

December 21, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0058

Title: Fire Management Assistance Grant Program

Form Number(s):

- 1. FEMA Form FF-104-FY-21-165 (formerly FEMA Form 078-0-2); Principle Advisor Report**
- 2. FEMA Form FF-104-FY-21-166 (formerly FEMA Form 078-0-1); Request for Fire Management Assistance Declaration**
- 3. FEMA Form FF-104-FY-21-167 (formerly FEMA Form 089-0-24) Request for Fire Management Assistance Subgrant**
- 4. FEMA Form FF-104-FY-23-100; Application for Management Costs**
- 5. FEMA Form FF-104-FY-23-101; Project Application for Emergency Protective Measures**
- 6. FEMA Form FF-104-FY-23-102; Project Application for Firefighting Activities**
- 7. FEMA Form FF-104-FY-23-103; Time Extensions**
- 8. No Form; FEMA-State Agreement and Amendment**
- 9. No Form; State Administrative Plan for Fire Management Assistance**
- 10. No Form; Appeal Letter**
- 11. No Form; Duplication of Benefits Letter**
- 12. No Form; Training Sessions**

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 information collected is required for Fire Management Assistance Grant Program (FMAGP) eligibility determinations, grants management, and compliance with other Federal laws and regulations. The FMAGP was established under Section 420 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C § 5187, as amended by § 303 of the Disaster Mitigation Act of 2000 (Pub. L. 106-390) and authorizes the President to provide assistance to any state, Tribal or local government for the mitigation, management, and control of any fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster. 44 CFR Part 204 specifies the information collections necessary to facilitate the provision of assistance under the FMAGP.

This revision adds four new instruments to collect information that was previously collected using instruments under 1660-0017. Those previously approved instruments will be removed from 1660-0017 with the current revision of that collection submitted to the Office of Management and Budget on February 23, 2023. The four new instruments are:

- FEMA Form FF-104-FY-23-100, Application for Management Costs;
- FEMA Form FF-104-FY-23-101, Project Application for Emergency Protective Measures;
- FEMA Form FF-104-FY-23-102, Project Application for Firefighting Activities; and
- FEMA Form FF-104-FY-23-103, Time Extensions.

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 information collection is used by both FEMA Regional, State and Tribal staff to facilitate the declaration request and grant administration processes of FMAGP, as well

as end of year internal reporting of overall declaration requests and estimated grant outlays. The following forms are used in information collection:

FEMA Form FF-104-FY-21-165 (formerly FEMA Form 078-0-2), Principal Advisor's Report is used by States to provide FEMA with technical assessment of a fire or fire complex for which the State is requesting a fire management assistance declaration. FEMA will review all information submitted in the State or Tribe's request along with the Principal Advisor's assessment and regional summary and will render a determination.

FEMA Form FF-104-FY-21-166 (formerly FEMA Form 078-0-1), Request for a Fire Management Assistance Declaration is used by the State or Tribe to provide information in support of its request for a fire management assistance declaration. This form must be completed by the Governor, Tribal Chief Executive Officer or Governor's Authorized Representative (GAR) and forwarded to the appropriate FEMA Regional Director for review and transmittal to FEMA headquarters. Follow-up information may be furnished by the State, by the Tribal Government or requested by FEMA after the initial request has been received. For example, if the extent or threat of the fire is vaguely stated in the FEMA FF-104-FY-21-165 (formerly 078-0-2) FEMA may need to request additional information about the fire in the initial request to make an eligibility determination. This information is provided upon each approval of a fire management assistance declaration.

FEMA Form 104-FY-21-167 (formerly FEMA Form 089-0-24), Request for Fire Management Assistance Subgrant is used by state, local and Tribal governments to state their interest in applying for sub-grants under an approved fire management assistance grant. The form provides essential sub-grantee contact information and is required upon each approval of a fire management assistance declaration.

FEMA Form FF-104-FY-23-100; Application for Management Costs is used by State, local and tribal governments to capture administrative costs that include indirect and direct costs associated with the FMAGP and projects. FEMA uses this form to collect information necessary to support administrative cost claims. For more information, please see *Chapter 3: Eligibility* in the FMAGP Policy Guide or contact the state, local, Tribal, or territorial emergency management office for additional information.

