

September 2, 2022

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0008

Title: Elevation Certificate/Floodproofing Certificate

Form Number(s):

- 1) FEMA Form FF-206-FY-22-152 (formerly 086-0-33), Elevation Certificate
- 2) FEMA Form FF-206-FY-22-153 (formerly 086-0-34), Floodproofing Certificate

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

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

The National Flood Insurance Act, 42 U.S.C. § 4001 *et seq.*, as implemented by the associated National Flood Insurance Program (NFIP) regulations at Title 44 of the Code of Federal Regulations, requires participating NFIP communities to ensure the elevation

or floodproofing of new or substantially improved structures in designated Special Flood Hazard Areas. As part of the criteria for making flood insurance available in a community, the NFIP requires communities to adopt a floodplain management ordinance that meets or exceeds the minimum requirements of the NFIP. These minimum requirements are designated to prevent new development from increasing flood hazards and to reduce the flood risk to new and existing buildings intended to reduce future flood losses. One such requirement is that the community requires that new or substantially improved buildings be elevated to or above the base flood elevation. The community must obtain the elevation of the lowest floor (including basement) of all new and substantially improved structures and maintain a record of all such information. The building elevation information should be generated and retained as part of the community's permit records. The Elevation Certificate is one convenient way for a community to document building compliance. This form can be completed by surveyors, the property owner, or government officials.

Surveyed elevations continue to be required for floodplain management compliance, but the Elevation Certificate is optional to rate a NFIP flood insurance policy. Under the Insurance program of the NFIP, Elevation Certificates can be used to provide a building's First Floor Height and other elevation information used for rating. FEMA does allow a policyholder the option to provide an Elevation Certificate to see if it will result in a more favorable rate than the FEMA-sourced elevation information.

Floodplain management requirements apply to buildings constructed in Special Flood Hazard Areas. For rating purposes, the NFIP determines the unique flood risk of all buildings, regardless of their location. Therefore, the Elevation Certificate now includes a new First Floor Height section that property owners in all zones can opt to complete to provide the First Floor Height of a building without incurring the cost of a surveyor. Property owners can measure the First Floor Height in feet and submit the measurement themselves, along with other pertinent property information on the form. Policyholders can also use the Elevation Certificate to identify the location of certain machinery and equipment servicing the building to be considered for a flood insurance mitigation discount.

For NFIP rating purposes, the Floodproofing Certificate for Non-Residential Structures is submitted in conjunction with the Flood Insurance Application and Elevation Certificate to certify that the design and construction elevation of a nonresidential building establish eligibility for a floodproofing premium discount. A completed Floodproofing Certificate for Non-Residential Structures must be completed by engineers or architects and also requires the following documentation:

- At least two photographs of the building that show the floodproofing measures in place, including: Photographs of the exterior of the building (all sides);
- Photographs of the components used to provide floodproofing protection (shields, gates, barriers); *and*
- Flood Emergency Plan that includes:
 - Chain of command;
 - Notification procedures;
 - Personnel duties;
 - Location of floodproofing components, install procedures, repair procedures;
 - Evacuation procedures for building occupants;
 - Component maintenance procedures during flooding event;
 - Drill and training program (at least once a year);
 - Regular review and update of Flood Emergency Plan; *and*
- Inspection and Maintenance Plan that includes:
 - Inspection procedures for the entire floodproofing system: wall systems, floor slab, openings, floodproofing components, valve operation, drainage and pump systems, equipment, and tools required to engage floodproofing measures; and
 - Regular review and update of the Inspection and Maintenance Plan.

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

The Elevation Certificate and Floodproofing Certificate are used in conjunction with the NFIP Application for Flood Insurance (OMB collection number 1660-0006, National Flood Insurance Program Policy Forms) to document compliance with community floodplain management ordinances for Post- Flood Insurance Rate Map (Post-FIRM) structures in Special Flood Hazard Areas (44 CFR § 60.3, 61.7, 61.8). Post-FIRM structures are those buildings constructed after publication of the Flood Insurance Rate Map (FIRM). In addition, the Elevation Certificate can be used to document elevation information for buildings in all flood zones. The standardized formats of the Elevation Certificate (FEMA Form FF-206-FY-22-152 (formerly 086-0-33)) and Floodproofing Certificate for Non-Residential Structures (FEMA Form FF-206-FY-22-153 (formerly 086-0-34)) provide community officials with data needed to verify building elevation and

determine compliance with the community's floodplain management ordinance. The elevation information documented on the certificate is then used in conjunction with the flood insurance application so that the building can be properly rated for flood insurance according to the building's unique flood risk. The elevation data is transmitted by the insurance agent, along with the appropriate NFIP policy forms, to FEMA.

The Floodproofing Certificate for Non-Residential Structures is a tool by which a registered professional engineer or architect documents their certification that the nonresidential building design and methods of construction are in accordance with accepted practices for meeting the floodproofing requirements in the community's floodplain management ordinance (as required to obtain a floodproofing credit for flood insurance). The engineer or architect makes a professional design determination that the building is floodproofed, for which they have professional liability. A prudent determination requires: a review of as-built design drawings that includes wall and floor sections, penetration of utilities into the building; a review of the protection of all openings (such as doors and egress); a review of soil conditions at the site; some calculation of loads and flow-rates of water through the soil; and a site visit to verify this information. Most owners who get this certification will use the services of the original designer of the building who has familiarity with the design.

The information provided on the Elevation Certificate and Floodproofing Certificate assists in FEMA's ability to measure the effectiveness of its regulations in reducing or eliminating damages caused by flooding and the appropriateness of NFIP premium charges for insuring property against the flood hazard.

