

September 1, 2023

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660 – NW160**

**Title: Floodplain Administrator (FPA) National Training Needs  
Assessment**

**Form Number(s): FEMA Form FF-206-FY-22-159, Floodplain  
Administrator Training Needs Assessment**

### **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 Federal Emergency Management Agency (FEMA) is requesting a three-year clearance to collect information from Floodplain Administrators (FPA) regarding their training needs, floodplain management experiences, and demographics to increase equity

among Floodplain Administrators and produce improved outcomes for the National Flood Insurance Program (NFIP). The data will be used to help FEMA, State, Tribal, and Territorial NFIP Offices, and Floodplain Associations to develop training strategies and solutions that effectively and efficiently address the diverse socio-economic backgrounds, abilities, schedules, learning styles, geographies and resources of FPAs who implement this Federal Government program on behalf of their local communities. The information collection, to be administered by an independent, third-party research organization, will allow for a data-informed approach to understanding the needs and expectations of an important and specific group of FEMA partners and customers for their development and program administration. By using this approach, FEMA will be able to gain important insights about FPAs and how to improve its offerings and support as well as to allocate resources more effectively. The ultimate objective is to reduce the socio-economic impact of floods through better preparation of FPAs to assist communities adopt and enforce floodplain management regulations that help mitigate flooding effects and thus support property owners, renters, and businesses to recover faster after a flooding event. There are three drivers that make an assessment of the training needs of the nation's FPAs by FEMA necessary. These are:

1. *The need to mitigate and reduce damage from increasing floods.* Floods can happen anywhere — just one inch of floodwater can cause up to \$25,000 in damage.<sup>1</sup> According to the National Climate Assessment, heavy downpours have increased in frequency and intensity worldwide in the last 50 years. Extreme precipitation events are expected to become more frequent and intense leading to more severe floods and greater risk of infrastructure failure as global temperatures continue to rise.<sup>2</sup> The average 100-year floodplain is projected to increase 45 percent by the year 2100, while the annual damages from flooding are predicted to increase by \$750 million.<sup>3</sup> Among the types of flooding that will likely become more frequent are localized floods and riverine floods.<sup>4</sup> Most homeowners insurance does not cover flood damage. Flood insurance is a separate policy that can cover buildings, the contents in a building, or both, so it is important to protect these financial assets including, homes, businesses, and possessions.

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<sup>1</sup> FEMA.gov. “Big Cost of Flooding”. Retrieved October 2022. [https://www.floodsmart.gov/sites/default/files/flood-loss-potential\\_jul19.pdf](https://www.floodsmart.gov/sites/default/files/flood-loss-potential_jul19.pdf).

<sup>2</sup> USGCRP, 2018: Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, 1515 pp. doi: 10.7930/NCA4.2018.

<sup>3</sup> EPA.gov. “Manage Flood Risk.” Retrieved October 2022. <https://www.epa.gov/green-infrastructure/manage-flood-risk#:~:text=As%20a%20result%2C%20the%20risk,to%20increase%20by%20%24750%20million>.

<sup>4</sup> AECOM, Michael Baker Jr., Inc., and Deloitte Consulting, LLP. 2013. The Impact of Climate Change and Population Growth on the National Flood Insurance Program through 2100.

The NFIP is authorized by the National Flood Insurance Act of 1968 (Title XIII of P.L. 90-448, as amended, 42 U.S.C. §§ 4001 et seq.). The last long-term reauthorization of the NFIP was by the Biggert-Waters Flood Insurance Reform Act of 2012. Congress amended elements of Biggert-Waters Act, but did not extend the NFIP's authorization further, in the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA). The general purpose of the NFIP is to create a voluntary program of flood insurance that can promote the public interest by providing appropriate protection against the perils of flood losses and encouraging sound land use by minimizing exposure of property to flood losses; and integrate the objectives of a flood insurance program. This is achieved by first identifying risks within a community, then community adoption and enforcement of floodplain management standards that at minimum, reflect FEMA's minimum criteria for floodplain management, which then allows FEMA to offer federally backed flood insurance in that community. Nationally, as of December 2021, over 22,000 communities in 56 states and jurisdictions participate in the NFIP. NFIP regulations, which include definitions, a description of the program, and eligibility requirements is contained in 44 CFR 59.

