

November 21, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0114

Title: FEMA Preparedness Grants: Port Security Grant Program (PSGP)

Form Number(s):

- 1) FEMA Form FF-207-FY-23-108 (formerly 089-5) Port Security Grant Program (PSGP) Investment Justification;**
- 2) FEMA Form FF-207-FY-23-109 (formerly 088-0-1) Grants Programs Directorate Performance Report (GPD-PR); and**
- 3) FEMA Form FF-207-FY-23-110, Grant Programs Directorate Extension Request (GPD-Extension).**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a) 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 **Port Security Grant Program (PSGP)** is a Department of Homeland Security (DHS) grant program that focuses on infrastructure protection activities. The PSGP is one tool in the comprehensive set of measures authorized by Congress and implemented by the Administration to strengthen the Nation’s critical infrastructure against risks associated with potential terrorist attacks. The bulk of U.S. critical infrastructure is owned and/or operated by State, local and private sector partners.

The PSGP provides funds to state, local, and private sector partners to support increased port-wide risk management and protect critical surface transportation infrastructure from acts of terrorism, major disasters, and other emergencies. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the PSGP supports the goal to Strengthen National Preparedness and Resilience.

Section 102 of the Maritime Transportation Security Act of 2002, as amended (46 U.S.C. § 70107), authorizes the PSGP to provide for the risk-based allocation of funds to implement Area Maritime Transportation Security Plans and facility security plans among port authorities, facility operators, and state and local government agencies required to provide port security services and to train law enforcement personnel under 46 U.S.C. § 70132.

Before awarding a grant under the program, the Secretary shall provide for review and comment by the appropriate Federal Maritime Security Coordinators and the Maritime Administrator. In administering the grant program, the Secretary shall consider national economic, energy and strategic defense concerns based upon the most current risk assessments available.” In addition, any information collected by FEMA for this program is in accordance with 46 U.S.C. § 70107(g), as amended by section 112(c) of the Security and Accountability For Every (SAFE) Port Act of 2006 (Pub. L. 109-347), which states: “Any entity subject to an Area Maritime Transportation Security Plan may submit an application for a grant under this section, at such time, in such form, and containing such information and assurances as the Secretary may require”; or in accordance with 2 CFR 200.205 Federal awarding agency review of merit of proposals; 2 CFR 200.309 Modifications to Period of Performance; and 2 CFR 200.329 Monitoring and reporting program performance.

FEMA is making two changes with this revision. First, FEMA is removing the template for a Memorandum of Understanding (or Agreement) from this collection because this informal template has not been required in Fiscal Years 2022 or 2023. Second, FEMA is introducing an extension request form to help reviewers understand the nature and cause of performance delays, inform GPD of grant recipients who are failing to meet policy and legislative grant requirements, and streamline current processes.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received

from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Form FF-207-FY-23-108 (formerly 089-5), PSGP Investment Justification (IJ) –

Submitted with the application, this document provides narrative detail on proposed investments. The IJ must demonstrate how proposed projects address gaps and deficiencies in applicant’s current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the Investment Justification (IJ) is collected to assist decision-making at all levels, although it is used primarily by individual application reviewers. The PSGP uses a multi-phase review process. Application data, including the IJ, is evaluated to determine which applications are the highest-scoring and address the program priorities. Review begins at the local level and the highest scoring applications advance to the national review phase. The National Review Panel (NRP) is comprised of officials from FEMA and United States Coast Guard (USCG). Representatives of other Federal stakeholder agencies such as the Transportation Security Administration (TSA) and the U.S. Maritime Administration (MARAD) may also be included. These reviewers then determine whether proposed activities identified in the application and IJ help achieve core missions of the grant program and formulate recommendations for funding to DHS leadership.

FEMA Form FF-207-FY-23-109 (formerly 088-0-1), Grant Programs Directorate

Performance Report (GPD-PR) – FEMA has developed a replacement to Office of Management and Budget (OMB) Form SF-PPR (OMB Control Number 0970-0334) designed to collect programmatic information on the use of grant funding as aligned with regulatory and program legislative requirements. The Report addresses performance measures and the activities identified in the Investment Justifications as necessary. In addition, the information provided in the reports will be used by the grantor agency (FEMA) to monitor grantee cash flow to ensure proper use of Federal funds. These semiannual reports are submitted by the grantee into the Non-Disaster Grants (ND Grants) management system within 30 days after the end of the reporting period (July 30 for the Reporting period of January 1 through June 30; and January 30 for the reporting period of July 1 through December 31). In addition, a final progress report is submitted into ND Grants once the grant work is completed or the grant expires. This collection activity previously was approved under OMB Control Number 0970-0334 (Performance Progress Report, SF-PPR). The SF-PPR was replaced with the GPD-PR, which is used for the Semiannual Progress Report utilizing the ND Grants management system. The grantee also is provided with a “text box” to narrate their progress if they are unable to complete the form. The regulation supporting the completion of the Performance Reports can be found at: 2 CFR 200.329.

