

November 28, 2022

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0023

Title: Community Assistance Contact (CAC) and Community Assistance Visits (CAV) Reports

Form Number(s):

- 1) FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E)), Community Assistance Visit (CAV) Report; and**
- 2) FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact (CAC) Report.**

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

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Flood Insurance Program (NFIP), codified as 42 U.S.C. 4001, *et seq.*, is authorized by Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the NFIP, and a major objective of the NFIP is to assure that participating communities are achieving the flood loss reduction objectives through implementation and enforcement of adequate land use and control measures. Sections 1315 and 1361 provide the basis for FEMA's process to evaluate how well communities are implementing their floodplain management programs. 44 CFR 59.22 directs the respondent to submit evidence of the corrective and preventive measures taken to meet the flood loss reduction objectives.

The two key methods FEMA uses in determining community assistance needs are through the Community Assistance Contact (CAC) and Community Assistance Visit (CAV), which serve to provide a systematic means of monitoring community NFIP compliance. Through the CAC and CAV, FEMA can also determine to what extent communities are achieving the flood loss reduction objectives of the NFIP. By providing assistance to communities, the CAC and CAV also serve to enhance FEMA's goals of reducing future flood losses, thereby achieving the cost-containment objective of the NFIP.

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

FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E)), Community Assistance Visit Report is a report based on a CAV which is recorded in the Community Information System (CIS). CIS is an online database and the official system of record for many NFIP activities. A CAV is a scheduled visit to a NFIP community for the purposes of conducting a comprehensive assessment of the community's floodplain management program, to assist the community in understanding the NFIP and its requirements, and implementing effective flood loss reduction measures. The CAV Report provides a simplified method to notate what, if any, problems exist with a community's floodplain management process, what actions the community might need to undertake to correct the problem(s), and how FEMA can possibly assist in any corrective action.

FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact Report is a report based on a CAC which is recorded in CIS. A CAC is a brief call or visit with a NFIP community for the purpose of establishing or reestablishing contact to determine if program-related problems exist and to offer assistance. The CAC

Report provides the actions that the community will take, if required, to resolve any minor issues with their floodplain management processes, and the report also will determine if a full CAV is required.

FEMA shares the information with the State partners, who collect the information for FEMA under an annual cooperative agreement.

The Floodplain Management Division at FEMA Headquarters is currently undergoing a redesign of NFIP compliance, including CACs and CAVs. Many changes are proposed, including doing away with the terms CAC and CAV and introducing the terms Diagnostic Evaluation and Full Evaluation in their place. The auditor will ask a predetermined set of questions and the answers will be recorded in a spreadsheet and uploaded into what is currently called the CAV Report and CAC Report in CIS. This redesign is not expected to be finalized and in use until after this collection's current expiration date.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FEMA has converted FEMA Forms FF-206-FY-21-141 (formerly 086-0-28(E)) and FF-206-FY-21-142 (formerly 086-029(E)) into an on-line database (DHS Integrated Security and Access Control System) called the Community Information System (CIS). The CIS allows for direct entry of the information into the on-line Account and Password Protected system at URL: [CIS: Community Information System Home \(fema.net\)](http://CIS: Community Information System Home (fema.net)).

The CIS database will be modernized in the next few years as part of the previously mentioned NFIP Compliance Redesign.

Usability testing has been conducted on this collection. As result, an increase of 56,000 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.

Some of the information collected is currently duplicated by another means (National Violations Tracker), but in future iterations of the CIS, but in future iterations we hope to automate this process and therefore eliminate duplication of efforts.

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

This information collection does not have an impact on small businesses or other small entities, because most if not all State NFIP Coordinating Offices are part of larger state agencies, which under a cooperative agreement with FEMA, and with FEMA grants, collect CAV and CAC data and enter it into the CIS as CAV Report and CAC Report.

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

If the information discussed above is not collected, FEMA would not know the extent to which approximately 22,500 communities participating in the NFIP are adhering to the obligation of implementing a floodplain management program as agreed to when joining the NFIP. The core of this agreement is that FEMA, as a requirement under the National Flood Insurance Act, will provide flood insurance coverage if communities adopt and enforce floodplain management regulations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (See 5 CFR 1320.5(d)(2)):

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

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

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

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

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

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

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

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

- e. In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

This information collection does not include a statistical survey.

- f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

This information collection does not use a statistical data classification that has not been reviewed and approved by OMB.

- g. That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

- h. Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection does not require respondents to submit trade secrets or other confidential information.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on September 1, 2022, at 87 FR 53760. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on November 28, 2022, at 87 FR 73014. One public comment was received regarding possible additional burden unaccounted for in the collection.

Public Comment: “The information collection instruments provided OMB describe a FEMA IT system used to collect the results of Community Assistance Contacts and Community Assistance Visits. However, FEMA's description of the Information Collection and attached instruments do not reflect the substantial burdens placed on thousands of communities nationwide that must create, maintain, and produce volumes of documentation and reports to FEMA and state officials to comply with the requirements of Community Assistance Contacts and Community Assistance Visits.

A more accurate description of the burden placed on local communities is provided in the NFIP's Guidance for Conducting Community Assistance Contacts and Community Assistance Visits, FEMA F-776/April 2011. Per Section 4.4, examiners are required to contact local officials prior to a Community Assistance Visit. As part of this contact, examiners are required to ask local officials for various documents, including "Copies of the latest floodplain management regulations and any other plans, regulations, or codes that are being used to assist in floodplain development" and "The community’s permit files for floodplain development for at least the past three to five years." Examiners must then send a written confirmation of the visit that instructs local governments to these records.