FEMA Form FF-104-FY-23-101; Project Application for Emergency Protective Measures is used by state, local and Tribal governments to capture emergency protective measures (EPM) activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. FEMA uses this form to collect information necessary to support the Applicant's claim.

For more information, please see *Chapter 3: Eligibility* in the FMAGP Policy Guide or contact the state, local, Tribal, or territorial emergency management office for additional information.

FEMA Form FF-104-FY-23-102; Project Application for Firefighting Activities is used by state, local and Tribal governments to capture fire suppression activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. FEMA uses this form to collect information necessary to support the Applicant's claim. For more information, please see *Chapter 3: Eligibility* in the FMAGP Policy Guide or contact the state, local, Tribal, or territorial emergency management office for additional information.

FEMA Form FF-104-FY-23-103; Time Extensions is used to capture changes to the original grant agreements. This form shows all information and documentation that is needed for FEMA to process the request. Please contact your FEMA Regional office for additional information. All signatures are official and legally binding. In general, this form will collect certain time extension information including, Declaration-level information, time extension details and justification, and proposed deadline.

FEMA-State Agreement and Amendment - Federal assistance under the Stafford Act must be provided in accordance with the FEMA State Agreement for the FMAGP. The State's Governor or Tribal Chief Executive Officer and the Regional Director must sign the Agreement, which contains the necessary terms and conditions consistent with the provisions of applicable laws, executive orders, and regulations, and specifies the type and extent of Federal assistance to be provided. The Agreement is an annual agreement applicable only for the calendar year in which it is signed and is required each year. Failure to provide a signed agreement will result in a denial of grant benefits.

A **State Administrative Plan for Fire Management Assistance** must be developed annually by the state for the administration of fire management assistance grants. The plan describes the procedures for the administration of FMAGP, designates the state agency to serve as Recipient, and ensures state compliance with the provisions of law and regulation applicable to fire management assistance grants. The plan also identifies staffing functions, the sources of staff to fill these functions, and the management and oversight responsibilities of each. In addition, the plan describes the procedures to notify potential applicants of the availability of the program, assists FEMA in determining applicant eligibility, reviews Project Worksheets (PWs), processes payment of subgrants, close-out grants, and audit and reconcile subgrants.

Appeals – When a State or Tribe's request for a fire management assistance declaration is denied, the Governor, Tribal Chief Executive Officer or GAR may appeal the decision in

writing. The State or Tribe may submit a one-time request for reconsideration in writing, with additional information, to the Director of FEMA's Recovery Division. The appeal must be submitted within 30 days of the date of the letter denying the State or Tribal Government's request. A time extension of 30 days may be granted by the Director if the Governor, Tribal Chief Executive Officer or GAR submits a written request for a time extension within the 30-day period. The information provided through the appeal process is reviewed for consideration of the reversal of a denial.

Similarly, applicants may appeal any cost or eligibility determination under an approved declaration within 60 days after receipt of the notice of the action that is being appealed. The request must be submitted in writing to FEMA through the Grantee in accordance with the appeal procedures. Appeals usually consist of a letter briefly describing the reason for the appeal and any new supporting documentation the State or applicant submits to FEMA for review.

Duplication of Benefits – Applicants are required to notify FEMA of all benefits, actual or anticipated, received from other sources for the same loss for which they are applying to FEMA for assistance. Notification can be accomplished in a letter, accompanied by supporting documentation. This notification is a requirement for each grant request made and occurs upon each approval of a fire management assistance declaration.

Training Sessions are provided primarily for regional staff and state officials who administer the FMAGP for the purpose of instructing and updating attendees on the laws, regulations, policies, and process that govern the program, as well as to discuss any program issues. These training sessions are not required to participate in the FMAGP but are offered on an annual basis at the request of the respondents.

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 forms utilized in this collection are available electronically through the FEMA Internet website at <https://www.fema.gov/assistance/public/fire-management-assistance> and allow for entry of data and/or printing of the forms to complete. Other information collection methods require free-form creation of responses. The information supplied must be signed by an authorized representative and can be transmitted electronically. Most often the information/data is initially submitted verbally then followed by formal documentation. The required information and data are typically obtained real-time in the

field where a fire is burning. Because this process uses information/data obtained verbally, this reduces the need for electronic gathering and submission except for the hard copy signatures.

