

February 23, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0006

Title: National Flood Insurance Program Policy Forms

Form Number(s):

- 1) FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application**
- 2) FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation / Nullification Request Form; and**
- 3) FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement**

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.**

Congress created the National Flood Insurance Program (NFIP) through enactment of the National Flood Insurance Act of 1968 (NFIA) (Title XIII of Pub. L. 90-448, 82 Stat. 476), found at 42 U.S.C. 4001 *et seq.* The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management requirements that reduce the risk of future flood damages. Communities participate in the NFIP based on an agreement between the community and FEMA. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, FEMA will make flood insurance available within the community as a financial protection against flood losses. Accordingly, the NFIP is comprised of three key activities: flood insurance, floodplain management, and flood hazard mapping.

The NFIA requires that FEMA provide flood insurance at full actuarial rates reflecting the complete flood risk to structures built or substantially improved on or after the effective date for the initial Flood Insurance Rate Map (FIRM) for the community, or after December 31, 1974, whichever is later. These NFIA requirements aim to ensure the risks associated with buildings in flood-prone areas are borne by those located in such areas and not by the taxpayers at large. These actuarial rates are based on the degree of the flood risk reflected on the FIRM and take into account a number of different factors including flood risk zone, elevation of the lowest floor above or below the Base Flood Elevation (the elevation of the 100-year frequency flood), type of building, number of floors, basements, and enclosures.

The NFIA also provides for various discounted premium rates. Certain buildings built before the effective date of the FIRM for the community, or before December 31, 1974, whichever is later, are eligible for pre-FIRM discounted premium rates. *See* 42 U.S.C. 4014(a)(2). FEMA must phase-out these discounts at various rates based on a building's occupancy use and loss history. *See* 42 U.S.C. 4014(a)(2)(A)-(E). FEMA must also provide discounted rates to buildings newly-mapped into Special Flood Hazard Areas. 42 U.S.C. 4015(i).

FEMA, through its direct servicing agent, NFIP Direct, uses the collected information acquired for the aforementioned actuarial rates to determine both eligibility for an NFIP flood insurance policy and the appropriate flood insurance premium. FEMA enters the information collected in these forms and accompanying supporting documentation into the NFIP Direct System.

FEMA also proposes changes to this information collection to implement a revised risk rating methodology that will apply to all policies issued or renewed on or after October 1, 2021. This revised methodology will require FEMA to collect new information necessary to sell and service flood insurance policies. However, the revised methodology is not

expected to increase the overall information collection burden on the public due to the use of data from sources other than policyholders. As a result of this revised methodology, FEMA proposes to modify FEMA Forms FF-206-FY-21-117 (formerly 086-0-1), FF-206-FY-21-118 (formerly 086-0-2), and FF-206-FY-21-119 (formerly 086-0-3).

During the transition to the revised rating methodology, FEMA still needed to maintain the existing forms in this information collection. As a result, FEMA added FEMA Forms 086-0-1T, 086-0-2T, 086-0-3T, and 086-0-5T to this information collection. Now that the transition to the revised risk rating methodology has been completed effective April 1, 2022, FEMA has discontinued the use of these forms and is removing them from this information collection.

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.

To provide for the continued widespread availability of policies for flood insurance, policies will continue to be marketed through the facilities of licensed insurance agents or brokers in the various States. Applications from agents or brokers are forwarded to a servicing company designated as a fiscal agent by FEMA. Upon receipt and examination of the application and required premium, the servicing company will issue the appropriate Federal flood insurance policy.

The following FEMA forms are used to collect the information necessary to issue NFIP policies and to accommodate the changing insurance needs of policyholders:

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application -

This form is used to obtain building and/or contents coverage for dwellings and general property. The form is also used to apply for a Residential Condominium Building Association Policy (RCBAP), which provides flood insurance coverage on a single policy for all residential condo units in a condominium building.

The application provides basic information concerning building and foundation type, occupancy, structural variables, building replacement cost, date of construction or substantial improvement, amounts of coverage desired, community map information, and other information, necessary for any NFIP policy to be issued.

