

February 23, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0083

Title: Community Disaster Loan (CDL) Program

Form Number(s):

- 1) FEMA Form FF-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Disaster Loans;
- 2) FEMA Form FF-104-FY-22-224 (formerly 116-0-1), Promissory Note;
- 3) FEMA Form FF-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security;
- 4) FEMA Form FF-104-FY-22-226 (formerly 112-0-3C), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements; and
- 5) FEMA Form FF-104-FY-22-227 (formerly 009-0-15), Application for Loan Cancellation.

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 Community Disaster Loan (CDL) Program is authorized by Section 417 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. 93-288, as amended, 42 U.S.C. §§ 5121-5207 (the “Stafford Act”). The Stafford Act provides policies and procedures for local governments and State and Federal officials concerning the CDL program. Federal Emergency Management Agency (FEMA) regulation at 44 CFR, Part 206, Subpart K, implements the statute. FEMA may approve a CDL to any local government which has suffered a substantial loss of tax or other revenues as a result of a major disaster or emergency and which demonstrates a need for Federal financial assistance to perform its governmental functions.

The loan must be justified on the basis of need and be based on the actual and projected expenses, as a result of the disaster, for the fiscal year in which the disaster occurred and the three succeeding fiscal years. FEMA has the authority to cancel repayment of all or part of these loans to the extent that a determination is made that revenues of the local government during the three fiscal years following the disaster are insufficient to meet the operating budget of that local government because of disaster related revenue losses and additional unreimbursed disaster-related municipal operating expenses.

FEMA reviewed the forms included in this collection and found that FEMA Form 090-0-4 (Letter of Application) presented difficulties for the local governments. FEMA found a simpler way to fulfill the regulatory requirement by using a template letter. Therefore, FEMA Form 090-0-4 (Letter of Application) will no longer be part of this 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.

The Assistant Administrator of the Recovery Directorate may approve a CDL for any local government which has suffered a substantial loss of tax and other revenues as a result of a major disaster or emergency and has shown a demonstrated need for financial assistance to perform its governmental function. Local governments may indicate interest in acquiring a CDL by contacting their Governor’s Authorized Representative (GAR). The GAR submits a letter to FEMA requesting the CDL Program for their State and specific disaster declaration(s).

FEMA works directly with each applicant during the evaluation process to ensure the regulatory compliance requirements are met. FEMA assists the applicant in completing the entire application. Along with the completed forms, the applicant submits a Letter of Application

developed by FEMA during the evaluation process indicating their request for assistance in the amount determined by the FEMA evaluator.

The CDL Application Package for the Program includes the following forms completed by each applicant:

FEMA Form FF-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Disaster Loans; This form is used to certify the eligibility of the local government to receive funds from a CDL. We estimate this form should take no longer than 2.5 hours.

FEMA Form FF-104-FY-22-224 (formerly 116-0-1), Promissory Note; This form is used to document the terms, conditions, amount, and interest associated with a CDL. We estimate this form should take no longer than 4 hours.

FEMA Form FF-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security; This form is used to pledge collateral security to FEMA on the Promissory Note for a CDL. Collateral security is required if the State is prohibited from co-signing the promissory note. We estimate this form should take no longer than 10 hours.

FEMA Form FF-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements; This form is used to certify compliance with important Federal requirements and lists applicant's places of performance. We estimate this form should take no longer than 26 minutes, (0.4333 hours).

FEMA Form FF-104-FY-22-227 (formerly 009-0-15), Application for Loan Cancellation. This form is used to determine if the local government's financial conditions meet cancellation criteria requirements.

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

Standard Form 1199A, Direct Deposit Sign Up Form

(<https://www.gsa.gov/forms-library/direct-deposit-sign-form>) – is used to establish the account at a financial institution to which CDL funds will be transferred. The CDL program office collects this form which FEMA Finance uses to create direct deposit accounts for eligible applicants to receive loan funds. It is approved for use by the U.S. Department of Treasury under OMB No. 1530-0006.

- 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.

This information collection does not include electronic or web-based capabilities for submission. While electronic versions of the forms are available to fill out, a hard copy must be printed, signed, and submitted. Once FEMA receives the information, the information is scanned and stored electronically on a FEMA server. FEMA stores the applicant file in the FEMA server by State/Disaster Number/Entity Name (school name, city/borough name, fire district, etc.) and not by POC information as this varies frequently. It is stored in PDF format. Therefore, FEMA does not use personally identifiable information (PII) to pull up the applicant file, but rather the local government's name. This information is never made available over the World Wide Web. Original hard copies are then placed in shredding bins to be discarded.