FEMA Form FF-104-FY-21-165 (formerly 078-0-2) , Principal Advisor’s Report is completed only by the Governor of a State, Chief Executive Officer of a Tribal Government, or their GAR. The sources for the information vary by state and may include each state’s forest managers, emergency management, and response personnel who are on the scene of a wildfire. Local Meteorologists may be used to provide current and expected weather information. Because the source(s) of information for each state or Tribe is different, the information may change rapidly when and if the fire characteristics change. The form is completed by knowledgeable staff in the state or Tribal government, and step-by-step instructions for completing the form is under development.

FEMA Form FF-104-FY-21-166 (formerly 078-0-1), Request for a Fire Management Assistance Declaration is completed only by professionally educated and trained foresters working for the U.S. Forest Service or Bureau of Land Management. If there are questions on the data or information submitted on the report, the Principal Advisor is contacted by telephone by a Regional Watch Officer or a Regional Administrator for clarification. Because an uncontrolled fire may change rapidly, the data and information gathered is only relevant for a short period of time and it is expected that the data will be modified on an as needed basis via telephone.

The information required on **FEMA Form FF-104-FY-21-167 (formerly 089-0-24), Request for a Fire Management Assistance Subgrant**, resides with the Agency completing the form. Requesters are only required to submit their name, address, county, state, zip code, and contact information.

FEMA Form FF-104-FY-23-100; Application for Management Costs is completed by state, local and Tribal governments to capture administrative costs that include indirect and direct costs associated with the FMAGP and FMAGP projects. The following information is needed to complete this form: the specific activities conducted, when, where, and by whom the activities were completed, actual cost information, and negotiated Indirect Cost Rate, if applicable

FEMA Form FF-104-FY-23-101; Project Application for Emergency Protective Measures is completed by state, local and Tribal governments to capture EPM activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. The following information is needed to complete this form: when, where, and by whom the activities were completed, and actual cost of EPM activities information.

FEMA Form FF-104-FY-23-102; Project Application for Firefighting Activities is completed by state, local and Tribal governments to capture fire suppression activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. The following information is needed to complete this form: when, where, and by whom the activities were completed, and actual cost of firefighting activities information.

FEMA Form FF-104-FY-23-103; Time Extensions is completed by state, local and Tribal governments to capture changes to the original grant agreements. In general, this form will collect certain time extension information including: declaration-level information, time extension details and justification, and proposed deadline.

Usability Testing has been conducted on this collection. As result, an increase of **1.6 hours** has been recognized and included as an update to the collection.

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

This information collected is requested for a fire declaration or grant application to get reimbursed for expenses for fire suppression and related services that are unique to a specific fire on a specific date. For that reason, the requested data/information is not available or 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 involves seven forms. **FEMA Form FF-104-FY-21-165 (formerly 078-0-2)** which is described in Question 3 above, is only completed by a Governor, a Tribal Chief Executive Officer, or a GAR in their request for an FMAG declaration. **FEMA Form FF-104-FY-21-166 (formerly 078-0-1)** is only completed by the U.S. Forest Service or Bureau of Land Management forester to confirm the severity of a wildland fire for which a Governor, Tribal Chief Executive Officer or GAR has requested an FMAG declaration. Neither small business or small entities will ever be asked or required to complete these two forms. **FEMA Form FF-104-FY-21-167 (formerly 089-0-24)** is required to be completed and submitted if a business or entity is affected by a declared fire and seeks reimbursement. **FEMA Forms FF-104-FY-23-100, FF-104-FY-23-101, FF-104-FY-23-102 and FF-104-FY-23-103** are completed by state, local and Tribal government employees (*These particular forms for collection of information does not impact small businesses or other small entities*). **FEMA Form FF-**

