

February 23, 2024

Supporting Statement for Paperwork Reduction Act Submissions

Title: FEMA Preparedness Grants: Homeland Security Grant Program (HSGP)

Form Number(s):

- 1) FEMA Form FF-207-FY-21-110 (formerly 089-1), Investment Justification for Homeland Security Grant Program (HSGP), State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI);
- 2) FEMA Form FF-207-FY-21-111 (formerly 089-16), Operation Stonegarden (OPSG) Operations Order and Budget Template;
- 3) FEMA Form FF-207-FY-21-112 (formerly 089-20), Operation Stonegarden (OPSG) Inventory of Operation Orders;
- 4) FEMA Instruction FI-207-FY-24-100, Urban Area Working Group (UAWG) Overview/Structure (including Point-of-Contact (POC));
- 5) FEMA Instruction FI-207-FY-24-101, Operational Overtime Documentation;
- 6) FEMA Instruction FI-207-FY-24-102, Multiyear Training and Exercise Plan;
- 7) FEMA Instruction FI-207-FY-24-103, Urban Area Security Initiative (UASI) Governance Charter;
- 8) FEMA Instruction FI-207-FY-24-104, Senior Advisory Committee (SAC) Charter;
- 9) FEMA Instruction FI-207-FY-24-105, Urban Area Working Group (UAWG) Allocation Methodology;
- 10) FEMA Instruction FI-207-FY-24-106, State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) Pass-Through Requirements;
- 11) FEMA Instruction FI-207-FY-24-107, Critical Emergency Supplies; and
- 12) FEMA Instruction FI-207-FY-24-108, SAFECOM Compliance Letter.

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 Federal Emergency Management Agency's (FEMA's) Homeland Security Grant Program (HSGP) is authorized under Section 2002 of the Homeland Security Act of 2002 (Pub. L. 107-296) (*See* 6 U.S.C. §§ 603-609, *as amended*) to fund a range of activities including planning, organization, equipment purchase, training, exercises, management and administration across all core capabilities and mission areas defined by the National Preparedness Goal.

The HSGP supports state, local, tribal, and territorial efforts to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States. The HSGP provides funding to implement investments that build, sustain, and deliver the 32 core capabilities essential to achieving the National Preparedness Goal of a secure and resilient Nation. The building, sustainment, and delivery of these core capabilities are not exclusive to any single level of government, organization, or community, but rather require the combined effort of the whole community. The HSGP supports core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response, and Recovery based on allowable costs. HSGP is comprised of three grant programs:

- State Homeland Security Program (SHSP)
- Urban Area Security Initiative (UASI)
- Operation Stonegarden (OPSG)

SHSP supports state, local, tribal, and territorial efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.

UASI assists high-threat, high-density Urban Area efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.

OPSG supports enhanced cooperation and coordination among Customs and Border Protection (CBP), United States Border Patrol (USBP), and law enforcement agencies from all levels of

government to improve overall border security. OPSG supports investments in joint efforts to secure the United States' borders along routes of ingress/egress to and from international borders, to include travel corridors in states bordering Mexico and Canada, as well as states and territories with international water borders.

This revision of the information collection removes an instrument (OPSG Daily Activity Report, FEMA Form FF-207-FY-21-113 (formerly 089-0-27)) that was created at the behest of CBP to fulfill CBP's requirements under OPSG and is only used to collect information from the public by CBP. FEMA has previously included this instrument under this collection as a service to CBP, but including an instrument used by CBP under a collection granting FEMA the authority to collect information does not provide the proper service to CBP, FEMA or the public.

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

FEMA Form FF-207-FY-21-110 (formerly 089-1), Investment Justification for Homeland Security Grant Program (HSGP), State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI): is submitted online via the Grants Reporting Tool. Applicants provide narrative detail on proposed activities (investments) that will be accomplished with SHGP and UASI funds. Investment justifications must demonstrate how proposed projects address gaps in current programs and capabilities and how grant funds will thereafter provide enhancements to overall homeland security preparedness.

FEMA Form FF-207-FY-21-111 (formerly 089-16), Operation Stonegarden (OPSG) Operations Order and Budget Template: Each eligible local unit of government (at the county or Federally-recognized Tribal government level) must develop a strategic plan, which is a formal proposal of action to address a specific situation and creates the basis for Operations Orders in coordination with state and Federal law enforcement agencies, including but not limited to CBP and USBP. The Operations Order is submitted into the CBP Operation Stonegarden Data Management System.

FEMA Form FF-207-FY-21-112 (formerly 089-20), Operation Stonegarden (OPSG) Inventory of Operation Orders: is provided to the State Administrative Agency (SAA) by FEMA with an electronic template for the state to list the names of each jurisdiction applying for funding and the dollar amount being requested by each. The assists FEMA and USBP to ensure that all Operations Orders have been submitted before the application deadline and provide an accounting of the funding amounts being requested.

FEMA Instruction FI-207-FY-24-100, Urban Area Working Group (UAWG)

Overview/Structure (including Point-of-Contact (POC)): The SAA must confirm a specific POC with the designated urban area. The SAA POCs are responsible for identifying and coordinating with the POC for the UAWG. This information must be provided to FEMA with the grant application. SAAs must work with existing urban areas to ensure that information for current POCs is on file with FEMA.