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 Elevation Certificate and Floodproofing Certificate for Non-Residential Structures can be downloaded from the Internet as text files or PDF files. The surveyor, engineer, or architect completing these forms is required to provide their license information and to affix their seal in certifying the information on the form. The completed forms are either mailed in with the Flood Insurance Application or are scanned and submitted as a scanned document if accompanying a Flood Insurance Application that is submitted electronically.

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 other form, and therefore is not duplicated elsewhere. This information is collected on a property only once and may then be passed on to subsequent owners. It may also be retained on file in the community.

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

This information collection does not have an impact on small businesses 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.

If the collection of information is not conducted, FEMA will not be able to measure the effectiveness of the regulations in eliminating or decreasing damage caused by flooding. Also, FEMA cannot adequately assess the appropriateness of its premium charges for insuring individual properties against the flood hazard, resulting in possible over- or under-charging for flood insurance policies. This information is collected on a property only once and may then be passed on to subsequent owners. It may also be retained on file in the community.

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.**

N/A

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

N/A

- (c) Requiring respondents to submit more than an original and two**

copies of any document.

N/A

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

N/A

(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.

N/A

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

N/A

(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.

N/A

(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.

N/A

None of the circumstances described in 7(a)-(h) are present in this information collection.

8. Federal Register Notice:

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

A 60-day Federal Register Notice inviting public comments was published on March 10, 2022, at 87 FR 13743. Seventeen comments related to the Elevation Certificate and Floodproofing Certificate were received. Two of the comments were not relevant to this information collection. Two other comments only expressed approval of the changes made and provided no suggestions. Several comments provided suggestions that had already been addressed in the proposed revisions. Some comments will be considered for future iterations as improved technology capabilities allow. FEMA accepted many of the other suggestions that better clarified the information being requested and improved the instructions for use of the collection instruments. None of the comments received addressed cost and hour burden.

Comment 2 (FEMA-2022-0012-0002): The second comment was not germane.

Comment 3 (FEMA-2022-0012-0003): The commenter suggested use of a larger comment box in Section D to provide additional information or provide designated sections for specific items.

FEMA Response to Comment 3: FEMA will make the Section D comments box expandable to fit the entry. In addition, the user can add attachments to supply additional information and comments.

Comment 4 (FEMA-2022-0012-0004): The commenter suggested that the Elevation Certificate does not clearly indicate to surveyors that the lowest adjacent grade elevation should be based on natural grade and not on fill. The commenter also noted that we do not have a diagram for this type of development. The commenter suggested that FEMA provide a certificate for wet floodproofing on non-residential buildings.

FEMA Response to Comment 4: FEMA added options to the Elevation Certificate for lowest adjacent grade and highest adjacent grade to indicate whether the elevation measurements are based on natural or finished grade. FEMA also added the following definition of natural grade to the Instructions: “Natural grade means the undisturbed natural surface of the ground prior to any excavation or fill.” FEMA believes that the diagrams already provided are sufficient for this type of development. Regarding the wet floodproofing, the Elevation Certificate does ask about flood openings, which is a

component of wet floodproofing. We do not intend to provide a separate certificate at this time.

Comment 5 (FEMA-2022-0012-0005): The commenter suggested that the elevation requirements to get a mitigation discount for elevation of machinery and equipment above the first floor makes all single-story homes with contents coverage ineligible for the discount and asked if this was the intent.

FEMA Response to Comment 5: FEMA recognizes that elevating above the first floor lowers the risk of flood damage to machinery and equipment covered in the policy. Single-story buildings would not be eligible for the machinery and equipment discount as the flood risk is higher on the first floor of a single-story building.

Comment 6 (FEMA-2022-0012-0006): The commenter noted that the draft looks very good and is very clear on what's needed.

FEMA Response to Comment 6: FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection.

Comment 7 (FEMA-2022-0012-0007): The commenter stated that the edits are appropriate and allow for more applicable and useful documentation to be completed and satisfy the multitude of interests involved.

FEMA Response to Comment 7: FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection.

Comment 8 (FEMA-2022-0012-0008): The eighth comment was not germane.

Comment 9 (FEMA-2022-0012-0009): The commenter (1) suggested moving item C1 to the first page to more easily reference and file the ECs required for new construction; (2) asked if we could add an "Existing Construction" category to item C; (3) expressed agreement with the additions to C2.f and C2.g; and (4) asked if for item E1, we could just remove "below" the HAG and replace with "above the Natural HAG".

FEMA Response to Comment 9: (1) FEMA considers that C1 is properly placed at the beginning of Section C – Building Elevation Information rather than moving it to the first page before Section A - Property Information, which does not address elevations. (2) FEMA is not adding an Existing Construction category, as there are other ways of determining whether finished construction is new construction. (3) FEMA is constantly

working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection. (4) FEMA is not contemplating changing E1 to replace “below” the HAG with “above the natural HAG.” The instructions indicate that natural grade should be used, if available, and users can already enter a negative number.

Comment 10 (FEMA-2022-0012-0010): The commenter suggested that Section H and Section I should be revised to include the same references to ownership, representatives, and floodplain management official (see mark-up).

FEMA Response to Comment 10: FEMA made this difference intentionally to reduce the burden on the local flood management official to sign in two different places. FEMA will add the following sentence after the first paragraph in Section I: “If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.”

Comment 11 (FEMA-2022-0012-00011): FEMA appreciates the concerns presented in the eleventh comment, but they were not germane to this information collection.