104-FY-23-101; Project Application for Emergency Protective Measures is used by state, local and Tribal governments to capture EPM activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. **FEMA Form FF-104-FY-23-102; Project Application for Firefighting Activities** is used by state, local and Tribal governments to capture fire suppression activities that eliminate or lessen immediate threats to lives, public health, or safety; or threats of significant damage to improved public or private property. **FEMA Form FF-104-FY-23-103; Time Extensions** is completed by state, local and Tribal governments to capture changes to the original grant agreements. In general, this form will collect certain time extension information including, declaration-level information, time extension details and justification, and proposed deadline. They have the option to attend an Applicant Briefing where the state, local or Tribal government provides information on the FMAG Program and how to complete the form. A small business or entity is required to complete and submit this form (FF-104-FY-21-167 (formerly 089-0-24) in order to receive any reimbursement as a subrecipient. The time that may be spent to attend an Applicant’s Briefing and the time to complete the form does have a time impact on small businesses or other small entities. If a small business or entity chooses not to submit FF-104-FY-21-167 (formerly 089-0-24) they will not be eligible for reimbursement.

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.

The information collection activities requested are required to receive a benefit and designed to assist both FEMA and the state in making a declaration decision, and for managing the operation and administration of the FMAGP. Without the collection of this information, declaration decisions could not be made and funds for fire suppression and related activities would not be eligible for Federal-State matching funds. Also, FEMA and the state would be unable to deliver assistance effectively and efficiently to eligible applicants authorized by the Stafford Act.

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.**

FEMA requires applicants to report information more than quarterly when instances of unexpected events or a new FMAGP declaration requires a separate submission of an Amendment to the FEMA-State Agreement for the FMAGP.

(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 August 11, 2023, at 88 FR 54633. The public comment period closed on October 10, 2023, with three comments received. Two comments from individuals are not germane to this collection. One comment from a state agency asked several questions about each instrument in turn and a summary of FEMA's responses to those questions are below.

Comment 1 (FEMA-2023-0019-0002): The commentor stated that:

"I was a tenant of the Broadway fire what appears to be brunt down along with a fatal helicopter crash I have been searching for assistance. We lost everything along with our 2 dogs and everything we owned only go out with what we had on please help us if you would contact me at 909-430-8056" and attached four images.

FEMA Response to Comment 1: This comment is not germane to this collection.

Comment 2 (FEMA-2023-0019-0003): The commentor stated that:

"I fought wildfire in the 1970's when we took risks to suppress fire threatening high value timber, and to a much lesser extent property. Being burnt over and deploying a fire shelter, suffering smoke inhalation, and all the other minor inconveniences such as no resupplies, etc, I realized suppressing wildfre is a fool's errand. Fires especially now adays are only suppressed naturally by weather, rain, snow or cooler weather. The fire fighter lives lost, the homeowner lives lost are

all tragic and the best way I see how to prevent future tragedies is to prohibit building in wildfire zones. Any tax payer money for mitigation should only go to de incentivizing development in forests and WUI. Thinning and other measures that remove vegetation is not addressing the root of the problem, regarding private property. Thinning around powerlines and other utilities is good. Prescribed fire I believe is good. it is a shame that leaders , politicians, councils, committees, have not prevented development in fire and flood zones. The insurance industry vacating Florida and soon other states that experience natural disasters is the first entity to say to home owners you dont belong in flood and fire zones and we wont back you. All he while it should have been the lawmakers who should have looked out for people who might have been unaware or misled by an unethical developer / realtor. The other homeowners who know the risk and decide to roll the dice should not be bailed out by tax payers. Tax payers do not want to be complicit in the next disaster where people drown or burn in a rebuilt home.

Use the money to preent development in these risk areas.”

FEMA Response to Comment 2: This comment is not germane to this collection.

Comment 3 (FEMA-2023-0019-0004): The commentor uploaded an attachment with detailed questions about each instrument.

FEMA Form FF-104-FY-23-100, Project Application for Administrative Activities

Question: Who is the intended audience?

FEMA Response: The intended audience is the state, local, Tribal, or territorial governments around the country for the mitigation, management, and control of any declared fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster.

Question: Is the Project Number known at this point?

FEMA Response: In the FEMA Go system, the project number will be a system-generated data element, auto populated as part of the collection of information process. The Applicant will not need to manually enter a project number when completing the instrument in a web-based interface or in hard copy (if necessary).

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Question: Is the Recipient the same as Applicant? (Suggest using same term where warranted.)