To provide faster service to applicants in terms of filling out the collection instrument, electronic versions of the forms are provided to each applicant by FEMA representatives. These electronic versions are stored internally for the Department of Homeland Security (DHS) at http://on.fema.net/employee_tools/forms/Pages/fema_forms.aspx and may not be downloaded by the applicants.

Usability Testing has been conducted on this collection. As a result, a reduction of 455 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 not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts 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, yet it impacts local governments with populations under 50,000. Program's target audience are all local governments impacted by a major disaster declaration. Minimization efforts are applied for all expected respondents, not just small entities. Program staff pre-fills information available in the entity's SAM.gov registration and helps each applicant (local government) fill out the forms. The responsible party at the local government is generally a common position already found in all local governments, regardless of size.

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.

Failure to conduct this information collection will result in FEMA's inability to implement the mandates of the Stafford Act and its implementing regulations. Furthermore, collecting this information is vital for affected communities with open presidential disaster declarations, to establish their eligibility for CDLs and keep essential government services open and available to these communities. The forms included in this collection are the mechanism for applicants to apply for a loan. If forms do not exist, local governments would lose the ability to apply. Without the loan, they would not have the needed funding to continue operations and would not be able to provide their essential services to the communities they represent.

The information collection process is a manual process. The CDL Program has been in pursuit of digital software which would help automate the process, information collection process and reduce the burden on the applicants. Software can assist FEMA to pre-populate some of the data required in this collection. An example of a form that could be eliminated should software be made available to the CDL Program is FEMA Form FF-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements. This form captures the local government's places of business among other certifications. With a digitalized system, this information can be either pulled from other databases, or captured earlier thus removing the need for the actual form. This change alone can reduce burden by 26 minutes per responder, or 22 annual hours per the projections below.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (See 5 CFR 1320.5(d)(2)):

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d) (2). Forms are filled only once per loan request.

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

This information collection does not require respondents to report information more than quarterly.

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

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

This information collection does not require respondents to submit more than an original and two copies of any document.

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

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax 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.**

This information collection does not include a statistical survey

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

This information collection does not use a statistical data classification that has not been reviewed and approved by OMB.

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

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

- h. Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection does not require respondents to submit trade secrets or other confidential information.

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 November 15, 2022, at 87 FR 68512. Two public comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 22, 2023, at 88 FR 10916. The public comment period ends on March 24, 2023.

Comment 1 (FEMA-2022-0036-0002): The first comment suggested simplifying the CDL application.

FEMA Response to Comment 1: To minimize both effort and time required to complete this loan application, the CDL Program has simplified the application process and paperwork to the least amount of effort possible. Additionally, the CDL Program assists local governments through the entire process, even post loan issuance. Once information obtained from the potential applicant, the CDL Program completes a financial analysis, fills forms, and then provides the pre-filled forms to the applicants for them to read, print and sign. This removes the guesswork from filling out the forms and makes the process as easy as possible.

Comment 2 (FEMA-2022-0036-0003): The second comment received suggests not using federal tax- payer dollars to rebuild in known hazard areas.

FEMA Response to Comment 2: By statute, FEMA is authorized to provide financial assistance for local governments to cover operational expenses. Local governments cannot use the financial assistance for capital improvements. Rebuilding is considered to be a capital expense and therefore an ineligible use of these CDL funds. Relocation is also an ineligible use of the loaned funds. The CDL Program validates that loans were used only for eligible uses.

- 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 confers with the GAR and other State Representatives. FEMA did not receive any complaints with the process or the forms required to implement it. Each GAR and State Representative was satisfied with the process and results. During the provision of loans after Hurricane Katrina and subsequent disasters, FEMA has worked with more than thirty-three (33) GARs to utilize these forms to administer over 420 loans providing over \$2.4 billion in loans.

- 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.**

Respondents can provide feedback regarding the form or process during each of the three loan phases: loan application, maintenance (where we conduct annual reviews), and the cancellation meetings (which are held at the end of the 3rd year of the loan). Respondents may also provide comments in writing via postal mail or email and the CDL Program Office considers all the information received. FEMA holds discussions/conversations with the GAR and other State Representatives, none registered a complaint with the process nor the forms required to implement it. Each was satisfied with the process and results.

- 9. Explain any decision to provide any payments 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) for FEMA Form FF-104-FY-22-227, Application for Loan Cancellation was approved by DHS on January 19, 2023. A PTA for FEMA Form FF-104-FY-22-225, Local Government Resolution – Collateral Security was also approved by DHS on January 19, 2023. FEMA provides a Privacy Statement on each form in this collection which reiterates that the information is only used to provide funding. There are no assurances of confidentiality provided to the respondents for this information collection.