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance

Cancellation/Nullification Request Form - The policyholder or insurer submits this form

to cancel or nullify an existing NFIP policy written under the revised risk rating methodology.

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement - This form is used to amend existing policy data shown on the policy Declarations Page. Following receipt and processing of the endorsement form, a Revised Declarations Page showing the requested changes is generated.

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.

Registered insurance agents/agencies can use electronic versions of Flood Insurance Policy Forms through the NFIP Direct website in lieu of paper forms. The agent can log into the NFIP Direct's secure website at <https://www.nfipdirect.fema.gov/Membership/SignIn/?ReturnUrl=%2f>. Agents select the transaction desired and will then be prompted to fill in the information required, which is transmitted electronically. Necessary supporting documentation may also be submitted along with the form in an electronic format, such as a PDF file.

Usability testing has been conducted on this collection. As a result, a reduction of 10,568 burden hours has been recognized and included as an update to the collection.

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 unique to this program and is not collected elsewhere. There is only one application required per structure to obtain flood insurance.

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.

Without this collection, the NFIP could not operate and could not provide necessary flood insurance coverage to property owners in communities participating in the NFIP. This would result in FEMA's inability to meet mandates required by law.

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.

There are no requirements for respondents to report information to the agency more often than quarterly.

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

There are no requirements for respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

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

There are no requirements for respondents to submit more than an original and two copies of any documents.

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

There are no requirements for respondents to retain records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

There is no statistical survey involved with this collection of information.

(f) Requiring the use of a statistical data classification that has not

been reviewed and approved by OMB.

There are no requirements to use statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this information collection.

(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.

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this 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 December 7, 2022, at 87 FR 75060. One complimentary comment was received and FEMA thanks the commentor.

Comment 1 (FEMA-2022-0049-0002): "I congratulate FEMA on its thoughtful transition from these antiquated information collection forms."

FEMA Response to Comment 1: FEMA simply thanks the commentor for their response.

A 30-day Federal Register Notice inviting public comments was published on February 22, 2023, at 88 FR 10918. The public comment period is open until March 24, 2023.

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 invites stakeholder input on the policy forms and any other program documentation. FEMA maintains an underwriting mailbox through the NFIP Direct that our stakeholders can contact to ask questions or provide comments.

FEMA representatives also meet quarterly with the Flood Insurance Producer National Committee (FIPNC) and representatives from the Insurance Institute for Business & Home Safety (IBHS) to discuss any aspects of the NFIP that are of concern to them. The FIPNC is comprised of non-government professionals involved with the NFIP and the IBHS is an independent, non-profit, scientific and educational organization wholly supported by the property insurance industry. This information collection, including the forms used, is open to FIPNC and IBHS as a subject of discussion if they so choose.

In addition, NFIP personnel frequently discuss the NFIP Policy Forms at meetings with other involved users, e.g., insurance agents, insurance company officials, mortgage lenders, surveyors, engineers, and others.

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 staff meet at least semi-annually with a working group to discuss recommended changes to our guidance documentation, specifically the NFIP Flood Insurance Manual, which includes information for the use of the policy forms. Input includes suggestions received from the NFIP Direct (which works directly with agents who complete the forms on behalf of policyholders), WYO insurance companies, agents, and policyholders. We also conduct monthly calls with our WYO industry partners that include a question and answer period, during which they can bring up any concerns about the policy forms.

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.

FEMA limits the disclosure of the information collected to the servicing office acting as the government's fiscal agent, to routine users, to the insured's agent of record, and the mortgagee listed on the flood insurance policy. The NFIP Direct system security plan complies with the Computer Security Act, 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 Privacy Threshold Analysis was approved by the Department of Homeland Security (DHS) on February 21, 2023. A Privacy Act Notice was also approved by DHS on February 21, 2023. 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) System, October 31, 2017, and DHS/FEMA/PIA-050 NFIP PIVOT System, March 28, 2018.

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.

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Application: is estimated to have 17,593 property owners (respondents) times 1 response per year for 17,593 total annual responses (17,593 x 1 = 17,593). It is estimated that each response will require 0.2167 burden hours, or 13 minutes, to complete, therefore 17,593 responses times 0.2167 hours equals 3,812 total annual burden hours (17,593 x 0.2167= 3,812).