FEMA's requirement that local governments produce these regulatory and administrative documents for review by examiners constitutes an Information Collection. However, these instruments have not been approved by OMB or otherwise comply with the Paperwork Reduction Act. Maintaining these records and producing them in a manner that complies with FEMA's requirements places a substantial administrative burden on local governments that should be made to comply with the PRA. Instead, the current Information Collection Request only discusses the burden on state and federal officials that input the results of these Community Assistance Contacts and Community Assistance Visits.”

FEMA Response: FEMA is recognizing a substantial increase in the burden placed on state and local governments with these revisions, which were specifically meant to be a more accurate estimate of said burden. FEMA is estimating an average time burden per community with this increase, recognizing the time burden will vary to some degree by community. While this burden can be a sizeable one, it is a necessary burden because it allows FEMA to determine that local participating communities are achieving their flood loss reduction objectives through the implementation and enforcement of adequate land use and control measures. It is worth noting that communities do agree to oversight from Federal and state agencies when they choose to join the NFIP. FEMA is also working on further changes to how the CAC and CAV reports are developed to be even more accurate with burden calculations in the future.

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 regularly receives input on the information collected during CACs and CAVs from State officials involved with floodplain management. As mentioned above, FEMA (Floodplain Management Division) is redesigning aspects of the NFIP Compliance process through a Compliance Committee which consists of representatives from each FEMA Regional Office, a Floodplain Management Division project manager, and a Regional FEMA Floodplain Management & Insurance Branch Chief Sponsor. This Committee regularly provides feedback on the information collected for the new proposed NFIP Compliance Redesign that will eventually replace the current CAC and CAV Reports. After the process is piloted in the summer of 2022, 7 volunteer states will also provide feedback. Feedback was collected after presentations at every Regional Community Assistance Program (CAP) Conference, the Association of State Floodplain Managers (ASFPM) Conference, Hazard Mitigation Workshop, and other venues. Through these engagements, policy issues on the process are discussed and, when appropriate, incorporated into future years' guidance.

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.

The NFIP is a voluntary program in which a community agrees to periodic audits of their program through the CAV and CAC process.

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.

An updated Privacy Threshold Analysis (PTA) draft is currently with FEMA's Privacy Branch for review.

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

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

There are no questions of a sensitive nature.

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

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

FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E)), Community Assistance Visit Report is estimated to have 50 respondents times 10 responses per year for 500 total annual responses ($50 \times 10 = 500$). It is estimated that each response will require 60 burden hours to complete, therefore 500 responses times 60 hours equals 30,000 total annual burden hours ($500 \times 60 = 30,000$)

FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact Report is estimated to have 50 respondents times 30 response per year for 1,500 total annual response ($50 \times 30 = 1,500$). It is estimated that each response will require 20 burden hours to complete, therefore 1,500 times 20 hours equals 30,000 total annual burden hours ($1,500 \times 20 = 30,000$).

After conducting usability testing there is a 56,000 burden hour increase 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 response to 12a above and 12c below.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

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	Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))	50	10	500	60	30,000	\$41.76	\$1,252,800
State, local or Tribal Government	Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))t	50	30	1,500	20	30,000	\$41.76	\$1,252,800
Total		100		2,000		60,000		\$2,505,600

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

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates mean wage rate for Community and Social Service Occupations (SOC 21-0000) is \$25.94 per hour.² Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$41.76 per hour. Therefore, the burden hour cost is estimated to be \$2,505,060 annually (\$41.76 x 60,000 hours = \$2,505,060).

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.)

¹ State and local government wage multiplier: Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/eccc_03182022.pdf. Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$54.96 by Wages and salaries for State and local government workers of \$34.09 per hour yielding a benefits multiplier of approximately 1.61

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2021/may/oes_nat.htm. SOC 21-0000 Community and Social Service Occupations

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 systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

There are no operation or maintenance costs associated with this 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 collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries* 35 of GS-12, step 5 employees spending approximately 35% of time annually performing the community contacts and visits; monitoring, reviewing, writing and approving the reports for this data collection. GS 12, Step 5 = 48.78 x 1.45 = \$70.73 x 35 employees = \$2,476 x (52 weeks x 40 hours x 35%) = \$1,802,528	\$1,802,528
Facilities [work occurs in the field, at telework locations, and inside federal facilities that are already rented]	\$0
Computer Hardware and Software [5%x \$1,290,000 [5% of total floodplain management database) = \$64,500]	\$64,500
Equipment Maintenance [5% of sum of all equipment costs estimated in each region’s spend plan = 5% of \$68,800]	\$3,440
Travel [sum of all CAV/CAC related travel estimated in each region’s spend plan for FY23]	\$311,500
Printing [mostly emailed]	\$0
Postage [mostly emailed]	\$0
Other	\$0
Total	\$2,181,968

¹ Office of Personnel Management 2022 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf Accessed August 15, 2022

² Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for all workers of \$40.35 by wages and salaries for all workers of \$27.83 per hour yielding a benefits multiplier of approximately 1.45.

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
Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))				2,000	30,000	+28,000
Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))				2,000	30,000	+28,000
Total(s)				4,000	60,000	+56,000

Explain: We have re-evaluated the burden hours using the CAP-SSE contract to reflect the average burden more accurately per response and include all aspects of collecting the information (rather than just filling out the forms). While this is a large increase in the recognized burden for this collection, it is also the most accurate burden estimate that FEMA has produced for this collection.

There have been no changes in the information being collected.

Itemized Changes in Annual Cost						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))				\$181,520	\$1,252,800	+\$1,071,280
Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))				\$181,520	\$1,252,800	+\$1,071,280
Total(s)				\$363,040	\$2,505,600	+\$2,142,560

Explain: The increase in cost is due to the increase in burden hours discussed above. We have also re-evaluated the burden costs by choosing a more accurate wage description of the local community official. There have been no changes in the information being collected.

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 publish the information collection in any format.

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.