FEMA Instruction FI-207-FY-24-101, Operational Overtime Documentation: States must provide documentation to the UAWG and FEMA upon request demonstrating how any UASI funds retrained by the state would directly support the urban area.

FEMA Instruction FI-207-FY-24-102, Multiyear Training and Exercise Plan: Recipients are required to develop and maintain a progressive exercise program consistent with the Homeland Security Exercise and Evaluation Program (HSEEP) and the National Exercise Program. Recipients must conduct a Training and Exercise Planning Workshop (TEPW). Recipients must then develop a multiyear Training and Exercise Plan (TEP) that address the priorities identified in the TEPW. The TEP shall be submitted to hseep@fema.dhs.gov no later than June 1 annually.

FEMA Instruction FI-207-FY-24-103, UASI Governance Charter: The UAWG must ensure that its approach to critical issues such as membership, governance structure, voting rights, grant management and administration responsibilities, and funding allocation methodologies are formalized in a working group charter or other form of standard operation procedure related to the UASI program governance. The charter must also outline how decision made the UAWG meetings will be documents and shared with UAWG members. The UAWG charter must be on file with FEMA prior to drawing down UASI funding and must be available to all UAWG members to promote transparency in decision-making related to the UASI program.

FEMA Instruction FI-207-FY-24-104, Senior Advisory Committee (SAC) Charter: The governance of the SHSP and UASI programs through the SAC should be directed by a charter. All members of the SAC should sign and date the charter showing their agreement with its content and their representation on the Committee. Revisions to the governing charter must be sent to the recipient's assigned Headquarters Program Analyst. The SAC charter must at a minimum address the following:

- A detailed description of the SAC's compositions and an explanation of key governance processes, including how the SAC is informed by the state's Threat and Hazard Identification and Risk Assessment (THIRA) and State Preparedness Report (SPR) data reflecting capability gaps and the approach to address gaps in core capabilities;
- A description of the frequency at which the SAC will meet;
- How existing governance bodies will be leveraged by the SAC;

- A detailed description of how decisions on programmatic priorities funded by SHSP and UASI are made and how those decisions will be documented and shared with its members and other stakeholders, as appropriate; and
- A description of defined roles and responsibilities for financial decision making and meeting administrative requirements.

FEMA Instruction FI-207-FY-24-105, UAWG Allocation Methodology: The SAA must provide written documentation verifying the consensus of the UAWG, or the failure to achieve otherwise, on the allocation of funds and submit it to FEMA immediately after the 45-day period allotted for the state to obligate funds to sub-recipients.

FEMA Instruction FI-207-FY-24-106, SHSP and UASI Pass-Through Requirements: The SAA must obligate at least 80 percent (80%) of the funds awards under the SHSP and UASI to local or Tribal units of government. The signature authority of the SAA must certify in writing to FEMA that pass-through requirements have been met.

FEMA Instruction FI-207-FY-24-107, Critical Emergency Supplies: Prior to the allocation of grant funds for stockpiling purposes, each state must have FEMA's approval of a five-year viable inventory management plan which should include a distribution strategy and related sustainment costs if planned grant expenditures are over \$100,000.

FEMA Instruction FI-207-FY-24-108, SAFECOM Compliance Letter: certifies that the applicant will comply with SAFECOM guidance when implementing interoperable communications projects. The letter will be attached in the ND Grants system as part of the HSGP application.

FEMA is in the process of establishing a Generic Clearance for FEMA's Preparedness Grant Programs. All of the above instruments will be included in that collection once it is approved.

FEMA Form FF-207-FY-21-113 (formerly 089-0-27), Operation Stonegarden (OPSG) Daily Activity Report: is being removed from this collection.

Homeland Security Exercise and Evaluation Program's (HSEEP's) After-Action Report and Improvement Plan (AAR/IP), FEMA Form FF-008-FY-21-102 (formerly 091-0-1): Recipients are required to submit one AAR/IP for each HSGP-funded progressive exercise series or submit individual AAR/IPs for each HSGP-funded exercise. AAR/IPs should be submitted to hseep@fema.dhs.gov no more than 90 days after completion of the exercise.

This collection activity is approved under OMB Control Number 1660-0118, which expires October 31, 2026.

Biannual Strategy Implementation Report (BSIR), FEMA Form FF-207-FY-23-107 (formerly FF-207-FY-22-121): Recipients are responsible for completing and submitting BSIRs through the Grants Reporting Tool (GRT) after a grant is awarded. The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report)). All required attributes of each project must be included. Updated obligations, expenditures, and significant developments must be provided within the BSIR to show progress of implementation for every project, as well as how expenditures support Planning, Organization, Equipment, Training and Exercises.

The BSIR data is submitted electronically in the GRT, an electronic FEMA-sponsored system. The collection activity is approved under OMB Control Number 1660-0156, which expired on August 31, 2023.

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

This collection activity is approved under OMB Control Number 1660-0115, which expires March 31, 2026.

