

March 9, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0017

Title: Public Assistance Program

Form Number(s):

- **FEMA Form FF-104-FY-21-131 (formerly 009-0-49), Request for Public Assistance;**
- **FEMA Form FF-104-FY-21-132 (formerly 009-0-111), Quarterly Progress Reports;**
- **FEMA Form FF-104-FY-21-137 (formerly 009-0-123), Force Account Labor Summary Record;**
- **FEMA Form FF-104-FY-21-138 (formerly 009-0-124), Materials Summary Record;**
- **FEMA Form FF-104-FY-21-139 (formerly 009-0-125), Rented Equipment Summary;**
- **FEMA Form FF-104-FY-21-140 (formerly 009-0-126), Contract Work Summary;**
- **FEMA Form FF-104-FY-21-141 (formerly 009-0-127), Force Account Equipment Summary Record ;**
- **FEMA Form FF-104-FY-21-135 (formerly 009-0-128), Applicant's Benefits Calculation Worksheet;**
- **FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141), FAC-TRAX System**
- **FEMA Template FT-104-FY-21-100, Equitable COVID-19 Response and Recovery: Vaccine Administration Information;**
- **FEMA Form FF-104-FY-22-233, Organization Profile;**
- **FEMA Form FF-104-FY-22-234, Recipient Incident Information;**
- **FEMA Form FF-104-FY-22-235, Applicant Impact Survey;**
- **FEMA Form FF-104-FY-22-238, Pre-Approval Request;**
- **FEMA Form FF-104-FY-22-236, Impact List;**
- **FEMA Form FF-104-FY-22-239, Project Application for Debris Removal;**
- **FEMA Form FF-104-FY-22-240, Project Application for Emergency Protective Measures;**
- **FEMA Form FF-104-FY-22-242, Project Application for Infrastructure Restoration;**
- **FEMA Form FF-104-FY-22-243, Project Application for Building Code and Floodplain Administration and Enforcement;**
- **FEMA Form FF-104-FY-22-244, Project Application for Management Costs;**
- **FEMA Form FF-104-FY-22-245, Damage Information;**

- **FEMA Form FF-104-FY-22-246, Environmental and Historic Preservation Addendum;**
- **FEMA Form FF-104-FY-22-247, Hazard Mitigation Addendum;**
- **FEMA Form FF-104-FY-22-241, Project Application for COVID-19;**
- **FEMA Form FF-104-FY-22-237, Donated Labor Sign-in;**
- **FEMA Form FF-104-FY-21-250, Tribal Administrative Plan;**
- **FEMA Form FF-104-FY-22-248, Time Extension; and**
- **FEMA Form FF-104-FY-22-249, State Administrative Plan.**

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 Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (Stafford Act), authorizes grants to assist state, local, territorial, and Tribal (SLTT) governments and certain private non-profit (PNP) entities with the response to and recovery from disasters following Presidentially declared major disasters and emergencies. The information collected is required for the Public Assistance (PA) Program eligibility determinations, grants management, and compliance with other Federal laws and regulations. 44 CFR Part 206 specifies the information collections necessary to facilitate the provision of assistance under the PA Program.

44 CFR 206.202 describes the general application procedures for the PA Program. Section 206.202(c) requires the Recipient to submit a Request for Public Assistance (FEMA Form FF-

104-FY-21-131) for each Applicant who requests PA. 44 CFR 206.202(d)(1)(i) requires the Applicant to submit a Project Worksheet for each project. The Project Worksheet must identify the eligible scope of work and must include a quantitative estimate for the eligible work. 44 CFR 206.202(d)(1)(ii) allows the Applicant to identify and report damage within 60 days following its first substantive meeting with FEMA.

44 CFR 206.203(d)(1) describes funding options for improved projects and 44 CFR 206.203(d)(2) for alternate projects. For an improved project, if an Applicant desires to make improvements but also restore the pre-disaster function of a damaged facility, the Recipient's approval must be obtained. If an Applicant determines that the public welfare would not be best served by restoring a damaged public facility or the function of that facility, the Recipient may request that the Regional Administrator approve an alternate project. Prior to the start of construction of any alternate project, 44 CFR 206.203(d)(2)(v) requires a Recipient to submit a Pre-Approval Request describing the proposed alternate project, a schedule of work, and the projected cost of the project. 44 CFR 206.203(d)(2)(v) also requires a Recipient to provide the necessary assurances to document compliance with special requirements, including but not limited to floodplain management, environmental assessment, hazard mitigation, protection of wetlands, and insurance.

44 CFR 206.204(c) allows the Recipient to approve time extensions for the completion of projects for an additional six (6) months for debris clearance and emergency work and an additional 30 months for permanent work. 44 CFR 206.204(d) allows Recipients to submit to FEMA requests for time extensions beyond extensions available under Section 206.204(c). 44 CFR 206.204(d)(2) requires Recipients to submit a detailed justification for the delay and a projected completion date to the Regional Administrator.

44 CFR 206.204(e) requires the Subrecipient to evaluate cost overruns for large projects and, when justified, submit a request for additional funding through the Recipient to the Regional Administrator for a final determination. All requests for the Regional Administrator's approval must contain sufficient documentation to support the eligibility of all claimed work and costs. The Recipient must include a written recommendation when forwarding the request to the Regional Administrator. The Regional Administrator will notify the Recipient in writing of the final determination.

44 CFR 206.204(f) requires progress reports (FEMA Form FF-104-FY-21-132) to be submitted by the Recipient to the Regional Administrator on a quarterly basis. The Regional Administrator and Recipient negotiate the date for submission of the first report. Progress reports describe the status of those projects on which a final payment of the Federal share has not been made to the Recipient, and outline any problems or circumstances expected to result in noncompliance with the approved grant conditions.

44 CFR 206.207 requires states or territories to develop a State Administrative Plan annually to administer the PA Program. The submission of the State Administrative Plan is required as a condition of receiving PA funding. FEMA must approve a State Administrative Plan before awarding any project grant assistance to any PA Applicant. The State must submit a revised plan annually. FEMA requires states to amend their plans to meet current policy guidance in each disaster for which PA is included.

The Sandy Recovery Improvement Act of 2013 (SRIA) amended the Stafford Act to provide Federally-recognized Indian tribal governments (Tribal governments) the option to request a Presidential emergency or major disaster declaration. A Tribal government that has received its own declaration, authorizing PA, must submit an updated administrative plan to the FEMA Regional office every year. The annual submission ensures the Tribal government has an updated plan on file should the Tribal government receive another Presidential declaration authorizing PA. The Tribal government will submit a disaster-specific administrative plan for each new tribal declaration. The Tribal government may request technical assistance from the regional office to develop this plan, both before and after a declaration. The Disaster Recovery Reform Act of 2018 (DRRA) Section 1215 amends Section 324 of the Stafford Act and defines management costs as “any indirect cost, any direct administrative cost, and any other administrative expense associated with a specific project under a major disaster, emergency, or disaster preparedness or mitigation activation or measure.” The Public Assistance (PA) Management Costs Interim Policy (Interim Policy) implements Section 1215 of the DRRA and provides greater flexibility to SLTT governments and certain PNP’s to manage the PA Program.

Once FEMA makes a determination on an application or project, the Applicant may appeal that determination. If an Applicant seeks appeal, 44 CFR 206.206 requires an Applicant to submit a request for appeal, and the Recipient to submit a recommendation regarding the Applicant’s request. For projects over \$500,000.00 resulting from Hurricanes Katrina or Rita (DR-1603, DR-1604, DR-1605, DR-1606, and DR-1607), Applicants may seek arbitration in lieu of an appeal. Arbitration is authorized by Section 601 of the American Recovery and Reinvestment Act of 2009 (Pub. L. 111-5) and 44 CFR 206.209. To seek arbitration, Applicants must submit a request for arbitration which may be accompanied by a recommendation from the Recipient.

On October 5, 2018, the President signed the DRRA into law and Section 1219, which amended Section 423(d) of the Stafford Act (42 U.S.C. § 5189a), provides a right of arbitration to certain Applicants of the PA Program that have a dispute concerning the eligibility for assistance or repayment of assistance.