Comment 12 (FEMA-2022-0012-0012): The commenter suggested (1) consolidating all vertical datum requirements into one location; (2) standardizing the language for B8 to require flood zone, or flood zones for the entire property rather than where the structure is located; (3) a separate box for Tax Parcel ID to focus attention that this is required data; (4) that the fields in Section B automatically populate once the address is entered, and (5) that in the digital EC, if the elevation for C2.f LAG is higher than C2.g HAG, then an error message should appear.

FEMA Response to Comment 12: (1) FEMA considers that all datum entries are necessary as they refer to different elements and cannot be consolidated. (2) The form must show the zone(s) for the actual location of the building, not the entire property. (3) FEMA does not require the Tax Parcel Number; however, FEMA will revise Item A3 to highlight the Tax Parcel Number as follows: “A.3 Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number.” (4) FEMA does not have the auto-populate capability for this form at present, but will explore the possibilities for future iterations. FEMA has discovered that variations in address formats may cause matching inconsistencies. (5) FEMA does not have the automatic error message capability for this item at present, but will explore the possibilities for future iterations. The information should be reviewed for accuracy by the surveyor prior to completion of the form.

Comment 13 (FEMA-2022-0012-0013): The commenter suggested that FEMA include the watercourse name on the new EC.

FEMA Response to Comment 13: FEMA does not view the name of the watercourse as being necessary, because the flooding may result from different sources. FEMA’s rating methodology already takes into account the water sources that may impact a specific building.

Comment 14 (FEMA-2022-0012-0014): The commenter suggested revisions for multiple sections of the Elevation Certificate. **Section A:** (1) Revise Item A5 to indicate source of Latitude and Longitude; (2) Revise Item A6 to remove the words “if the Certificate is being used to obtain flood insurance”; (3) Revise Items A8 and A9 first line to report number of crawlspaces/enclosures, so “0” (zero) could be entered’ (4) Revise Items A8d and A9d to add space to identify “unique design” or “manufactured” and to report “rated opening” (instead of physical opening); (5) Revise instructions for Items A8 and A9 regarding certification for manufactured engineered openings and refer to ICC-ES site (remove “if you have it”). **Section B:** (1) Revise Item B1 to allow comment in instances where communities have changed governmental form (such as from Town to Township), or have merged but are not yet mapped as such, or have gained or lost mapped areas due to annexations; (2) Add ability to indicate if information in Items B8 and B9 is based on a LOMC and to report applicable LOMC(s), including date, Case Number, type of LOMC. (3) Add boxes to Item B10 to indicate LOMC, Transect, and FIS Stillwater data table; (4) Add a line to Section B to indicate if the site is subject to Limit of Moderate Wave Action. **Section C:** (1) Revise Item C2 to say “control utilized” instead of “benchmark utilized”; (2) Revise Item C2 to provide space to identify datum conversion (to be used only when applicable); (3) Revise Items C2a-c to accommodate multiple levels below the main floor, or multi-level enclosures, or mid-level floors, with space to identify what the reported elevation(s) represent; (4) Revise instructions to address below grade window wells, basement entries, and loading docks. **Sections D and F:** (1) Add a line to “Check here if attachments” to read “This form is void without the referenced attachments”. Add language to instructions to require identification in Sections D and F of what those attachments are. **Building Diagrams:** (1) Make referenced dimensions defining a crawlspace in Diagram 9 consistent with Technical Bulletin 11. **Instructions:** (1) Update Floodplain Management Bulletin 467-1 (“Elevation Certificate”) and reference it in the Elevation Certificate instructions.

FEMA Response to Comment 14: Section A: (1) Proposed Instructions already ask to provide source of latitude and longitude in the Section D comments area, or add attachment. The commenter may have been viewing a previous version of the form. (2) Words already removed; commenter may have been viewing a previous version of the form. (3) A change to report the number to enter “0” is not necessary. Per instructions for

Items A8.a and A9.a, users can enter N/A if no enclosures or crawlspaces. (4) Already addressed in proposed form. The commenter may have been viewing a previous version of the form. (5) Changed from “if you have it” to “if applicable.” Instructions are to attach a copy of the certification and indicate the manufacturer’s model number in the Comments, if applicable. **Section B:** (1) Section B instructions already updated to provide for such situations. (2) No change needed; the BFE for LOMCs are determined by FEMA, and the community should determine or verify BFEs for local floodplain management. (3) Users can click on the “Other” box and then enter the other source on the form. (4) FEMA is adding a new Item B.13. “Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)?” **Section C:** (1) FEMA is not revising Item C2 because benchmark utilized is a commonly used and well-known term. (2) FEMA is leaving C2 as is, as the current instructions are clear. (3) No change to Items C2a-c; focus on simplicity as we cannot address every possible scenario. (4) No change to Instructions; focus on simplicity. **Section D:** (1) Section D instructions are sufficient; attachments already addressed in proposed form. **Section F:** (1) Section F instructions are sufficient; attachments already addressed in proposed form. **Building Diagrams:** (1) No change to reference building diagram dimensions defining a crawlspace. The language in FEMA Technical Bulletin 11 may be different, but the meaning is essentially the same in practice. **Instructions:** (1) The document Floodplain Management Bulletin 467-1 will remain referenced under “Purpose for the Elevation Certificate”; updates are being considered for the future.

