

August 29, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0113

Title: FEMA Preparedness Grants: Tribal Homeland Security Grant Program (THSGP)

Form Number(s):

- 1) FEMA Form FF-207-FY-22-118 (formerly 089-22), Tribal Homeland Security Grant Program (THSGP) Investment Justification Template; and**
- 2) No Form, Copy of Application provided to State prior to submission.**

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’s (FEMA’s) Tribal Homeland Security Grant Program (THSGP) is authorized by Section 2005 of the Homeland Security Act of

2002 (codified as amended at 6 U.S.C. § 606). THSGP provides supplemental funding to eligible Tribes to help strengthen the Nation against risks associated with potential terrorist attacks. THSGP supports building and sustaining capabilities through planning, equipment, training, and exercise activities. The Fiscal Year (FY) 2022 THSGP plays an important role in the implementation of Presidential Policy Directive 8 (PPD-8) by supporting the development and sustainment of core capabilities. Core capabilities are essential for the execution of each of the five mission areas outlined in the *National Preparedness Goal* (the Goal). The development and sustainment of these core capabilities are not exclusive to any single level of government or organization, but rather require the combined effort of the whole community. The FY 2022 THSGP supports all core capabilities in the Prevention, Protection, Mitigation, Response, and Recovery mission areas based on allowable costs. Files and information on PPD-8 can be found at <http://www.fema.gov/ppd8>.

This law empowers the FEMA Administrator to make grant awards directly to eligible Tribes and requires the Administrator to accept appropriate application data submitted by eligible Tribes, including:

- the purpose for which the Tribe seeks grant funds and the reasons why the Tribe needs the grant to meet its target capabilities;
- a description of how the Tribe plans to implement the grant funds to fill gaps and address needs;
- an indication of the National Preparedness Goal core capabilities that will be supported;
- an indication of the mission areas that will be supported;
- a budget showing how the tribe intends to expend the grant funds; and
- a directly eligible Tribe must provide a copy of its application to each State within which any part of the Tribe is located for review before the tribe submits such application to the Department.

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 Form FF-207-FY-22-118 (formerly 089-22), Tribal Homeland Security Grant Program (THSGP) Investment Justification Template – Submitted with the application, this document provides narrative detail on proposed activities (Investments) that will be accomplished with grant funds. Investment Justifications (IJ) must demonstrate how proposed projects address gaps and deficiencies in current programs

and capabilities or the Tribe's ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the IJ is collected to assist decision-making at all levels, although it is primarily used by individual application reviewers through a national review process. This process results in the scoring of eligible tribal applications based on the anticipated effectiveness of proposed investments and how well the proposed investments address the identified need(s) or capability shortfall(s). The national review is comprised of subject matter experts familiar with tribal issues. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the respective grant program.

No Form, Copy of Application provided to State prior to submission – Eligible Tribes are required to submit a copy of their application for THSGP funds to each state within which any part of the Tribe is located for review before the Tribe submits it to <http://www.grants.gov>. This coordination ensures consistency with state plans. This information is used by FEMA to verify applicants' compliance with all administrative and eligibility criteria identified in the THSGP grant guidance.

FEMA Form FF-207-FY-23-107, Biannual Strategy Implementation Report (BSIR) – The BSIR serves as the reporting format for the Semiannual Progress Report. The recipient is responsible for providing FEMA with BSIR reports to account for grant funding. The BSIRs are due within 30 days of the end of the reporting periods (June 30 and December 31), for the life of the award. A close-out BSIR is due 120 days after the end date of the award period of performance. The submission of a completed BSIR satisfies programmatic reporting requirements as outlined in the grant Notice of Funding Opportunity to ensure legal and prudent use of Federal funds. All funds provided to the Tribe must be accounted for and linked to one or more projects. This, in turn, must support specific goals and objectives identified in the Investment Justification, as detailed in the special conditions of the grant award. The BSIR data is submitted electronically in a FEMA-sponsored system, the Grants Reporting Tool (GRT). This collection activity is approved under OMB Control Number 1660-0156, which expires on August 31, 2023.

FEMA Form FF-207-FY-21-100 (formerly 024-0-1), Environmental and Historic Preservation (EHP) Environmental Screening Form (ESF) - The EHP ESF is a paper form used by FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to GPD for an EHP regulatory compliance review. This collection activity is approved under OMB Control Number 1660-0115, which expires on March 31, 2026.