To request arbitration pursuant to the newly amended 42 U.S.C. § 5189a, a PA Applicant (1) must have a dispute arising from a disaster declared after January 1, 2016, (2) must be disputing an amount that exceeds \$500,000 (or \$100,000 for an Applicant in a “rural area” with a population of less than 200,000 and outside of an urbanized area), and (3) must have submitted a

first appeal pursuant to the requirements established under 44 CFR 206.206. Such Applicants that receive a negative first appeal decision then have the option of submitting either a request for a second appeal or a request for arbitration. In addition, an Applicant that has had a first appeal pending with FEMA for more than 180 calendar days may withdraw such appeal and submit a request for arbitration.

On March 13, 2020, the White House declared a nationwide emergency with Proclamation 9994, and subsequent major disaster declarations, to provide Federal assistance under the Stafford Disaster Act for emergency protective measures to address the COVID-19 pandemic. The PA Program issued FEMA Policy #104-21-0004: “Coronavirus (COVID-19) Pandemic: Medical Care Eligible for PA (Interim) (Version 2).” This interim policy defines the framework and requirements for determining the eligibility of medical care work and costs under the PA Program to ensure consistent and appropriate implementation across all COVID-19 emergency and major disaster declarations, and to ensure equitable distribution of medical care.

COVID-19 has a disproportionate impact on communities of color and other underserved populations, including members of the lesbian, gay, bisexual, transgender, queer, intersex and other gender-identifying community, persons with disabilities, those with limited English proficiency, and those living at the margins of our economy. In accordance with the legal authorities found in Section 308 of the Stafford Act (42 U.S.C. § 5151) and implemented under 44 C.F.R. 206.11(a); Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and implemented under 44 C.F.R. 7.10(b)-(c); Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(a)(2)) and implemented under 44 C.F.R. 206.11(a); the Age Discrimination Act of 1975, (42 U.S.C. § 6101 *et seq.*) and implemented under 44 CFR 7.930; and Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 *et seq.*) and implemented under 44 CFR 19.605; FEMA requires PA Recipients and Subrecipients to collect data consistent with the Office of Management and Budget (OMB) minimum standard collection categories, as per OMB Statistical Policy Directive No. 15, including race, ethnicity, and disability status. It is further required that Recipients make best efforts to collect additional equity-focused person-level data including information on primary language and sexual orientation or gender identity. Recipients and Subrecipients shall incorporate these data in their development of short-term targets for the equitable deployment of PA financial assistance and to reach communities of color and other underserved populations.

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 requests information and documentation required to substantiate the eligibility of an SLTT government or PNP organization to receive grant funding through the PA program.

Additionally, the Applicant is responsible for providing information and documentation to support that its facilities, work, and costs are eligible based on the applicable laws, regulations, EOs, and policies. At a minimum, FEMA usually requires the “who, what, when, where, why, and how much” for each item claimed. The information and documentation may be shared with other FEMA program areas to ensure there are no duplication of benefits and to coordinate with other Federal Agencies to when disaster efforts require immediate attention or Federal support.

This information collection has been significantly revised to reduce administrative hurdles and minimize the paperwork burden when applying for assistance through the PA program. This collection was designed to incorporate a people-first approach by making the process simpler, more accessible, and more user-friendly. Questions removed from the collection and replaced with certifications significantly reducing information and documentation requirements. The forms collect information and use technology to identify underserved communities to improve FEMA’s resource allocation and coordination. FEMA also incorporated ways to enable communities to directly address their own threats from climate change through incorporating considerations from Climate Adaptation Plans, easily identifying mitigation opportunities, and reducing the burden to incorporate codes and standards when rebuilding.

Summary of changes: The collection includes 17 new forms, 5 revised forms, 7 forms removed, and 8 forms without changes.

The following forms are removed from this collection:

- **FEMA Form FF-104-FY-21-133 (formerly 009-0-91), Project Worksheet (PW);**
- **FEMA Form FF-104-FY-21-133A (formerly FF 009-0-91A), Project Worksheet (PW) – Damage Description and Scope of Work Continuation Sheet;**
- **FEMA Form FF-104-FY-21-142 (formerly FF 009-0-91B), Project Worksheet (PW) – Cost Estimate Continuation Sheet;**
- **FEMA Form FF-104-FY-21-143 (formerly FF 009-0-91C), Project Worksheet (PW) - Maps and Sketches Sheet;**
- **FEMA Form FF-104-FY-21-144 (formerly FF 009-0-91D), Project Worksheet (PW)- Photo Sheet;**
- **FEMA Form FF-104-FY-21-134 (formerly FF 009-0-120), Special Considerations Questions; and**
- **FEMA Form FF-104-FY-21-136 (formerly FF 009-0-121), PNP Facility Questionnaire.**

The following forms are new to this collection:

FEMA Form FF-104-FY-22-233, Organization Profile - FEMA PA Recipients and Applicants complete this form to create a Grants Portal account, manage user accessibility, and provide general information needed for the PA Program. Recipients are SLTT governments that may

receive and administer Federal awards. Applicants are SLTT government entities or private nonprofit organizations that may receive subawards under an SLTT PA award.

FEMA Form FF-104-FY-22-234, Recipient Incident Information - FEMA PA Recipients complete this form to provide incident-specific information and to elect whether to lead all or part of the PA Program delivery process.

FEMA Form FF-104-FY-22-235, Applicant Impact Survey - Applicants complete this form to collect preliminary information regarding incident impacts. FEMA uses this information to assess the Applicant's incident impacts to identify resources needed to assist the Applicant. FEMA does not use this information to determine the level of funding it provides.

FEMA Form FF-104-FY-22-238, Pre-Approval Request – Work associated with certain activities requires pre-approval from the Recipient and/or FEMA. Applicants complete this form to collect information necessary to approve activities such as:

- Alternate Project
- Alternative Procedures Use of Excess Funds
- Demolition of Commercial Property
- Demolition of Residential Property
- Equipment Rate
- Improved Project
- Host-State/Tribe Sheltering and Evacuation
- Mosquito Abatement
- Non-congregate Sheltering
- Private Property Debris Removal
- Project Amendment
- Replacement Project
- Residential Electric Meter Repair Program
- Safe Rooms for Temporary Schools

FEMA Form FF-104-FY-22-236, Impact List - Applicants complete this form to report incident-related impacts and damage. The information collected will help catalog the damage and impacts to ensure all claims are submitted to FEMA for reimbursement. FEMA and the Recipient use this information to determine manage the event and identify resources required to assist the Applicant. FEMA does not use this information to determine the monetary assistance available for the Applicant.

FEMA Form FF-104-FY-22-239, Project Application for Debris Removal - Debris removal includes activities that eliminate immediate threats to life, public health, and safety; eliminate immediate threats of significant damage to improved public or private property; and ensure economic recovery of the affected community to the benefit of the community at large by

clearance, removal, and disposal when in the public interest. FEMA uses this form to collect information necessary to support the Applicant's claim.

FEMA Form FF-104-FY-22-240, Project Application for Emergency Protective Measures – Emergency Protective Measures include activities that eliminate or lessen immediate threats to life, 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.

FEMA Form FF-104-FY-22-242, Project Application for Infrastructure Restoration - Permanent Work (Categories C–G) includes activities required to restore a facility to its pre-disaster design (size and capacity) and function in accordance with all applicable codes and standards. FEMA uses this form to collect information necessary to support the Applicant's claim.

FEMA Form FF-104-FY-22-243, Project Application for Building Code and Floodplain Administration and Enforcement - Building code and floodplain management administration and enforcement activities related to the repair, replacement or retrofit of disaster-damaged structures in the jurisdiction of the Applicant may be eligible for PA funding. This may include public and private structures.

FEMA Form FF-104-FY-22-244, Project Application for Management Costs - Management costs include indirect and direct administrative costs associated with the PA Program and projects. FEMA uses this form to collect information necessary to support management cost claims.

FEMA Form FF-104-FY-22-245, Damage Information - FEMA, Recipients, or Applicants complete this form to record detailed incident-related damage descriptions with dimensions. FEMA and the Recipient use this form to validate damage, scopes of work, and estimates. FEMA can provide technical assistance upon request.

