

October 17, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0022

Title: Community Rating System (CRS) Program – Application Letter and CRS Quick Check, Community Annual Recertification, Environmental and Historic Preservation Certifications, and NFIP Repetitive Loss Update Form

Form Number(s):

- 1) FEMA Form FF-206-FY-23-100 (formerly 086-0-35), Application Letter and CRS Quick Check;**
- 2) FEMA Form FF-206-FY-23-101 (formerly 086-0-35A), Community Annual Recertification;**
- 3) FEMA Form FF-206-FY-23-102 (formerly 086-0-35B), Environmental and Historic Preservation Certifications; and**
- 4) FEMA Form FF-206-FY-23-103 (formerly 086-0-35C), NFIP Repetitive Loss Update 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) promotes and implements sound local floodplain management. Communities must adopt minimum floodplain management standards to participate in the NFIP and receive the benefits of flood insurance. The Community Rating System (CRS), codified by the National Flood Insurance Act of 1968, as amended (42 U.S.C. § 4022), was designed by the Federal Emergency Management Agency (FEMA) to encourage communities to undertake activities that will mitigate flooding and flood damage beyond the minimum standards for NFIP participation. Respondents (communities) select activities to apply for and receive credit using the Application Letter and Quick Check. The Community Certifications and the NFIP Repetitive Loss Updates document these activities so that proper credit is applied for each. Detailed explanations of the program and its activities are available in reference documents. Communities that receive these credits become eligible for flood insurance premium discounts.

- 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-206-FY-23-100 (formerly 086-0-35), Community Rating System (CRS) Application Letter and Quick Check and Documentation: Communities submit a CRS Application Letter of Interest and supporting documentation with a Quick Check to apply for activity points leading up to a CRS rating and commensurate flood insurance premium discounts. To complete the application process, communities are interviewed about their floodplain management activities and submit the completed Letter of Interest and supporting documentation for review to FEMA. The floodplain management and insurance activities available that can be undertaken to reduce flood losses are described in the CRS Coordinator's Manual¹ the primary reference document for the CRS, plus the Addendum² to the CRS Coordinator's Manual. Approval of the application results in credits that can be applied to flood insurance rates. The instructions explaining how to apply to CRS, including the CRS Quick Check form, can be found at <https://www.CRSresources.org/200>.

FEMA Form FF-206-FY-23-101 (formerly 086-0-35A), Community Rating System Community Annual Recertifications: Each year a community must certify that it is continuing to perform the activities that are being credited by the CRS. It does this by certifying a summary of its activities. The summary of activities is provided to the community by FEMA for review

¹ https://www.fema.gov/sites/default/files/documents/fema_community-rating-system_coordinators-manual_2017.pdf

² https://www.fema.gov/sites/default/files/documents/fema_community-rating-system_coordinator-manual_addendum-2021.pdf

and certification by the community. Successful certifications allow for continued qualification for flood insurance credits.

FEMA Form FF-206-FY-23-102 (formerly 086-0-35B), Environmental and Historic Preservation Certifications: These certifications are completed and signed by community officials in CRS participating communities. These are required to raise awareness and understanding about various laws and regulations related to environmental protection and historic preservation. The information is not shared. It is used to reinforce the importance of community compliance with environmental and historic preservation laws.

The following documents provide instruction to the respondent as to how to best answer the questions: CRS Coordinator's Manual, Addendum to the CRS Coordinator's Manual, Elevation Certificate Checklist³, Outreach Projects for Credit under the Community Rating System⁴, Preparing a Flood Insurance Assessment for CRS Credit⁵, CRS Credit for Planning Committees⁶, How to Use a Grid Overlay⁷, Mitigation Planning and the Community Rating System Key Topics Bulletin⁸, Developing a Repetitive Loss Area Analysis⁹, Developing a Program for Public Information for CRS Credit¹⁰, Protecting Building Utilities from Flood Damage¹¹, Non-conversion Agreement for Certain Structures in the Floodplain¹², CRS Credit for Habitat Protection¹³, CRS Credit for Stormwater Management¹⁴, CRS Credit for Drainage System Maintenance¹⁵, Maps as Cornerstones of Flood Warning and Response¹⁶, Guidance on Dam Failure Inundation Mapping¹⁷, and Preparing a Substantial Damage Management Plan¹⁸.