FEMA Form FF-008-FY-21-102 (formerly 091-0-1), Homeland Security Exercise and Evaluation Program (HSEEP) After-Action Report (AAR) and Improvement Plan (IP) – The information contained within this report identifies areas where expectations for preparedness to respond to an emergency situation are met as well as areas where improvement is required. This information is used by the Secretary of Homeland Security and shared with heads of other Federal Departments, as well as FEMA’s National Preparedness Directorate (NPD), to allow for planning methods to increase levels of preparedness, establishing mechanisms for improved delivery of Federal preparedness assistance to state and local governments, and outlining actions to strengthen preparedness capabilities of Federal, state and local entities.

This initiative is managed by NPD. Grant recipients must report on scheduled exercises and ensure that an HSEEP AAR and IP are prepared for each exercise conducted with FEMA support. This information must be submitted to FEMA within 60 calendar days following completion of an exercise. There are two separate templates that support this data collection effort: (1) **Discussion-Based Exercise template**; 2) **Operations-Based Exercise template**. This collection activity is approved under OMB Control Number 1660-0118, which is currently under review with OMB for a revision.

FEMA Form FF-008-FY-21-106 (formerly 008-0-19), Threat and Hazard Identification and Risk Assessment (THIRA) – State Preparedness Report (SPR) Unified Reporting Tool – States and territories must submit a THIRA every year they receive THSGP grant funding. Urban Areas are required to complete one (1) THIRA for each grant award. This submission is valid for the entire period of performance of the individual grant award. If an Urban Area does not receive additional fiscal year grants, the award year THIRA submission covers the requirement for the entire period of performance. The THIRA is a tool developed and managed by Protection and National Preparedness. Additionally, recipients shall develop and maintain, jurisdiction-wide, all threats and hazards Emergency Operations Plans (EOPs) consistent with Comprehensive Preparedness Guide (CPG) 101 v.2. Recipients must update their EOP at least once every two years in the SPR. This collection activity is approved under OMB Control Number 1660-0131, which expires on April 30, 2026.

Information from the following Standard Forms (SF) is collected within the subgrant application. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal government.

SF-424, Application for Federal Assistance is used by applicants as a required face-sheet for applications submitted for assistance. It is approved under OMB No. 4040-0004.

SF-424A, Budget Information for Non-Construction Programs, is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is not construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0006.

SF-424B, Assurances for Non-Construction Programs is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is not construction. It is approved for use under OMB No.4040-0007.

SF-424C, Budget Information for Construction Programs is a standard form used by applicants to submit budget data when applying for a grant or cooperative agreement where the major purpose is construction. The information can include budget narrative that is used to relate items to program activities and to justify and explain budget items. It is approved for use under OMB No. 4040-0008.

SF-424D, Assurances for Construction Programs is a standard form used by applicants to certify compliance with important Federal requirements when applying for a grant or cooperative agreement where the major purpose is construction. It is approved for use under OMB No. 4040-0009.

SF-LLL, Disclosure of Lobbying Activities, is a standard form used by applicants as a required agreement to comply with all requirements of the awarding agency. It is approved for use under OMB No. 4040-0013.

SF-1199A, Direct Deposit Sign-Up Form is a standard form used by recipients to receive direct deposit payments from a Federal Agency. It is approved for use under OMB No. 1510-0007.

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 posts most of its grant application packages on www.Grants.gov. This allows applicants to download the application package and complete it offline. After applicants have completed all required forms, they can electronically submit the package to FEMA

through www.Grants.gov. Applicants must create their IJs in fillable pdf and upload the information as an attachment to the THSGP application, which is electronically submitted via www.Grants.gov. The copy of the application provided to the State prior to submission is transmitted as an attachment in www.Grants.gov.

Additionally, grant applicants must use the FEMA-sponsored GRT to submit data for the IJs and the BSIR to report on funds awarded. The GRT provides recipients the ability to electronically create and submit these data collection requirements. The GRT homepage is (<https://www.reporting.odp.dhs.gov/>). The GRT is used to capture FEMA's annual award and biannual grant reporting data. The GRT was designed to help the recipients meet all reporting requirements identified by FEMA's Grant Programs Directorate (GPD) as well as to streamline the reporting process for recipients. This system was developed in response to customer feedback concerning difficulties using other means of providing progress report data. The Department of Homeland Security (DHS) developed the GRT as a tool to streamline the reporting process for recipients. The GRT is user-friendly with a web-based format, thus reducing burden on the recipients by providing increased flexibility yet ensuring adherence to Agency guidelines. This collection activity is approved under OMB Control Number 1660-0156, which expires on August 31, 2023.

