

February 21, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-NW162

Title: Preparedness Grants Portfolio, including Regional Catastrophic Preparedness Grant Program (RCPGP), Grants Reporting Tool (GRT), Emergency Management Performance Grant (EMPG), Intercity Bus Security Grant Program (IBSGP), Emergency Operation Center Grant Program (EOCGP), Nonprofit Security Grant Program, and Controlled Equipment Request

Form Number(s):

- 1. FF-207-FY-23-105 RCPGP- Required additional Documentation**
- 2. FF-207-FY-23-100 EOCGP -Formal Investment Justification**
- 3. FF-207-FY-23-101 EMPG -Work Plan**
- 4. FF-207-FY-23-102 IBSGP-Associated Investment Justification Form**
- 5. FF-207-FY-23-103 IBSGP-Associated detailed Budget**
- 6. FF-207-FY-23-104 IBSGP-Vulnerability Assessment and Security Plan**
- 7. FF-207-FY-23-107 FEMA Form (formerly 207-FY-22-121), Biannual Strategy Implementation Report (BSIR)**
- 8. FF-207-FY-23-106 (formerly 087-0-0-1, Controlled Equipment Request Form**
- 9. FF-207-FY-21-115 (formerly 089-25), NSGP Investment Justification**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(I)(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 purpose of the Preparedness Grants Portfolio is to support immediate needs in response to delivering and supporting grant programs that help the Nation before, during, and after disasters to make the country more resilient. The instruments under this collection include information required for recipients to apply for grant awards and receive funding, for FEMA to monitor awards for compliance, and to comply with applicable laws and regulations. The applicable laws and regulations are included as attachments.

This new collection is being submitted under the Emergency Process for approval of a valid OMB control number for a period of 6 months. FEMA is submitting an emergency request because: (1) this information is essential to the mission of the Agency, (2) this information is necessary prior to the expiration of time periods established under PRA, (3) public harm is reasonably likely to result if normal clearance procedures are followed, and (4) the use of normal clearance procedures is reasonably likely to cause a statutory deadline to be missed.

FEMA Form 207-FY-22-121 Biannual Strategy Implementation Report (BSIR) has completed the 60- and 30-day Federal Register Notices, and all documents are currently submitted to OMB for approval under Collection number 1660-0117. FEMA Form, EMPG -Work Plan has drafted the 60-day Federal Register Notice, which FEMA is working to submit. FEMA plans to seek public comments on the remainder of the collection through the normal clearance process.

- 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 information is used by FEMA's Grants Programs Directorate to evaluate applications, monitor grants for performance and compliance, and respond to requests from Congress. See below for details on each instrument.

FF-207-FY-23-105 RCPGP- Required additional Documentation

Budget Detail Worksheet The purpose of the Budget Detail Worksheet is for applicants to demonstrate a reasonable and cost-effective budget.

Budget Narrative The purpose of the Budget Narrative is to provide a detailed description of the budget found in the SF-424A and the Budget Detail Worksheet. The budget narrative must include a detailed discussion of how RCPGP funds will be used. The Budget Narrative should 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information provided on the Budget Worksheet. For the Cost Share, applicants must include a detailed description of the source of the cost share/matching funds. If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation

Information regarding regional preparedness partners: The involvement of regional preparedness partners is critical to the success of this program. This collection allows FEMA to maintain awareness of regional partners participating in the program.

FF-207-FY-23-100 EOCGP -Formal Investment Justification

As part of the FY 2023 Emergency Operations Center (EOC) Grant Program application process, applicants must develop a formal Investment Justification (IJ) that addresses the proposed EOC construction or renovation project identified for federal funding support. The Investment Justification must be consistent with the project authorized for funding in accordance with the Congressionally Directed Spending (CDS) outlined in the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2023 (Pub. L. No. 117-328).

The Federal Emergency Management Agency (FEMA) has developed guidelines that establish the required IJ content and helps ensure that submissions are organized in a consistent manner while addressing key data requirements. This IJ template may be used by applicants to complete and submit their IJ. If applicants do not wish to use this form, they must follow the requirements detailed in the FY 2023 EOC Grant Program Notice of Funding Opportunity (NOFO). Failure to address these data elements in the prescribed format, including the strict formatting guidelines, could potentially result in the rejection of the Investment Justification from review consideration.