FEMA Form FF-206-FY-23-103 (formerly 086-0-35C), NFIP Repetitive Loss Update Form: This form documents changes to any properties in the community that appear on the annual FEMA Repetitive Loss List. Changes to the Repetitive Loss List are reported and certified by a community official as part of FEMA Form FF-206-FY-23-101 (formerly 086-0-35A). The information is not shared. It is used to support efforts to mitigate property losses due to repeated flooding.

³ <https://crsresources.org/300-3/>

⁴ https://crsresources.org/files/300/outreach_projects_for_credit_under_the_crs_2017.pdf

⁵ https://crsresources.org/files/300/preparing_a_flood_insurance_assessment.pdf

⁶ https://crsresources.org/files/300/crs_credit_for_planning_committees_2017.pdf

⁷ https://crsresources.org/files/400/403_using_the_grid_overlay.pdf

⁸ https://www.fema.gov/sites/default/files/2020-06/fema-mitigation-planning-and-the-community-rating-system-key-topics-bulletin_10-1-2018.pdf

⁹ <https://crsresources.org/files/500/rlaa-guide-2017.pdf>

¹⁰ https://crsresources.org/files/300/developing_a_ppi_for_credit_under_the_crs.pdf

¹¹ https://www.fema.gov/sites/default/files/documents/fema_p-348_protecting_building_utility_systems_from_flood_damage.zip

¹² https://crsresources.org/files/400/430_example_nonconversion_agreements.doc

¹³ <https://crsresources.org/files/guides/crs-credit-for-habitat-protection.pdf>

¹⁴ https://crsresources.org/files/400/450_crs_credit_for_stormwater_management.pdf

¹⁵ <https://crsresources.org/files/500/model-540-drainage-2019.pdf>

¹⁶ https://crsresources.org/files/600/610_maps_as_cornerstone.pdf

¹⁷ https://crsresources.org/files/600/630_crs_handout_dam_failure_inundation_mapping.pdf

¹⁸ https://crsresources.org/files/500/developing_subst_damage_mgmt_plan.pdf

NOTE: The Non-conversion Agreement for Certain Structures in the Floodplain is only provided as a possible way for the community to make certain the property characteristics that are in place at the time of the CRS Application remain from that time forward.

FEMA Form FF-206-FY-22-153 (formerly 086-0-33), Elevation Certificate, is required for this collection and is approved separately under OMB Control Number 1660-0008.

- 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 instructions explaining how to apply to the CRS, and the Quick Check form can be found at <http://www.CRResources.org/200>. This process saves time for the local official. The approach allows a verbal submission that is entered into a database by a FEMA representative along with necessary supporting documentation. All responses may be provided electronically and through a document upload system for ease and document organization. The primary reference document, the *CRS Coordinator's Manual*, along with the *Addendum to the CRS Coordinator's Manual*, describes in detail the specific information gathered and allows for strict consistency in how the information is entered.

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 available through other sources and is not duplicated elsewhere. The detail required is specific to this program.

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

This information collection does not have an impact on small businesses or other small entities. As described in Question 3, the approach allows a verbal submission that is entered into a data base by a FEMA representative along with necessary supporting documentation.

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 community information were not provided through this application and verification process, FEMA would not be able to provide the flood insurance premium discount credits mandated by statute. Without these credits, communities would be adversely affected by higher flood insurance premiums.

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 May 31, 2023, at 88 FR 34873. Two public comments were received with one comment providing edits that FEMA has incorporated and one comment was not considered germane to this collection.