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Cancellation: is estimated to have 30,964 property owners (respondents) times 1 response per year for 30,964 total annual responses (30,964 x 1 = 30,964). It is estimated that each response will require 0.1500 burden hours, or 9 minutes, to complete, therefore 30,964 responses times 0.1500 hours equals 4,645 total annual burden hours (30,964 x 0.1500 = 4,645).

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Endorsement: is estimated to have 323,865 property owners (respondents) times 1 response per year for 323,865 total annual responses (323,865 x 1 = 323,865). It is estimated that each response will require 0.1333 burden hours, or 8 minutes, to complete, therefore 323,865 responses times 0.1333 hours equals 43,171 total annual burden hours (323,865 x 0.1333 = 43,171).

Usability testing has been conducted on this collection. As a result, a reduction of 10,568 burden hours has been recognized and included as an update to the collection.

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.

Please see our response to 12a above and 12c below.

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 Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses	Total No. of	Avg. Burden	Total Annual	Avg. Hourly	Total Annual

			per Respondent	Responses	per Response (in hours)	Burden (in hours)	Wage Rate	Respondent Cost
Individual, business, non-profit, State, local, or Tribal Government	Flood Insurance Application/ FEMA Form FF-206-FY-21-117 (formerly 086-0-1)	17,593	1	17,593	0.2167	3,812	\$40.61	\$154,805
Individual, business, non-profit, State, local, or Tribal Government	Flood Insurance Cancellation/ Nullification Request Form / FEMA Form FF-206-FY-21-118 (formerly 086-0-2)	30,964	1	30,964	0.1500	4,645	\$40.61	\$188,633
Individual, business, non-profit, State, local, or Tribal Government	Flood Insurance General Change Endorsement / FEMA Form FF-206-FY-21-119 (formerly 086-0-3)	323,865	1	323,865	0.1333	43,171	\$40.61	\$1,753,174
Total		372,422		372,422		51,628		\$2,096,612

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.¹ 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 All occupations (SOC 00-0000) is \$28.01. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$40.61 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$2,096,612 ((\$40.61 x 51,628 hours) - 1 due to rounding).

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for all workers of \$40.35 by wages and salaries for all workers of \$27.83 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

After conducting Usability Testing there is a 7,030-hour reduction in burden on the OMB inventory. Combined with a reduction in burden of 6,210 hours with removal of temporary FEMA Form 086-0-5T (Preferred Risk Policy Application), which is no longer used and is not being replaced, this results in a total burden reduction of 13,240 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.)

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
[Form Name/#]				
Total	\$0	\$0	\$0	\$0

There is no cost to respondents to submit any of the FEMA Forms currently under this information collection. The only cost is the amount of the insurance premium received by the NFIP Direct Servicing Agent; it is not a cost to the respondents due to the data collection activity.

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account costs 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.

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.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: expenses directly supporting the processing of the forms, including underwriting, customer service, and data entry	\$9,340,000
Staff Salaries: 2 GS-12 Step 5; 2 GS-13 Step 5; 1 GS-14 step 5 employees spending approximately 1.9% of time annually analyzing NFIP forms to determine if any changes are needed and responding to program changes and program experiences ((2 x \$106,759 x 1.45) + (2 x \$126,949 x 1.45) + (1 x \$150,016 x 1.45)) x 0.019 = \$17,010	\$17,010
Facilities: storage cost for forms	\$700
Computer Hardware and Software	\$0
Equipment Maintenance	\$0
Travel (not to exceed)	\$0
Total	\$9,357,010
¹ Office of Personnel Management 2023 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/2023/DCB.pdf Accessed January 13, 2023 ² 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).