FF-207-FY-23-101 EMPG -Work Plan

This document provides details, timeline, and milestones on proposed projects for the Emergency Management Performance Grant (EMPG) Program. The work plan must demonstrate how proposed projects address gaps, deficiencies, and capabilities in current programs and the

ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. All EMPG applicants must submit a Work Plan that outlines the State's/Territory's emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, proposed for the applicable fiscal year EMPG Program period of performance. Prior to submission of the Work Plan, the applicant must work with the Regional Administrator (RA) or designated Regional EMPG Program Manager to ensure that the common set of agreed-upon priorities are properly addressed in the Work Plan. In addition, the Work Plan must include a detailed budget-build and Budget Narrative that enumerates all expenses associated with project execution, including management and administration costs. The instructions for the EMPG Work Plan can be found in the Preparedness Grants Manual, Appendix H and the EMPG Notice of Funding Opportunity (NOFO).

FF-207-FY-23-102 IBSGP-Associated Investment Justification Form

The purpose of this form is for applicants to develop a single formal Investment Justification (IJ) for the Intercity Bus Security Grant Program (IBSGP) that addresses the initiative being proposed for funding, including Management and Administration (M&A) costs. The IJ must demonstrate how proposed activities address gaps and deficiencies (identified in a current vulnerability assessment) in current programs and capabilities, and link to one or more core capabilities identified in the National Preparedness Goal.

FF-207-FY-23-103 IBSGP-Associated detailed Budget

The Budget Detail Worksheet may be used as a guide to assist applicants in the preparation of the required budget and budget narrative.

FF-207-FY-23-104 IBSGP-Vulnerability Assessment and Security Plan

The purpose of this form is for applicants to certify that they have had a vulnerability assessment completed and a security evaluation preparedness plan developed or updated within the past three years.

FF-207-FY-23-107 (formerly FF 207-FY-22-121) Biannual Strategy Implementation Report (BSIR)

The Grants Reporting Tool (GRT) supports the information collection needs for the Homeland Security Grant Program, Nonprofit Security Grant Program, Tribal Homeland Security Grant Program, and Emergency Management Performance Grant Program. Depending on the grant program that the recipient is reporting for, the recipient navigates a set of screens customized to that program. The information submitted by grant recipients, enables FEMA to evaluate projects, monitor ongoing performance, manage the flow of federal funds, and appropriately close-out

grants or cooperative agreements, when all work is completed. The use of the GRT expedites and streamlines the recipient reporting process while providing FEMA an organized, searchable database of project progress data.

The Biannual Strategy Implementation Report (BSIR) serves as the reporting format for the Performance Progress Report. The State Administrative Agency/directly eligible tribe is responsible for providing FEMA with BSIR reports to account for grant funding and activities. The BSIRs are due within 30 days of the end of the reporting periods (June 30 and December 31), for the life of the award. For awards made before November 12, 2020, a closeout BSIR is due 90 days after the end date of the award's period of performance per the regulation previously at 2 C.F.R. § 200.343. For awards made on or after November 12, 2020, a closeout BSIR is due 120 days after the end of the award date's period of performance per the current regulation at 2 C.F.R. § 200.344. The submission of a completed BSIR satisfies programmatic reporting requirements as outlined in the grant program guidance to ensure legal and prudent use of federal funds. All funds awarded to the SAA through these grant programs must be accounted for and linked to one or more projects. These projects must support specific gaps identified in the Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), as detailed in the respective Notice of Funding Opportunity and terms and conditions of the grant award.

FF-207-FY-23-106 (formerly 087-0-0-1), Controlled Equipment Request Form

FEMA form 087-0-0-1 "Controlled Equipment Request" is being reinstated to comply with requirements specified in Section 70914 of the Build America, Buy America Act (BABAA) (Pub. L. No. 117-58, §§ 70901-52). FEMA form 087-0-0-1 "Controlled Equipment Request" was initially developed to collect required information as part of the implementation of Executive Order (EO) 13688: Federal Support for Local Law Enforcement Equipment Acquisition, issued January 16, 2015, which established a Prohibited Equipment List and a Controlled Equipment List Report for the purpose of identifying actions that can improve federal support for the appropriate use, acquisition, and transfer of controlled equipment by state, local, tribal, territorial, and private grant recipients.