FEMA Response: No. The Recipient is the state, local, Tribal, or territorial government who is awarded an FMAG grant and is accountable for the use of the funds provided. This generally includes the state as designated in the FEMA-State Agreement for the FMAG. After an FMAG declaration, a tribal government may choose to be a Recipient, or it may act as a Subrecipient under the state. For more information regarding the definition of the terms “Applicant” and “Recipient” refer to 44 CFR 204.3 – Definitions (<https://www.ecfr.gov/current/title-44/section-204.3>).

Question: Are “Summary Record and Summary Template” the same? (If so, suggest using the same terminology.)

FEMA Response: The summary report and summary template should be the same thing. The Agency will consider whether the language can be standardized or if the summary template will be something the Applicant completes in the web-based system.

FEMA Form FF-104-FY-23-101, Project Application for Emergency Protective Measures

Question: Who is the intended audience?

FEMA Response: The intended audience is the state, local, Tribal, or territorial governments around the country for the mitigation, management, and control of any declared fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster.

Question: Is the Project Number known at this point?

FEMA Response: In the FEMA Go systems, the project number will be a system-generated data element, auto populated as part of the collection of information process. The Applicant will not need to manually enter a project number when they are completing the instrument in a web-based interface or in hard copy (if necessary).

Question: Is the Recipient the same as Applicant? (Suggest using same term where warranted.)

FEMA Response: No. The Recipient is the state, local, Tribal, or territorial government who is awarded an FMAG grant and is accountable for the use of the

funds provided. This generally includes the state as designated in the FEMA-State Agreement for the FMAG. After an FMAG declaration, a tribal government may choose to be a Recipient, or it may act as a Subrecipient under the state. For more information regarding the definition of the terms “Applicant” and “Recipient” refer to 44 CFR 204.3 – Definitions (<https://www.ecfr.gov/current/title-44/section-204.3>).

Question: Are “Summary Record and Summary Template” the same? (If so, suggest using the same terminology.)

FEMA Response: The summary report and summary template should be the same thing. The Agency will consider whether the language can be standardized or if the summary template will be something the Applicant completes in the web-based system.

FEMA Form FF-104-FY-23-102, Project Application for Fire Suppression Activities

Question: Who is the intended audience?

FEMA Response: The intended audience is the state, local, Tribal, or territorial governments around the country for the mitigation, management, and control of any declared fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster.

Question: Is the Project Number known at this point?

FEMA Response: In the FEMA Go system, The project number will be a system-generated data element, auto populated as part of the collection of information process. The Applicant will not need to manually enter a project number when completing the instrument in a web-based interface or in hard copy (if necessary). ,.

Question: Is the Recipient the same as Applicant? (Suggest using same term where warranted.)

FEMA Response: No. The Recipient is the state, local, Tribal, or territorial government who is awarded an FMAG grant and is accountable for the use of the funds provided. This generally includes the state as designated in the FEMA-State Agreement for the FMAG. After an FMAG declaration, a tribal government may choose to be a Recipient, or it may act as a Subrecipient under the state. For more information regarding the definition of the terms “Applicant” and

“Recipient” refer to 44 CFR 204.3 – Definitions
(<https://www.ecfr.gov/current/title-44/section-204.3>).

Question: Are “Summary Record and Summary Template” the same? (If so, suggest using the same terminology.)

FEMA Response: The summary report and summary template should be the same thing. The Agency will consider whether the language can be standardized or if the summary template will be something the Applicant completes in the web-based system.

FEMA Form FF-104-FY-23-103, Time Extension Request

Question: Who is the intended audience?

FEMA Response: The intended audience is the state, local, Tribal, or territorial governments around the country for the mitigation, management, and control of any declared fire on public or private forest land or grassland that threatens such destruction as would constitute a major disaster.

Question: Is the Project Number known at this point?

FEMA Response: In the FEMA Go system, the project number will be a system-generated data element, auto populated as part of the collection of information process. The Applicant will not need to manually enter a project number when they are completing the instrument in a web-based interface or in hard copy (if necessary).

Question: Is the Recipient the same as Applicant? (Suggest using same term where warranted.)