In addition, grantees still submit their quarterly and final financial status reports into the Payment and Reporting System (PARS). This form (Standard Form 425, OMB Control Number 0348-0061) is the same whether it is for a quarterly submission or final report.

FEMA Form FF-207-FY-23-110, Grant Programs Directorate Extension Request (GPD-Extension) – FEMA has developed a form with which grant recipients seeking to extend the Period of Performance (POP) of their existing grant may request an extension in a consistent manner, while also ensuring a consistent FEMA review processes. GPD requires grant recipients to justify extending the POP of their approved grants as a program management technique designed to ensure that grant funded activities are conducted in accordance with 2 CFR 200 and can be completed within timeframes established within the award agreement between FEMA and the grant recipient. This form is designed to help reviewers understand the nature and cause of performance delays as well as inform GPD of grant recipients who are failing to meet policy and legislative grant requirements. This form will also streamline current processes, reducing the average process time requirements from 6 weeks to approximately 6 days.

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 submission of information for the PSGP involves the use of electronic means. All applicants submit an initial application through www.grants.gov and upload their Investment Justification and all other required documents as file attachments (in MS Word, Excel or other electronic format) into ND Grants System at <https://portal.fema.gov>. In addition, the grantee submits their quarterly and final financial status reports into the PARS system.

Usability Testing has been conducted on this collection. As a result, a reduction of 4 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.

The information retained from the previous version of the FEMA Form FF-207-FY-23-108 (formerly 089-5) IJ template is generally not collected in any other form. Some information, specifically the geographic location of a project may be duplicative of FEMA Form FF-207-FY-21-100 (formerly 024-0-1) Environmental and Historic Preservation (EHP) Screening Form (OMB Control Number 1660-0115), however not to the level of granularity required by EHP. Additionally, an EHP form is not required of every project, thereby necessitating a project location to be identified within FF-207-FY-23-108 (formerly 089-5). A detailed budget worksheet is required of each applicant and included in FF-207-FY-23-108 (formerly 089-5) which expands and identifies specific costs of specific items to a level of detail not available elsewhere. To ensure consistent review, applicants may NOT use their own format. Lacking a standard form, duplicative and/or inconsistent information may be provided. The investment

justification template with incorporated budget detail minimizes duplicated information as well as risk of misalignment of grant funds. Feedback from applicants since developing the current form have been generally positive regarding ease of use, simplicity in the submission process, and consolidation of information. Approximately 570 applicants submit this form per year.

Information previously collected in the OMB SF-PPR is collected in the FEMA Form FF-207-FY-23-109 (formerly 088-0-1), GPD-PR. The GPD-PR has replaced the SF-PPR including specialized language to solicit responses necessary to demonstrate performance associated with GPD grants. Information collected within the GPD-PR has improved program office review processes by ensuring consistent format and level of detail required to satisfy Code of Federal Regulation requirements and has reduced the level of follow-up previously required to ensure compliance. Approximately 296 grants are awarded under PSGP in any given year and this form is required twice per year and one final report at the end of the period of performance of awards.

Extension requests are currently collected via email and no form is available. Grant recipients are required to explain the reason for delays and the need for an extension of the approved Period of Performance (POP). FEMA Form FF-207-FY-23-110, GPD-Extensions will formalize this collection and ensure consistency that may be lost in email correspondence. Approximately 100 grants require a POP extension in any given year and this form is required only upon requests initiated by the grant recipient. Each grant POP may be extended up to 12 months per request.

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.

The PSGP is a competitively administered discretionary grant. Approximately 17% of PSGP funding requests are from “Private” entities. Due to the competitive nature of the program, consistent application requirements are necessary to ensure fair and reasonable administration of awards.

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.