One of the requirements of the report is to collect information on the grant recipient, their policies, training, record keeping, etc. FEMA form 087-0-0-1 includes only fields required to comply with the recommendations (which were accepted by the President). As part of implementing the recommendations report, FEMA Grants Program Directorate (GPD) will conduct compliance reviews, consistent with each grant program's statutory or other authorities. The focus of these reviews will be conducted as part of routine advanced monitoring as appropriate by the GPD. GPD may provide part or all of the information collected to the Federal Interagency Law Enforcement Equipment Working Group (LEEWG) for those purposes. The LEEWG consist of many agencies across the federal government, as well as other state and local

agencies/organizations. For further information on the LEEWG, the following link has been provided: <https://www.whitehouse.gov/the-press-office/2015/01/16/executive-order-federal-support-local-law-enforcement-equipment-acquisition>. The LEEWG is required to track controlled equipment inventory and sanctions. On occasion, grant applicants will apply for funding to purchase the same equipment from multiple federal agencies. The working group database, once implemented, will allow federal agencies to check for redundant applications or existing sanctions prior to awarding funds for controlled equipment. GPD does not and will not maintain a database. Until a system is in place for the working group to accept the information, the information on the form will be kept in electronic format in the ND-Grants system with the official grant file; and information is only retrieved by organization/state/grant file name.

FEMA Form FF-207-FY-21-115 (formerly 089-25), NSGP Investment Justification

Submitted with the application, this document provides narrative details on proposed activities (Investments) that will be accomplished with Nonprofit Security Grant Program (NSGP) grant funds. Investment Justifications (IJs) must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the IJ is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers. The NSGP grant program uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. The highest scoring applications advance to the national review phase. The national review is comprised of a panel of officials from FEMA (headquarters and regions) and peer subject matter experts. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the respective grant program.

- 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.**

To the extent possible, GPD uses Adobe or Excel fillable forms (FEMA Form 087-0-0-1, Controlled Equipment Request Form, FEMA Form, EOCGP -Formal Investment Justification, EMPG Work Plan; FEMA Form FF-207-FY-21-115, NSGP Investment Justification) or systems-based collection (FEMA Form FEMA Form 207-FY-22-121 Biannual Strategy Implementation Report through the Grants Reporting Tool). In all other cases, FEMA provides detailed guidance or a suggested template for the collection.

As this is an emergency request, and none of the instruments has changed substantially, we believe there is no change to this collection.

Usability Testing has been conducted on this collection. As result, an increase of 1508 hours has been recognized and included as an update to the collection. Please see the Table entitled Itemized Changes in Annual Burden Hours.

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.

The following forms have been discontinued, thereby reducing burden:

- FEMA Form 089-17 RCPT Membership List
- Regional Catastrophic Planning Team (RCPT) Charter Guidelines
- FEMA Form 089-0-0-18 EOC Prioritization of Investment Justifications Template
- FEMA Form 089-0-0-3A EOC Investment Justification Scoring Worksheet

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.

Except for FEMA Form FF-207-FY-21-115, NSGP Investment Justification, FEMA does not believe that this information collection has a significant economic impact on small businesses or other small entities. FEMA anticipates the use of a separate form in the future for small businesses if it is determined there is an impact on those entities.

For FEMA Form FF-207-FY-21-115, NSGP Investment Justification, repetitive/irrelevant questions have been removed or consolidated resulting in fewer questions overall; FEMA has provided clarity on sections that have historically been ambiguous.

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, FEMA could not review grant applications and award millions of dollars of federal funds that support the FEMA mission. Additionally, FEMA could not exercise comprehensive financial management, ensure the efficient and effective use of Federal funds, or fulfill monitoring requirements. Collection of this information supports fulfilling the requirements of applicable laws and regulations, including 2 CFR 200.

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

- 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.**

As this an emergency request, and comments for the remaining instruments were not solicited prior to approval by OMB. The agency is, however, also pursuing approval under the normal notice and comment process and will publish notice in the Federal Register for comment before receiving an extension of this approval.

- 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 consults with Federal, State, local and nonprofit partners on a regular basis throughout the year such as Headquarters and Regional FEMA staff, and State Administrative Agencies/previous year grant recipients. FEMA uses teleconferences, email communications, and issue-specific conferences to meet with representatives.

- 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 consults on a regular basis with Federal, State, and local and non profit stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices.

FEMA staff review and adjudicate all comments, questions, and inquiries, received through stakeholder outreach efforts. These types of interactions can affect future iterations of the grant programs in several ways. For example, responses to questions posed by grantees at times result in formal “Frequently Asked Questions” (FAQ) documents which are circulated to wider stakeholder audiences. These FAQs are distributed at various times and venues, including program guidance release, award announcement, and after action conferences.