FEMA Form FF-104-FY-22-246, Environmental and Historic Preservation Addendum – Environmental and Historic Preservation (EHP) statutes, Executive Orders, and regulations establish requirements to protect the environment and preserve the Nation's historic and archaeological resources. FEMA reviews each PA project to ensure the work complies with applicable Federal EHP laws and implementing regulations, and applicable EOs. This form is triggered when an Applicant's response to questions asked in the information collection forms indicate that the work may require compliance with applicable Federal, state, territorial, or Tribal EHP laws.

FEMA Form FF-104-FY-22-247, Hazard Mitigation Addendum – This form takes a new approach to communicating and collecting information about communities’ interest in mitigating damage to facilities. This form is triggered when an Applicant indicates interest in implementing measures that mitigate future damage for all-hazards. FEMA uses this form to collect information needed to engage with Applicants on mitigation opportunities. The form also collects the information necessary for FEMA specialists to write mitigation scopes of work and estimates if technical assistance is requested.

FEMA Form FF-104-FY-22-241, Project Application for COVID-19 - FEMA uses this form to collect information necessary to support the Applicant’s claim for costs related to emergency protective measures conducted as a result of the COVID-19 pandemic. Emergency protective measures are activities conducted to address immediate threats to life, public health, and safety.

FEMA Form FF-104-FY-22-237, Donated Labor Sign-in - Applicants may use this form as a volunteer sign-in sheet for donated labor.

FEMA Form FF-104-FY-21-250, Tribal Administrative Plan - Tribes use this form as guide when developing their Tribal Administrative Plan. It provides citations of laws, regulations and policies that Tribe procedures must comply with in order to meet Federal program and grant administrative requirements. Each Tribe should tailor the format of their Administrative Plans, as needed, to best explain their own process of delivering FEMA’s PA Program.

FEMA Form FF-104-FY-22-248, Time Extension - Time extensions are changes to the original grant agreements. This form shows all information and documentation that is needed for FEMA to process the request.

The following forms were previously approved but revised:

FEMA Form FF-104-FY-21-131 (formerly 009-0-49), Request for Public Assistance – Government entities and PNP organizations complete this revised form to register for FEMA’s PA program. The Recipient and FEMA use this information to determine whether the Applicant is eligible for PA and the level of resources required to assist the Applicant. FEMA does not use this information to determine the level of funding it provides. This information is time sensitive. Applicants and Recipients must complete this information within 30 days of the date of declaration or the respective area being designated in the declaration. Applicants not able to submit the information within the allotted time may request a time extension describing the extenuating circumstances. This form is revised from previously approved versions. Changes to the form include removing questions that are unnecessary and including questions improve understanding of the Applicant’s needs.

FEMA Form FF-104-FY-21-140 (formerly FF 009-0-126), Contract Work Summary

Record – Applicants and Recipients complete this form for each contract secured to perform work being claimed under the FEMA PA Program. FEMA uses this information to confirm that Applicants are adhering to all Federal and SLTT government procurement and contracting laws, regulations, and policies. The information requested in this form is required by Section 430 of the Stafford Act and Title 2 CFR Part 200.

FEMA Form FF-104-FY-21-132 (formerly FEMA Form 009-0-111), Quarterly Progress

Reports – This revised form is a tool for FEMA and the Recipient to track the progress of large projects. The Recipient reports the status and disbursement information for all open large projects and management cost projects on a quarterly basis as required by the FEMA-State/Tribe Agreement and 44 CFR 206.204. Applicants provide this information to the Recipient.

FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141), FAC-TRAX System – This system will be the primary resource to collect and process information. Information will be collected in a consistent manner through the FAC-TRAX system as the paper version of the forms. Due to the nature of disasters, there may be occurrences where power outages or other damage may inhibit use of electronic systems to capture the information needed to process the PA grant. In those instances, the paper version of the forms will be used to collect the information however in absence of those challenges, the system will mirror the questions, help text, instructions, and other information conveyed in the paper version.

FEMA Form FF-104-FY-22-249, State Administrative Plan – States/Territories use this form as guide when develop their annual State Administrative Plan. It provides citations of laws, regulations and policies that state procedures must comply with in order to meet Federal program and grant administrative requirements. Each state should tailor the format of their Administrative Plans, as needed, to best explain their own process of delivering FEMA’s PA Program.

The following forms were previously approved and remain unchanged:

FEMA Form FF-104-FY-21-137 (formerly FF 009-0-123), Force Account Labor Summary

Record – The Force Account Labor Summary Record may be used to record costs associated with conducting eligible work by an Applicant’s own employees for COVID-19 projects.

FEMA Form FF-104-FY-21-135 (formerly FF 009-0-128), Applicant’s Benefits Calculation

Worksheet - The Applicant’s Benefits Calculation Worksheet may be used to record the percentage of the actual wages that pays for employee benefits, known as fringe benefits for COVID-19 projects.

FEMA Form FF-104-FY-21-141 (formerly FF 009-0-127), Force Account Equipment Summary Record – The Force Account Equipment Summary Record may be used to record Applicant equipment costs for COVID-19 projects.

FEMA Form FF-104-FY-21-138 (formerly FF 009-0-124), Materials Summary Record – The Materials Summary Record may be used to record the costs associated with supplies and materials that were purchased or taken from an Applicant’s stock and used during the performance of eligible work for COVID-19 projects.

FEMA Form FF-104-FY-21-139 (formerly FF 009-0-125), Rented Equipment Summary Record - The Rented Equipment Summary Record may be used to record the costs of rented or leased equipment for COVID-19 projects.

Appeal – After receiving a determination from FEMA, the Applicant may file a first appeal through the Recipient, for eventual submission to FEMA. The request must indicate that the Applicant wishes to appeal the determination made by FEMA, and must contain documented justification supporting the Applicant’s position, specify the monetary figure in dispute and the provisions of Federal law, regulation, or policy with which the Applicant believes the initial determination was inconsistent. Once the Recipient receives the Applicant’s request for appeal, the Recipient reviews it and prepares a recommendation for the FEMA Regional Administrator. The letter from the Recipient includes a written recommendation on the merits of the Applicant’s appeal. The Recipient also forwards to FEMA the Applicant’s Request for First Appeal. If the Applicant is dissatisfied with the result of the first appeal, it may seek a second appeal. To do so, the Applicant again files a request through the Recipient which explains the request and provides any documentation that the Applicant feels is necessary to support its contention that FEMA’s determination was incorrect. Once the Recipient receives the Applicant’s request for second appeal, it forwards it to FEMA and may also add its letter recommendation on the merits of the Applicant’s appeal.

Arbitration – For determinations made after February 17, 2009, regarding projects over \$500,000.00 resulting from Hurricanes Katrina or Rita (DR-1603, DR-1604, DR-1605, DR-1606, and DR-1607), as an alternative to the appeal process, Applicant s may request arbitration of the disputed determination. To do so, the Applicant must submit a Request for Arbitration in the form of a letter submitted to the Recipient, the arbitration administrator and FEMA. The Request for Arbitration must contain a written statement and all documentation supporting the position of the Applicant, as well as the name and address of the Applicant’s authorized representative or counsel. For final agency actions made before February 17, 2009, arbitration is not an option.

Section 1219 of the DRRRA provides Applicant an additional choice in FEMA’s appeals and arbitration process: Applicant s must choose to either submit a second appeal or a request for

arbitration. Or an Applicant may select arbitration if the Regional Administrator has received a first appeal but has not rendered a decision within 180 calendar days of receipt. There is no change to the number of responses, as Applicants may only choose one option.

FEMA Template FT-104-FY-21-100, Equitable COVID-19 Response and Recovery:

Vaccine Administration Information – FEMA requires Recipients and Subrecipients to collect data related to race, ethnicity, and disability status, along with information on primary language, and sexual orientation or gender identity, under the COVID-19 Pandemic: Medical Care Eligible for Public Assistance (Interim) (Version 2) policy; however, this data is not required to be submitted to FEMA. Instead, Recipients and Subrecipients of PA must submit information documenting specifics for sites selected for vaccination administration.