FEMA Response: No. The Recipient is the state, local, Tribal or territorial government who is awarded an FMAG grant and is accountable for the use of the funds provided. This generally includes the state as designated in the FEMA-State Agreement for the FMAG. After an FMAG declaration, a tribal government may choose to be a Recipient, or it may act as a Subrecipient under the state. For more information regarding the definition of the terms “Applicant” and “Recipient” refer to 44 CFR 204.3 – Definitions
(<https://www.ecfr.gov/current/title-44/section-204.3>).

Question: Are “Summary Record and Summary Template” the same? (If so, suggest using the same terminology.)

FEMA Response: The summary report and summary template should be the same thing. The Agency will consider whether the language can be standardized or if the summary template will be something the Applicant completes in the web-based system.

Question: Is the request from the Applicant or the Recipient?

FEMA Response: The directions in Section 2 – Time Extension Request indicate “Recipient and Applicants complete a time extension request for each types of extension,” so the Applicant would need to submit a Time Extension Request to the Recipient, and depending on the type of Time Extension Request, the Recipient may need to submit the request to FEMA for approval. The FMAG Program Office will determine if an Applicant signature block would be added to the form.

Principal Advisor’s Report

Question: Prevailing Weather Conditions. Is this at the time of the FMAG request? (Verbally or in writing?)

FEMA Response: The prevailing weather can be provided verbally and later confirmed with a written submission from either real time observations when completing the report or through various weather-related sources and monitoring agencies.

Question: Prediction of Weather and Fire Conditions for the Next 24 Hours (Fire Behavior). Are these for the following 24 hours after the request has been made? (Verbally or in writing?)

FEMA Response: These are for the following 24 hours after the request has been made. These predictions can be provided verbally and later confirmed with a written submission from various weather-related sources and monitoring agencies.

Request for Fire Management Assistance Subgrant

Question: Suggest using the term “Subgrantee” and not “Applicant” throughout the form.

FEMA Response: The term “Applicant” is correct, per 44 CFR Part 204.3, and will not be revised on the FMAG instruments.

Question: Is the “Applicant” on this form different from the “Applicant” listed on forms -100, -101, -102, and -103?

FEMA Response: No, the term “Applicant” refers to the same entity across the FMAG-related instruments.

A 30-day Federal Register Notice inviting public comments was published on December 21, 2023, at 88 FR 88408. 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.

FEMA communicates with state emergency managers and foresters and discusses various program aspects, including the information being collected. Revisions to program forms was discussed during a FMAGP Workshop held virtually on April 14th, 2023. FEMA will likely make some changes to the information collections in the future. The overall collection burden may not change but only the specific data requested would change.

In addition, FEMA coordinates with representatives of the U.S. Forest Service, and the U.S. Department of Agriculture via meetings and conference calls regarding the FMAGP information requested/collected.

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 holds monthly conference calls with regional program managers and staff, and FEMA Regions and Headquarters personnel have meetings in which FEMA Regional Offices, state emergency offices, and FEMA State Forestry Departments discuss various aspects of the program. Specifically, during a FMAGP Workshop held in Boise, Idaho from March 26-28, 2019, FEMA consulted with the relevant representatives.

Additionally, FEMA Regional staff hold briefings and training sessions via conference call or occasionally in person for states for fire declarations to provide an overview of the program and the application process. Regional Offices communicate regularly with states and other Federal Agencies who collect the information.

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.

The Privacy Threshold Analysis (PTA) for the FMAG Program was approved by the DHS Privacy Office on August 31, 2021, and is valid through August 31, 2024.

A Privacy Impact Assessment (PIA) is required for this collection as a privacy-sensitive system and coverage is provided by two existing PIA's, DHS/FEMA/PIA-013 Grant Management Programs and DHS/FEMA/PIA-052 Grants Management Modernization (GMM).

No System of Records Notice (SORN) 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 including questions related to sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

FEMA Form FF-104-FY-21-165 (formerly 078-0-2), Principal Advisor's Report: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

FEMA Form FF-104-FY-21-167 (formerly 089-0-24), Request for FEMA Sub-grant: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 0.3 burden hours (18 minutes) to complete, therefore 100 responses times 0.3 hours equals 30 total annual burden hours ($100 \times 0.3 = 30$).