Additionally, questions may signal to FEMA leadership that clarification on a particular matter is warranted, and as a result, information bulletins are issued to stakeholders. As a result FEMA has developed the *Stakeholder Engagement Plan* to report on the processes it utilizes to incorporate stakeholder input for grant guidance development and award distribution.

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

No payment or gifts are issued to respondents.

- 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 the FEMA Form 207-FY-22-121 Biannual Strategy Implementation Report (BSIR) was approved on August 24, 2022. A PIA for this instrument was determined to be needed and is included as an attachment with this submission.

A Privacy Threshold Analysis (PTA) for the EMPG Work Plan was approved on June 14, 2022. A PIA for this collection was not determined to be needed.

A PTA for the remainder of the instruments has been submitted and is under review.

There are no assurances of confidentiality provided to the respondents for this information collection.

- 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.**

Please see Table 1 for the response to 12a.

After conducting usability testing, there is a 1464 hour increase in burden 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 Table 1 for the response to 12b.

- 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.

Please see Table 1 for the response to 12c. To calculate the hourly rate, we used the May 2021 [Emergency Management Directors \(bls.gov\)](https://www.bls.gov) mean labor rate of \$40.77, which we then multiplied by 1.61 to get a fully burdened rate of \$65.64.

Table 1

Estimated Annualized			
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent

Note: The “Avg. Hourly Wage Rate” for each respondent include a 1.45 multiplier to reflect a fully-loaded wage rate.
 “Type of Respondent should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

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.

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 systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**
- b. **Capital and Start-Up Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

There are no capital, start-up, maintenance, or operating costs for respondents 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.

Biannual Strategy Implementation Report (BSIR) Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	\$1,083,666

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.

FY 2023 FEMA Template – Supporting Statement A

System Hosting and Development: \$1,049,850.00 GRT Infrastructure is hosted, secured, and maintained by TechnoGlobe, LLC in the Amazon GovCloud (GRTC is the Production environment, PGSC is the Non-Production environment) under the APPS contract. TechnoGlobe also performs all system development under this contract. This contract also covers reporting and program support.	
Helpdesk Services: \$33,816.00 Manta Group handles all helpdesk services for GRT support.	
Staff Salaries*1 GS-13 employee(s) spending approximately 100% of time annually for this administrative and financial data collection 1 GS-13 Step 5 (\$121,065 x 1.45 = \$175,544)	\$175,544
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$1,259,210
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

EMPG Work Plan Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	
There is one contract that supports this effort: The MetaPhase Consulting Program and Administrative Support Contract. This contract supports the development of all preparation programs. The total cost for this contract is \$4.5M. Approximately 1/10 of the contract (\$450,000) provides support for EMPG.	\$450,000
Staff Salaries* [15 of GS 13, step 1] employees spending approximately 20% of time annually for this administrative and financial data collection. \$ 106,823* 1.46 = \$155,965 *20% = \$31,193 *15=\$467,894	\$467,894
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$917,894
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

RCPGP- Required additional Documentation Annual Cost to the Federal Government

FY 2023 FEMA Template – Supporting Statement A

Item	Cost (\$)
Contract Costs	\$450,000
There is one contract that supports this effort: The MetaPhase Consulting Program and Administrative Support Contract. This contract supports the development of all preparation programs. The total cost for this contract is \$4.5M. Approximately 1/10 of the contract (\$450,000) provides support for RCPGP.	
Staff Salaries* [One GS 14 , step 5 employee spending approximately 160 hours per year for this data collection] $\$143,064/1880 = \$76.10 \times 160 = \$12,176 \times 1.45 = \$17,167.68$	\$17,655.20
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$467,655.20
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

IBSGP Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	\$450,000
There is one contract that supports this effort: The MetaPhase Consulting Program and Administrative Support Contract. This contract supports the development of all preparation programs. The total cost for this contract is \$4.5M. Approximately 1/10 of the contract (\$450,000) provides support for IBSGP.	
*Staff Salaries [8 GS-13, step 1 employees spending approximately 60% of time annually for this administrative and financial data collection] $8 \times \$106,823 = \$854,600 \times 1.45 = \$1,247,716 \times .60 = \$748,629.60$	\$748,629.60
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$1,198,629.60
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

Controlled Equipment Request Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	
Staff Salaries* [1 _# of GS-12, step 1 employees spending approximately 0.7% of time	

FY 2023 FEMA Template – Supporting Statement A

annually to review and file 175 forms. $1 \times \$89,834 \times 1.45 \times 0.7\% = \$911,815...$ for this data collection]	\$911,815
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$911,815
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