Usability Testing has been conducted on this collection. As result, there is no change to this collection at this time.

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

This information is not collected in any form, and therefore is not duplicated elsewhere.

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

Yes, the program provides assistance to small governments (Tribal Governments) submitting plans/applications. Such assistance takes the form of:

- Dedicated email address that is monitored (fema-thsgp@fema.dhs.gov) where responders to the collection can seek assistance with completing the collection
- FEMA provides several webinar opportunities prior to the collection deadline where responders are provided new and updated information regarding the collection
- Responders are provided several points-of-contact where they can seek assistance addressing various elements of the collection

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 FEMA could not request information through this collection, the Agency would be unable to fulfill statutory requirements to carry out the THSGP. For example, the statutory authority for THSGP specifically outlines applicant eligibility and use of funds. This collection ensures that Federal funds are distributed to the entities intended to receive and expend such funds according to statute. Additionally, if FEMA could not request and obtain this information, FEMA could not exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill monitoring requirements.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

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

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.

Generally, records must be retained for at least three years after the final expenditure report is submitted. The only exceptions are the following:

- (a) If any litigation, claim, or audit is started before the expiration of the three-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
 - (b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
 - (c) Records for real property and equipment acquired with Federal funds must be retained for three years after final disposition.
 - (d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the three-year retention requirement is not applicable to the non-Federal entity.
 - (e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
 - (f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - (1) *If submitted for negotiation.* If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the pass-through entity) to form the basis for negotiation of the rate, then the three-year retention period for its supporting records starts from the date of such submission.
 - (2) *If not submitted for negotiation.* If the proposal, plan, or other computation is not required to be submitted to the Federal Government (or to the pass-through entity) for negotiation purposes, then the three-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.
- (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 May 24, 2023, at 88 FR 33626. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August 29, 2023, at 88 FR 59530. The public comment period is open until September 28, 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 meets with the National Governors Association (NGA), the National Emergency Management Association (NEMA), and the International Association of Emergency Managers (IAEM) national associations that represent these entities, as well as individual recipients, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. Throughout the grant lifecycle of past years, FEMA met and consulted directly with grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements.

As a result of these consultations, FEMA took the following measures to improve the THSGP Investment Justification template. First, the Introduction page was expanded to provide additional instructions on how to complete the form, application submission instructions and the self-certification requirement. Second, a five-point bonus section was added to the Investment Justification template to assist tribes who have not received THSGP funding.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA consults on a regular basis with Federal, state, local, and Tribal stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most states are very familiar and comfortable with the grant administrative and financial reporting data elements that FEMA uses. Reporting requirement tools were streamlined to reduce the number of forms needed to meet the requirements.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on August 5, 2022

The THSGP Investment Justification, FEMA Form FF-207-FY-22-118 (formerly 089-22) is a privacy sensitive collection requiring Privacy Impact Assessment (PIA) coverage. This form is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015.

No Privacy Act Statement nor SORN coverage is required for the form.

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

There are no questions of a sensitive nature.

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.

The THSGP is an existing grant program that uses the forms outlined in this collection. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The burden estimated to collect the necessary information has been estimated to be 18,010 total annual burden hours.

Forms completed by States, Territories, and Tribal Governments:

FEMA Form FF-207-FY-22-118 (formerly 089-22), Tribal Homeland Security Grant Program (THSGP) Investment Justification Template – is estimated to have 60 respondents times one response per year for 60 total annual responses ($60 \times 1 = 60$). It is estimated that each response will require 300 hours to complete, therefore 60 responses times 300 hours equals 18,000 total annual burden hours ($60 \times 300 = 18,000$).

Copy of Application / No Form– is estimated to have 60 respondents times one response per year for 60 total annual responses ($60 \times 1 = 60$). It is estimated that each response will require 0.1667 hours to complete, therefore 60 responses times 0.1667 hours equals 10 total annual burden hours ($60 \times 0.1667 = 10$).