These data collection elements are required in order to exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. The IJ template supports Section 102 of the Maritime Transportation Security Act of 2002, as amended (46 U.S.C. § 70107), by allowing FEMA to ensure funding awarded to eligible entities in accordance with legislation and program guidance. FEMA Form FF-207-FY-23-109 (formerly 088-0-1), GPD-PR supports regulatory guidance and reporting options in 2 CFR 200.329 and allows FEMA to verify grant performance. FEMA Form FF-207-FY-23-110, GPD-Extension allows FEMA to ensure a consistent review process for extending the POP of existing grants per 2 CFR 200.309.

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

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

This information collection does not require respondents to report information more than quarterly.

- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

- (c) Requiring respondents to submit more than an original and two copies of any document.**

This information collection does not require respondents to submit more than an original and two copies of any document.

- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

Records must be retained for at least three years or longer in accordance with 2 CFR 200.334.

- (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 September 6, 2023, at 88 FR 60964. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on November 17, 2023, at 88 FR 80325. The public comment period is open until December 18, 2023.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

FEMA meets with the American Association of Port Authorities (AAPA) national association and other public/non-profit maritime organizations, as well as past and current grant recipients, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are widely used in advance of submission deadlines. These consultations focus on the nature of information needed by FEMA to manage the grant programs as well as sharing FEMA/DHS mission priorities for PSGP.

FEMA consults on a regular basis with Federal, state, local, tribal stakeholders, private for-profit and non-profit entities on a variety of issues, particularly on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by FEMA to administer and manage the grant programs. Partners offer comments and suggestions about their reporting practices.

Previous recommendations or comments provided most commonly are the challenges with submitting progress reports into the ND Grants system. This issue has been corrected by the ND Grants systems staff. Most recently, a few applicants noted concern with their lack of understanding of how to complete IJs, in particular the requirement to demonstrate the cost share at the time of application. The IJ template has been updated to include an instruction page, a “warning” system to ensure required input is complete, and a “Sensitive Security Information” or “SSI” cover sheet has been incorporated to reduce the burden since PSGP is intended for Anti-Terrorism projects, and an auto-sum function locked into the detailed budget to ensure the highest degree of successful completion of the application possible.

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

FEMA consults on a regular basis with Federal, state, local, tribal stakeholders on a variety of issues, particularly on matters related to this information collection submission. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Nearly all concerns are typically related to user-error and nearly all feedback about the current template is positive. PSGP hosts 6-10 outreach sessions each year, with an average attendance of over 100 PSGP stakeholders. Most of this outreach is informational in nature to assist PSGP stakeholders with grant management and each session includes a solicitation of feedback from stakeholders.

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) form was approved on April 21, 2023.

The PSGP Investment Justification, FEMA Form FF-207-FY-23-108 (formerly 089-5) is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015.

No Privacy Act Statement or System of Records Notice (SORN) coverage is required for the form.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of 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 PSGP is an existing grant program that uses the forms outlined in this collection. The bulk of U.S. critical infrastructure is owned and/or operated by State, Local, and Tribal Governments and private sector partners.

The PSGP provides funds to State, Local, and Tribal Governments and private sector partners to support increased port-wide risk management and protect critical surface transportation infrastructure from acts of terrorism, major disasters, and other emergencies. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the PSGP supports the goal to Strengthen National Preparedness and Resilience.

FEMA Form FF-207-FY-23-108 (formerly 089-5), PSGP Investment Justification. FEMA estimates that four hundred fifty-six (456) State, Local, and Tribal Governments and one hundred fourteen (114) businesses will submit a PSGP investment justification two (2) times annually. Each response will require 15 hours (900 minutes) for a total of 17,100 burden hours.

- State, Local and Tribal Government Respondents – 456 respondents × 2 submissions per year × 15 hours = 13,680 total burden hours for State, Local and Tribal Governments.
- Private Sector Respondents – 114 respondents × 2 submissions per year × 15 hours = 3,420 total burden hours for the Private Sector.
- 13,680 + 3,420 = 17,100 total annual burden hours for the instrument.

FEMA Form FF-207-FY-23-109 (formerly 088-0-1), Grant Programs Directorate Performance Report (GPD-PR). FEMA estimates that two hundred thirty-seven (237) State, Local, and Tribal Governments and fifty-nine (59) businesses will submit a PSGP investment justification two (2) times annually. Each response will require 0.5 hours (30 minutes) for a total of 296 burden hours.