The NFIP is managed by FEMA, through its subcomponent the Federal Insurance and Mitigation Administration (FIMA). FEMA manages a Risk Mapping, Assessment and Planning (Risk MAP) process to produce Flood Insurance Rate Maps (FIRMs). Depicted on FIRMs are Special Flood Hazard Areas (SFHAs), which are areas exposed to a 1% or greater risk of annual flooding. The Risk MAP process provides extensive outreach and appeal opportunities for communities. Updating a community's FIRMs can take three to five years or more. Participating communities must adopt a flood map and minimum floodplain standards to regulate development in the SFHA.

2. *Diversity of Floodplain Administrators (FPAs)*. FEMA has an interest in the success of the NFIP it oversees. Each "Eligible or participating community," which means a community for which the Administrator has authorized the sale of flood insurance under the National Flood Insurance Program<sup>5</sup> shall legislatively (1) Appoint or designate the agency or official with the responsibility, authority, and means to implement the commitments of application to the National Flood Insurance Program and (2) Designate the official responsible to submit a report to the Federal Insurance Administrator concerning the community participation in the Program, including, but not limited to the development and implementation of flood plain management regulations. It is common for eligible and participating communities to assign the FPA role to employees who are also simultaneously responsible for other roles such

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<sup>5</sup> 44 CFR § 59.22

as Police Chief, Town Clerk, Grants Manager, or Finance Manager. FIMA also understands from interactions with FPAs that they are relatively underpaid and undertrained. This poses three training related challenges:

- a. When an employee wears multiple hats, they become indispensable to the local government's day to day operations. This makes it difficult for that employee to leave to attend a four-day floodplain management training.
- b. Those employees that are able to attend training away from their community are hard pressed to use their new skills often and consistently. For these mostly adult learners, many of their newly learned skills become forgotten skills if they are not reinforced through practice.
- c. Attrition of those already trained. The NFIP suffers from high turnover of FPAs.

For these reasons, traditional training methods have not been effective. Innovative and targeted training products and methods must be employed to effectively train these leaders in a manner that meets their individual needs, the communities' needs, and FEMA's needs.

Complicating the challenge is the nation's FPAs are a diverse group with varied socio-economic backgrounds, abilities, schedules, learning styles, geographies, and resources. A Training Strategy is needed to direct FEMA's limited FPA training budget into training solutions that address the unique needs of FPAs as well as their varied abilities, schedules, learning styles, geographies, and resources. To be effective, the FPA Training Strategy must be grounded in an accurate understanding of FPAs' varied socio-economic backgrounds, needs, abilities, schedules, learning styles, geographies, and resources. To achieve this understanding, a Training Assessment must be performed.

3. *Data-informed decision-making for results, service quality, and customer satisfaction.* The primary law that supports the information collection efforts is the Government Performance and Results Act (GPRA) of 1993, 31 U.S.C. § 1116, which has as one of its purposes "improve Federal programs effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction." Such an initiative is also widely supported by longstanding administrative policy, as expressed in Executive Orders and Laws, described below.

On September 11, 1993, President Clinton issued Executive Order 12862, "Setting Customer Service Standards" which establishes that Federal Government agencies should survey customers to determine their level of satisfaction with existing services, measure customer service satisfaction results against service standards, benchmark customer service performance against the best in business, provide customers with choices in both the sources of service and the means of delivery, make complaint

systems easily accessible, and provide means to address customer complaints. Agencies are to utilize information about their customer satisfaction results in judging the performance of agency management and in making resource allocations.

In 2007, President Bush issued Executive Order 13450 aimed at improving Government Program Performance. The Order focused on maximizing the effectiveness of programs for citizens through establishing clear annual and long-term goals and having the means to measure progress toward these goals. A Performance Improvement Council was established within the Office of Management and Budget to provide oversight to agencies in implementing the Order.

In January 2009, the Obama Administration released the Memorandum on Transparency and Open Government to all Executive Departments and Agencies calling for the creation of a more transparent, participatory, and collaborative Government. The memorandum notes that Executive departments and agencies should solicit public feedback to identify information of greatest use to the public, determine how to best increase and improve opportunities for public participation in Government, and assess and improve the level of collaboration and cooperation between Government and nonprofit organizations, businesses, and individuals in the private sector. The memorandum directed the Administration's Chief Technology Officer, Administrator of General Services Administration, and the Director of OMB with coordinating efforts to produce an Open Government Directive that would address specific actions for implementing the principles of a transparent and open Government.

On January 4, 2011, Congress passed the Government Performance and Results Act (GPRA) Modernization Act of 2010 (124 Stat. 3866, Pub. L. 111-352) enhanced the Federal Government's performance management by creating two new frameworks: 1) one government-wide performance plan developed by OMB with input from departments and agencies, and 2) agency priority goals that are identified and reported quarterly. GPRA 2010 tasks the agency Chief Operating Officer and Performance Improvement Officer with the overall organization management to improve performance.

On April 27, 2010, President Obama issued Executive Order 13571 - Streamlining Customer Service Delivery and Improving Customer Service. This Order requires each agency to develop a customer service plan in consultation with OMB that addresses how each agency will provide services in a manner that streamlines service delivery and improves the experience of its customers. The Order requires the establishment of mechanisms to solicit customer feedback on Government services and using feedback regularly to make improvements. Furthermore, the Order requires

improving the customer experience by adopting proven customer service best practices across service channels as well as identifying ways to use innovative technologies to accomplish customer service activities, thereby lowering costs, decreasing service delivery times and improving the customer experience (as can be accomplished through agency websites).

On March 30, 2016, President Obama established the Core Federal Services Council, which again emphasized the need to deliver world-class customer service to the American people. The Council, composed of the major high-volume, high-impact Federal programs that provide transactional services directly to the public, were encouraged “to improve the customer experience by using public and private sector management best practices, such as conducting self-assessments and journey mapping, collecting transactional feedback data, and sharing such data with frontline and other staff.”

In March 2018, the Trump Administration launched the President's Management Agenda (PMA) and established new Cross-Agency Priority (CAP) Goals. Excellent service was established as a core component of the mission, service, stewardship model that frames the entire PMA, embedding a customer-focused approach in all of the PMA's initiatives. This model was also included in the 2018 update of the Federal Performance Framework in Circular A-11, ensuring 'excellent service' as a focus in future agency strategic planning efforts. The PMA included a CAP Goal on Improving Customer Experience with Federal Services, with a primary strategy to drive improvements within 25 of the nation's highest impact programs. This effort is supported by an interagency team and guidance in Circular A-11 requiring the collection of customer feedback data and increasing the use of industry best practices to conduct customer research.

On January 14, 2019, President Trump signed the Foundations of Evidence-Based Policy-Making bill into law (Evidence Act) (Pub. L. 115-435). In its provisions, the Evidence Act requires the head of each agency, in the agency's strategic plan, to include a systematic plan for identifying and addressing policy questions relevant to the programs, policies, and regulations of the agency. While not named specifically, customer service delivery and satisfaction related questions may arise in agency's strategic plan, evaluation plan, and/or learning agendas described in the Evidence Act.

On December 13, 2021, President Biden issued Executive Order 14058 -- Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government. The Executive Order directs Federal agencies to put people at the center of everything the Government does. Specifically, the Executive Order includes 36

customer experience (CX) improvement commitments across 17 Federal agencies, all of which aim to improve people's lives and the delivery of Government services. As part of this framework, the Administration will work to identify and define critical services that meet customers' needs and expectations, assess performance delivery and report it publicly, incorporate customer feedback during each interaction, and ultimately ensure services deliver a better experience to the public.

On March 28, 2022, the Biden Administration released the Fiscal Year (FY) 2023 budget. In the budget document, the Analytical Perspectives section describes the government's commitment to setting ambitious goals for protecting individuals and communities, modernizing infrastructure, investing in children, and taking care of the most vulnerable. An area of emphasis is the centrality of on-the-ground results and citizen's experiences with their government. Our effort is in direct support of the goals and guidance established in the Biden Administration's Budget and Analytical Perspectives.

These executive and legislative initiatives clearly recognize that while federal resources need to be allocated to programs and managers that deliver results, agencies need to engage and collaborate with the public to ensure that programs are structured in a way that maximizes effectiveness and strives to improve program quality. Therefore, agencies are likely to make more use of information collections involving citizen input and perspectives, like the proposed information collection, to collaborate effectively with the public and meet Administration mandates. The proposed information collection is a tool for FEMA to use in demonstrating its willingness to be open and collaborative, as it solicits input on a critical aspect supporting the administration of the NFIP.

The nature and source of the information to be collected is as follows:

This clearance will establish the ability for FEMA to collect FPAs' insights and use them to improve training and related services for these community-based FPAs. The clearance will also enable FEMA to assist and advise State, Tribal, and Territorial NFIP Offices, and Floodplain Manager Associations to improve both efficiency and mission delivery of NFIP, based on front-line insights gathered through developing an understanding of the FPAs' needs, and increase accountability by communicating about these efforts with the public.

The information collection consists of two major components: a) obtain information about the composition, capacity, experiences, needs, training preferences, and obstacles faced by FPAs in terms of program management and improvement and their professional development and retention, and b) test hypotheses related to floodplain program

management, continuity, sustainability, and public support. FPAs are partners in the administration of the NFIP; however, for the purposes of this request and of the training services provided to FPAs by FIMA, the FPAs are considered customers. FIMA follows the guidance in the U.S. Office of Management and Budget (OMB) Circular No. A-11, section 280<sup>6</sup> and defines “customers” as individuals, businesses, and organizations that interact with a Federal Government agency or program, either directly or via a Federal contractor. “Service delivery” or “services” refers to the multitude of diverse interactions between a customer and Federal agency such as seeking guidance about floodplain management or accessing training about floodplain management or the NFIP.<sup>7</sup>

The source for the information will be the 22,582 FPAs who are based in local U.S. communities. As previously noted, larger and wealthier communities often have FPAs that are solely employed to work on Floodplain Management, while in smaller and lower income communities, Floodplain Management is one of many unrelated job responsibilities assigned to a single staff person. FEMA intends to conduct an online census of all 22,582 FPAs. For FPAs who regularly correspond with FEMA through traditional mail, a printed copy of the survey will be mailed to those communities. Both the online and written versions of the information collection will be available in English and Spanish.

**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.**

This information has not been collected before and represents a new collection that is the first in-depth voice of the customer analysis for FPA training programs. Previously, FEMA has surveyed disaster survivors, who typically represent the general public, and usually after an event. FEMA has never surveyed FPAs, who are the civil servants whose work is conducted before and after disaster events. Information received through this collection will be used to help FEMA, State NFIP Offices, and Floodplain Management Associations better understand the diversity and training needs of FPAs and to develop training strategies and solutions that address those needs to improve services, service delivery, and floodplain management.

FEMA has contracted with Virginia Tech University’s Center for Coastal Studies (VTU) to conduct the instrument design, data collection, analysis and reporting. VTU will

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<sup>6</sup> U.S. Office of Management and Budget. 2020. OMB Circular No. A-11; Section 280. Retrieved October 2022. <https://www.performance.gov/cx/assets/files/a11-280.pdf>.