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.

Usability testing has been conducted on this collection. As a result, a reduction of 142,554 hours, or 20%, has been recognized and included as an update to the collection.

The PA Program developed the Emergency Management Mission Integrated Environment (EMMIE) a web-based application used for the PA grant process <https://portal.fema.gov/famsVuWeb/home>. EMMIE is the system of record used for all disasters. EMMIE enables PA Applicants to apply for Federal disaster grant assistance via the Internet, however there are limitations with transparency and visibility for project progress, funding status, and useability.

Between 2015-2017, FEMA underwent a significant re-evaluation of PA processes, technology, and roles/responsibilities. As a result, the PA Program developed the FEMA Applicant Case Tracker (FAC-TRAX), a customer relationship management tool designed to assist Applicants and Recipients. FAC-TRAX is referred to as Grants Manager, which is used by internal users, and Grants Portal, which is used by external users. FEMA, SLTT governments, and PNP organizations involved in the testing of the new model stated that Grants Manager and Grants Portal allow them to better manage and track PA applications and documentation, providing greater transparency and efficiencies in the program. The suite of information collection forms will be integrated into FAC-TRAX, streamlining the process and simplifying information and documentation requirements.

In addition to the online grants management web-based systems, other techniques have been implemented in the revised information collection process to improve the customer experience,

reduce the administrative burden, and increase accessibility to underserved communities. These improvements include:

- Questions are displayed in a cascading manner to show the information and documentation needed based on answers provided
- System automation to eliminate duplicate requests
- Information is stored for user accessibility and application across multiple projects and disasters
- Improved tracking of repetitive damage, mitigation and increased resiliency measures, insurance coverage and obtain & maintain requirements, and other details that increase collaboration, coordination, and communication
- Information can be shared to report metrics needed for future process improvements
- Incorporate early identification of underserved communities' needs
- Enhance coordination with other Federal Agencies
- Acceptance of electric or digital signatures
- Help text with links to important resources
- System functionality to import information reducing duplicate entries

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

This information is not collected in any form, and therefore is not duplicated elsewhere.

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

“Small entity” is defined in 5 U.S.C. § 601. The term “small entity” can have the same meaning as the terms “small business,” “small organization,” and “small governmental jurisdiction.” Section 601(3) defines a “small business” as having the same meaning as “small business concern” under Section 3 of the Small Business Act. This includes any small business concern that is independently owned and operated and is not dominant in its field of operation. Section 601(4) defines a “small organization” as any not-for-profit enterprise which is independently owned and operated and is not dominant in their field of operation. Section 601(5) defines “small governmental jurisdiction” as governments of cities, counties, towns, townships, villages, school districts, or special districts, with a population of less than 50,000.

The Small Business Administration’s (SBA) “Table of Size Standards” stipulates how large an entity may be and still retain a “small entity” classification. These small business size standards are matched to industries described in the North American Industry Classification System to determine if an entity is considered small.

FEMA's goal throughout the recovery phase is to assist states, tribes, territories, and local governments and eligible private nonprofit organizations with achieving desired outcomes and building resilience. The PA Program offers technical assistance to both large and small entities as well as underserved communities. FEMA provides technical assistance to individuals using PA Grants Manager and Grants Portal via a Help Line at 1-866-337-8448 and through email at FEMA-Recovery-PA-Grants@fema.dhs.gov. FEMA provides technical support to Applicants throughout the recovery process to help ensure compliance with all EHP laws, regulations, and Executive Orders (EO)s, as well as to identify opportunities to incorporate conservation measures in the project area for the protection and preservation of environmental or historic resources. FEMA, professionally licensed engineers and architects, qualified cost estimators, construction managers, and staff with other technical expertise, as necessary, develop, review, and validate the estimates. FEMA also provides assistance to Recipients and Applicants on PA Program requirements, including conducting site inspections, understanding and identifying resiliency measures, writing plans, and developing the capability to plan for, manage, and execute long-term recovery solutions,

Section 1219 of the DRRRA does not place any requirements on small entities. It does, however, offer those who qualify as eligible PA Applicants an alternative means to dispute FEMA's determination for PA eligibility. If the entity chooses to dispute a PA determination, and they select arbitration rather than a second appeal, they would be responsible for their own costs arising out of the arbitration process.

All small entities must meet the final requirements to be eligible for arbitration. FEMA identified 3,478 Applicants for FEMA's PA Program that would be eligible for arbitration under the final requirements for the time frame from 2010 through 2019. FEMA used Slovin's formula and a 90 percent confidence interval to determine the sample size. ($n = N / (1 + N * e^{-2})$). $3,478 / (1 + 3,478 * 0.1^{-2}) = 97$ (rounded)).

FEMA sampled 97 of these Applicants and found that 74 (76 percent) met the definition of a small entity based on the population size of local governments (less than 50,000 population), or PNP organizations based on size standards set by the SBA. The remaining 23 entities were not found to be considered small entities. Eligible small entities included 67 small government agencies and seven PNP organizations. Based on information presented in the Executive Orders 12866 and 13563 section, FEMA estimates 15 arbitration cases per year. If 76 percent of these are small entities, FEMA estimates 11 arbitration requests per year from small entities with an average cost of between \$13,211 and \$22,651 per case. Eleven small entities do not represent a substantial number of small entities impacted by this final rule and the costs imposed to these small entities are not significant.

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

FEMA has statutory responsibility to administer Federal disaster assistance, including coordination with SLTT governments and PNP's and the accurate estimation of the amount and extent of damage in affected areas. Failure to collect all necessary information would prevent FEMA from providing funds for recovery from disasters.

The PA program places eligible work into project categories for emergency and permanent repair work, which must meet requirements to be eligible for FEMA funding. Eligibility determinations commence when an Applicant submits a Request for PA and continues through project formulation, financial obligation, and financial and programmatic closeout processes. The Applicant's project must also satisfy specific eligibility requirements for the following four essential elements: 1) the Applicant, 2) the facility, 3) the work, and 4) the cost.

The State/Tribe/Territory Administrative Plans are necessary to ensure these entities are ready to administer PA when disaster strikes. Without a plan in place, FEMA would not be able to administer the PA Program.

Applicants who seek a reevaluation of a FEMA determination on their project or eligibility would be unable to do so should FEMA not collect requests for appeal or arbitration. FEMA's failure to offer an appeal or arbitration would violate section 423 of the Stafford Act and section 601 of the American Recovery and Reinvestment Act of 2009.

The COVID-19 Pandemic: Medical Care Eligible for Public Assistance (Interim) (Version 2) policy defines the framework and requirements for determining the eligibility of medical care work and costs under the PA Program to ensure consistent and appropriate implementation across all COVID-19 emergency and major disaster declarations. The COVID-19 pandemic has exposed and exacerbated severe and pervasive health and social inequities in America. As stated in the January 21, 2021, Executive Order on Ensuring Equitable Pandemic Response and Recovery, COVID-19 has a disproportionate impact on various marginalized communities, and the lack of complete data, disaggregated by race and ethnicity, on COVID-19 has hampered efforts to ensure an equitable pandemic response.

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

The special circumstances contained in item 7(c), (d), (e), (f), (g) and (h) of the supporting statement are not applicable to this information collection.

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

FEMA requires Recipients and Subrecipients under the COVID-19 Pandemic: Medical Care Eligible for Public Assistance (Interim) (Version 2) policy to report information related to equitable vaccine administration under the collection every 30 days when they are administering vaccines. FEMA requires regular reporting to determine whether underserved populations are being served equitably; however, if the Recipients and Subrecipients are not currently administering vaccines in a 30-day period, they do not have to report. Reporting only every quarter may affect these communities' ability to receive vaccinations that could protect them from the pandemic. Protecting these communities is our priority. Less frequent reporting could negatively impact these communities during the pandemic. The reporting is only required while on-going vaccinations are taking place.

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

FEMA requires states/territories to report information more than quarterly when multiple major disaster declarations, for which PA is included, occur in the same quarter. States/Territories are required to submit a State Administrative Plan with any amendments required to meet current policy guidance.