FEMA Form FF-104-FY-21-166 (formerly 078-0-1), Request for FMAG Declaration: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 3 burden hours to complete, therefore 100 responses times 3 hours equals 300 total annual burden hours ($100 \times 3 = 300$).

FEMA Form FF-104-FY-23-100, Application for Management Costs: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

FEMA Form FF-104-FY-23-101, Project Application for Emergency Protective Measures: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

FEMA Form FF-104-FY-23-102, Project Application for Firefighting Activities: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

FEMA Form FF-104-FY-23-103, Time Extensions: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

No Form, FEMA-State Agreement and Amendment: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 0.4 burden hours (24 minutes) to complete, therefore 100 responses times 0.4 hours equals 40 total annual burden hours ($100 \times 0.4 = 40$).

No Form, State Administrative Plan for Fire Management Assistance: is estimated to have 25 respondents times 1 response(s) per year for 25 total annual responses ($25 \times 1 = 25$). It is estimated that each response will require 8 burden hours to complete, therefore 25 responses times 8 hours equals 200 total annual burden hours ($25 \times 8 = 200$).

No Form, Appeal Letter: is estimated to have 3 respondents times 1 response(s) per year for 3 total annual responses ($3 \times 1 = 3$). It is estimated that each response will require 1 burden hours to complete, therefore 3 responses times 1 hours equals 3 total annual burden hours ($3 \times 1 = 3$).

No Form, Duplication of Benefits Letter: is estimated to have 25 respondents times 4 response(s) per year for 100 total annual responses ($25 \times 4 = 100$). It is estimated that each response will require 1 burden hours to complete, therefore 100 responses times 1 hours equals 100 total annual burden hours ($100 \times 1 = 100$).

No Form, Training Sessions: is estimated to have 25 respondents times 1 response(s) per year for 25 total annual responses ($25 \times 1 = 25$). It is estimated that each response will require 1.5 burden hours (90 minutes) to complete, therefore 25 responses times 1.5 hours equals 37.5 total annual burden hours ($25 \times 1.5 = 37.5$) which is rounded up to 38 burden hours.

Usability Testing has been conducted on this collection. As result, an increase of **1.6 hours** has been recognized and included as an update to the collection.

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)¹ 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.

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 national wage multiplier is calculated by dividing total compensation for all workers of \$42.48 by wages and salaries for all workers of \$29.32 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees 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.

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	Principal Advisor's Report, FEMA Form FF-104-FY-21-165 (formerly 078-0-2)	25	4	100	3	300	\$87.04	\$26,112
State, Local or Tribal Government	Request for FMAG Declaration, FEMA Form FF-104-FY-21-166 (formerly 078-0-1)	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	Request for FEMA Sub-grant, FEMA Form FF-104-FY-21-167 (formerly 089-0-24)	25	4	100	0.3	30	\$87.04	\$2,611
State, Local or Tribal Government	Application for Management Costs, FEMA Form FF-104-FY-23-100	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	Project Application for Emergency Protective Measures, FEMA Form FF-104-FY-23-101	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	Project Application for Firefighting Activities, FEMA Form FF-104-FY-23-102	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	Time Extensions, FEMA Form FF-104-FY-23-103	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	FEMA-State Agreement and Amendment	25	4	100	0.4	40	\$87.04	\$3,482
State, Local or Tribal Government	State Administrative Plan for Fire Management Assistance	25	1	25	8	200	\$87.04	\$17,408
State, Local or Tribal Government	Appeal Letter	3	1	3	1	3	\$87.04	\$261
State, Local or Tribal Government	Duplication of Benefits Letter	25	4	100	1	100	\$87.04	\$8,704
State, Local or Tribal Government	Training Sessions	25	1	25	1.5	38	\$87.04	\$3,308
Total		278		953		1,211		\$105,406

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. 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,² the May 2022 Occupational Employment and Wages estimates for Administrative Services and Facilities Managers (SOC 11-3010) is \$ \$54.06. Including the wage rate multiplier of 1.61, the fully loaded wage rate is \$87.04 per hour. Therefore, the annual burden hour cost is estimated to be \$106,406 (\$87.04 x 1,211 hours = \$105,405+1 due to rounding).