Comment 15 (FEMA-2022-0012-0015): The commenter suggested revisions for multiple sections of the **Elevation Certificate**. **Overall:** (1) The commenter expressed that the revisions to Lines A8.a-f and A9.a-f will help clarify several flood ventilation scenarios not easily documented in the past. **Property Information:** (1) Change Line A3 to clarify the data points needed. (2) Increase the field length in Line A5 for the latitude/longitude entries on the MS Word version. (3) Line A6 - making photographs a requirement for all uses of this form is a much-needed improvement. (4) Line A8 – consider adding checkboxes for adjacent or interior grade and update instructions. (5) Line A9: Consider revising to clarify that an attached garage is not under a building. (6) Lines A9 (a-f): Very helpful to breakout engineered vs. non-engineered vents and into square-inches and square-feet of coverage. **Section C:** (1) Line C2.d: Consider revising to clarify that an attached garage is not under a building. **Section D:** (1) Telephone: (underscore line missing where entry would go). **Section E:** (1) Line E3: Consider revising to clarify that an attached garage is not under a building. **Section G:** (1) Line G9.a. Suggest adding checkboxes for lowest floor and next higher floor. **Instructions Section A:** (1) Items A1-A4: Clarify data points needed by inserting the word “either.” **Section B:** (1) Item B8: Suggested including LOMC data.

The commenter also suggested revisions for multiple sections of the **Floodproofing Certificate**. **Overall:** (1) The commenter noted that the new design closes a gap in determining if the certificate was intended for design or as-built and may be completed by different professionals. The commenter suggested that adding the Property Information and FIRM information to each Section would confirm that the design and as-built certifications are associated with the same property, though they may be completed at different times. **Purpose:** (1) The following sentence within the last paragraph appears to contain typographic errors and miswording. **Property Information:** (1) The line: “*Property Description (Lot and Block Numbers, Tax Parcel Number, Legal Description, etc.)*” leads some to believe all these data points are necessary in this one field. Recommend revising to include the word “or” as follows: “*Property Description (Lot and Block Numbers, or Tax Parcel Number, Legal Description, etc.)*.” (2) Recommend numbering the lines for easier reference. **Required Documentation:** (1) Section 1, Line b: Recommend include “backflow (non-return) valves or shutoff valves” as these can often be the most difficult-to-locate components upon non-residential sites with many other utility connections. (2) Section 1, Line c: Recommend deleting the section requiring additional photographs of openings without flood barriers installed. (3) Section 2, Line h: Recommend deleting this line: “*Repair procedures and component maintenance procedures that may be necessary during a flooding event*”; and adding new line “*Flood barriers labeled to identify opening they protect and order of component installation.*” and adding examples. (4) Section 3, Lines d and e: Recommend deleting line “e” as these lines appear to include the same items. (5) Section 4: Recommend deleting the Building Owner acknowledgment. Such an acknowledgement might be better suited to the policy documentation which would usually reflect the most current associations with a building. **Instructions:** (1) Property Information: Recommend revising the instruction to include the word “or” before the Tax Parcel Number to better clarify not all these datapoints are necessary in this one field.

FEMA Response to Comment 15: **Elevation Certificate - Overall:** (1) FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection. **Property Information:** (1) FEMA is clarifying Item A3 by revising to read as follows: “A.3 Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:” (2) FEMA believes that the space provided on the form in Item A5 is sufficient. (3) FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection. (4) Item A8: No change to the form. FEMA will add the word “adjacent” in front of the exterior and interior grade references in the instructions. (5) Item A9. FEMA is making no change to the attached garage verbiage. (6) FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection. **Section C:** (1) Item C2.d: FEMA is making no changes. **Section D:** (1) The form

provides a fillable field for the telephone number. **Section E:** (1) Item E3: FEMA is making no changes. **Section G:** (1) Item G9.b: FEMA will keep the numbering as is, as the next higher floor measurement is not needed. **Instructions Section A:** (1) Items A1-A4: Replace with: “This section identifies the building, its location, and its owner. Enter the name(s) of the building owner(s) and the building’s complete street address. Enter the property description (e.g., lot and block numbers or legal description) and/or tax parcel number. If the building’s address is different from the owner’s address, enter the address of the building being certified. If the address is a rural route or a Post Office box number, enter the property description (e.g., lot and block numbers or legal description) and/or tax parcel number, or an abbreviated location description based on distance and direction from a fixed point of reference. FEMA is adding a new sentence at the end of the instructions for Items A1-A4: “For properties with multiple buildings, include a description for the specific building.” **Instructions Section B.** (1) Item B8. FEMA will add the following: “If the area where the building is located was revised by a LOMA, CLOMA, LOMR-F, or CLOMR-F, include the flood zone shown on the LOMA, CLOMA, LOMR-F, or CLOMR-F, and add the effective date and the case number in the comments area of Section D.”

Floodproofing Certificate – Overall: (1) As the certificate may be assembled by different professionals at different times for the design phase and the finished construction, FEMA will add the property address header to each page of the form (pages 3-5). On page 7, 1st paragraph of Instructions, after last sentence, add: “For certification of finished construction, this form is invalid without Sections I through IV.” **Purpose:** (1) FEMA will revise the 2nd and 3rd sentences at the top of page 2 as follows: “The dry floodproofing of non-residential buildings and the non-residential portions of mixed-use buildings may be permitted as an alternative to elevating to or above the Base Flood Elevation (BFE); however, a dry floodproofing design certification is required. This form is to be used for that certification.” **Property Information:** (1) FEMA will revise the Property Description line to read as follows: “Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:” (2) FEMA will consider numbering the lines in future iterations. **Required Documentation:** (1) Section 1, Line b: FEMA will add “backflow (non-return) valves or shutoff valves.” (2) Line c: FEMA will keep as is. (3) Section 2, Line h: FEMA will delete Line h but feels that the component maintenance procedures already cover the rest of the recommendation. (4) Section 3, Lines d and e: FEMA will merge Line e with Line d by adding “barriers and all seals” in Line d to read as follows: “d . Flood shields, gates, panels, doors, glazing, barriers, and other components designed to provide dry floodproofing protection, including all seals, gaskets, fasteners, and mounting hardware and tools.” (5) Section 4: FEMA will keep the building owner/third-party contractor acknowledgment as required documentation. **Instructions:** (1) Property Information: FEMA will revise the last sentence as shown: If the address is a rural route or a Post Office box number, enter the lot and block numbers,

and/or the tax parcel number, the legal description, or an abbreviated location description based on distance and direction from a fixed point of reference.”