FEMA may require additional information or documentation to evaluate eligibility. In these cases, FEMA requests the information or documentation by submitting a Request for Information (RFI). FEMA usually requires responses within 15 days of the Applicant's receipt of the RFI; however, since FEMA establishes the deadline based on the nature of the request and consideration of the type and volume of information or documentation requested the amount of time allowed may vary.

Request for Arbitration resulting from Hurricanes Katrina or Rita require that a Recipient must submit its written recommendation in support or opposition of the Applicant's request for arbitration, if desired, within 15 calendar days of receipt of the Applicant's request for arbitration. In selecting 15 calendar days, FEMA is implementing the intent of the American Recovery and Reinvestment Act of 2009. The Act specifically requires the arbitration process to "expedite" recovery efforts from Hurricanes Katrina and Rita. A time limit of 15 calendar days is intended to expedite the resolution of the Applicant's or Subrecipient's dispute. However, this 15-day period should allow sufficient time for the Recipient to review the request and prepare a recommendation without delaying the arbitration process.

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 aligns with 2 CFR 200.334 retention requirements for records and does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years from the date of submission of the final expenditure report.

- 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.**

As this revised Supporting Statement is being provided to support an Emergency Request, the 60 Day and 30-Day Federal Register Notices (FRNs) will not be utilized at this time due to time constraints.

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

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

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

There are no assurances of confidentiality.

On April 15, 2022, DHS approved a Privacy Threshold Analysis (PTA) for this information collection. Interim Privacy Impact Assessment (PIA) coverage is provided by DHS/FEMA/PIA-013-Grant Management Programs, approved by DHS for this collection on February 19, 2015. System of Records Notice (SORN) coverage is provided by DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs System of Records (79 FR 16015, March 24, 2014) was approved by DHS for this collection on February 19, 2015. FEMA Form 009-0-111 is utilized by both the Public Assistance Grant Program and the Hazard Mitigation Grant Program (HMGP). Under HMGP, the form is stored in the HMGP System, which is covered by DHS/FEMA/PIA-025 Hazard Mitigation Grant Program System and DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs.

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

The PA Program issued FEMA Policy #104-21-0004: “Coronavirus (COVID-19) Pandemic: Medical Care Eligible for PA (Interim) (Version 2).” This interim policy defines the framework and requirements for determining the eligibility of medical care work and costs under the PA

Program to ensure consistent and appropriate implementation across all COVID-19 emergency and major disaster declarations, and to ensure equitable distribution of medical care. COVID-19 has a disproportionate impact on communities of color and other underserved populations, including members of the lesbian, gay, bisexual, transgender, queer, intersex and other gender-identifying community, persons with disabilities, those with limited English proficiency, and those living at the margins of our economy. FEMA requires PA Recipients and Subrecipients to collect data consistent with the OMB minimum standard collection categories, as per OMB Statistical Policy Directive No. 15, including race, ethnicity, and disability status. It is further required that Recipients make best efforts to collect additional equity-focused person-level data including information on primary language and sexual orientation or gender identity. Recipients and Subrecipients shall incorporate these data in their development of short-term targets for the equitable deployment of PA financial assistance and to reach communities of color and other underserved populations. FEMA will not request or collect demographic details that may be sensitive in nature.

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

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

After conducting usability testing there is a 142,554-hour reduction in burden on the OMB inventory.

This collection of information requires the submittal of information from Recipients (State/Tribe/Territory) who are the grant administrators for all funds provided under the PA Grant Program and Applicants responsible for ensuring that all eligible work is identified, and all costs are submitted for disaster related damage and impacts for funding. FEMA has estimated that approximately 60 States, Tribes and Territories will review, consider, and then submit a various number of projects that they have received from Applicants for funding, therefore the number of responses may vary.

FEMA Form FF-104-FY-22-233, Organization Profile: is estimated to have 1,000 responses from Recipients/Applicants, for approximately 60 disasters per year. It is estimated that each form will require 0.30 burden hours (18 minutes) to complete. Therefore $1,000 \text{ Recipients/Applicants} \times 0.30 \text{ hours} \times 60 \text{ disasters} = 18,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-234, Recipient Incident Information: is estimated to have one (1) response from Recipients, for each disaster declaration, for approximately 60 disasters per year. It is estimated that each form will require 0.0833 burden hours (5 minutes) to complete. Therefore, one Recipient times $0.0833 \text{ hours} \times 60 \text{ disasters} = 5 \text{ total burden hours}$.

FEMA Form FF-104-FY-21-131 (formerly 009-0-49), Request for Public Assistance: is estimated to have one (1) response from approximately 1,000 Applicants, for each disaster declaration for approximately 60 disasters per year. Each form takes 0.1167 hours (7 minutes) to complete. Therefore $1,000 \text{ Applicants} \times 0.1167 \text{ hours} \times 60 \text{ disasters} = 7,002 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-235, Applicant Impact Survey: is estimated to have one (1) response from approximately 1,000 Applicants, for each declaration for approximately 60 disasters per year. Each form takes 0.1167 hours (7 minutes) to complete. Therefore $1,000 \text{ Applicants} \times 0.1167 \text{ hours} \times 60 \text{ disasters} = 7,002 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-238, Pre-Approval Request: is estimated to have one response from approximately 500 responses, for each declaration for approximately 60 disasters per year. Each form takes 0.50 hours (30 minutes) to complete. Therefore $500 \text{ responses} \times 0.50 \text{ hours} \times 60 \text{ disasters} = 15,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-236, Impact List: is estimated to have approximately 1,000 responses, for each declaration, for approximately 60 disasters per year. Each form takes 0.50 hours (30 minutes) to complete. Therefore $1,000 \text{ Applicants} \times 0.50 \text{ hours} \times 60 \text{ disasters} = 30,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-239, Project Application for Debris Removal: is estimated to have one approximately 1,000 responses, for each declaration, for approximately 60 disasters per year. Each form takes 0.75 hours (45 minutes) to complete. Therefore $1,000 \text{ responses} \times 0.75 \text{ hours} \times 60 \text{ disasters} = 45,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-240, Project Application for Emergency Protective Measures: is estimated to have approximately 1,000 responses, for each declaration, for approximately 60 disasters per year. Each form takes 0.75 hours (45 minutes) to complete. Therefore $1,000 \text{ responses} \times 0.75 \text{ hours} \times 60 \text{ disasters} = 45,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-242, Project Application for Infrastructure Restoration: is estimated to have approximately 1,200 responses, for each declaration, for approximately 60 disasters per year. Each form takes 0.75 hours (45 minutes) to complete. Therefore $1,200 \text{ responses} \times 0.75 \text{ hours} \times 60 \text{ disasters} = 54,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-243, Project Application for Building Code and Floodplain Administration and Enforcement: is estimated to have one response from approximately five (5) Applicants, for each declaration for approximately 60 disasters per year. Each form takes 0.2333 hours (14 minutes) to complete. Therefore $5 \text{ Applicants} \times 0.2333 \text{ hours} \times 60 \text{ disasters} = 70 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-244, Project Application for Management Costs: is estimated to have one response from approximately 1,000 Recipients/Applicants, for each declaration for approximately 60 disasters per year. Each form takes 0.2167 hours (13 minutes) to complete. Therefore $1,000 \text{ responses} \times 0.2167 \text{ hours} \times 60 \text{ disasters} = 13,002 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-245, Damage Information: is estimated to have 1,200 responses from site/damage inspections (inspections) completed for each disaster, for each declaration for approximately 60 disasters per year. Each form takes 1.25 hours (1 hour 15 minute) to complete and may consist of multiple sites and ancillary facilities. Therefore $1,200 \text{ inspections} \times 1.25 \text{ hours} \times 60 \text{ disasters} = 90,000 \text{ total burden hours}$.

FEMA Form FF-104-FY-22-241, Project Application for COVID-19: is estimated to have approximately 220 responses, from approximately 60 Applicants. Each form takes 0.3667 hours (22 minutes) to complete. Therefore $50 \text{ responses} \times .3667 \text{ hours} \times 60 \text{ Applicants} = 1,100 \text{ total burden hours}$.