An “**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 Insurance Application / FEMA Form FF-206-FY-21-117 (formerly 086-0-1)				3,519	3,812	293
Flood Insurance Cancellation / Nullification Request Form / FEMA Form FF-206-FY-21-118 (formerly 086-0-2)				3,871	4,645	774
Flood Insurance General Change Endorsement / FEMA Form FF-206-FY-21-119 (formerly 086-0-3)				48,595	43,171	-5,424
Flood Insurance Preferred Risk Policy Application / FEMA Form 086-0-5T	6,211	0	-6,211			
Total	6,211	0	-6,211	55,985	51,628	-4,357

Explain: FEMA Form FF-206-FY-21-117 (formerly 086-0-1) (Application) – Incorporates the burden hours formerly associated with temporary FEMA Form 086-0-1/T, which is no longer in use, but its burden hours remain associated with the current form. The burden hours increased by 293 based on the Usability Testing results and correction of errors in the burden estimates (3,812 – 3,519 = 293).

FEMA Form FF-206-FY-21-118 (formerly 086-0-2) (Cancellation) – Incorporates the burden hours formerly associated with temporary FEMA Form 086-0-2/T, which is no longer in use, but its burden hours remain associated with the current form. The burden hours increased by 774 based on the Usability Testing results and correction of errors in the burden estimates (4,645 – 3,871 = 774).

FEMA Form FF-206-FY-21-119 (formerly 086-0-3) (Endorsement) – Replaces the burden hours formerly associated with temporary FEMA Form 086-0-3/T, which is no longer in use, but its burden hours remain associated with the current form. The burden hours decreased by 8,097 based on a combination of the Usability Testing results and a correction of errors in the burden estimates; also, a decrease in the amount of information requested (eliminating duplicate information) resulted in less time to complete the form (43,171 – 48,595 = -5,424).

FEMA Form 086-0-5T (Preferred Risk Policy Application) – This form is no longer in use because FEMA no longer offers the Preferred Risk Policy under the NFIP Risk Rating 2.0: Equity in Action rating methodology. Its removal from this collection reduces burden by 6,211 hours. The number of submitted forms decreased from 37,259 to 0. The number of burden hours has decreased from 6,211 to 0.

In summation, a reduction of 10,568 (-6,211 + -4,357) burden hours has been recognized and included as an update to the collection.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
Flood Insurance Application / FEMA Form FF-206-FY-21-117 (formerly 086-0-1)				\$132,138	\$154,805	\$22,667
Flood Insurance Cancellation / Nullification Request Form / FEMA Form FF-206-FY-21-118 (formerly 086-0-2)				\$145,356	\$188,633	\$43,277
Flood Insurance General Change Endorsement / FEMA Form FF-206-FY-21-119 (formerly 086-0-3)				\$1,824,742	\$1,753,174	-\$71,568
Flood Insurance Preferred Risk Policy Application / FEMA Form 086-0-5T	\$2,233,223	\$0	-\$2,233,223			
Total	-\$2,233,223	\$0	-\$2,233,223	\$2,102,236	\$2,096,612	-\$5,624

Explain: FEMA Forms FF-206-FY-21-117 (formerly 086-0-1) (Application) - Replaces the burden cost formerly associated with FEMA Form 086-0-1/T. The increase in the annual cost burden is due to the increase in the wage rate. The cost burden has increased from \$132,138 to \$154,805.

FF-206-FY-21-118 (formerly 086-0-2) (Cancellation) - Replaces the burden cost formerly associated with FEMA Form 086-0-2/T. The increase in the annual cost burden is due to the increase in the wage rate. The cost burden has increased from \$145,356 to \$188,633.

FF-206-FY-21-119 (formerly 086-0-3) (Endorsement) - Replaces the burden cost formerly associated with FEMA Form 086-0-3/T. The cost burden has decreased from \$1,824,742 to \$1,753,174.

FEMA Form 086-0-5T Preferred Risk Policy and Newly Mapped Application –The decrease in the annual cost burden is due to the removal of this form from the information collection because the Preferred Risk Policy is no longer available and this form is no longer used under the new rating methodology. The cost burden has decreased from \$2,233,223 to \$0.

In summation, a reduction of \$2,238,847 (-\$2,233,223 + -\$5,624) has been recognized and included as an update to the collection.

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

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

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

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

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”. Statistical Survey methodology is not applicable.

B. Collections of Information Employing Statistical Methods.

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION.