

July 31, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0015

Title: Revisions to National Flood Insurance Program Maps: Application Forms and Instructions for (C)LOMAs and (C)LOMR-Fs

Form Number(s):

- 1) FEMA Form FF-206-FY-23-104 (formerly 086-0-22), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps;**
- 2) FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish version);**
- 3) FEMA Form FF-206-FY-23-105 (formerly 086-0-26), Property Information Form;**
- 4) FEMA Form FF-206-FY-23-106 (formerly 086-0-26A), Elevation Form; and**
- 5) FEMA Form FF-206-FY-23-107 (formerly 086-0-26B), Community Acknowledgment Form.**

General Instructions

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

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy**

of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Flood Insurance Program (NFIP) is authorized by 42 U.S.C. § 4001 *et seq.* (Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973)). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. The land area covered by the floodwaters of the base flood is the Special Flood Hazard Area (SFHA) on NFIP maps. The SFHA is the area where the NFIP's floodplain management regulations must be enforced and the area where the mandatory purchase of flood insurance applies. If a SFHA has been determined to exist for property and the owner or lessee of the property believes his/her property has been incorrectly included in a SFHA, information can be provided to support removal of the SFHA designation. NFIP regulations 44 CFR 65 and 44 CFR 70 outline the data that must be submitted by an owner or lessee of property who believes his/her property has been incorrectly included in a Special Flood Hazard Area (SFHA). In order to remove an area from a SFHA, the owner or lessee of the property must submit scientific or technical data demonstrating that the area is "reasonably safe from flooding" and not in the SFHA.

- 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.**

FEMA collects scientific and technical data submissions to determine whether a specific property is located within or outside of a SFHA. If the property is determined not to be within a SFHA, FEMA provides a written determination and the appropriate map is modified by a Letter of Map Amendment (LOMA) or a Letter of Map Revision – Based on Fill (LOMR-F). The owner or lessee of a property uses a LOMA or LOMR-F to show that a property is not flood prone, making it possible for the lending institution to waive the flood insurance requirement.

FEMA Form FF-206-FY-23-104 (formerly 086-0-22) and FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Spanish version), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps: This form allows the owner or lessee of a single lot or structure to understand and prepare the data required to determine if the single lot or structure is located in the SFHA. The form describes the location of the property, what is being requested, and what data are required to support the request. The form also includes the contact information of the requestor.

FEMA Form FF-206-FY-23-105 (formerly 086-0-26), Property Information Form:

This form describes the location of the property, what is being requested, whether or not fill has been placed on the property, and what data are required to support the request. The form also includes the contact information of the requestor.

FEMA Form FF-206-FY-23-106 (formerly 086-0-26A), Elevation Form: This form indicates what the Base (1-percent annual chance) Flood Elevation (BFE) for the property is, how the BFE was determined, the lowest ground elevation on the property, and/or the elevation of the lowest adjacent grade to any structures on the property. This information is required in order for FEMA to determine if the property that the requestor would like removed from the SFHA is at or above the BFE.

FEMA Form FF-206-FY-23-107 (formerly 086-0-26B), Community Acknowledgment – NFIP regulations 44 CFR 65.5(a)(4) require that a community official certify that the request complies with minimum floodplain management criteria specified in 44 CFR 60.3. For LOMR-F and CLOMR-F requests only Section A needs to be certified. A LOMR-F is a request for properties on which fill has been placed to elevate the land or structure to or above the BFE. A CLOMR-F is a request for FEMA’s comment on whether a proposed project involving the placement of fill would be excluded from the SFHA. For LOMA requests in which the property has been inadvertently included within the regulatory floodway, only Section B needs to be certified. This form ensures that this requirement is fulfilled prior to the submittal of the request to FEMA.

- 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.**

FEMA Forms FF-206-FY-23-104 (formerly 086-0-22) and FF-206-FY-23-104-A (formerly 086-0-22A) are available on the Internet and can be downloaded from the website. The forms can be found at the following website address:

<https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-ez>.

The forms are provided in Adobe® Acrobat® PDF and Word format. Users are able to download the files and print completed forms manually and mail them to FEMA.

FEMA Forms FF-206-FY-23-105 (formerly 086-0-26), FF-206-FY-23-106 (formerly 086-0-26A) and FF-206-FY-23-107 (formerly 086-0-26B) are available on the Internet and can be downloaded from the website. The forms can be found at the following website address:

<https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-1>.

The forms are provided in Adobe® Acrobat® PDF format. Users are able to download the files and print completed forms manually and mail them to FEMA. Due to the various documents required to support the request, the completed forms, along with the supporting documentation are mailed back to FEMA.

Additionally, respondents may use FEMA's Online LOMC tool to submit and track responses electronically as an alternative to filling out forms FF-206-FY-23-104 (formerly 086-0-22) (Page 1) and FF-206-FY-23-105 (formerly 086-0-26) and submitting to FEMA by mail. Additional forms and required supporting data must be uploaded via the Online LOMC tool. Respondents may access the Online LOMC tool at the following website address: <https://hazards.fema.gov/femaportal/onlinelomc/signin>.

Effective Flood Insurance Rate Maps (FIRM), Flood Boundary and Floodway Maps (FBFM), and Flood Insurance Study (FIS) reports that cover the area in which a particular property is located can be obtained from the Map Service Center (MSC) on the FEMA website at <https://msc.fema.gov/portal>. Those that do not have internet access can contact the Map Service Center at 1-(877) FEMA MAP (1-877-336-2627).

Requestors can check on the status of their Letter of Map Amendment (LOMA) request by visiting FEMA's Mapping Information Platform website at <https://hazards.fema.gov>.

Usability Testing has been conducted on this collection. As a result, a reduction of 79,491 burden hours has been recognized and included as an update to the collection.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There are no duplicative efforts. Detailed information on specific property locations within communities, nationwide, is not collected or maintained by FEMA. Each request is unique and requires information that is specific to that property.

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

This information collection will impact small entities; however, those entities may contact the FEMA Mapping and Insurance eXchange (FMIX) at 1-877-336-2627 and/or refer to available resources on FEMA.gov for assistance with application forms.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

If the collection of information were not conducted, it would deprive individuals of the right to provide scientific or technical data to correct flood insurance maps that may be in error. If this information were not collected, the majority of respondents to this collection would continue to pay flood insurance which may no longer be required if they were to get a determination showing that their property was no longer in a SFHA. If this were the case, local pressures would likely mount and cause a significant number of communities to reevaluate their decisions to continue their participation in the NFIP. Without this collection of information there would also be increased costs for mapping since these requests would require physical revisions to the Flood Insurance Rate Maps to map individual properties outside of the SFHA as opposed to amending or revising the maps by letter only through this collection of information.

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 April 25, 2023, at 88 FR 25004. Two public comments were received, but neither are germane to this

collection because the comments did not discuss these instruments or the information they collect.

Public Comment FEMA-2023-0011-0002: “I recommend we stop using tax payer dollars to insure people who choose to live in wildland fire and flood zones. We should use accurate and scientifically based maps to define wildland fire and flood zones. Lastly, developers and realtors should be prevented from building and selling structures in wildland fire and flood zones. The current policies are a waster of resources and tax payer dollars mostly to support a corrupt industry and wealthy people.” (*Anonymous*)

FEMA Response:

The National Flood Insurance Act of 1968 allows FEMA to make flood insurance available through the NFIP only in communities that have adopted adequate floodplain management regulations for its SFHAs, otherwise known as high-risk flood areas. The intent is to reduce future flood risks, with the Federal Government making flood insurance available to property owners and renters in that community in return.

Participating in the NFIP is on a community basis since individual residents cannot regulate or establish construction priorities for communities.

There are many reasons for communities to participate in the NFIP, including:

- To make the community more resilient in the event of flooding;
- To protect residents against the risk of financial uncertainty that flooding can bring if flood insurance is not available;
- To allow residents to purchase flood insurance, thereby transferring the financial risk of flooding in exchange for an annual premium; and/or
- To receive flood disaster assistance in a community with SFHAs, as federal agencies may not provide assistance unless the community participates in the program.

The NFIP is a voluntary program. In order to join, any interested community must complete and submit an application, adopt a resolution of intent to participate and cooperate with FEMA, and adopt and submit a floodplain management ordinance that meets or exceeds the minimum NFIP criteria. The floodplain management ordinance must also adopt any Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Map (FHBM) for the community.

Federal regulations in 44 CFR Subpart A, *Requirements for Flood Plain Management Regulations*, addresses floodplain management regulations and the minimum requirements.

Floodplain management regulations means zoning ordinances, subdivision regulations, health regulations, special purpose ordinances (such as a floodplain ordinance, grading ordinance, and erosion control ordinance) and other applications of police power. The term describes such state or local regulations, in any combination thereof, which provide standards for the purpose of flood damage prevention and reduction. 44 CFR 60.3(a) – (f) details the minimum NFIP criteria.

Public Comment FEMA-2023-0011-0003: The American Public Works Association provided a letter discussing multiple points, including the need for a map creation process that includes all stakeholders, the relocation of people and livelihoods from flood plains to reduce potential liabilities, and potential flood insurance products from the private sector.

FEMA Response:

In order to improve the overall effectiveness of the NFIP, the development of standards and guidelines should be established through a process involving stakeholders at all levels of government, private, and non-profit sectors when creating maps

FEMA works with states, communities and other partners to ensure local knowledge, areas of concern, and data sources are integrated into mapping studies and into current, effective flood maps. At any time, community officials can submit scientific or technical data to FEMA to support a local flood map revision. Flood map changes could be driven by things like construction projects, surface erosion, or the impact of natural events that affect the community's floodplains.

FEMA is required to re-evaluate all flood hazard studies at least once every five years, but that doesn't always mean that maps are updated every five years. When FEMA identifies which maps to update, it's a conversation with the state about their priorities and then with the community.

While FEMA has its requirements, they aren't just FEMA maps and communities can request changes to the maps at any time. Communities can provide technical data to us and FEMA will make sure it meets the right standards and incorporate it into the map.

FEMA recognizes that it can't monitor all the changes that happen, and FEMA shouldn't; the mapping process really needs to be a partnership between FEMA, the state, and the community and that means that everyone has a role to play to ensure that the maps reflect accurate flood risk.

If the desire is to further reduce potential liabilities in the flood plain by removing structures, the real factor is the relocation of people, their families, and their livelihoods.

FEMA encourages states, territories, and Federally recognized Tribes to prioritize the mitigation of high flood risk properties for funding to not only reduce flood risk and disaster suffering, but also help address affordability with flood insurance costs for economically disadvantaged communities. FEMA does not have any programs or policies on managed retreat. While we offer Hazard Mitigation Assistance (HMA) funds for property acquisitions (buyouts) and relocation projects, these decisions are initiated and managed locally.

Each year, flooding causes millions of dollars' worth of property damage. Property owners with repetitively flood damaged buildings struggle with the difficult decision of whether to return to the flood-prone area to repair and rebuild or participate in an acquisition/buyout or a relocation project. FEMA's property acquisition/buyout mitigation activity helps communities purchase flood-prone properties, remove the buildings and maintain the land as open space.

With increased public awareness, state and local officials can proactively pursue aggressive flood mitigation strategies, including acquisitions and relocations. To the extent that acquisitions and relocations are a priority of these entities, as well as individual homeowners who must voluntarily agree to the buyout, greater numbers of flood prone structures will be acquired or relocated.

FEMA's principles for emergency management assert that disasters are best when they're federally supported, state managed and locally executed. Together with Federal, state, Tribal, local and territorial agencies, we're strengthening and enhancing partnerships. We're ensuring our role supports decisions that need to happen at the state and local level.

Another consideration for FEMA is to consider there might be interest from the private sector in developing flood insurance products for low or minimal risk structures (outside of regulatory floodplains).

FEMA continuously works with partners to develop a more comprehensive picture of flood hazard and flood risk across the nation. We're encouraged to see third parties building on federal agency datasets and the information included in our flood maps to bring together new data and technology in order to deliver flood hazard information in a different and useful way.

A 30-day Federal Register Notice inviting public comments was published on July 31, 2023, at 88 FR 49484. The 30-Day public comment period is open until August 30, 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.**

In preparation of the forms and instructions, FEMA's MT-1 Processing Services Provider and Customer and Data Services contractor were consulted regarding changes to the forms and instructions. No major changes to the forms and instructions are being implemented.

- 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.**

By the nature of the information collection activity, itself, consultation with those from whom information is to be obtained is continuous. These consultations are conducted on a daily basis by FEMA's MT-1 Processing Services Provider. When requests are received from respondents (homeowners, surveyors, and engineers), comments are often included regarding the forms and instructions. Additionally, feedback and comments regarding the forms and data requirements are often received from respondents by FEMA's Customer and Data Services contractor. The majority of the comments involve the clarity of instructions.

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

There are no payments or gifts provided 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) was approved on December 30, 2014. While it has since expired, an updated PTA has been drafted.

The Privacy Impact Assessment (PIA) is covered under the DHS/FEMA/PIA-045 – FEMA Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems, approved by DHS on June 26, 2017. Additionally, the updated System of Records Notice (SORN) for this collection is DHS/FEMA-014 Hazard Mitigation Planning and Flood Mapping Products and Services Records System of Records which was published on January 112021, 86 FR 1988.

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.**

FEMA Form FF-206-FY-23-104 (formerly 086-0-22), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (English): The responses consist of one form that will require both the homeowner to complete a part and a surveyor or engineer to complete the remainder. These respondents will complete 1 response(s) per year.

It is estimated that 8,491 homeowners will complete the form and that each response will require 1.0333 hours (or 1 hour and 2 minutes), therefore 8,491 responses times 1.0333 burden hours equals 8,774 total annual burden hours for homeowners ($8,491 \times 1.0333 = 8,774$).

It is estimated that 5,490 surveyors will complete the form and that each response will require 1.1667 hours (or 1 hour and 10 minutes), therefore 5,490 responses times 1.1667 burden hours equals 6,405 total annual burden hours surveyors ($5,490 \times 1.1667 = 6,405$).

It is estimated that 2,353 engineers will complete the form and that each response will require 1.1667 hours (or 1 hour and 10 minutes), therefore 2,353 responses times 1.1667 burden hours equals 2,745 total annual burden hours engineers ($2,353 \times 1.1667 = 2,745$).

The total annual burden (in hours) for the three types of respondents using the English version of the Application Form is 17,924 ($8,774 + 6,405 + 2,745 = 17,924$).

FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A), Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (Spanish): The responses consist of one form that will require both the homeowner to complete a part and a surveyor or engineer to complete the remainder. These respondents will complete 1 response(s) per year.

It is estimated that 1,979 homeowners will complete the form and that each response will require 1.0333 hours (or 1 hour and 2 minutes), therefore 1,979 responses times 1.0333 burden hours equals 2,045 total annual burden hours for homeowners ($1,979 \times 1.0333 = 2,045$).

It is estimated that 1,279 surveyors will complete the form and that each response will require 1.1667 hours (or 1 hour and 10 minutes), therefore 1,279 responses times 1.1667 burden hours equals 1,492 total annual burden hours surveyors ($1,279 \times 1.1667 = 1,492$).

It is estimated that 548 engineers will complete the form and that each response will require 1.1667 hours (or 1 hour and 10 minutes), therefore 548 responses times 1.1667 burden hours equals 639 total annual burden hours engineers ($548 \times 1.1667 = 639$).

The total annual burden (in hours) for the three types of respondents using the Spanish version of the Application Form is 4,176 ($2,045 + 1,492 + 639 = 4,176$).

FEMA Form FF-206-FY-23-105 (formerly 086-0-26), Property Information Form: is estimated to have 15,982 respondents times 1 response(s) per year for 15,982 total annual responses. It is estimated that each response will require 1.4667 burden hours (or 1 hour and 28 minutes) to complete, therefore 15,982 responses times 1.4667 hours equals 23,441 total annual burden hours ($15,982 \times 1.4667 = 23,441$).

FEMA Form FF-206-FY-23-106 (formerly 086-0-26A), Elevation Form: is estimated to have 14,761 surveyors or engineers (respondents) complete 1 response(s) per year for 14,761 total annual responses.

It is estimated that 10,333 surveyors will complete the form and that each response will require 1.2167 hours (or 1 hour and 13 minutes), therefore 10,333 responses times 1.2167 burden hours equals 12,572 total annual burden hours surveyors ($10,333 \times 1.2167 = 12,572$).

It is estimated that 4,428 engineers will complete the form and that each response will require 1.2167 hours (or 1 hour and 13 minutes), therefore 4,428 responses times 1.2167 burden hours equals 5,388 total annual burden hours engineers ($4,428 \times 1.2167 = 5,388$).

The total annual burden (in hours) for the two types of respondents using the Elevation Form is 17,960 ($12,572 + 5,388 = 17,960$).

FEMA Form FF-206-FY-23-107 (formerly 086-0-26B), Community Acknowledgment Form: is estimated to have 4,052 respondents times 1 response(s) per year for 4,052 total annual responses. It is estimated that each response will require 1.3833 burden hours (or 1 hour and 23 minutes) to complete, therefore 4,052 responses times 1.3833 hours equals 5,605 total annual burden hours ($4,052 \times 1.3833 = 5,605$).

The **Online LOMC** tool is estimated to have 12,766 respondents times 1 response(s) per year for 12,766 total annual responses. Each respondent will use the tool once which will require 0.1667 hours (or 10 minutes) to complete the user registration, therefore 12,766 responses times 0.1667 hours equals 2,128 total annual burden hours ($12,766 \times 0.1667 \text{ hours} = 2,128$).

After conducting usability testing there is a 79,491 reduction in burden hours on the OMB inventory.

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

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

- c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.61 for State and local government employees) and this total should be entered in the cell for "Avg. Hourly Wage Rate." The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

| Estimated Annualized Burden Hours and Costs | | | | | | | | |
|---|--|--------------------|---------------------------------|------------------------|-------------------------------------|--------------------------------|-----------------------|------------------------------|
| Type of Respondent | Form Name / Form No. | No. of Respondents | No. of Responses per Respondent | Total No. of Responses | Avg. Burden per Response (in hours) | Total Annual Burden (in hours) | Avg. Hourly Wage Rate | Total Annual Respondent Cost |
| Individuals and Households (Homeowners) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) | 8,491 | 1 | 8,491 | 1.0333 | 8,774 | \$43.15 | \$378,598 |
| Individuals and Households (Homeowners) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) | 1,979 | 1 | 1,979 | 1.0333 | 2,045 | \$43.15 | \$88,242 |
| Private Sector (Surveyors) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) | 5,490 | 1 | 5,490 | 1.1667 | 6,405 | \$49.53 | \$317,240 |
| Private Sector (Surveyors) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) | 1,279 | 1 | 1,279 | 1.1667 | 1,492 | \$49.53 | \$73,899 |
| Private Sector (Engineers) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) | 2,353 | 1 | 2,353 | 1.1667 | 2,745 | \$67.89 | \$186,358 |
| Private Sector (Engineers) | Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) | 548 | 1 | 548 | 1.1667 | 639 | \$67.89 | \$43,382 |
| Individuals and Households (Homeowners) | Property Information Form / FEMA Form FF-206-FY-23-105 (formerly 086-0-26) | 15,982 | 1 | 15,982 | 1.4667 | 23,441 | \$43.15 | \$1,011,479 |
| Private Sector (Surveyors) | Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) | 10,333 | 1 | 10,333 | 1.2167 | 12,572 | \$49.53 | \$622,691 |
| Private Sector (Engineers) | Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) | 4,428 | 1 | 4,428 | 1.2167 | 5,388 | \$67.89 | \$365,791 |
| State, Local, or Tribal Governments (Community Officials) | Community Acknowledgment Form / FEMA Form FF-206-FY-23-107 (formerly 086-0-26B) | 4,052 | 1 | 4,052 | 1.3833 | 5,605 | \$101.56 | \$569,244 |
| Individuals and Households (Homeowners) | Online LOMC | 12,766 | 1 | 12,766 | 0.1667 | 2,128 | \$43.15 | \$91,823 |
| Total | | 67,701 | | 67,701 | | 71,234 | | 3,748,747 |

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.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) is \$29.76.² Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$43.15. Therefore, the burden hour cost is estimated to be \$1,570,142 annually ($\$43.15 \times 36,388 \text{ hours} = \$1,570,142$).

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for Surveyors (SOC 17-1022) is \$34.16.³ Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$49.53. Therefore, the burden hour cost is estimated to be \$1,013,830 annually ($\$49.53 \times 20,469 \text{ hours} = \$1,013,830$).

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for Civil Engineers (SOC 17-2051) is to be \$46.82.⁴ Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$67.89. Therefore, the burden hour cost is estimated to be \$595,531 annually ($\$67.89 \times 8,772 \text{ hours} = \$595,531$).

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for Management Occupations (SOC 11-0000) to be \$63.08.⁵ Including the wage rate multiplier of 1.61,⁶ the fully-loaded wage rate is \$101.56. Therefore, the burden hour cost is estimated to be \$569,244 annually ($\$101.56 \times 5,605 \text{ hours} = \$569,244$).

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03172023.pdf. Accessed March 20, 2023. The wage multiplier is calculated by dividing total compensation for all workers of \$42.48 by wages and salaries for all workers of \$29.32 per hour yielding a benefits multiplier of approximately 1.45.

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2022/may/oes_nat.htm

³ Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2022/may/oes_nat.htm

⁴ 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/2022/may/oes_nat.htm

⁵ 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/2022/may/oes_nat.htm

⁶ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at 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

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.**

| Annual Cost Burden to Respondents or Recordkeepers | | | | |
|--|--|--|--|---|
| Data Collection Activity/Instrument | *Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures) | *Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.) | Annual Non-Labor Cost (expenditures on training, travel, and other resources) | Total Annual Cost to Respondents |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) | | \$3,921,500 | | \$3,921,500 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) | | \$913,500 | | \$913,500 |
| Property Information Form / FEMA Form FF-206-FY-23-105 (formerly 086-0-26) | | \$7,380,500 | | \$7,380,500 |
| Total | \$0 | \$12,215,500 | \$0 | \$12,215,500 |

The property owner is required to hire a surveyor or engineer at an average cost of \$500 to provide certified elevation data. The total cost for this is: FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (7,843 x \$500 = \$3,921,500); FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (1,827

x \$500 = \$913,500); and FEMA Form FF-206-FY-23-105 (formerly 086-0-26) (14,761 x \$500 = \$7,380,500) added together equals \$12,215,500.

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: | |
| Contractor cost to handle incoming calls related to application process: 14,807 inquiries with a 6-minute average per inquiry at \$60.00 per hour = 14,807 x 0.1000 burden hours (or 6 minutes) x \$60.00 = \$88,842. | \$88,842 |
| Staff Salaries: ¹ | |
| 1 GS 12 Step 5 (\$106,759) at 15%-time x 1.45 loaded wage rate ² = \$23,220 | \$23,220 |
| 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 |
| Postage (1,064 MT-EZ and MT-1 Forms annually x \$0.63 per form = \$670) | \$670 |
| Total | \$112,732 |
| ¹ Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf . Accessed April 13, 2022. | |
| ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate. | |

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

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

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

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

| Itemized Changes in Annual Burden Hours | | | | | | |
|--|---|----------------------|---------------|---|------------------|----------------|
| Data Collection Activity/Instrument | Program Change (hours currently on OMB inventory) | Program Change (new) | Difference | Adjustment (hours currently on OMB inventory) | Adjustment (new) | Difference |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Homeowners) | | | | 24,794 | 8,774 | -16,020 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly -0-22A) (Homeowners) | | | | 3,542 | 2,045 | -1,497 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Surveyors) | | | | 17,357 | 6,405 | -10,952 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Surveyors) | | | | 2,479 | 1,492 | -987 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Engineers) | | | | 7,438 | 2,745 | -4,693 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Engineers) | | | | 1,063 | 639 | -424 |
| Property Information Form / FEMA Form FF-206-FY-23-105 (formerly 086-0-26) (Homeowners) | | | | 48,804 | 23,441 | -25,363 |
| Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) (Surveyors) | | | | 26,199 | 12,572 | -13,627 |
| Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) (Engineers) | | | | 11,228 | 5,388 | -5,840 |
| Community Acknowledgment Form / FEMA Form FF-206-FY-23-107 (formerly 086-0-26B) (Community Officials) | | | | 5,156 | 5,605 | 449 |
| Online LOMC (Homeowners) | | | | 1,272 | 2,128 | 856 |
| Online LOMA/LOMR-F Tutorial (Homeowners) | 1,393 | 0 | -1,393 | | | |
| Total | 1,393 | 0 | -1,393 | 149,332 | 71,234 | -78,098 |

Explain: The decrease in annual burden hours is the result of a decrease in the number of applications submitted and the removal of redundant questions. There is a decrease of 79,491 (-78,098 + -1,393) burden hours. Estimated burden hours are not included for the Online LOMA/LOMR-F Tutorial due to the tutorial no longer being available as a resource for homeowners to use as an option to complete the application forms.

| 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 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Homeowners) | | | | \$863,823 | \$378,598 | -\$485,225 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Homeowners) | | | | \$123,403 | \$88,242 | -\$35,161 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Surveyors) | | | | \$773,428 | \$317,240 | -\$456,188 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Surveyors) | | | | \$110,464 | \$73,899 | -\$36,565 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104 (formerly 086-0-22) (Engineers) | | | | \$468,445 | \$186,358 | -\$282,087 |
| Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps / FEMA Form FF-206-FY-23-104-A (formerly 086-0-22A) (Engineers) | | | | \$66,948 | \$43,382 | -\$23,566 |
| Property Information Form / FEMA Form FF-206-FY-23-105 (formerly 086-0-26) (Homeowners) | | | | \$1,700,331 | \$1,011,479 | -\$688,852 |
| Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) (Surveyors) | | | | \$1,167,427 | \$622,691 | -\$544,736 |
| Elevation Form / FEMA Form FF-206-FY-23-106 (formerly 086-0-26A) (Engineers) | | | | \$707,139 | \$365,791 | -\$341,348 |
| Community Acknowledgment Form / FEMA Form FF-206-FY-23-107 (formerly 086-0-26B) (Community Officials) | | | | \$427,123 | \$569,244 | \$142,121 |
| Online LOMC (Homeowners) | | | | \$44,316 | \$91,823 | \$47,507 |
| Online LOMA/LOMR-F Tutorial (Homeowners) | \$48,532 | \$0 | -\$48,532 | | | \$0 |
| Total | \$48,532 | \$0 | -\$48,532 | \$6,452,847 | \$3,748,747 | -\$2,704,100 |

Explain: The decrease in cost burden of \$2,752,632 (-\$2,704,100 + -\$48,532) is the result of a decrease in the number of applications submitted and the removal of the Online LOMA/LOMR-F Tutorial.

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

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

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

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

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

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