Emergency Operation Center Grant Program (EOCGP) Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs There is one contract that supports this effort: The MetaPhase Consulting Program and Administrative Support Contract. This contract supports the development of all preparation programs. The total cost for this contract is \$4.5M. Approximately 1/10 of the contract (\$450,000) provides support for RCPGP.	\$450,000
Staff Salaries [35 GS-13 step 1 employees spending approximately 5% of time annually for this administrative and financial data collection] $35 \times \$106,823 = \$3,738,805 \times 1.45 = \$5,421,267 \times 0.05 = \$271,063.36$	\$271,063.36
Facilities [cost for renting, overhead, etc. for data collection activity]	\$
Computer Hardware and Software [cost of equipment annual lifecycle]	\$
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$
Travel (not to exceed)	\$
Total	\$721,063.36
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed January 27, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

NSGP Investment Justification Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs There is one contract that supports this effort: The Chevo Consulting Risk Assessment Strategy Support Contract. This contract supports the development of the programs & provides guidance/assistance to grantees, collect & review information. The total cost for this contract is \$1,987,433.39. Approximately 90% of the contract (\$1,788,690.05) provides support for NSGP.	\$1,788,690.05

FY 2023 FEMA Template – Supporting Statement A

Staff Salaries ¹ 20 of GS 13 Step 5 employees spending approximately 10% of time annually on this administrative and financial data collection. (20 x \$ 121,065x 0.1 x 1.45 = \$)	\$351,088.50
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	\$2,139,778.55
¹ Office of Personnel Management 2020 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/20Tables/html/DCB.aspx .	
² Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.	

The total cost to the federal government is \$7,616,045.71.

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).*

*“**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		
Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)

Explain:

EMPG Work Plan burden increase is due to the development of a new template that allows the EMPG program office to better assess the value and compliance of recipients of grant funds.

Biannual Strategy Implementation Report (BSIR) burden reduction is due to eliminating the Initial Strategy Implementation Plan

RCPGP- Required additional Documentation burden increase is due to an increase of expected recipients from 10 to 25.

EOCGP burden reduction is due to changes in the program that vastly reduces the number of recipients of grant funds.

There is no change to the burden for the IBSGP Associated Investment Justification Form.

The IBSGP Associated detailed budget burden increase is due to a new requirement compared to the most recent collection approval.

The IBSGP-Vulnerability Assessment and Security Plan burden increase is due to a new requirement compared to the most recent collection approval.

FY 2023 FEMA Template – Supporting Statement A

The Controlled Equipment Request Form burden decrease is due to changes in the form compared to the previous version from 2016.

The is no change to the burden for the NSGP Investment Justification form.

Itemized Changes in Annual Burden		
Data Collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)
EMPG Work Plan	\$ 9,008.26	\$ 329,315.8

Explain: EMPG Work Plan cost burden increase is due to the development of a new template that allows the EMPG program office to better assess the value and compliance of recipients of grant funds. Also note that since the previous OMB inventory, BLS average wage rates have increased.

Biannual Strategy Implementation Report (BSIR) cost burden reduction is due to eliminating the Initial Strategy Implementation Plan. Also note that since the previous OMB inventory, BLS average wage rates have increased.

RCPGP- Required additional Documentation cost burden increase is due to an increase of expected recipients from 10 to 25. Also note that since the previous OMB inventory, BLS average wage rates have increased.

EOCGP cost burden reduction is due to changes in the program that vastly reduces the number of recipients of grant funds. Also note that since the previous OMB inventory, BLS average wage rates have increased.

There is no change to the IBSGP Associated Investment Justification Form. Also note that since the previous OMB inventory, BLS average wage rates have increased.

The IBSGP Associated detailed budget cost burden increase is due to a new requirement compared to the most recent collection approval. Also note that since the previous OMB inventory, BLS average wage rates have increased.

The IBSGP-Vulnerability Assessment and Security Plan cost burden increase is due to a new requirement compared to the most recent collection approval. Also note that since the previous OMB inventory, BLS average wage rates have increased.

The Controlled Equipment Request Form cost burden decrease is due to changes in the form compared to the previous version from 2016. Also note that since the previous OMB inventory, BLS average wage rates have increased.

The NSGP cost burden reduction is attributable to a change in the average wage rate used to calculate cost burden.

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 outlined plans for tabulation and publication of data for this information collection beyond the Act's requirement to submit annual reports to Congress describing the claims submitted under the Act.

17. If seeking approval no 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 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".