

June 6, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0115

Title: Environmental and Historic Preservation Screening Form

**Form Number(s): FEMA Form FF-207-FY-21-100 (formerly 024-0-1),
Environmental and Historic Preservation Screening 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 Environmental Policy Act (NEPA) (Pub. L. 91-190, Sec. 102 (B) and (C), 42 U.S.C. § 4332) requires that the Federal Government examine the impact of a major Federal action significantly affecting the quality of the human environment. This involves the Federal agency reviewing the environmental impacts of the proposed action,

alternatives to that action, informing both decision-makers and the public of the impacts through a transparent process, and implementing mitigation measures if necessary. Environmental and Historic Preservation (EHP) compliance refers to the process by which the Federal Government ensures that projects financed through Federal grant funding are compliant with NEPA, and existing laws and regulations related to environment and historic preservation. Compliance under NEPA is required whenever Federal funds are expended as listed in Sec. 102(C)-(D) of the National Environmental Policy Act (42 U.S.C. § 4332(C)-(D)).

Among other environmental laws and Executive Orders, a NEPA compliance review process for FEMA grant programs incorporates compliance with Section 106 of the National Historic Preservation Act (NHPA), as amended (Pub. L. 89-665, 54 U.S.C. § 306108), and Section 7 of the Endangered Species Act of 1973 (Pub. L. 93-205, 16 U.S.C. § 1531 *et seq.*, 40 CFR 1501.3, 1508.1). Section 106 of the NHPA requires that prior to the approval of any Federal funds for an undertaking (i.e., such as a Federally-funded project), a Federal official, with jurisdiction over awarding the funds, consider the effect of the undertaking on any historic district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. Section 7 of the Endangered Species Act requires the Federal agency to consult with the United States Fish and Wildlife Service to ensure the agency action including an agency-funded action is not likely to jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the species' critical habitat.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

The Environmental and Historic Preservation Screening Form, FEMA Form FF-207-FY-21-100 (formerly 024-0-1), is a paper form used by FEMA's Grant Programs Directorate (GPD) and is required for grant packages that utilize this instrument. This form should be attached to all project information sent to the GPD for an EHP regulatory compliance review.

The information submitted with the Screening Form will be used by FEMA GPD's environmental specialists to determine the extent of the effect that a proposed project will have or could have on the environment, including historic resources. This is how the current collection is used, i.e., to assess the project-in-question's effect on the environment including historic properties and endangered or threatened species.

The information collected by FEMA GPD will not be disseminated to the public or used to support information that will be disseminated to the public. FEMA GPD is committed to integrating information quality principles into every step of the information life cycle, from the creation or collection of the information through its processing, dissemination, use, storage, and disposition.

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.

Although the FEMA Form FF-207-FY-21-100 (formerly 024-0-1) may be completed by hand and mailed in, it is designed to be completed and submitted electronically. The document is available in Adobe Acrobat (pdf) format on FEMA's website:

<https://www.fema.gov/grants/preparedness/preparedness-grants-ehp-compliance>

The recipients/subrecipients may email and submit their completed screening forms to GPDEHPinfo@fema.dhs.gov. FEMA's GPD will review the content of the form, i.e., the project description and the documents submitted with the form, and determine if the project will have, or has the potential to have, an adverse effect on the environment. FEMA has determined that some specific types of projects will not have an adverse effect on the environment. These projects are categorically excluded from an environmental review unless there are extraordinary circumstances. See 40 CFR 1501.4; DHS Instruction 123-01-001-01, Rev.1, Appendix A. If FEMA determines that the project can be categorically excluded, FEMA will approve the project. If FEMA determines that the project could have an adverse effect, FEMA will refer the project to the appropriate FEMA region for further analysis and possible consultation with the appropriate agency, such as the State Historic Preservation Office or the U.S. Fish and Wildlife Service.