<sup>7</sup> Ibid.



collect the data using an online survey creation and data collection tool, QuestionPro (<https://www.questionpro.com>). All data collected will be assessed, including frequency descriptions and use of statistical tests of significance and correlation and regression analysis. Based on these assessments, a final report and strategy document will be shared with NFIP Coordinators who represent State, Tribal, and Territorial Governments. 44 CFR 60.25 describes the duties and responsibilities of these officials. As evidenced in this regulation, these NFIP Coordinating offices provide training and technical assistance to Participating Communities and therefore have a vested interest in understanding the training needs of Participating Communities within their borders.

The final report and strategy document will also be shared with the Association of State Floodplain Managers (ASFPM), a non-profit 501c3 organization that administers the Certified Floodplain Manager exam and licensure. FEMA and ASFPM are parties to a cooperative agreement where ASFPM delivers the FEMA-developed EL0273 Managing Floodplain Development through the NFIP to FPA's on behalf of FEMA.

A public-facing report will include observations and recommended training strategies and will be posted on FEMA's Floodplain Management Division webpage. The report will refer to States and Regions but not call out individual communities. Instead, it will refer to them in representational ways such as a "rural and inland town in Southeast New York with a population under 50,000".

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

The primary methods for data collection are email invitations to take an Internet-based survey and mailing of paper survey copies to respondents who do not have access to Internet-based surveys. FEMA anticipates approximately 85 percent of the respondent population will be reached through the email/Internet survey process. The Internet-based survey platform that will be used is QuestionPro. Increased use of automated technology is reducing the paperwork burden related to this collection. The approach generally involves sending email invitations to customers. To participate in the survey, customers activate the provided URL, which takes them to a website where the survey is presented, and the data is collected. This technique streamlines the process of data collection, reduces paperwork, and cuts costs significantly. In addition, it emphasizes the voluntary nature of participating in a survey. In the case of email invitations sent to individuals, those who participate can complete the survey at a time that is convenient his or her

schedule. The online survey will reduce burden through the use of multiple question types and skip logic which creates the appropriate question path for respondents based upon their input and allows them to skip over questions that are not relevant to them. The use of QuestionPro also reduces burden on analysis as the platform provides real-time frequency analysis. Frequency data can be shared through dashboards can assist in quick analysis and informed decision making.

In the case of mailed surveys, experienced researchers can review completed forms and manually enter the responses into the QuestionPro platform so that all the data is stored in the same file. The researchers also use techniques of review and inter-coder reliability to ensure data is accurate and complete when being entered. The decision to use mailed surveys is based on previous interactions with FPAs who do not have access to Internet. Telephone interviews were not considered as the alternative due to length of the survey and costs that would be related to using a call assisted center.

**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.**

For FEMA, this is a new information collection based upon the intended respondent population (FPAs) and the questions being asked. Every effort has been made to identify duplicating or similar surveys and survey questions. FEMA has found this collection does not replace or duplicate other surveys of the respondent population. FEMA could not locate any similar information collection already available or that could be modified for this information collection—as no national information collection of FPAs has been conducted by FEMA or other entities. The majority of questions being asked in this collection are about FPAs' specific circumstances and preferences, which have not been collected by FEMA previously, or are approved in any other FEMA information collection. A smaller set of questions will be used to collect the specific demographic variables of FPAs. These questions are necessary within this information collection because demographic questions for the specific respondent population have not been collected previously under any other information collection. Demographic information collected from previous FEMA surveys or information collection instruments. As noted, the respondent audience for this information collection is fundamentally different (pre-disaster, local government) than other surveys (post-disaster, general public). Data from previous FEMA surveys are not compatible or linked to survey responses from other FEMA information collections. In order to reduce potential burden and/or respondent confusion, this information collection will use, as appropriate and relevant, the demographic question language of previously approved FEMA information collections but is requesting to ask additional questions necessary for FEMA's understanding of this

specific respondent population for tailored program management and improvement for the NFIP and FPA training.

Respondents may be involved in community self-assessments but given the nature of comprehensive preparedness planning and of this information collection, which is anticipated to occur once every five to ten years, it is unlikely that individual respondents would be selected to complete more than one survey over an annual reporting cycle. Moreover, as a census survey, FEMA and its contractor will conduct the information collection to provide a statistically valid result.

**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.**

The information collection will only involve individuals designated as Flood Program Administrators (FPAs), who represent the eligible and participating communities. The information collection will not impact local governments or small businesses. The data collection may impact other small entities, if the FPA is a representative of an eligible and participating community representing the government of a city, town, county, township, school district, etc. with a population of less than 50,000. To minimize potential burden and impact on local government small entities, the respondent will be provided with instructions and may contact the collecting program for clarification and assistance. If asked to participate in a survey, a small business could opt out very easily without penalty or pressure.

**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.**

FEMA does not anticipate this information will be requested again from eligible and participating communities more than once every five to ten years. This frequency of collection will allow FEMA to track noticeable differences in the respondent population and their needs due to changing socio-economic variables and climate of flood plains, or due to evolving federal assistance to these communities.

If this information is not collected, training will be suboptimal for tens of thousands of FPA's and federal dollars will not be programmed as efficiently as they could be. Studies suggest that for every dollar spent on mitigation, \$8 are saved from avoiding future disasters. It is fair to question, however, if this observation is true for those communities who are not using mitigation best practices (due to poor training), or worse, are allowing unsafe developments to occur in their community. By not conducting this information

collection, training for FPAs are likely to remain in the status quo as the environment and needs change. FEMA and FPAs are likely to face:

- Reduced preparedness and competence to implement the NFIP
- Training that does not meet the FPAs' diverse needs thereby reducing the efficiency and effectiveness of training resources
- Increasing attrition of knowledgeable FPAs
- Limited, if any, growth of communities participating in or benefiting from the NFIP after a disaster
- Increased post-disaster community costs that may need to be augmented by the Federal Government
- Slower and more painful recovery from flooding events by property owners, renters, and businesses
- Hinder developing strategies that advance the equity of services to Floodplain Administrators

**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.**

A 60-day Federal Register Notice inviting public comments was published on January 3, 2023, at 88 FR 86. No public comments were received.

A 30-day Federal Register Notice inviting public comments was published at 88 FR 60473 on September 1, 2023. The public comment period is open until October 2, 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’s Floodplain Management has consulted with the following groups to inquire about the availability of data:

- State NFIP Coordinators
- VTU
- University of North Texas
- The Association of State Floodplain Managers
- The Texas Association of Floodplain Managers

A working group has been established to help guide FEMA in the development of clear and relevant questions, instructions, data elements, and dissemination of the Assessment.

The work group includes members representing:

- FEMA
- The Emergency Management Institute
- The Commonwealth of Puerto Rico
- State of Oregon, State NFIP Coordinator
- State of North Carolina, State NFIP Coordinator
- State of New York, State NFIP Coordinator
- University of Florida
- The Association of State Floodplain Managers
- The Texas Association of Floodplain Managers

FEMA has determined that no recordkeeping or reporting is required of respondents. FEMA's privacy office and records custodian have reviewed the recordkeeping requirements for FEMA and VTU.

**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 and VTU conducted a pilot test of the draft survey instrument with nine FPAs, who represent the focus population. These respondents of the survey tools did not question the necessity of the collection or the quality, utility, and clarity of the information to be collected.

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

No payments or gifts will be offered or made to Assessment participants or work group members.

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

A Forms Privacy Threshold Analysis (PTA) was approved by DHS on June 29, 2023.

Privacy Impact Assessment (PIA) coverage is provided by DHS/FEMA-PIA-045 – FEMA Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems.

Individuals and organizations contacted in the course of conducting this information collection will be assured of the confidentiality of their 5 U.S.C. § 552a (Privacy Act of 1974) and OMB Circular No. A-130. Survey respondents will be advised on the survey form that participation is voluntary. No personally identifiable information (PII) will be collected.

Data is not being retrieved by a unique identifier, so SORN coverage is not necessary.