Privacy Impact Assessment (PIA) coverage for both instruments is provided by DHS/FEMA/PIA – 013 Grant Management Programs, dated March 16, 2020. System of Records Notice (SORN)

coverage for FEMA Form FF-104-FY-22-227 is provided by DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs (79 FR 16015, March 24, 2014). SORN cover is not required for FEMA Form FF-104-FY-22-225 because information is not retrieved by a unique identifier.

The information collected is provided voluntarily and may be disclosed to DHS personnel, state officials or other agents who require such information to provide disaster relief. The CDL Program obtains authorities from the Stafford Act in Section 417 and 44 Code of Federal Regulations Sections 206.360-367.

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 should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consolation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

The number of potential respondents is 50 based upon a likely average loan amount below \$2 million and a ceiling authority of \$5 million. Applicants must only respond one time per disaster. Burden hours were estimated based upon historical experience dating back a decade or more as well as recent experience implementing the program. A usability test was performed by at least four individuals to evaluate the estimated burden for each form. That test confirmed the burden of hours estimated.

FEMA Form FF-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Loans: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 2 burden hours to complete, therefore 50 responses times 2 hours equals 100 total annual burden hours ($50 \times 2 = 100$).

FEMA Form FF-104-FY-22-224 (formerly 116-0-1), Promissory Note: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 2 burden hours to complete, therefore 50 responses times 2 hours equals 100 total annual burden hours ($50 \times 2 = 100$).

FEMA Form FF-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 3 burden hours to complete, therefore 50 responses times 3 hours equals 150 total annual burden hours ($50 \times 3 = 150$).

FEMA Form FF-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 26 minutes or 0.4333 burden hours to complete, therefore 50 responses times 0.4333 hours equals 22 total annual burden hours ($50 \times 0.4333 = 22$).

FEMA Form FF-104-FY-22-227 (formerly 090-0-15), Application for Loan Cancellation: FEMA estimated 60 respondents times 1 response per year for 60 total annual responses ($60 \times 1 = 60$). It is estimated that each response will require 3 burden hours to complete, therefore 60 responses times 3 hours equals 180 total annual burden hours ($60 \times 3 = 180$).

After conducting usability testing there is a reduction of 455 burden hours in on the OMB inventory.

- 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 for 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 (1.61 for State and local government employees) and this total should be entered in the cell for “Avg. Hourly Wage Rate.” The cost to the respondents of contracting out to 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 per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, & Tribal Government	Certification of Eligibility for a Community Disaster Loan / FEMA Form FF-104-FY-22-223 (formerly 090-0-1)	50	1	50	2	100	\$46.74	\$4,674
State, Local, & Tribal Government	Promissory Note / FEMA Form FF-104-FY-22-224 (formerly 116-0-1)	50	1	50	2	100	\$46.74	\$4,674
State, Local, & Tribal Government	Local Government Resolution - Collateral Security / FEMA Form FF-104-FY-22-225 (formerly 085-0-1)	50	1	50	3	150	\$46.74	\$7,011
State, Local, & Tribal Government	Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements / FEMA Form FF-104-FY-22-226 (formerly 112-0-3C)	50	1	50	0.4333	22	\$46.74	\$1,028
State, Local, & Tribal Government	Application for Loan Cancellation / FEMA Form FF-104-FY-22-227 (formerly 009-0-15)	60	1	60	3	180	\$46.74	\$8,413
Total		260		260		552		\$25,800

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.61.¹ For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.61, and the entry for the “Avg. Hourly Wage Rate” would be \$68.44.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates wage rate for All Occupations SOC 00-0000 is

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 October 12, 2022. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$54.96 by Wages and salaries for State and local government workers of \$34.09 per hour yielding a benefits multiplier of approximately 1.61

\$29.03.² Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$46.74 per hour. Therefore, the burden hour cost is estimated to be \$25,800 annually (\$46.74 x 552 hours = \$25,800).

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

Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Local government	Direct Deposit Sign Up Form / Standard Form 1199A (OMB No. 1530-0006)	50	1	50	0.1667	8	\$46.74	\$374
Total		50		50		8		\$374

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

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 systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

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

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: Contractors (Fluor and CCPRS) are utilized to pre-populate forms in this collection and assist local governments in completing required forms. They are paid from Task Orders associated with the Community Disaster Loan funds allocated in the Law.	\$1,000,000
Staff Salaries: 2 GS 12 Step 5 (\$106,759) at 10% of time x 1.45 loaded wage rate = \$30,960 1 GS 14 Step 5 (\$150,016) at 10% of time x 1.45 loaded wage rate = \$21,752 1 GS 13 Step 5 (\$126,949) at 5% of time x 1.45 loaded wage rate = \$9,204 (\$30,960 + \$21,752 + \$9,204) = \$61,916	\$61,916
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 (not to exceed)	\$0
Total	\$1,061,916
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 6, 2023. ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