Electronic completion and submission will help to increase the efficiency with which grant application materials are received by FEMA GPD, since the transmission time will be greatly shortened versus using regular mail or overnight mail. In addition, it reduces the cost and time burden on recipients who would otherwise have to pay for postage and shipping, and make arrangements to send the materials. Furthermore, the image quality of faxed materials would be substantially lower than electronically submitted materials. Since visual documentation will be a key component of most Screening Form submissions, this would require FEMA GPD to go back to the recipient for further information, and could potentially result in more burden on the applicant as well as project delays.

Designing and implementing a web-based Screening Form may increase efficiencies in processing the Screening Form once submitted, but would not provide any reduction in burden on the applicants. Designing such a system has been determined to be cost-prohibitive at this time.

Usability testing has been conducted on this collection. As a result, with the revised form, there will be a reduction in burden per form from 8 hours to 7.2833 hours. There is an increase of respondents from the last inventory. This increase of respondents is a result of increased grant funding for various GPD grant programs resulting in additional responses and has resulted in an increase of 752 burden hours 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.

This information is not collected in any other 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.

This information collection does have an impact on Private Non-Profits (PNPs), state local, territorial, and Tribal (SLTT) government entities, and other small entities.

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

FEMA GPD only requests the EHP information once per grant-funded project. If FEMA GPD could not request and obtain this information, FEMA GPD could not comply with comprehensive EHP statutory and regulatory requirements that are in place and mandate that prior to implementing the grant-funded project, FEMA consider the potential environmental effects of the project, provide the public notice and the opportunity for comment, and identify measures to mitigate any adverse effects. If FEMA GPD was not able to receive information collected from grant recipients, the agency could not fulfill its EHP compliance requirements.

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 November 4, 2022, 87 FR 66718. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 7, 2023, at 88 FR 7990. No comments were received.

- 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.**

N/A

- 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.

N/A.

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 submitted to the FEMA Privacy Office and approved by DHS Privacy on July 19, 2022.

The Environmental and Historic Preservation Screening Form, FEMA Form FF-207-FY-21-100 (formerly 024-0-1), is a privacy sensitive collection requiring a Privacy Impact Assessment (PIA) coverage, which was covered by the existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on March 16, 2020.

No Privacy Act Statement or System of Records Notice coverage is required.

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 number of respondents for instruments included in this information collection has varied slightly from year to year. In FY 2020, FEMA received approximately 2,000 responses. In FY 2021, FEMA received approximately 2,300 responses. Based on this data, FEMA estimates approximately 2,300 responses per year over the next four years.

Based on its experience working with respondents on the submission of this form over the last several years, with the previous form, FEMA estimated that it took a total of eight (8) hours to fill out the form and compile the requisite supporting documentation such as photos which comprised the collection. For this revised form, FEMA estimates that it takes a total of 7.2833 hours (7 hours and 17 minutes) to fill out the form and compile the requisite supporting documentation such as photos which comprised the collection. Recipients are only required to submit one (1) screening form per project.

FEMA estimates that 2,000 respondents who are State, Local, or Tribal Governments will submit an average of one (1) submission of FEMA Form FF-207-FY-21-100 (formerly 024-0-1) annually. Each response will take 7.2833 hours (7 hours and 17 minutes) for a total annual burden of 14,567 hours ($= 2,000 \times 1 \times 7.2833$).

FEMA estimates that on average, 300 respondents who are not-for-profit Organizations will an average of one (1) submission of FEMA Form FF-207-FY-21-100 (formerly 024-0-1) annually. Each response will take 7.2833 hours (7 hours and 17 minutes) for a total annual burden of 2,185 hours ($= 300 \times 1 \times 7.2833$).

Usability testing has been conducted on this collection. As a result, with the revised form, there will be a reduction in burden per form from 8 hours to 7.2833 (7 hours and 17 minutes) hours. There is an increase of respondents from the last inventory. This increase in the number of respondents is due to increased grant funding for various GPD grant programs and resulted in additional responses. The increase in the number of respondents contributed to an increase of 752 ($= (2,300 \times 7.2833) - (2,000 \times 8)$) burden hours.