Once data is collected from an individual or an organization, any information needed to contact respondents is severed from the respondent record and submitted data is

identified through a unique ID number generated by the QuestionPro application. No system of records is created.

**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.**

The information collection will not ask questions or collect data of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. However, on occasion, some respondents may consider some demographic questions as sensitive in nature (e.g., questions that request the respondent's age range, gender, education, or income range). Demographic questions are useful in segmenting the responses of different user groups and helpful in evaluating the results; therefore, respondents will be encouraged to answer these questions but assured that their participation is completely voluntary. For this information collection, the demographic questions are necessary to: a) document the diversity of the specific population (FPAs) where no information about their diversity, socio-economic backgrounds, needs, learning styles, locations has been collected previously by FEMA or in already approved information collections; and b) conduct the analyses necessary to answer the hypotheses that FEMA is testing that will be used for evidence-based decision-making and program planning.

**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-22-159, Floodplain Administrator Training Needs Assessment:** The total population for the survey is 22,582 FPAs. FEMA estimates



achieving a response rate of 28 percent. This estimation is based upon research of online survey response rates. Most research shows the average online response rate to fall within a range of 10 to 33 percent, with email and online surveys usually between 29 and 30 percent. Needs assessments, based on selected research average a 40 percent response rate. The response rate is affected by a number of variables, including focus of survey, survey length, invitation, number of interactions, respondent familiarity, and respondent demographics. FEMA is anticipating a 28 percent response rate for the information collection based general customer satisfaction faction survey rates which generally exist around 30 percent. FEMA has reduced the amount slightly to account for the information collection being a first-time collection and the length of the survey instrument. FEMA estimates the 28 percent response rate will generate 6,323 ( $22,582 \times 28$  percent) respondents with one response per year for a total of 6,323 ( $6,323$  respondents  $\times$  1 response per year) total annual responses. It is estimated that each response will require 0.5 burden hours to complete for total burden hours of 3,162 ( $6,323 \times 0.5$ ) per year.

FEMA and VTU conducted a pilot (usability) test between March 30, 2022, and April 28, 2022, of the draft survey instrument with nine (9) FPAs, who represent the focus population. Eight (8) test respondents completed the survey. On average, test respondents who completed the survey took 30 minutes. Follow up interviews were conducted with five of the respondents who confirmed to FEMA and VTU that the instrument questions were clear and did not need adjustment, the online process and survey instructions were clear, and all links worked. The group did not recommend any changes to the instrument, instructions, or the process. As noted in 8c, they also did not question the necessity of the collection or the quality, utility, and clarity of the information to be collected. As a first user test of the questionnaire and process, there were no previous estimates.

**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 1.61 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 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, and Tribal Governments	Floodplain Administrator National Training Needs Assessment / FEMA Form FF-206-FY-22-159	6,323	1	6,323	0.5	3,162	\$39.32	\$137,895
<b>Total</b>		<b>6,323</b>		<b>6,323</b>		<b>3,162</b>		<b>\$137,895</b>

**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.<sup>8</sup> 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 Surveying and Mapping Technicians SOC 17-3031 for local government is \$27.09.<sup>9</sup> Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$43.61 per hour. Therefore, the burden hour cost is estimated to be \$137,895 (\$43.61 x 3,162 hours) annually.

**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:**

<sup>8</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at [https://www.bls.gov/news.release/archives/ecec\\_03172023.pdf](https://www.bls.gov/news.release/archives/ecec_03172023.pdf). Accessed March 20, 2023. The wage multiplier is calculated by dividing total compensation for State and Local Government workers of \$57.60 by Wages and salaries for State and Local Government workers of \$35.69 per hour yielding a benefits multiplier of approximately 1.61.

<sup>9</sup> 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/oes173031.htm>. Accessed on March 20, 2023.