FEMA Form FF-104-FY-21-137 (formerly FF 009-0-123), Force Account Labor Summary Record: is estimated to have approximately 32 responses, from approximately 60 Applicants. Each form takes 0.50 hours (30 minutes) to complete. Therefore $32 \text{ responses} \times 0.50 \text{ hours} \times 60 \text{ Applicants} = 960 \text{ total burden hours}$.

FEMA Form FF-104-FY-21-135 (formerly FF 009-0-128), Applicant's Benefits Calculation Worksheet: is estimated to have approximately 32 responses, from approximately 60 Applicants. Each form takes .50 hours (30 minutes) to complete. Therefore $32 \text{ responses} \times 0.50 \text{ hours} \times 60 \text{ Applicants} = 960 \text{ total burden hours}$.

FEMA Form FF-104-FY-21-141 (formerly FF 009-0-127), Force Account Equipment Summary Record: is estimated to have approximately 32 responses, from approximately 60 Applicants. Each form takes 0.25 hours (15 minutes) to complete. Therefore $32 \text{ responses} \times 0.25 \text{ hours} \times 60 \text{ Applicants} = 480 \text{ total burden hours}$.

FEMA Form FF-104-FY-21-138 (formerly FF 009-0-124), Materials Summary Record: is estimated to have approximately 32 responses, from approximately 60 Applicants. Each form takes 0.25 hours (15 minutes) to complete. Therefore $32 \text{ responses} \times 0.25 \text{ hours} \times 60 \text{ Applicants} = 480$ total burden hours.

FEMA Form FF-104-FY-21-139 (formerly FF 009-0-125), Rented Equipment Summary Record: is estimated to have approximately 32 responses, from approximately 60 Applicants. Each form takes 0.50 hours (30 minutes) to complete. Therefore $32 \text{ responses} \times 0.50 \text{ hours} \times 60 \text{ Applicants} = 960$ total burden hours.

FEMA Form FF-104-FY-21-140 (formerly FF 009-0-126), Contract Work Summary Record: is estimated to have approximately 100 responses, from approximately 60 Applicants. Each form takes 0.1833 hours (11 minutes) to complete. Therefore $100 \text{ responses} \times 0.1833 \text{ hours} \times 60 \text{ Applicants} = 1,100$ total burden hours.

FEMA Form FF-104-FY-22-237, Donated Labor Sign-in: is estimated to have approximately 60 responses, from approximately 10 disasters. Each form takes 0.0667 (4 minutes) hours to complete. Therefore $60 \text{ responses} \times 0.0667 \text{ hours} \times 10 \text{ disasters} = 40$ total burden hours.

FEMA Form FF-104-FY-21-132, (formerly FEMA Form 009-0-111), Quarterly Progress Reports: is estimated to have approximately four (4) responses, from approximately 60 disasters. Each form takes 0.60 hours (36 minutes) to complete. Therefore $4 \text{ responses} \times 0.60 \text{ hours} \times 60 \text{ disasters} \times 4 \text{ (responses are due quarterly until project is complete/closed)} = 576$ total burden hours.

FEMA Form FF-104-FY-22-248, Time Extension: is estimated to have approximately 60 Applicants, who are expected to request an extension twice a year for an estimated 60 different events or projects, for an estimated $(2 \times 60 = 120)$ 120 responses per year and $(60 \times 120 = 7,200)$ 7,200 total responses per year. Each form takes 0.40 hours (24 minutes) to complete. Therefore $0.40 \text{ hours} \times 7,200 \text{ total responses} = 2,880$ total burden hours.

FEMA Form FF-104-FY-22-249, State Administrative Plan: is estimated to have approximately one (1) response, from approximately 60 states/territories. Each form takes 0.60 hours (36 minutes) to complete. Therefore $1 \text{ response} \times 0.60 \text{ hours} \times 60 \text{ Applicants} = 36$ total burden hours.

FEMA Form FF-104-FY-21-250, Tribal Administrative Plan: is estimated to have approximately one (1) response, from approximately five (5) Tribes. Each form takes 0.4167 hours (25 minutes) to complete. Therefore $1 \text{ response} \times 0.4167 \text{ hours} \times 5 \text{ Applicants} = 2$ total burden hours.

Request for Appeals or Arbitrations: - FEMA has estimated that 56 states will submit nine (9) appeals after receiving a determination from FEMA (seven first appeals and two second appeals). Therefore, FEMA has estimated it will receive $(56 \times 9 = 504)$ 504 requests from states, on the behalf of applicants concerning applications for PA. FEMA estimated it will take approximately two (2) hours to prepare a letter for appeal. This estimate assumes that most of the information necessary for preparing the appeal request is found in the existing project worksheet. The resulting hour burden is estimated to be $56 \text{ states} \times 9 \text{ appeals} \times 2 \text{ hours} = 1,008$ burden hours.

States, serving as Recipients, will also provide a recommendation per each Applicant request. FEMA estimates it will take approximately one (1) hour to prepare a recommendation. The resulting hour burden is estimated to be $56 \text{ states} \times 9 \text{ appeals} \times 1 \text{ hour} = 504$ hours. The total annual burden is estimated to be $(1,008 \text{ hours for a letter of appeal} + 504 \text{ hours for a recommendation; or } 56 \text{ Recipients} \times 9 \text{ appeals} \times 3 \text{ hours}) 1,512$ burden hours.

Applicants must choose either submitting a second appeal or submitting a request for arbitration. Or an Applicant may select arbitration if the Regional Administrator has received a first appeal but has not rendered a decision within 180 calendar days of receipt. There is no change to the number of responses, as Applicants may only choose one option.

Request for Arbitration resulting from Hurricanes Katrina or Rita (DR1603, DR-1604, DR-1605, DR-1606, and DR-1607): FEMA has estimated that four (4) States will ask for arbitration without appeals for projects over \$500,000.00 in lieu of appeals. It is estimated that FEMA will receive five (5) responses per state. FEMA assumes that a similar effort is necessary to draft an arbitration request as a request for appeal, specifically two (2) hours to submit a written statement/request with supporting documentation. Therefore, the resulting hour burden is estimated to be $4 \text{ states} \times 5 \text{ responses} \times 2 \text{ hours} = 40$ burden hours. States, serving as Recipients, will also provide a recommendation per each Applicant request. FEMA estimates it will take approximately one (1) hour to prepare a recommendation. The resulting hour burden is estimated to be $4 \text{ States} \times 5 \text{ recommendations} \times 1 \text{ hour} = 20$ hours. The total annual burden is estimated be $(40 \text{ hours for arbitration requests} + 20 \text{ hours for recommendations; or } 4 \text{ states} \times 5 \text{ responses} \times 3 \text{ hours}) 60$ burden hours.

FEMA Template FT-104-FY-21-100, Equitable COVID-19 Response and Recovery:

Vaccine Administration Information: Recipients and Subrecipients that have received FEMA funding for vaccination efforts must submit their information within 30 days. FEMA estimates that 60 Recipients will submit 228 Reports on Equitable Vaccine Administration Information for an annual total of $(60 \times 228 = 13,680)$ 13,680 total responses. The estimated time to complete these is 0.5 hours (30 minutes) per submission for a total annual burden of $(60 \text{ Recipients} \times 228 \text{ submissions} \times 0.5 \text{ hours}) 6,840$ hours.

FEMA Form FF-104-FY-22-246, Environmental and Historic Preservation Addendum and **FEMA Form FF-104-FY-22-247, Hazard Mitigation Addendum** are addendums to the Project Applications. Burden hours for these addendums are included with the estimated burden of the applicable project application. **FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141), FAC-TRAX System** reflects the same information collection type and method conveyed in the forms therefore the burden is reflected in the applicable form.