Comment 1 (FEMA-2023-0013-0002): The commentor stated that:

- 1) the authority citation for the information collection was incorrect, and rather than the citation being the National Flood Insurance Reform Act (NFIRA) of 1994 (P.L. 103-325, Sec. 541) the citation should be National Flood Insurance Act of 1968 § 1315(b) (42 U.S.C. § 4022(b)) on all forms in the information collection;

- 2) the information collection fails to implement the Department of Homeland Security's Office of the Inspector General (OIG) 2020 recommendation (OIG-20-68) to overhaul the NFIP Repetitive Loss Update Form and instructions (issues related to severe repetitive loss (SRL) properties were highlighted); and
- 3) the NFIP Repetitive Loss Update Form is improperly included in the CRS information collection and it should instead be used by all NFIP communities in alignment with 44 CFR 59.22(a)(9)(iii).

FEMA Response to Comment 1:

- 1) This comment is accepted. The forms will be updated to reference the National Flood Insurance Act of 1968, as amended (42 U.S.C. 4022(b))”.
- 2) FEMA will continue to take actions to address the recommendations made by the OIG in OIG-20-68 (see pages 20-22 of the report). As part of this effort, the CRS program will continue to require that all CRS participating communities submit NFIP Repetitive Loss Update Forms for all repetitive loss properties within the community.
- 3) The NFIP Repetitive Loss Update Form is required to be used by NFIP communities that participate in the CRS. The form may be used by NFIP communities that do not participate in the CRS at the community's discretion. FEMA's CRS program office will continue to maintain the form. 44 CFR 59.22(a)(9)(iii) does not require this form.

Comment 2 (FEMA-2023-0013-0003): The second comment was not germane.

A 30-day Federal Register Notice inviting public comments was published on October 17, 2023, at 88 FR 71584. The public comment period is open until November 16, 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.

The ongoing improvements to the CRS and its data collection instruments are the product of an inclusive process designed to generate as much input from stakeholders as possible and integrate their suggestions.

The Community Rating System Task Force is the interagency, multidisciplinary advisory body that has provided guidance to FEMA since the inception of the CRS. The CRS Task Force meets twice each year, and a portion of every meeting is devoted to garnering the input of state and local officials about improvements to the data collection and other aspects of the program. The CRS Task Force specifically invites comments and routinely collects letters from CRS participants.

FEMA issued a Request for Information on the National Flood Insurance Program's Community Rating System (86 FR 47128, August 23, 2021) to receive input from the public on the CRS. Over 300 public comments were submitted.

In addition, several other forums during the year allow for consultation with local government officials on the CRS application and field verification process. A national conference hosted by the Association of State Floodplain Managers occurs annually. Every year at that conference, a CRS Program Update workshop is held, which fosters an open discussion about the CRS with emphasis on suggestions for improvement. At the national conference there are abundant opportunities for informal discussions with local officials. Many state floodplain management associations conduct annual state-level forums in which CRS is highlighted, affording time for input.

The CRS hosts webinars throughout the year, facilitating exchange of information about the CRS and allowing for input to be collected from community representatives. For example, during 2018 the CRS held 20 webinars on a variety of CRS-related topics, with a total of about 1,000 participants.

In addition, there are 48 CRS Users Groups active today, encompassing over 900 individuals from CRS-participating communities throughout the nation. These groups have formed voluntarily to share their experiences in implementing the CRS program in their communities and their views are routinely received and incorporated into the program.

- 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.**

Continuous consultation with respondents is an integral part of CRS program. It includes reviews of feedback from communities through state workshops, professional forums, CRS Users Groups, and direct community contacts. CRS communities receive bi-monthly newsletters, e-mail, and phone contact for updated information on the program. Respondents are offered opportunities to provide feedback through the information provided in these outreach efforts. The CRS Task Force, a working group of individuals that provide input on CRS operations, includes representatives of four CRS participating communities. The views of these CRS community representatives are directly integrated with any changes to the CRS.