Comment 16 (FEMA-2022-0012-0016): The commenter suggested revisions for multiple sections of the Elevation Certificate. (1) Page 2 of 19: Include verbiage in the title area to indicate that only Section C or Section E (not both) needs to be filled out to gain FEMA and community compliance. (2) Pages 3-8: Reincorporate the “IMPORTANT: In these spaces, copy the corresponding information from Section A.” verbiage that was in the previous edition to appear on each page of the form; (3) Section D/Section F: Include underline in the telephone section; (4) Item E1.b: This section should read "below the LAG" instead of "below the HAG"; (5) Section E: Clarify whether or not Section E is intended to allow individuals to gain regulatory compliance without the use of surveyed elevations; (6) Section H: Clarify its use; (7) Section I - Please include a sentence that states "If Section H is filled out by local official, please complete Section G instead" to clarify that Section G must be filled in, in lieu of I if a government official fills out the measurements in Section H.; (8) Add a verbiage to Page 1 of the instruction stating: "Note that an EC does not have to have both Sections C and E filled out for compliance, but instead only one of those two."

FEMA Response to Comment 16: (1) Page 2 of 19: The first page of the Instructions already provides detailed information on who can or should complete which sections of the EC. (2) Pages 3-8: FEMA will reincorporate the recommended verbiage on each page of the form. (3) Section D/F: The line display may vary based on the version of the viewing software. However, this is a fillable field, so the underline is not needed (4) Item E1.b: FEMA agrees and will correct the last checkbox to read “below the LAG. (5) Section E clarification: Please see Instructions for clarifications on the use of Section E for compliance. The intent of Section E is not changing; it is used for compliance for Zones AO, AR/AO, and A only, and Section C is used for compliance for other zones. Section H has been added for better alignment with the current rating methodology. (6) Section H was provided to give property owners an option for determining the new First Floor Height rating element without a licensed surveyor. The surveyed elevations in Section C take precedence. FEMA will add “(SURVEY NOT REQUIRED)” to the Section H heading for additional clarification. Also see response (8) below; (7) Section I: FEMA will add the following Note after the first paragraph in Section I on the form and as a note at the end of the Section I instructions: “**Note:** If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.” (8) FEMA will add a sentence to the end of the general Instructions preceding the Section A instructions: “**Note:** Section C can be used for insurance and compliance in any zone; however, Section E can be used only for compliance in Zone AO, Zone AR/AO, and Zone A. For insurance purposes only, a local floodplain management official, a property owner, or an owner's authorized representative may

provide First Floor Height details in Section H for any zone.” FEMA will also add the following verbiage to the end of the first paragraph in the Section H Instructions: If Sections C and/or E and H are all completed, then information in Section C will prevail for insurance purposes and for compliance.

Comment 17 (FEMA-2022-0012-0017): The commenter had multiple recommendations for the Elevation Certificate provided in two separate attachments. FEMA combined the recommendations to avoid repetition. **Privacy Act Statement and throughout:** (1) Change references from LOMC to LOMA or LOMR-F; **Purpose** (1) Remove the LOMC definition, remove the word “insurance” from description of flood zones, reorder the zones throughout, and add Zone AO. (2) Specify throughout that surveyor must be a land surveyor; add “as authorized by state law”; **Elevation Certificate Form Section A:** (1) Item A9.c Remove “(if applicable)” after Engineered flood openings. **Section B:** (1) Add new Item B13 with Yes/No checkboxes and accompanying instructions. “Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)?” **Section E:** (1) Add an asterisk both after Construction Drawings and Building Under Construction and add new line under Building Measurements “*A new Elevation Certificate will be required when construction of the building is complete.” (2) Item E1.b: Correct HAG to LAG. **Section G:** (1) Add periods between numbers and letters and at the end for Items G9a, G9b, G10a, and G10b. **Instructions:** (1) In second paragraph, remove “state” in reference to authorization of community officials, as the “state” qualifier is not applicable. **Section A:** (1) Item A5: Correct the latitude/longitude conversions. (2) Item A6: In line 3, remove period between A and 7. (3) Item A7: Delete “of these instructions” in line 1. (4) Item A8.b: Remove “Yes”; change “if the openings are not” to “none of the openings are”; change reference to Item A8.d to A8.c-f. (5) Item A8.c: Remove “If A8.b is Yes” and change location of the word “permanent.” (6) Item A8.d: Change “estimated” to “measured” net open area. Revise reference to comments to direct users to use “the Comments area of the appropriate section” because a surveyor, a local floodplain management official, or a property owner can complete Sections A and B. (7) Item A8.e: Second sentence, add “for a specific building” after Certification, and “of the appropriate section” after Comments. Update reference in last line from A8.c to A8.d. (8) Items A9.a - A9.e: Make corresponding changes suggested above for Items A8.a - A8.e. For A9.e, add the manufacturer’s name. (9) Item A9.f: Add “net” in front of “open area.” **Section B:** (1) Third paragraph: Change six-digit “number” to six-digit “Community Identification Number.” (2) Item B1.a-b. Add new second sentence: “For an unincorporated area of a county, enter the county name and “unincorporated area”, and the six-digit number of the county.” (3) Item B2. Delete “and unincorporated area.” (4) Item B9: Update to clarify zones with base flood depths instead of base flood elevations. (5) Item B10: Should be an entirely separate paragraph beginning on a new line. (6) (new) Item B.13. Indicate whether the building is located seaward of the Limit of Moderate Wave Action (LiMWA). If the LiMWA is not shown on the FIRM, check the

“No” box. Information about the LiMWA and other coastal flood zones may be obtained on the FEMA website at www.fema.gov/flood-maps/coastal/insurance-rate-maps.

Section C: (1) C2.c Remove “Building Diagrams 5 and 6” because this elevation is required for all buildings in V and coastal zones. (2) Item C2.e. Second line, change “machinery” to “M&E.” Last sentence, delete “on top of the roof.” (3) Item C2.f. Use acronym for lowest adjacent grade. (4) Item C2.g. The text contradicts the requirements, as “natural” in C2.g only applies to Zone AO, for LOMA/LOMR-F purposes. (5) Item C2.h. Update for consistency with C2.f-g. (6) Update caption for figure to remove Building Diagrams 5 and 6. **Section E:** (1) Add “or AR/AO” after Zone A in first line of first paragraph. (2) Line 3: Replace LOMC with: LOMA, CLOMA, LOMR-F, or CLOMR-F. (3) Items E1.a and b.: Line 3, add “natural” in front of LAG; change depth number to “base flood depth”; delete last sentence “Buildings in Zone A (without BFE) may qualify for a lower insurance rate if an engineered BFE is developed at the site” as this statement no longer applies under the new rating methodology. **Section F:** The commenter made several minor edits for consistency. **Section G:** (1) Delete “state” in front of “law” because the state qualifier is not applicable. (2) Revise format of Items G1-G4 to be consistent with other instructions. (3) G1. Add “land” in front of “surveyor in first sentence. (4) G2.a. Remove “FEMA issued or community”. (5) G9.b Remove “Building Diagrams 5 and 6” because this elevation is required for all buildings in V and coastal zones. (6) G10.b: Delete “if higher than the BFE”. **Section H:** (1) First paragraph: delete last sentence “A local floodplain management official who completes Section H may certify in Section G instead.” (2) Items H1a and H1.b. For consistency, in the parenthesis delete “applicable diagram” and replace with “selected Building Diagram, Item A7”. (3) Item H2: Move the placement of the M&E to improve readability. (4) Foundation Type Diagrams for Use in Section H: Correct the introductory paragraph to reference eleven Building Diagrams instead of nine. Also move the Foundation Type Diagrams to the next page to increase their size. **Section I:** Update to clarify who can certify Section H and where to certify on the form. **Building Diagrams:** In the second paragraph, change the reference from “drawing” to “figure” for consistency.

FEMA Response to Comment 17: Privacy Act Statement and throughout: (1) FEMA is revising the first reference to LOMC to reflect Letter of Map Amendment (LOMA), Conditional LOMA (CLOMA), Letter of Map Revision Based on Fill (LOMR-F), or Conditional LOMR-F (CLOMR-F). Hereafter, FEMA will replace all references to LOMC with these acronyms: LOMA, CLOMA, LOMR-F, or CLOMR-F. **Purpose** (1) FEMA will remove the LOMC definition, remove the word “insurance”, and add Zone AO, but maintain the order of the zones. (2) FEMA will revise the fourth sentence of fourth paragraph under Purpose to read as follows: “Lowest Adjacent Grade (LAG) elevations certified by a land surveyor, engineer, or architect (as authorized by state law) will be required if the certificate is used to support a LOMA, CLOMA, LOMR-F, or CLOMR-F request.

Elevation Certificate Form: Section A: (1) Item A9.c: FEMA will remove “(if applicable.” **Section B:** (1) FEMA will add new Item B13 “Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)?” **Section E:** (1) FEMA will add an asterisk both after Construction Drawings and Building Under Construction, and add new line under Building Measurements “*A new Elevation Certificate will be required when construction of the building is complete.” (2) Item E1.b: Correct HAG to LAG. **Section G:** (1) FEMA will add periods between numbers and letters for Items G9a, G9b, G10a, and G10b. **Elevation Certificate Instructions:** (1) In second paragraph, FEMA will remove the word “state.” **Section A:** (1) Item A5: FEMA will revise the latitude/longitude conversions. (2) Item A6: In line 3, FEMA will remove period between A and 7. (3) Item A7: FEMA will delete “of these instructions” in line 1. (4) through (9) Items A8 and A9 instructions above: FEMA will update as suggested. **Section B** instructions: FEMA will update as suggested. **Section C:** (1) Item C2.c: FEMA will replace the instruction as follows: “For floodplain management compliance, this elevation is required for all Building Diagrams 5 and 6 in V zones, areas seaward of the LiMWA, and in other areas regulated for coastal flooding hazards. Enter the elevation measured at the bottom of the lowest horizontal structural member of the floor indicated per the selected Building Diagram (Item A7) or the figure below. This elevation can be entered for Building Diagrams 5 and 6 in any flood zone, including Zones B, C, X, and D. For Building Diagrams other than 5 and 6 (if applicable), enter the C2c elevation as indicated in the figure below. *If this item does not apply to the building, enter "N/A" for not applicable.*” (2) Item C2.e. FEMA will update as suggested. (3) Item C2.f. FEMA will update as suggested. (4) Item C2.g. FEMA will replace the instruction as follows: “Enter the finished Highest Adjacent Grade (HAG) elevation of the ground, sidewalk, or patio slab next to and in direct contact with the building. For a building in Zone AO, use the natural grade elevation, if available. Indicate whether the natural or finished grade was used. If natural grade was used, attach the source of the information (e.g., a grading plan). For buildings under construction in any zone, enter the HAG elevation at the time of the survey.” (5) Item C2.h. FEMA will replace the instruction as follows: “Enter the finished LAG elevation of the lowest ground, sidewalk, or patio slab next to and in direct contact with the structurally-attached-deck supports or stairs structurally attached to the building. For buildings under construction in any flood zone, enter the lowest LAG at the time of the survey.” (6) Figure: FEMA will update the figure caption as follows: “For use in determining Item C2c.” **Section E** instructions (1) through (3): FEMA agrees with the comments and will update as suggested. **Section F:** FEMA reviewed and accepted the suggested edits. **Section G:** (1) through (4): FEMA reviewed and accepted the suggested edits. (5) FEMA will replace the instruction as follows: “G9.b. As-built lowest horizontal structural member. Enter the elevation measured at the bottom of the lowest horizontal structural member of the floor indicated per the selected Building Diagram (Item A7), or in the figure in the instructions for Section C. Indicate the datum used.” (6) FEMA