After conducting usability testing there is no change to the burden hours as listed in 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 responses to 12a above and 12c below.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.61 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 Number	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 or Tribal Government	Tribal Homeland Security Grant Program (THSGP) Investment Justification Template / FEMA Form FF-207-FY-22-118 (formerly 089-22)	60	1	60	300	18,000	\$53.44	\$961,920

State, Local or Tribal Government	Copy of Application provided to State prior to submission / No Form	60	1	60	0.1667	10	\$53.44	\$534
Total		120		120		18,010		\$962,454

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

Hourly wage data for First-line Supervisors of Office and Administrative Support Workers occupational series is used to estimate burden costs for completing and submitting the FEMA grant information to FEMA. According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2022 Occupational Employment and Wage Estimates wage rate for Local Government First-line Supervisors of Office and Administrative Support Workers (SOC 43-1011) is \$33.19. Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$53.44 (= \$33.19 × 1.61) per hour. Therefore, the annual burden hour cost is estimated to be \$962,454 annually (\$53.44 × 18,010 hours).

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 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.

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/oes431011.htm>. Accessed May 3, 2023.

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

Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate (\$)	Total Annual Respondent Cost (\$)
State, Local or Tribal Government	Application for Federal Assistance / SF 424 (OMB No. 4040-0004)	60	1	60	0.75	45	\$53.44	\$2,405
State, Local or Tribal Government	Budget Information - Non-Construction Programs / SF 424A (OMB No. 4040-0006)	60	1	60	3	180	\$53.44	\$9,619
State, Local or Tribal Government	Assurances - Non-Construction Programs / SF 424B (OMB No. 4040-0007)	60	1	60	0.25	15	\$53.44	\$802
State, Local or Tribal Government	Budget Information - Construction Programs / SF 424C (OMB No. 4040-0008)	60	1	60	3	180	\$53.44	\$9,619
State, Local or Tribal Government	Assurances - Construction Programs / SF 424D (OMB No. 4040-0009)	60	1	60	0.25	15	\$53.44	\$802
State, Local or Tribal Government	Disclosure of Lobbying Activities / SF LLL (OMB No. 4040-0013)	60	1	60	0.1667	10	\$53.44	\$534
State, Local or Tribal Government	Direct Deposit Sign-Up Form / SF 1199A (OMB No. 1510-0007)	60	1	60	0.1667	10	\$53.44	\$534
Total		420		420		455		\$24,315

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 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 information 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 information 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 There are 2 contracts that support this effort: The Technical Assistance and Program Development Contract and the Grant Operations Support Contract. These contracts support the development of the programs and provide guidance/assistance to recipients, collect and review information, and the cost for these contracts are: Technical Assistance and Program Development: \$119,192 Grant Operations Support: \$86,880 [\$119,192 + \$86,880 = \$206,072]	\$206,072
Staff Salaries* 15 GS-13, Step 5 employees spending approximately 10% of time annually for this administrative and financial data collection [15 × \$126,949 × 0.10 × 1.45 ¹ = \$276,114]	\$276,114
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments × postage]	
Other	
Total	\$482,186
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 May 2, 2023. Salary includes a 1.45 multiplier to reflect the fully-loaded wage rate. Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2023.” Available at https://www.bls.gov/news.release/pdf/ecec.pdf . Accessed on May 2, 2023. The wage multiplier for not-for-profit institutions and individuals and households 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.	

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

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

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

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

Itemized Changes in Annual Burden Hours

Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Tribal Homeland Security Grant Program (THSGP) Investment Justification Template / FEMA Form FF-207-FY-22-118 (formerly 089-22)						
Copy of Application provided to State prior to submission / No Form						
Total						

Explain: There are no changes to the annual hour burden previously reported and there has been no change to the information being collected.

Itemized Changes in Annual Cost						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
Tribal Homeland Security Grant Program (THSGP) Investment Justification Template / FEMA Form FF-207-FY-22-118 (formerly 089-22)				\$909,900	\$961,920	\$52,020
Copy of Application provided to State prior to submission / No Form				\$506	\$534	\$28
Total				\$910,406	\$962,454	\$52,048

Explain: The wage rate for First-line Supervisors of Office and Administrative Support Workers has increased since the previous review. This change has led to a burden cost increase of \$52,048 (= \$962,454 - \$910,406).

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 statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.