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 12(a) above and 12(c) 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 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	Environmental and Historic Preservation Screening Form / FEMA Form FF-207-FY-21-100 (formerly 024-0-1)	2,000	1	2,000	7.2833	14,567	\$62.89	\$916,119
Not-for-Profit Institutions	Environmental and Historic Preservation Screening Form / FEMA Form FF-207-FY-21-100 (formerly 024-0-1)	300	1	300	7.2833	2,185	\$56.64	\$123,758
Total		2,300		2,300		16,752		\$1,039,877

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 for not-for-profit institutions and 1.61 for State, Local or Tribal Government.¹ For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45 for not-for-profit institutions and 1.61 for State, Local or Tribal Government, and the entries for the “Avg. Hourly Wage Rate” would be \$61.64 and \$68.44 respectively.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 National Industry-Specific Occupational Employment and Wage Estimates wage rate for Environmental Scientists and Specialists, Including Health (Standard Occupational Classification 19-2041) is \$39.06 per hour.² Including the wage rate multiplier of 1.45 for not-for-profit institutions, the fully-loaded wage rate is \$56.64 per hour. Including the wage rate multiplier of 1.61 for State, Local, or Tribal Government, the fully-loaded

¹ 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 2022.” Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed January 11, 2023. The wage multiplier for not-for-profit institutions is calculated by dividing total compensation for all workers of \$40.35 by wages and salaries for all workers of \$27.83 per hour yielding a benefits multiplier of approximately 1.45. The wage multiplier for State, Local, or Tribal Government is calculated by dividing total compensation for State and local Government workers of \$54.96 by Wages and salaries for State and Local Government workers of \$34.09 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/2021/may/oes_nat.htm. Accessed on January 11, 2023.
NOTE: The Employer Costs for Employee Compensation data and the May 2022 Occupational Employment and Wage Statistics data will be released March 2023.

wage rate is \$62.89 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$1,039,877 $((\$56.64 \times 2,185 \text{ hours}) + (\$62.89 \times 14,567 \text{ hours}))$.

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	\$0
Staff Salaries ¹ : 30 of GS 12 Step 5 employees spending approximately 5% of time annually inputting data collected into the Physical Access Control System for the data collection. [= \$101,813 × 30 × 1.45 ² = \$4,428,866]	\$4,428,866
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: 30 staff, 76.66 reviews each, \$750 per review, which includes airfare, per diem, and two nights lodging. [\$750 × 30 × 76.66 = \$1,725,850]	\$1,724,850
Total	\$6,153,716
¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB.aspx . Accessed October 6, 2022 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

Explanation: If FEMA did not collect this information via the Screening Form, the staff would have to conduct site visits to gather the information. The annual costs of the collection would include salaries of 30 full-time staff members plus travel expenses. FEMA estimates that a staff member could conduct two (2) site visits/assessments per week including travel time. FEMA conducts 2,300 reviews per year, so 30 staff members would be necessary to conduct the visits/assessments (2,300 reviews divided by 30 staff equals 76.66 reviews per staff member). A GS-12 Step 5 earns \$101,813 per year. FEMA estimates that travel would be \$750 per review which would include airfare, per diem, and two nights lodging.

The use of contractor support is also an option, however far more expensive than the use of Federal staff. It is estimated that contractors’ overhead and profit could almost double the **\$6,153,716** cost listed above.

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
Environmental and Historic Preservation Screening Form / FEMA Form FF-207-FY-21-100 (formerly 024-0-1)				16,000	16,752	752
Total(s)				16,000	16,752	752

Explain: There was an increase of burden hours from 16,000 to 16,752, a difference of 752 burden hours. This program increase was due to an additional 300 respondents since the previous inventory. This increase in the number of respondents is due to an increase in the amount of grant funding available for various GPD grant programs which resulted in additional responses.

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
Environmental and Historic Preservation Screening Form / FEMA Form FF-207-FY-21-100 (formerly 024-0-1)				\$871,360	\$1,039,877	\$168,517
Total(s)				\$871,360	\$1,039,877	\$168,517

Explain: There was an increase of 300 respondents from the previous inventory. This increase in the number of respondents is due to an increase in grant funding for various

GPD grant programs. This resulted in additional responses. This increase in the number of respondents along with an increase in the wage rates resulted in an increase in annual cost burden of \$168,517.

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.