reviewed and accepted the suggested edit. **Section H** (1) through (4): FEMA reviewed and accepted the suggested edits. **Section I**: FEMA reviewed and accepted the suggested edits. **Building Drawings**: FEMA reviewed and accepted the suggested edit.

Comment 18 (FEMA-2022-0012-0018): The commenter made several suggestions for the **Elevation Certificate**. (1) This version of the form represents significant progress by improving the Elevation Certificate as a compliance tool. (2) Remove the date from the FEMA form number. This is problematic for those communities that explicitly require use of the FEMA certificate because citing the form number in their regulations will lock them into a specific version of the form and thus would require those communities to amend their regulations every time FEMA updates the form. (3) In A8.d, e, and f – and A9.d, e, and f – modify so there aren't mixed units (both square inches and square feet) which is complicated when the summation of both nonengineered and engineered is needed. Alternatively, eliminate Item A8.f and A9.f so there is no need to combine the measurements. (4) In Items C2.c and G9.b, clarify the intent of the phrase “regulated areas.” (5) The commenter noted the benefit of having photographs of all sides of the building. **Floodproofing Certificate**: (1) This version of the form represents significant progress by recognizing and clearly distinguishing the certification of design from certification of the “as-built” condition. (2) Remove the date from the FEMA Form Number. (3) Commented on the need for surveyed elevations of machinery and equipment whether inside or outside of the building. (4) Questioned the rationale for the elevation of the lowest protected floor to be surveyed to a tenth of a foot. (5) Recognized the benefit of requiring more photographs. (6) Suggested having a section for the building owner to acknowledge the Emergency Operations Plan and the Inspection and Maintenance Plans.

FEMA Response to Comment 18: Elevation Certificate (1) FEMA is constantly working to improve our delivery of assistance and streamline our processes and appreciates your evaluation of our data collection. (2) FEMA will keep the format of the form number with the date, as this is the new standard for all FEMA forms. (3) FEMA will keep the instructions provided as the most effective solution, and the items will remain as currently proposed. (4) FEMA updated the instructions for C2.c and G9.b to clarify the information needed. (5) FEMA appreciates your comment regarding photographs.

Floodproofing Certificate: (1) FEMA appreciates your evaluation. (2) FEMA is unable to remove the date from the form number, as this is the new standard format for all FEMA forms. (3) and (4) FEMA is removing both B. Elevation of machinery and equipment and C. Elevation of the lowest protected floor from Sections II and III of the form as these elevations are not needed. (5) FEMA appreciates your comment regarding photographs. (6) The instructions already require that the plans be submitted with the

certificate, and Part 4 of the Required Documentation addresses the building owner acknowledgment.

A 30-day Federal Register Notice inviting public comments was published on [date, Volume FR pp (example 74 FR 15228)]. **[Select one---No comments were received OR x number of comments related to (state topic of comments) were received].**

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

NFIP personnel frequently discuss the certificates at meetings with involved users; e.g., insurance agents, company officials, floodplain managers, surveyors, and others. The Federal Insurance and Mitigation Administration (FIMA) works very closely with the surveyors, engineers, and architects during the development process. FIMA also worked with a representative from the Community Rating System Task Force and consulted with representatives of the Association of State Floodplain Managers to obtain their views.

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

In June 2021, FEMA formed a workgroup to review and make recommendations for the improvement of the Elevation Certificate and the Floodproofing Certificate. This workgroup was composed of FEMA and Federal Insurance and Mitigation Administration staff that had invited and compiled comments on the Elevation Certificate and the Floodproofing Certificate from the private sector, including engineers, surveyors, community officials, floodplain managers, insurance company representatives, insurance producers, underwriters, and others. The workgroup also included a representative from the Community Rating System task force and consulted with representatives from the Association of State Floodplain Managers.

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 approved on December 15, 2021.

The NFIP Direct system security plan complies with the Computer Security Act and OMB Circulars A-123, A-127, and A-130. The NFIP Direct Servicing Agent computer system has protection and control of the data maintained in the system.

A System of Records Notice (SORN), DHS/ FEMA-003 – National Flood Insurance Program Files System of Records Notice 79 Fed. Reg. 28747 (May 19, 2014) has been completed. The NFIP Direct System is currently covered by DHS/FEMA/PIA-048 National Flood Insurance Program (NFIP) Direct Servicing Agent (NFIP Direct) and DHS/FEMA/PIA-050 NFIP PIVOT System, October 31, 2017.

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 requiring response from respondents.

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.

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

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item13.