Usability testing has been conducted on this collection. As a result, a reduction of 142,554 hours, or 20%, 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) and this total should be entered in the cell for “Avg. Hourly Wage Rate.” The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Applicant	Applicant Impact Survey FEMA Form FF-104-FY-22-235	60	1,000	60,000	0.1167	7,002	\$57.96	\$405,836
Applicant	Applicant's Benefits Calculation Worksheet FEMA Form FF-104-FY-21-135 (formerly 009-0-128)	60	32	1,920	0.50	960	\$57.96	\$55,642
Applicant	Contract Information FEMA Form FF-104-FY-21-140 (formerly 009-0-126)	60	100	6,000	0.1833	1,100	\$57.96	\$63,756
Applicant	Damage Information FEMA Form FF-104-FY-22-245	60	1,200	72,000	1.25	90,000	\$57.96	\$5,216,400
Applicant	Donated Labor Sign-in FEMA Form FF-104-FY-22-237	60	10	600	0.0667	40	\$57.96	\$2,318
Applicant	Environmental and Historic Preservation Information Addendum* FEMA Form FF-104-FY-22-246	0	0	0	0.00	0	\$0	\$0
Applicant	Equitable Vaccine Administration Information Submission Template FEMA Template FT-104-FY-21-100	60	228	13,680	0.50	6,840	\$57.96	\$396,446
Recipient/ Applicant	FAC-TRAX System FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141)	0	0	0	0.00	0	\$0	\$0
Applicant	Force Account Equipment Summary FEMA Form FF-104-FY-21-141 (formerly 009-0-127)	60	32	1,920	0.25	480	\$57.96	\$27,821
Applicant	Force Account Labor Summary Record FEMA Form FF-104-FY-21-137 (formerly 009-0-123)	60	32	1,920	0.50	960	\$57.96	\$55,642
Applicant	Hazard Mitigation Addendum* FEMA Form FF-104-FY-22-247	0	0	0	0.00	0	\$0	\$0
Applicant	Impact List FEMA Form FF-104-FY-22-236	60	1,000	60,000	0.50	30,000	\$57.96	\$1,738,800
Applicant	Materials and Summary Record FEMA Form FF-104-FY-21-138 (formerly 009-0-124)	60	32	1,920	0.25	480	\$57.96	\$27,821
Recipient/ Applicant	Organization Profile FEMA Form FF-104-FY-22-233	60	1,000	60,000	0.30	18,000	\$57.96	\$1,043,280
Applicant	Pre-Approval Request FEMA Form FF-104-FY-22-238	60	500	30,000	0.50	15,000	\$57.96	\$869,400
Applicant	Project Application for Building Code and Floodplain Management	60	5	300	0.2333	70	\$57.96	\$4,057

	and Enforcement FEMA Form FF-104-FY-22-243							
Applicant	Project Application for COVID-19 FEMA Form FF-104-FY-22-241	60	50	3,000	0.3667	1,100	\$57.96	\$63,756
Applicant	Project Application for Debris Removal FEMA Form FF-104-FY-22-239	60	1,000	60,000	0.75	45,000	\$57.96	\$2,608,200
Applicant	Project Application for Emergency Protective Measures FEMA Form FF-104-FY-22-240	60	1,000	60,000	0.75	45,000	\$57.96	\$2,608,200
Applicant	Project Application for Infrastructure Restoration FEMA Form FF-104-FY-22-242	60	1,200	72,000	0.75	54,000	\$57.96	\$3,129,840
Applicant	Project Application for Management Costs FEMA Form FF-104-FY-22-244	60	1,000	60,000	0.2167	13,002	\$57.96	\$753,596
Applicant	Quarterly Progress Report FEMA Form FF-104-FY-21-132 (formerly 009-0-111)	60	4	240	.60	144	\$57.96	\$8,346
Recipient	Recipient Incident Information FEMA Form FF-104-FY-22-234	60	1	60	0.0833	5	\$57.96	\$290
Applicant	Rented Equipment Summary Record FEMA Form FF-104-FY-21-139 (formerly 009-0-125)	60	32	1,920	0.50	960	\$57.96	\$55,642
Applicant	Request for Appeals or Arbitrations & Recommendations / No Form	56	9	504	3.00	1,512	\$57.96	\$87,636
Applicant	Request for Appeals or Arbitrations & Recommendations from Hurricanes Katrina or Rita / No Form	4	5	20	3.00	60	\$57.96	\$3,478
Applicant	Request for Public Assistance FEMA Form FF-104-FY-21-131 (formerly 009-0-49)	60	1,000	60,000	0.1167	7,002	\$57.96	\$405,836
Recipient	State/Territory Administrative Plan FEMA Form FF-104-FY-22-249	60	1	60	0.60	36	\$57.96	\$2,087
Applicant	Time Extension Request FEMA Form FF-104-FY-22-248	60	120	7,200	0.40	2,880	\$57.96	\$166,925
Recipient	Tribe Administrative Plan FEMA Form FF-104-FY-22-250	5	1	5	0.4167	2	\$57.96	\$116
Total		1,505		635,269		341,635		\$19,801,167

The term Recipient refers to States, Tribes, and Territories. The term Applicant refers to States, Tribes, Territories, and local governments and certain private non-profit organizations.

* FEMA Form FF-104-FY-22-246, Environmental and Historic Preservation Addendum and FEMA Form FF-104-FY-22-247, Hazard Mitigation Addendum are addendums to the Project Applications. Burden hours for these addendums are included with the estimated burden of the applicable project application.

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.¹ For example, a non-

¹ 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.

loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2021 Occupational Employment and Wage Estimates wage rate for Emergency Management Directors (SOC: 11-9161) is \$36.00.² Including the wage rate multiplier of 1.61,³ the fully-loaded wage rate is \$57.96 per hour. Therefore, the burden hour cost is estimated to be \$19,801,167 annually (\$57.96 x 341,635 hours = \$19,801,165 + 2 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.)

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

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 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.**

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

³ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf. Accessed December 6, 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

There are no capital or start-up costs associated with this information collection.

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

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	\$0
Staff Salaries: 12 employees to process a project at the pay scale of GS-12 (step 5 ¹) employees spending approximately 52% of time annually reviewing information for this data collection. (12 x \$106,759 x 0.52 x 1.45 ² = \$921,204)	\$965,955
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software cost of equipment annual lifecycle	\$1,000,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$36,000
Total	\$2,001,955
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 February 24, 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 OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

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

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

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

Itemized Changes in Annual Burden Hours

Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Differen ce
Applicant Impact Survey FEMA Form FF-104-FY-22-235 (new)	0	7,002	7,002			
Applicant's Benefits Calculation Worksheet FEMA Form FF-104-FY-21-135 (formerly 009-0-128)				21,952	960	-20,992
Contract Information FEMA Form FF-104-FY-21-140 (formerly 009-0-126)				896	1,100	204
Damage Information FEMA Form FF-104-FY-22-245 (new)	0	90,000	90,000			
Donated Labor Sign-in FEMA Form FF-104-FY-22-237 (new)	0	40	40			
FAC-TRAX System FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141)	63,910	0	-63,910			
Force Account Equipment Summary FEMA Form FF-104-FY-21-141 (formerly 009-0-127)				448	480	32
Force Account Labor Summary Record FEMA Form FF-104-FY-21-137 (formerly 009-0-123)				896	960	64
Impact List FEMA Form FF-104-FY-22-236 (new)	0	30,000	30,000			
Materials and Summary Record FEMA Form FF-104-FY-21-138 (formerly 009-0-124)				448	480	32
Organization Profile FEMA Form FF-104-FY-22-233 (new)	0	18,000	18,000			
PNP Facility Questionnaire FEMA Form FF-104-FY-21-136 (formerly 009-0-121)	2,632	0	-2,632			
Pre-Approval Request FEMA Form FF-104-FY-22-238 (new)	0	15,000	15,000			
Project Application for Building Code and Floodplain Management and Enforcement FEMA Form FF-104-FY-22-243 (new)	0	70	70			
Project Application for COVID-19 FEMA Form FF-104-FY-22-241 (new)	0	1,100	1,100			
Project Application for Debris Removal FEMA Form FF-104-FY-22-239 (new)	0	45,000	45,000			
Project Application for Emergency Protective Measures FEMA Form FF-104-FY-22-240 (new)	0	45,000	45,000			
Project Application for Infrastructure Restoration FEMA Form FF-104-FY-22-242 (new)	0	54,000	54,000			
Project Application for Management Costs FEMA Form FF-104-FY-22-244 (new)	0	13,002	13,002			
Project Worksheet (PW) and a Request for Time Extension FEMA Form FF-104-FY-21-133 (formerly 009-0-91)	70,560	0	-70,560			
Project Work Sheet (PW) Damage Description and Scope of Work FEMA Form FF-104-FY-21-133A (formerly 009-0-91A)	65,856	0	-65,856			
Project Worksheet (PW) Cost Estimate Continuation Sheet and Request for additional funding for Cost Overruns FEMA Form FF-104-FY-21-142 (formerly 009-0-91B)	58,537	0	-58,537			
Project Worksheet (PW) Maps and Sketches Sheet FEMA Form FF-104-FY-21-143 (formerly 009-0-91C)	61,152	0	-61,152			

