection for all three programs is 13,440 + 26,880 = 40,320 hours.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

For purposes of this new request to add QPRs to this information collection: the QPR consists of one form that will be utilized by BRIC, PDM, and FMA. With the additional form, the estimated annualized burden hours and costs for purposes of this information collection is as follows:

¹² The 60-hour estimated time to complete the QPR is based off the number of fields in the QPR for BRIC/FMA/PDM compared to the fields requested for quarterly reporting for purposes of another HMA program, Hazard Mitigation Grant Program. (IC 1660-0076). Because the QPRs for all the programs are identical but for program specific differences, there are 5 additional fields added for purposes of the BRIC/FMA/PDM QPR. FEMA estimates the time it will take to complete the QPR for BRIC/FMA/PDM as an increase from 25 to 30 fields of information, or a 20% increase. FEMA apply this to the 50 hours it takes to complete the QPR for HMGP, which results in 60-hour estimated time to complete the QPR (50*1.2 = 60).

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
Flood Mitigation Assistance (97.029)								
State, Territory or Tribal government	Benefit-Cost Determination	56	50	2800	5	14,000	\$60.59	\$848,260
State, Territory or Tribal government	Environmental Review	56	50	2800	7.5	21,000	\$60.59	\$1,272,390
State, Territory or Tribal government	Project Narrative-Sub-Grant Application	56	50	2800	12	33,600	\$60.59	\$2,035,824
State, Territory or Tribal government	Quarterly Progress Report (FMA)	56	4	224	60	13,440	\$60.59	\$814,330
BRIC, BRIC DTA, and PDM								
State, Territory or Tribal government	Benefit-Cost Determination	56	20	1120	5	5,600	\$60.59	\$339,304
State, Territory or Tribal government	Environmental Review	56	20	1120	7.5	8,400	\$60.59	\$508,956
State, Territory or Tribal government	Project Narrative-Sub-grant Application	56	20	1120	12	13,440	\$60.59	\$814,330
State, Territory or Tribal government	FEMA DTA Request Form / FEMA Form FF-206-FY-	125	1	125	5	625	\$54.85	\$34,281

	22-155							
State, Territory or Tribal government	BRIC Review Panel	100	1	100	144	14,400	\$54.85	\$789,840
State, Territory or Tribal government	Quarterly Progress Report (BRIC and PDM)	112	4	448	60	26,880	\$60.59	\$1,628,659
Total		729		12,657		151,385		\$9,086,174

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.62¹³. 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 \$68.86.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2020 Occupational Employment and Wage Estimates wage rate for Urban and Regional Planners working for local governments (SOC 19-3051) is \$37.40.¹⁴ Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$60.59 per hour.

The May 2020 Occupational Employment and Wage Estimate wage rate for Life, Physical, and Social Science Occupations (SOC-19-000) working in State, local, or Tribal governments with an annual average wage of \$33.86.¹⁵ Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$54.85 per hour (\$33.86 x 1.62).

Information from the following Standard Forms (SF) is collected within the sub-grant application. Approval for the collection of the information listed below is provided under a government-wide OMB No. 4040 control number. The listed forms are used throughout the Federal government and, therefore, FEMA does not include the monetary costs to avoid double counting.

¹³ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs for Employee Compensation by ownership, June 2021.” Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed November 19, 2021. FEMA calculates the wage multiplier by dividing total compensation for State and local government workers of \$53.59 by wages and salaries of \$33.09 per hour yielding a benefits multiplier of approximately 1.62 (53.59 ÷ 33.09).

¹⁴ Bureau of Labor Statistics. Occupational Employment Wages, May 2020. 19-3051 Urban and Regional Planners. Industry Profile, Local Government, excluding schools and hospitals (OEWS Designation). Hourly mean wage. <https://www.bls.gov/oes/2020/may/oes193051.htm>

¹⁵ Bureau of Labor Statistics. Occupational Employment Wages, May 2020. 19-0000 Life, Physical, and Social Science Occupations (Major Group). Industry Profile, Local Government, excluding schools and hospitals (OEWS Designation). Hourly mean wage. <https://www.bls.gov/oes/2020/may/oes190000.htm>