- State, Local and Tribal Government Respondents – 237 respondents × 2 submissions per year × 0.5 hours = 237 total burden hours for State, Local and Tribal Governments.
- Private Sector Respondents – 59 respondents × 2 submissions per year × 0.5 hours = 59 total annual burden hours for the Private Sector.
- 237 + 59 = 296 total annual burden hours for the instrument.

FEMA Form FF-207-FY-23-110, Grant Programs Directorate Extension Request (GPD-Extension). FEMA estimates that eighty (80) State, Local, and Tribal Governments and twenty (20) businesses will submit a PSGP investment justification two (2) times annually. Each response will require 0.5 hours (30 minutes) for a total of 50 burden hours.

- State, Local and Tribal Government Respondents – 80 respondents × 1 submissions per year × 0.5 hours = 40 total burden hours for State, Local and Tribal Governments.
- Private Sector Respondents – 20 respondents × 1 submissions per year × 0.5 hours = 10 total annual burden hours for the Private Sector.
- 40 + 10 = 50 total annual burden hours for the instrument.

The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The total burden to collect the necessary information is estimated to be 17,446 total annual burden hours. This total is based on an average 570 applications received per year and 296 grants awarded each year.

Additionally, FEMA allows up to 5% of grant funds to be utilized for Management and Administration (M&A) costs. M&A costs may be paid to the grant recipient staff or contractors for the purpose of managing the grant. Grant management activities can include cost of supplies and hourly wages of personnel responsible for meeting program requirements such as submitting performance progress reports or extension requests. FEMA also authorizes up to \$1,500 of pre-award costs for contracted grant writer fees (such as completing the Investment Justification) for each application.

After conducting usability testing there is a reduction of 4 burden hours on the OMB inventory.

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

Please see our responses to 12a above and 12c below.

c. Provide an estimate of annualized cost to respondents for the burden hours for collections of information, identifying and using appropriate wage rate categories. 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	PSGP Investment Justification / FEMA Form FF-207-FY-23-108 (formerly 089-5)	456	2	912	15	13,680	\$84.62	\$1,157,602
Private Sector	PSGP Investment Justification / FEMA Form FF-207-FY-23-108 (formerly 089-5)	114	2	228	15	3,420	\$80.61	\$275,686
State, Local or Tribal Government	Grant Programs Directorate Performance Report (GPD-PR) / FEMA Form FF-207-FY-23-109 (formerly 088-0-1)	237	2	474	0.5	237	\$84.62	\$20,055
Private Sector	Grant Programs Directorate Performance Report (GPD-PR) / FEMA Form FF-207-FY-23-109 (formerly 088-0-1)	59	2	118	0.5	59	\$80.61	\$4,756
State, Local or Tribal Government	Grant Programs Directorate Extension Request (GPD-Extension) / FEMA Form FF-207-FY-23-110	80	1	80	0.5	40	\$84.62	\$3,385
Private Sector	Grant Programs Directorate Extension Request (GPD-Extension) / FEMA Form FF-207-FY-23-110	20	1	20	0.5	10	\$80.61	\$806
Total		966		1,832		17,446		\$1,462,290

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 for-profit businesses. Multiply the non-loaded “Avg. Hourly Wage Rate” by 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 businesses and 1.61 for State, Local or Tribal Government, and the entry 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 2022 Occupational Employment and Wage Estimates national and Local Government wage rates for Administrative Services Manager (Standard Occupational Classification 11-3012) are \$55.59 for and \$52.56 respectively.² Including the wage rate multipliers of 1.45 for businesses and 1.61 for State, Local or Tribal Government, the fully-loaded wage rates are estimated at \$80.61 (= \$55.59 × 1.45) and \$84.62 (= \$52.56 × 1.61) per hour respectively. Therefore, the estimated annual

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 2023.” Available at <https://www.bls.gov/news.release/pdf/ecec.pdf>. wage multiplier for business or other for-profit 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. The wage multiplier for State, Local, or Tribal Government 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. Accessed on July 7, 2023.

² Information on the mean wage rate from the U.S. Department of Labor is available online at: <https://www.bls.gov/oes/tables.htm>. Accessed on July 7, 2023.

burden hour cost is estimated to be \$1,462,290 (= (\$80.61 × 3,489 hours) + (\$84.62 × 13,957 hours)).