Estimated annual cost to the Federal Government totals \$1,061,916 allocated between FEMA staff at various grades and steps spending approximately between 5% to 10% of their time involved in collection-related activities for (\$61,916) and contractor expenses (\$1,000,000 at \$20,000 per week). Contract funding comes from a congressional appropriation which has averaged \$1,000,000 to administer 50 loans. FEMA staff oversight of contractor activities is directly related to the collection and included in the estimated cost to the Federal Government. Validation of information contained in the forms is performed by one of three FEMA staff working on CDL Program dedicating about 10% of their time each year to processing loans, plus loan establishment functions directly related to the information contained in the forms processed by a FEMA Finance staff spending an estimated 5% of their time each year.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of 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 regulation 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 collection 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
FEMA Form 090-0-4 Letter of Application	50	0	-50			
Certificate of Eligibility, FEMA Form FF-104-FY-22-223 (formerly 090-0-1)				125	100	-25
FEMA Form 116-0-1 Promissory Note, FEMA Form FF-104-FY-22-224 (formerly 116-0-1)				200	100	-100
Local Government Resolution - Collateral Security, FEMA Form FF-104-FY-22-225 (formerly 085-0-1)				500	150	-350
Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements, FEMA Form FF-104-FY-22-226 (formerly 112-0-3C)				22	22	0
Application for Loan Cancellation, FEMA Form FF-104-FY-22-227 (formerly 009-0-15)				110	180	70
Total	50	0	-50	957	552	-405

Explain: Overall, the annual burden for this collection was reduced by 455 (405 + 50) hours. Time burden for FEMA Form FF-104-FY-22-226 (formerly 112-0-3C) rounded to 22 hours for a difference of zero (0) burden hours compared to the previous submission. Program is reducing

burden by 50 hours through the removal of FEMA Form 090-0-4 (Letter of Application). Program found that sending a template request letter served the requirement of the prior form while reducing the burden on the local government. Through usability testing, burden hours for applicant changed from prior renewal of this collection. An example of this is the Certificate of Eligibility, FEMA Form FF-104-FY-22-223 (formerly 090-0-1). Previously, FEMA estimated 2.5 hours to fill the form, while this year’s testing yielded an estimate of 2 hours. FEMA Form FF-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security, entails coordination of a session for a Local Government to obtain consent from its governing body to go into the loan, plus the development of a Resolution. Most of that coordination is not controlled or driven by the information requested on the form itself. FEMA adjusted the estimated burden to reflect only the time required to complete and submit the form. That change reduced the time burden from the estimated 10 hours to 3 hours. FEMA Form FF-104-FY-22-227 (formerly 090-0-15), Application for Loan Cancellation, in the last three years had more users due to FEMA’s caseload at the time. The number of loans expected to use the form between September of 2023 and August of 2026 was significantly reduced via a blanket cancellation authorized by Congress through P.L. 117-43.

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
FEMA Form 090-0-4 Letter of Application	\$2,679	\$0	-\$2,679			
Certificate of Eligibility, FEMA Form FF-104-FY-22-223 (formerly 090-0-1)				\$6,698	\$4,674	-\$2,024
FEMA Form 116-0-1 Promissory Note, FEMA Form FF-104-FY-22-224 (formerly 116-0-1)				\$10,716	\$4,674	-\$6,042
Local Government Resolution - Collateral Security, FEMA Form FF-104-FY-22-225 (formerly 085-0-1)				\$26,790	\$7,011	-\$19,779
Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements, FEMA Form FF-104-FY-22-226 (formerly 112-0-3C)				\$1,161	\$1,028	-\$133
Application for Loan Cancellation, FEMA Form FF-104-FY-22-227 (formerly 009-0-15)				\$5,894	\$8,413.00	\$2,519
Total	\$2,679	\$0	-\$2,679	\$51,259	\$25,800	-\$25,459

Explain: Overall, the annual cost burden for this collection was reduced by \$28,138 (\$25,459 + \$2,679) by reducing the burden about 455 hours, mainly from eliminating FEMA Form 090-0-4, Application for Federal Assistance (Application for Community Disaster Loan) and change in the average hourly wage rate.

In previous years we had utilized the general public mean wage rate to calculate burden cost to the applicant to fill out these forms. This year, we are correcting the type of applicant since our applicants are local governments, plus using the local government multiplier of 1.61 instead of the general public multiplier of 1.45. FEMA used the wage rate for All Occupations SOC 00-0000 is \$29.03.³ Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$46.74 per hour.

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

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

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

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

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

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

³ 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