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:

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

a. Operation and Maintenance and purchase of services component. These estimates should consider 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.

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

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.

The numbers are based on the following methodology: In any given year, five FEMA regions will have one or more wildland fires that may result in an FMAG declaration. When one of those five regions has a declaration, the forms in this collection are completed and submitted. The wages for the staff who complete these forms is estimated to be a GS-13/Step 5. The time and dollar figures in the box below provide estimates of the time needed to provide responses to questions on the forms. The annual salary for a GS-13 step 5 in the Raleigh-Durham-Chapel Hill area from OPM website is \$116,294.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$0
Staff Salaries:	
1 GS 13, step 5 employee in Raleigh, Durham, Chapel Hill NC spending approximately 50% of time annually reviewing and making determinations for FMAGP requests. [1 x \$116,294 x 0.50 x 1.45 ¹ = \$84,313]	
1 GS-13 step 5 employee spending approximately 5% of time reviewing reports. [1 x \$116,294 x 0.05 x 1.45 = \$8,431]	
2 GS-13 step 5 employees spending approximately 10% of time training. [2 x \$116,294 x 0.10 x 1.45 = \$33,725]	\$682,930
1 GS-13 step 5 employee spending approximately 1% of time auditing. [1 x \$116,294 x 0.01 x 1.45 = \$1,686]	
1 GS-13 step 5 employee spending approximately 5% of time reviewing appeals. [1 x \$116,294 x 0.05 x 1.45 = \$8,431]	
Total times 5 regions \$136,586 x 5 = \$682,930	
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	\$0
Total	\$682,930
¹ 1 Office of Personnel Management 2023 Pay and Leave Tables for the RALEIGH-DURHAM-CHAPEL HILL, NC locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RA.pdf . Accessed July 19, 2023.	
² Wage rate includes a 1.45 multiplier to reflect the fully loaded wage rate.	

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

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

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Application for Management Costs, FEMA Form FF-104-FY-23-100	0	100	+100	0	0	0
Project Application for Emergency Protective Measures, FEMA Form FF-104-FY-23-101	0	100	+100	0	0	0
Project Application for Firefighting Activities, FEMA Form FF-104-FY-23-102	0	100	+100	0	0	0
Time Extensions, FEMA Form FF-104-FY-23-103	0	100	+100	0	0	0
Total	0	400	+400	0	0	0

Explain: FEMA’s increase of 400 burden hours is due to four new instruments being added to this collection. FEMA previously used instruments approved under 1660-0017 to collect this information, but those instruments will be removed from 1660-0017 with the revision submitted to OMB on February 23, 2023.

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
Principal Advisor's Report, FEMA Form FF-104-FY-21-165 (formerly 078-0-2)				\$25,263	\$26,112	\$849
Request for FMAG Declaration, FEMA Form FF-104-FY-21-166 (formerly 078-0-1)				\$8,421	\$8,704	\$283
Request for FEMA Subgrant, FEMA Form FF-104-FY-21-167 (formerly 089-0-24)				\$2,526	\$2,611	\$85
Application for Management Costs, FEMA Form FF-104-FY-23-100	\$0	\$8,704	\$8,704			
Project Application for Emergency Protective Measures, FEMA Form FF-104-FY-23-101	\$0	\$8,704	\$8,704			
Project Application for Firefighting Activities, FEMA Form FF-104-FY-23-102	\$0	\$8,704	\$8,704			
Time Extensions, FEMA Form FF-104-FY-23-103	\$0	\$8,704	\$8,704			
FEMA-State Agreement and Amendment				\$3,368	\$3,482	\$114
State Administrative Plan for FMAG				\$16,842	\$17,408	\$566
Appeal Letter				\$253	\$261	\$8
Duplication of Benefits Letter				\$8,421	\$8,704	\$283
Training Sessions				\$3,200	\$3,308	\$108
Total	\$0	\$34,816	\$34,816	\$68,294	\$70,590	\$2,296

Explain: FEMA's increase in of \$37,112 burden costs is primarily due to the increased burden hours from four new instruments.

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.

There are no outline plans for tabulation and publication of data 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.

This collection does not seek approval to not display the expiration date for OMB approval.

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

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