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
Flood Mitigation Assistance (FMA) (97.029)						
State (may include Tribal Government)	Application for Federal Assistance SF 424 (OMB No. 4040-0004)	56	25	1400	0.75	1050
State, Territory, or Tribal Government	Budget Information for Non- Construction Program SF-424A (OMB No. 4040-0006)	56	100	5600	1.8	10,080
State, Territory, or Tribal Government	Assurances for Non-Construction Programs SF 424B (OMB No. 4040-0007)	56	100	5600	0.8	4,480
State, Territory, or Tribal Government	Budget Information for Non-Construction Programs SF-424C (OMB No. 4040-0008)	56	25	1400	9.7	13,580
State, Territory, or Tribal Government	Assurances for Construction Programs SF-424D (OMB No. 4040-0009)	56	1	56	1.7	95
State, Territory, or Tribal Government	Obligating Document for Awards/Amendments (No Form No. listed in Grants.Gov)	56	2	112	1.2	134
State, Territory, or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs SF-271 (OMB No. 4040-0011)	56	40	1840	17.2	31,648

State, Territory, or Tribal Government	Real Property Status Report SF-429 (OMB No. 4040-0016)	56	1	56	4.2	235
State, Territory, or Tribal Government	Federal Financial Report/Report Attachment SF-425/425A (OMB No. 4040-0014)	56	25	1400	0.084	118
State, Territory, or Tribal Government	Disclosure of Lobbying Activities / SF LLL (OMB No. 4040-0013)	56	1	56	0.167	9
Total		616		17576		61,429
Pre-Disaster Mitigation (PDM) (97.047)						
State, Territory, or Tribal Government	Application for Federal Assistance/FEMA Form SF 424 (OMB No. 4040-0004)	56	10	560	0.75	420
State, Territory, or Tribal Government	Budget Information – Non-construction Programs / SF-424A (OMB No. 4040-0006)	56	10	560	1.8	1008
State, Territory, or Tribal Government	Assurances for Non-Construction Programs, SF-424B (OMB No. 4040-0007)	56	10	560	0.8	448
State, Territory, or Tribal Government	Budget Information for Construction Programs, SF-424C, (OMB No. 440-0008)	56	10	560	9.7	5,432
State, Territory, or Tribal Government	Assurances for Construction Programs SF-424D, (OMB No. 4040-0009)	56	10	560	1.7	952
State, Territory, or Tribal Government	Obligating Document for Awards/Amendments (No Form No. listed in Grants.Gov, FEMA Form 112-0-7)	56	10	560	1	560

State, Territory, or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs, SF-271 (OMB No. 4040-0011)	56	30	1680	17	28,560
State, Territory, or Tribal Government	SF-429, Real Property Status Report (OMB No. 4040-0016)	56	10	560	4.2	2352
State, Territory, or Tribal Government	Reconciliation of Grants and Cooperative Agreements (No Form No. listed in Grants.Gov, FEMA Form 112-0-6)	56	10	560	0.084	47
State, Territory, or Tribal Government	Federal Financial Report / SF 425 and SF 425A (OMB No. 4040-0014)	56	20	1120	1.5	1680
State, Territory, or Tribal Government	Disclosure of Lobbying Activities / SF LLL (OMB No. 4040-0013)	56	1	56	0.167	9
Total		616		7336		41,468
Building Resilient Infrastructure and Communities (97.047)						
State, Territory, or Tribal Government	Application for Federal Assistance SF 424 (OMB No. 4040-0004)	56	4	224	0.75	168
State, Territory, or Tribal Government	Budget Information – Non-construction Programs SF-424A (OMB No. 4040-0006)	56	4	224	1.8	4,032
State, Territory, or Tribal Government	Assurances for Non-Construction Programs SF 424B (OMB No. 4040-0007)	56	4	224	0.8	179

State, Territory, or Tribal Government	Budget Information for Non-Construction Programs SF-424C (OMB No. 4040-0008)	56	4	224	9.7	21,728
State, Territory, or Tribal Government	Assurances for Construction Programs, SF-424D (OMB No. 4040-0009)	56	4	224	1.7	381
State, Territory, or Tribal Government	Obligating Document for Awards/Amendments (No Form No. listed in Grants.Gov)	56	4	224	1.2	2688
State, Territory, or Tribal Government	Outlay Report and Request for Reimbursement for Construction Programs, SF-271(OMB No. 4040-0011)	56	40	2240	17.2	38,528
State, Territory, or Tribal Government	SF-429, Real Property Status Report (OMB No. 4040-0016)	56	4	224	4.2	941
State, Territory, or Tribal Government	Reconciliation of Grants and Cooperative Agreements	56	4	224	0.08	18
State, Territory, or Tribal Government	Disclosure of Lobbying Activities / SF LLL (OMB No. 4040-0013)	56	1	56	0.167	9
State, Territory, or Tribal Government	Federal Financial Report / SF 425 and SF 425A (OMB No. 4040-0014)	56	20	1120	1.5	1680
Total		616		5208		70,352

Note: Information from the following Standard Forms (SF) is collected within the sub-grant application. Approval for the collection of the information listed below is provided under a government-wide OMB No. 4040 control number. The listed forms are used throughout the Federal government and, therefore, FEMA does not include the monetary costs to avoid double counting.