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
Businesses - Surveyors (Contracted by the property owner)	Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (formerly 086-0-33)	3,350	1	3,350	3.75	12,563	\$48.02	\$603,275
Businesses - Architects/Engineers (Contracted by the property owner)	Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153 (formerly 086-0-34)	2	1	2	3.25	7	\$63.95	\$448
Businesses - All Occupations (Contracted by the property owner)	Elevation Certificate and Instructions FEMA Form FF 206-FY-22-153 (formerly 086-0-33)	165	1	165	1	165	\$40.61	\$6,701
Total		3,517		3,517		12,734		\$610,424

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2021 Occupational Employment and Wage Estimates wage rate for Surveyors (SOC: 17-1022) is \$33.12. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is estimated at \$48.02 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$603,275 (\$48.02 x 12,563 hours).

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_09162021.pdf. Accessed February 22, 2022. The wage multiplier is calculated by dividing total compensation for all workers of \$38.91 by wages and salaries for all workers of \$26.85 per hour yielding a benefits multiplier of approximately 1.45.

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2021/may/oes_nat.htm

The wage rate for Architecture and Engineering Occupations (SOC: 17-0000) is \$44.10. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is estimated at \$63.95 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$448 (\$63.95 x 7 hours).

The wage rate for All Occupations (SOC: 00-0000) is \$28.01. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is estimated at \$40.61 per hour. Therefore, the estimated annual burden hour cost to property owners who complete the Elevation Certificate for the First Floor Height measurement only is estimated to be \$6,701 (\$40.61 x 165 hours).

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.

There are no operation or maintenance costs associated with this collection.

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

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153 (formerly 086-0-34)	\$0	\$0	\$0	\$0
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (formerly 086-0-33)	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$0

There are no capital or start-up costs associated with this 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.

The total Annualized Cost to the Federal Government is estimated to be \$32,343. We no longer incur facilities, printing, or postage costs, as the Elevation Certificate and the Floodproofing Certificate for Non-Residential Structures are no longer printed or stored. They are available on the FEMA website as fillable PDF forms. Staff salaries referenced in the table below are for the locality pay area of Washington-Baltimore-Arlington.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: Data Entry Keyers (SOC: 43-9021)- 197 hours (3,352 forms at .059 hour) at \$25.06 (\$17.28 ¹ x 1.45 loaded wage rate) = \$4,937 Insurance Underwriters (SOC: 13-2053)- 335 hours (3,352 forms at .10 hour) at \$55.72 (\$38.43 x 1.45 loaded wage rate) = \$18,666	\$23,603
Staff Salaries: 1 GS 12 Step 5- 34 hours at \$70.73 (\$48.78 ² x 1.45 ³ loaded wage rate) = \$2,405 1 GS 13 Step 5- 34 hours at \$84.11 (\$58.01 x 1.45 loaded wage rate) = \$2,860 1 GS 14 Step 5- 34 hours at \$99.40 (\$68.55 x 1.45 loaded wage rate) = \$3,380	\$8,645
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	\$32,248
¹ Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2021/may/oes_nat.htm ² 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_h.pdf . . Accessed February 22, 2022. ³ Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

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

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

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

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

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
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (formerly 086-0-33)	0	0	0	46,343	12,728	-33,615
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153 (formerly 086-0-34)	0	0	0	3	7	4
Total	0	0	0	46,346	12,735	-33,611

Explain: The burden hour per response for FEMA Form FF-206-FY-22-152 (formerly 086-0-33) and FEMA Form FF-206-FY-22-153 (formerly 086-0-34) has remained the same. However, the burden hours for this collection decreased from 46,346 to 12,735 hours, an adjustment decrease of 33,611 hours.

This decrease is due to a decrease in the number of flood insurance applications being submitted to the NFIP Direct Servicing Agent, many of which were rated based on elevation data provided on the certificates. Since the Elevation Certificate and Floodproofing Certificate are submitted in conjunction with an application for flood insurance, fewer applications being submitted results in fewer Elevation Certificates and Floodproofing Certificates being submitted. The total number of responses for the Elevation Certificate has decreased from 12,359 to 3,350 (-9,009 responses). The number of responses for the Floodproofing Certificate has increased from 1 to 2 responses.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (formerly 086-0-33). Respondent Cost	\$0	\$0	\$0	\$2,065,022	\$609,976	-\$1,455,046
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153 (formerly 086-0-34). Respondent Cost	\$0	\$0	\$0	\$441	\$448	\$7
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (formerly 086-0-33). Annual Maintenance Cost	\$0	\$0	\$0	\$4,325,300	\$0	-\$4,325,300
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153 (formerly 086-0-34). Annual Maintenance Cost	\$0	\$0	\$0	\$350	\$0	-\$350
Total	\$0	\$0	\$0	\$6,391,113	\$610,424	-\$5,780,689

Explain: The change in the Annual Cost Burden is an adjustment decrease due to a decrease in the number of respondents for FEMA Form FF-206-FY-22-152 (formerly 086-0-33) from 12,359 to 3,350, and a decrease in cost per response due to decreased Surveyor wage rates. The net change decreases annual respondent burden cost from \$2,065,465 to \$609,976.

Annual maintenance costs were corrected to \$0 due to double counting costs in respondent burden costs and annual maintenance costs previously estimates \$4,325,650.

The total annual cost burden for this collection has decreased from \$6,391,113 to \$610,424.

Effective October 1, 2021, the NFIP implemented the new Risk Rating 2.0 pricing methodology, which no longer requires an Elevation Certificate for rating as FEMA can

supply the ground elevation and First Floor Height measurement using sourced data and geospatial technology.

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

There are no plans for tabulation and publication of data for this information collection.

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

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

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions.”