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

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

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

A Privacy Threshold Analysis (PTA) was approved by the Department of Homeland Security on May 8, 2023. Privacy Impact Assessment (PIA) coverage for this collection is provided by DHS/FEMA/PIA-011 – National Flood Insurance Program (NFIP). No System of Records Notice (SORN) coverage is required.

A Privacy Act statement is required and a notice was approved on May 8, 2023.

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-23-100 (formerly 086-0-35), Community Rating System Application Letter and Quick Check and Documentation, is estimated to have 350 respondents times one (1) response per year for 350 total annual responses (350 x 1 = 350). It is

estimated that each response will require 45 burden hours to complete, therefore 350 responses times 45 hours equals 15,750 total annual burden hours ($350 \times 45 = 15,750$).

Respondents are community engineers. Every CRS-participating community uses this form once every five years during the cycle verification of its program. Thus, every year about one-fifth of the 1,500 CRS communities uses the form, or 300 communities per year. Added to this is the number of new community applicants, who also use this form. The new applications have been averaging 50 per year. (300 plus 50 = 350 responses per year).

FEMA Form FF-206-FY-23-101 (formerly 086-0-35A), Community Rating System Community Annual Recertifications, is estimated to have 1,500 respondents times one (1) response per year for 1,500 total annual responses ($1,500 \times 1 = 1,500$). It is estimated that each response will require 23.5 burden hours (23 hours and 30 minutes) to complete, therefore 1,500 responses times 23.5 hours equals 35,250 total annual burden hours ($1,500 \times 23.5 = 35,250$).

Respondents are community engineers. There will be 1,500 responses every year because every participating CRS community uses this form once a year for its recertification process.

FEMA Form FF-206-FY-23-102 (formerly 086-0-35B), Environmental and Historic Preservation Certifications, is estimated to have 120 respondents times one (1) response per year for 120 total annual responses ($120 \times 1 = 120$). It is estimated that each response will require 1.6 burden hours to complete, therefore 120 responses times 1.6 hours (1 hour and 36 minutes) equals 192 total annual burden hours ($120 \times 1.6 = 192$).

Respondents are community engineers. This form is used only by the 600 communities who are receiving CRS credit for certain activities under the CRS. Each of those communities uses the form once every five years, so in any given year one-fifth of the 600 communities (120 communities) responds.

FEMA Form FF-206-FY-23-103 (formerly 086-0-35C), NFIP Repetitive Loss Update Form, is estimated to have 200 respondents times 11 responses per year for 2,200 total annual responses ($200 \times 11 = 2,200$). It is estimated that each response will require 0.5 burden hours (30 minutes) to complete, therefore 2,200 responses times 0.5 hours equals 1,100 total annual burden hours ($2,200 \times 0.5 = 1,100$).

Respondents are community engineers. This form is used only by those CRS communities that have updates to their list of properties that have experienced repetitive flood losses. A community uses one form for each property whose status needs updating. Communities have submitted an average of 11 forms (responses) each.

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 response for 12a above and 12c below.

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

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, or Tribal Government	Community Rating System Application Letter, Quick Check, & Documentation / FF-206-FY-23-100 (formerly 086-0-035)	350	1	350	45.00	15,750	\$79.82	\$1,257,165
State, Local, or Tribal Government	Community Rating System Annual Certification / FF-206-FY-23-101 (formerly 086-0-035A)	1,500	1	1,500	23.50	35,250	\$79.82	\$2,813,655
State, Local, or Tribal Government	Environmental and Historic Preservation Certifications / FF-206-FY-23-102 (formerly 086-0-035B)	120	1	120	1.60	192	\$79.82	\$15,325
State, Local, or Tribal Government	Repetitive Loss Update Form / FF-206-FY-23-103 (formerly 086-0-035C)	200	11	2,200	0.50	1,100	\$79.82	\$87,802
Total		2,170		4,170		52,292		\$4,173,947

Note: The "Avg. Hourly Wage Rate" for each respondent include a 1.61 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 1.61.¹⁹ 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 2022 Occupational Employment and Wage Estimate wage rate for [Civil Engineers \(SOC: 17-2051\) working in local government](#) is \$49.58 per hour.²⁰ Including the wage rate multiplier of 1.61, the fully loaded wage rate is \$79.82. Therefore, the burden hour cost is estimated to be \$4,173,947 annually (\$79.82 x 52,292 = \$4,173,947).