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

The cost estimates should be split into two components:

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

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

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

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

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

For item 14, the total cost to FEMA is \$7,739,695. Approximately 30 staff members with an estimated grade level of GS-13 step 5 in Washington, DC review and make determinations for these grant programs. There are no cost estimates for annual cost to the Federal Government in

relation to Questions 12 or 13. This submission utilizes existing equipment, software, and existing maintenance practices.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: FEMA contracts the maintenance and enhancements of FEMA GO (Mitigation eGrants data collection is maintained). The annual cost of this maintenance contract with IBM, Inc. is \$3,000,000.00 for the sustainment/maintenance of the FEMA GO system.	\$3,000,000
Staff Salaries: 26 GS 13, step 5 employees spending approximately 100% of their time annually to collect data/survey individuals for this data collection. [26 x \$121,065 x 1 x 1.45 ¹ = \$4,564,151] 4 GS 13, Step 5 employees spending approximately 25% of their time on planning, review, and evaluation of BRIC panels. [4 x \$121,065 x 0.25 x 1.45 = \$175,544] [\$4,564,151 + \$175,544 = \$4,739,695]	\$4,739,695
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
Total	\$7,739,695
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf Accessed March 8, 2022. ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate for civilian workers (\$38.91 ÷ \$26.85).	

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 Itemized Change in Burden Hour Table. The Table Denotes a program increase as a positive number, and a program decrease as a negative number.

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

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Flood Mitigation Assistance (FMA) (97.029)						
Benefits Cost Determination				2,800	14,000	11,200
Environmental Review				4,200	21,000	16,800
Project Narrative-Subgrant Application				9,408	33,600	24,192
National Review Panel Solicitation						
Quarterly Progress Report (QPR)	0	13,440	13,440			
Sub-Total	0	13,440	13,440	16,408	68,600	52,192
BRIC, BRIC DTA, and PDM						
Benefits Cost Determination				5,600	5600	0
Environmental Review –				8,400	8400	0
Project Narrative-Subgrant Application						
FEMA DTA Request Form / FEMA Form FF-206-FY-22-155	0	625	625			
National Review Panel Solicitation						
Quarterly Progress Report (QPR)	0	26,880	26,880			
Sub-Total	0	26,880	26,880	14,000	19,600	0
Total (both Sub-Totals)		40,945	40,945	30,400	88,200	52,192
Combination Total of New and Revised Instruments (40,945 hours new + 52,192 hours revised)						95,512

Explain: The changes in burden hour calculations reflected in the benefits cost determination and environmental review data resulted from updates to historical program requirements. The FMA, BRIC, and PDM teams also established new quarterly reporting data forms and descriptions that are reflected in additional burden hours in the above table. Previous to this submission, the FMA, BRIC, and PDM programs, had not established a standardized format for quarterly reporting. The FMA, BRIC and PDM programs had relied on data formats and forms

generated by the recipient’s data collection systems for quarterly reporting information. This submission will allow the FMA, BRIC, and PDM programs to collect standardized information and apply a standardized form to the quarterly reporting process.

Itemized Changes in Annual Cost Burden FMA, BRIC, and PDM						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
Benefit-Cost Determination				\$490,560	\$1,187,564	\$697,004
Environmental Review				\$735,840	\$1,611,694	\$875,854
Project Narrative-Sub-Grant Application						
FEMA DTA Request Form / FEMA Form FF-206-FY-22-155		\$3,565	\$3,565			
National Review Panel Solicitation						
Quarterly Progress Report (QPR)	\$0	\$2,442,989	\$2,442,989			
Total	\$0	\$2,446,554	\$2,446,554	\$1,266,400	\$2,799,258	\$1,572,850
Combination Total of New and Revised Instruments (\$2,446,554 new + \$1,572,850 revised)						\$4,019,412

Explain: The new costs in quarterly reporting reflect the increases in the burden hours attributed to the implementation of a standardized form, data and data collection process. The increase in the benefit-cost determination costs reflect data updates that show decreases in the number of responses per respondent. The change in the environmental review costs reflect data updates that account for an increased number of respondents. (SOC 19-3051).

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

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

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

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

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

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

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.