Project Worksheet (PW) Photo Sheet FEMA Form FF-104-FY-21-144 (formerly 009-0-91D)	61,152	0	-61,152			
Quarterly Progress Report FEMA Form FF-104-FY-21-132 (formerly 009-0-111)				22,000	144	-21,856
Recipient Incident Information FEMA Form FF-104-FY-22-234 (new)	0	5	5			
Rented Equipment Summary Record FEMA Form FF-104-FY-21-139 (formerly 009-0-125)				896	960	64
Request for Public Assistance FEMA Form FF-104-FY-21-131 (formerly 009-0-49)				1,806	7,002	5,196
Special Considerations Questions FEMA Form FF-104-FY-21-134 (formerly 009-0-120)	23,520	0	-23,520			
State/Territory Administrative Plan FEMA Form FF-104-FY-22-249 (formerly no form)				448	36	-412
Time Extension Request FEMA Form FF-104-FY-22-248 (new)	0	2,880	2,880			
Tribe Administrative Plan FEMA Form FF-104-FY-22-250 (new)	0	2	2			
Equitable COVID-19 Response and Recovery FEMA Template FT-104-FY-21-100				25,508	6,840	-18,668
Total	407,319	321,101	-86,218	75,298	18,962	-56,336

Explain: In short, FEMA added 17 new forms, revised five (5) existing forms, and removed seven (7) forms; leaving eight (8) forms without changes and a total reduction of 142,554 burden hours. FEMA has spent the last 18 months working with internal and external stakeholders to identify ways to improve their experience requesting PA and providing their damage and impact details needed to provide necessary funding to survivors and communities recovering from disasters. The changes to PA’s information collection reflects the improvements needed to simplify and streamline the information collection process. FEMA challenged itself to remove barriers and use technology to reduce the administrative burden. The result is a significant reduction in burden hours despite there being an increase in severe weather events and biological disasters.

For the emergency request fillable form FF-104-FY-22-238, that can also be used as a paper form, will be added for use until the electronic system is implemented with the new forms.

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
Applicant Impact Survey FEMA Form FF-104-FY-22-235	\$0	\$405,836	\$405,836			
Applicant's Benefits Calculation Worksheet FEMA Form FF-104-FY-21-135 (formerly 009-0-128)				\$1,228,214	\$55,642	-\$1,172,572
Contract Information FEMA Form FF-104-FY-21-140 (formerly 009-0-126)				\$50,131	\$63,756	\$13,625
Damage Information FEMA Form FF-104-FY-22-245	\$0	\$5,216,400	\$5,216,400			
Donated Labor Sign-in FEMA Form FF-104-FY-22-237	\$0	\$2,318	\$2,318			
FAC-TRAX System FEMA Form FEMA Form FF-104-FY-21-145 (formerly FF 009-0-141)	\$3,575,765	\$0	-\$3,575,765			
Force Account Equipment Summary FEMA Form FF-104-FY-21-141 (formerly 009-0-127)				\$25,066	\$27,821	\$2,755
Force Account Labor Summary Record FEMA Form FF-104-FY-21-137 (formerly 009-0-123)				\$50,131	\$55,642	\$5,511
Impact List FF-104-FY-22-236	\$0	\$1,678,500	\$1,678,500			
Materials and Summary Record FEMA Form FF-104-FY-21-138 (formerly 009-0-124)				\$25,066	\$27,821	\$2,755
Organization Profile FEMA Form FF-104-FY-22-233	\$0	\$1,043,280	\$1,043,280			
PNP Facility Questionnaire FEMA Form FF-104-FY-21-136 (formerly 009-0-121)	\$1,738,800	\$0	-\$1,738,800			
Pre-Approval Request FEMA Form FF-104-FY-22-238	\$0	\$869,400	\$869,400			
Project Application for Building Code and Floodplain Management and Enforcement FEMA Form FF-104-FY-22-243	\$0	\$4,057	\$4,057			
Project Application for COVID-19 FEMA Form FF-104-FY-22-241	\$0	\$63,756	\$63,756			
Project Application for Debris Removal FEMA Form FF-104-FY-22-239	\$0	\$2,608,200	\$2,608,200			
Project Application for Emergency Protective Measures FEMA Form FF-104-FY-22-240	\$0	\$2,608,200	\$2,608,200			
Project Application for Infrastructure Restoration FEMA Form FF-104-FY-22-242	\$0	\$3,129,840	\$3,129,840			
Project Application for Management Costs FEMA Form FF-104-FY-22-244	\$0	\$753,596	\$753,596			
Project Worksheet (PW) and a Request for Time Extension FEMA Form FF-104-FY-21-133 (formerly 009-0-91)	\$3,947,832	\$0	-\$3,947,832			
Project Work Sheet (PW) Damage Description and Scope of Work FEMA Form FF-104-FY-21-133A (formerly 009-0-91A)	\$3,684,643	\$0	-\$3,684,643			
Project Worksheet (PW) Cost Estimate Continuation Sheet and Request for additional funding for Cost Overruns FEMA Form FF-104-FY-21-142 (formerly 009-0-91B)	\$3,275,145	\$0	-\$3,275,145			
Project Worksheet (PW) Maps and Sketches Sheet FEMA Form FF-104-FY-21-143 (formerly 009-0-91C)	\$3,421,454	\$0	-\$3,421,454			
Project Worksheet (PW) Photo Sheet FEMA Form FF-104-FY-21-144 (formerly 009-0-91D)	\$3,421,454	\$0	-\$3,421,454			
Quarterly Progress Report FEMA Form FF-104-FY-21-132 (formerly 009-0-111)				\$1,230,900	\$8,346	-\$1,222,554
Recipient Incident Information	\$0	\$290	\$290			

FEMA Form FF-104-FY-22-234						
Rented Equipment Summary Record FEMA Form FF-104-FY-21-139 (formerly 009-0-125)				\$50,131	\$55,642	\$5,511
Request for Public Assistance FEMA Form FF-104-FY-21-131 (formerly 009-0-49)				\$101,046	\$405,836	\$304,790
Special Considerations Questions FEMA Form FF-104-FY-21-134 (formerly 009-0-120)	\$1,315,944	\$0	-\$1,315,944			
State/Territory Administrative Plan FEMA Form FF-104-FY-22-249				\$25,066	\$2,087	-\$22,979
Time Extension Request FEMA Form FF-104-FY-22-248	\$0	\$166,925	\$166,925			
Tribe Administrative Plan FEMA Form FF-104-FY-22-250	\$0	\$116	\$116			
Request for Appeals or Arbitrations & Recommendation /No Forms				\$84,596	\$87,636	\$3,040
Request for Arbitration & Recommendation resulting from Hurricanes Katrina or Rita/ No Form				\$3,357	\$3,478	\$121
Equitable COVID-19 Response and Recovery FEMA Template FT-104-FY-21-100				\$1,427,173	\$396,446	-\$1,030,727
Total	\$24,381,037	\$18,550,714	-\$5,830,323	\$4,300,877	\$1,190,153	-\$3,110,724

Explain: The reduction in costs is mainly driven by the large number of changes to the list of instruments and associated burden hours (FEMA added 17 new forms, revised five (5) existing forms, and removed seven (7) forms; leaving eight (8) forms without changes and a total reduction of 142,554 burden hours) mitigated by a slight increase in the hourly wage.

16. For collections of information w 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.

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

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”. This collection does not use efficient statistical survey methodology.