Port Security Grant Program (PSGP) (97.056)								
<i>The following Standard Forms (SF) are utilized for the FEMA grant programs. Approval for the collection of this information is provided under a government-wide OMB control number used throughout the Federal Government; burden hours specific to these forms are not submitted for approval of this collection: Note that the higher rate of \$65.66 (mean Local wage rate) by default since the majority of applications received are from local government entities.</i>								
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, Business or other for-profit	Application for Federal Assistance / SF 424 Grants.gov OMB Control # 4040-0001	570	1	570	1.0	570	\$84.62	\$48,233
State, Local or Tribal Government, Business or other for-profit	Budget Information - Non-Construction Programs / SF 424A Grants.gov OMB Control # 4040-0006	570	1	570	1.0	570	\$84.62	\$48,233
State, Local or Tribal Government, Business or other for-profit	Assurances - Non-Construction Programs / SF 424B Grants.gov OMB Control # 4040-0007	570	1	570	0.50	285	\$84.62	\$24,117
State, Local or Tribal Government, Business or other for-profit	Budget Information - Construction Programs / SF 424C Grants.gov OMB Control # 4040-0008	100	1	100	1	100	\$84.62	\$8,462
State, Local or Tribal Government, Business or other for-profit	Assurances - Construction Programs / SF 424D Grants.gov OMB Control # 4040-0009	100	1	100	0.5	50	\$84.62	\$4,231
State, Local or Tribal Government, Business or other for-profit	Disclosure of Lobbying Activities / SF LLL Grants.gov OMB Control # 4040-0013	570	1	570	1.0	570	\$84.62	\$48,233
State, Local or Tribal Government, Business or other for-profit	Direct Deposit Sign-Up Form / SF 1199A Dept. of Treasury OMB Control # 1530-0006	296	1	296	0.1667	49.34	\$84.62	\$4,175
State, Local or Tribal Government, Business or other for-profit	Federal Financial Report / SF 425 Grants.gov OMB Control # 4040-0014	296	4	1,184	1	1,184	\$84.62	\$100,190
Total		2,776		3,960		3,378		\$285,874

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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.)

Annual Cost Burden to Respondents		
Data Collection Activity/In	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional

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	
Staff Salaries [3 of GS 13 Step 5, 7 of GS 12 Step 5, and 1 of GS 14 Step 5 employees spending approximately 60% of time annually for this administrative and financial data collection] [(3 × \$126,949 × 1.45) × (7 × \$106,759 × 1.45) + (\$150,016 × 1.45) = \$1,853,355]	\$1,853,355
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments × postage]	
Other	
Total	\$1,853,355
¹ Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf . Accessed July 10, 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 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
PSGP Investment Justification / FEMA Form FF-207-FY-23-108 (formerly 089-5)				17,100	17,100	+0
Grant Programs Directorate Performance Report (GPD-PR) / FEMA Form FF-207-FY-23-109 (formerly 088-0-1)	0			296	296	+0
Grant Programs Directorate Extension Request (GPD-Extension) / FEMA Form FF-207-FY-23-110		50	+50			
PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA)				54	0	-54
Total(s)	0	50	+50	17,450	17,396	-54

Explain: FEMA estimates a decrease of 54 burden hours from the discontinuation of the PSGP – MOU or MOA template, which is offset by an increase of 50 burden hours from the introduction of FEMA Form FF-207-FY-23-110, GPD-Extension. This gives an overall decrease of 4 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
PSGP Investment Justification / FEMA Form FF-207-FY-23-108 (formerly 089-5)				\$1,401,687	\$1,433,288	+\$31,601
Grant Programs Directorate Performance Report (GPD-PR) / FEMA Form FF-207-FY-23-109 (formerly 088-0-1)				\$24,263	\$24,811	+\$548
Grant Programs Directorate Extension Request (GPD-Extension) / FEMA Form FF-207-FY-23-110	\$0	\$4,191	+\$4,191			
PSGP - Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA)				\$4,426	\$0	-\$4,426
Total(s)	\$0	\$4,191	+\$4,191	\$1,430,376	\$1,458,099	+\$27,723

Explain: FEMA estimates a decrease in annual cost burden of \$4,426 from the discontinuation of the PSGP MOU or MOA template; an increase of \$4,191 from the introduction of FEMA Form FF-207-FY-23-110, GPD-Extension, and an increase of \$32,149 from an increase of wages

for FEMA Forms FF-207-FY-23-110, PSGP IJ and FF-207-FY-23-110, GPD-PR (\$31,601 + \$548 = \$32,149). This gives an overall increase in cost burden of \$27,723.

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.