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

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

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

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

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: Project Management Costs to Bloomsburie at $\$255,294 \times 2.5\% = \$6,382$ ; Contract cost to Virginia Tech University for survey design, data collection, data analysis, report writing = $\$394,000$ . ( $\$6,382 + \$394,000 = \$400,382$ )	\$400,382
Staff Salaries <sup>1</sup> : 1 GS 13 Step 5 (Washington, D.C.) spending approximately 2.5% of time annually for project guidance, direction, and management of data collection and report distribution. ( $\$126,949 \times 0.025 \times 1.45^2 = \$4,602$ ) 1 GS 14 Step 5 (Washington, D.C.) spending approximately 7.5% of time annually for executive oversight of the information collection. ( $\$150,016 \times 0.075 \times 1.45 = \$16,314$ ) ( $\$4,602 + \$16,314 = \$20,916$ )	\$20,916
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
<b>Total</b>	<b>\$421,298</b>
<sup>1</sup> Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf</a> . Accessed March 20, 2023.	
<sup>2</sup> Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

The estimate of total annual cost burden to the Federal Government resulting from the collection of information is based upon a one-time collection within the three-year approval period for the instrument. FEMA provides additional information regarding:

- Facilities – no additional costs have been incurred for the information collection.
- Computer Hardware and Software – no additional costs have been incurred for the information collection.
- Equipment Maintenance – no additional costs have been incurred for the information collection.
- Travel – no travel is expected for the information collection.

**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 an 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
Floodplain Administrator National Training Needs Assessment / FEMA Form FF-206-FY-22-159	0	3,162	3,162			
<b>Total</b>	<b>0</b>	<b>3,162</b>	<b>3,162</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Explain:** This is a new information 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
Floodplain Administrator National Training Needs Assessment / FEMA Form FF-206-FY-22-159	\$0	\$124,310	\$124,310			
<b>Total</b>	<b>\$0</b>	<b>\$137,895</b>	<b>\$137,895</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

**Explain:** This is a new information 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.**

All data collected will be analyzed, including frequency descriptions and use of statistical tests of significance and correlation and regression analysis. Analytical techniques that

will be used for analysis include: T-tests and chi-square tests; Pearson's correlations; Ordinary Least Squares and Ordered Logit Regressions; Polychoric correlations; and Confirmatory Factor Analysis.

T-tests and chi-square tests will be used to test differences in means of variables, telling us how the variable averages vary. Pearson's correlations will be used to find associations between variables and scales. Those with higher correlations are linearly related and move in coordination with one another. Ordinary Least Squares (OLS) and Ordered Logit Regressions will be used to find associations between variables and scales, while controlling for other variables (i.e., controlling for variables like age, education level, income, etc.) Regressions allow us to find statistically significant relationships between sets of variables. Polychoric correlations will be used to find associations between categorical variables (i.e., variables that have no rank order like race or gender). Finally, we will use Confirmatory Factor Analysis (CFA) to find latent scales or assumptions amongst the variables (e.g., a hidden association between years employed, training history, and turnover rates).

Based on these assessments, a final report and strategy document will be shared with NFIP Coordinators who represent State, Tribal, and Territorial Governments. The final report and strategy document will also be shared with the Association of State Floodplain Managers (ASFPM), a non-profit 501(c)(3) organization that administers the Certified Floodplain Manager exam and licensure. FEMA and ASFPM are parties to a cooperative agreement where ASFPM delivers the FEMA-developed EL0273 Managing Floodplain Development through the NFIP to FPAs on behalf of FEMA.

A public-facing report will include observations and recommended training strategies and will be posted on FEMA's Floodplain Management Division webpage. The report will refer to States and Regions but not call out individual communities. Instead, it will refer to them in representational ways such as a "rural and inland town in Southeast New York with a population under 50,000".

The entire project schedule is estimated to take 22 months. The anticipated schedule is:

<b>Activity</b>	<b>Duration</b>
Develop Survey Questions	3 months
Test and Train	1 month
OMB Approval	8 months
Launch Survey	1 month after approval
Collect Data	2 months
Analyze Data	3 months
Final Report	2 months
Publication (internal clearance)	2 months
<b>TOTAL</b>	<b>22 months</b>

**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”.