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

¹⁹ 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.

²⁰ 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/oes172051.htm>

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:

Annual Cost Burden to Respondents or Record Keepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
Total	\$ -	\$ -	\$ -	\$ -

- 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.

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: ISO contract to review applications for completeness and make recommendations for appropriate actions. The full, 100% of the contract cost is associated with this action.	\$12,819,654
<p>Staff Salaries:</p> <p>1 GS 14 Step 5 (Washington, DC, \$150,016)¹ spending approximately 10% of time annually verifying and approving CRS classes for this data collection x 1.45 loaded wage rate² = \$21,752 (\$150,016 x 10% x 1.45 = \$21,752)</p> <p>10 GS 12 Step 5 (one in each FEMA Regional Office) spending approximately 10% time annually providing informational resources to respondents and reviewing data for this data collection x 1.45 loaded wage rate² = \$150,884</p> <p>Region 1 (Boston) \$105,599 x 10% x 1.45 = \$15,312</p> <p>Region 2 (New York) \$109,716 x 10% x 1.45 = \$15,909</p> <p>Region III (Philadelphia) \$103,012 x 10% x 1.45 = \$14,937</p> <p>Region IV (Atlanta) \$99,128 x 10% x 1.45 = \$14,374</p> <p>Region V (Chicago) \$104,583 x 10% x 1.45 = \$15,165</p> <p>Region VI (Dallas) \$101,828 x 10% x 1.45 = \$14,765</p> <p>Region VII (Kansas City) \$95,228 x 10% x 1.45 = \$13,808</p> <p>Region VIII (Denver) \$103,987 x 10% x 1.45 = \$15,078</p> <p>Region IX (Oakland) \$116,155 x 10% x 1.45 = \$16,842</p> <p>Region X (Seattle) \$101,335 x 10% x 1.45 = \$14,694</p> <p>(\$15,312 + \$15,909 + \$14,937 + \$14,374 + \$15,165 + \$14,765 + \$13,808 + \$15,078 + \$16,842 + \$14,694 = \$150,884)</p> <p>(\$21,752 + 150,884 = \$172,636)</p>	\$172,636
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel (not to exceed)	\$0
Total	\$12,992,290
<p>¹ Office of Personnel Management 2023 Pay and Leave Tables Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/general-schedule . Accessed May 12, 2023</p> <p>² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.</p>	

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
Total						0

Explain: There is no change in burden hours.

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
Community Rating System (CRS) Application Letter, Quick Check & Documentation / FEMA Form FF-206-FY-23-100 (formerly 086-0-35)				\$1,149,372	\$1,257,165	\$107,793
Community Rating System Community Certifications / FEMA Form FF-206-FY-23-101 (formerly 086-0-345A)				\$2,572,404	\$2,813,655	\$241,251
Environmental and Historic Preservation Certification / FEMA Form FF-206-FY-23-102 (formerly 086-0-35B)				\$14,011	\$15,325	\$1,314
Repetitive Loss Update Form / FEMA Form FF-206-FY-23-103 (formerly 086-0-035C)				\$80,274	\$87,802	\$7,528
Total				\$3,816,061	\$4,173,947	\$357,886

Explain: There is an overall increase in the cost burden as the wage multiplier has increased to from 1.60 to 1.61 and the mean wage for Civil Engineers employed by the local government has increased from \$45.61 to \$49.58.

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.

This information collection will not be published for statistical purposes.

17. If seeking approval no 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.