Threat and Hazard Identification and Risk Assessment (THIRA) – Stakeholder Preparedness Review (SPR) Unified Reporting Tool, FEMA Form FF-008-FY-21-106: States, territories, and high-risk urban areas are required to submit a THIRA every three (3) years to establish a consistent baseline for assessment. While the THIRA will one be required every three years, jurisdictions will continue to be required to submit an SPR annually. The THIRA/SPR is submitted through the Unified Reporting Tool, FEMA Form FF-008-FY-21-106.

This collection activity is approved under OMB Control Number 1660-0131, which expires April 30, 2026.

Emergency Operations Plans (EOPs): Recipients must update their EOP at least once every two years in the SPR.

This collection activity is approved under OMB Control Number 1660-0131, which expires April 30, 2026.

National Cybersecurity Review (NCSR): enables agencies to benchmark and measure progress of improving their cybersecurity posture. Although this is only a requirement for recipients and

subrecipients, all state, local, Tribal, and territorial agencies with preparedness responsibilities are highly encouraged to participate and complete the NCSR.

This collection activity was approved under OMB Control Number 1670-0040, which expired on November 30, 2022, and a reinstatement was submitted to OMB on April 5, 2023.

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.

To the extent possible, FEMA's Office of Grants Administration uses a web-based application through the FEMA Grant Outcomes (FEMA GO) system, Adobe, or Excel fillable forms. In all other cases, FEMA provides detailed guidance or a suggested template for the collection.

FEMA GO is the system of record for grants within FEMA, developed by the Grants Management Modernization (GMM) program office using agile development methods; meaning the team ships software iteratively, rather than waiting for the entire system to be developed before launching.

The FEMA GO system allows the application only to present questions relevant to the request being submitted. The questions presented will change based on type of funding being requested, type of organization, and equipment/services being requested. Only asking relevant questions helps FEMA reduce the burden on respondents completing an application.

The GRT is used to capture DHS/FEMA's annual award and biannual grant reporting data. The Department developed the GRT as a tool to streamline the reporting process for grantees. The module is user-friendly with a web-based format, thus reducing burden on the grantees by providing increased flexibility yet ensuring adherence to agency guidelines. The OPSG Operations Order and Budget Template, Daily Activity Report and Inventory of Operations forms are submitted through the Operation Stonegarden Data Management System.

Usability Testing has been conducted on this collection. As a result, a reduction of 547,500 hours has been recognized and included as an update to the collection.

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

This information is not collected in any other form, and therefore is not duplicative 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.

For all instruments that impact businesses or other small entities, repetitive/irrelevant questions have been removed or consolidated resulting in fewer questions overall; FEMA has provided clarity on sections that have historically been ambiguous.

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 FEMA could not request and obtain this information, the Agency could not exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the Agency could not fulfill monitoring requirements.

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

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

No data collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

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

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

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

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

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

Records must be retained for three years after close-out. Financial records, supporting documents, statistical records, and all other [non-Federal entity](#) records pertinent to a [Federal award](#) must be retained for a period of three years from the date of submission of the final expenditure report or, for [Federal awards](#) that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the [Federal awarding agency](#) or [pass-through entity](#) in the case of a [subrecipient](#) (2 CFR § 200.334). If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.

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

This information collection does not include a statistical survey.

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

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

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

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

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

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

8. Federal Register Notice:

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

A 60-day Federal Register Notice inviting public comments was published on November 17, 2023, at 88 FR 80324. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 23, 2024, at 89 FR 13730. The public comment period is open until March 25, 2024.

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

FEMA meets with both the National Emergency Management Association and the National Governors Association, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and email communications are also used. FEMA meets and consults directly with grant recipients to discuss the whole range of grant administration matters, including reporting requirements. Listening sessions conducted in various regions have been instrumental in gathering information on the effectiveness of the grant programs and how FEMA can improve the management and administration of the grant programs.

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

FEMA consults on a regular basis with federal, state, local, territorial, and tribal stakeholders on a variety of issues. These consultations involve discussions regarding the nature of information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their grant management practices.

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.

An updated Privacy Threshold Analysis (PTA) was submitted to DHS on February 6, 2024.

A Privacy Impact Assessment (PIA) for this collection was determined to be needed and coverage is provided by an existing PIA, DHS/FEMA/PIA-013 – Grant Management Programs.

A Systems of Record Notice (SORN) for this collection was not determined to be needed.

A Privacy Notice should be included on the applicant form.

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.

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-207-FY-21-110 (formerly 089-1), Investment Justification for Homeland Security Grant Program (HSGP): is estimated to have 56 respondents times 1 response per

year for 56 total annual responses ($56 \times 1 = 56$). It is estimated that each response will require 1,488.50 burden hours to complete, therefore 56 responses times 1,488.50 hours equals 83,356 total annual burden hours ($56 \times 1,488.50 = 83,356$).

FEMA Form FF-207-FY-21-111 (formerly 089-16), Operation Stonegarden (OPSG) Operations Order and Budget Template: is estimated to have 202 respondents times 1 response per year for 202 total annual responses ($202 \times 1 = 202$). It is estimated that each response will require 572 burden hours to complete, therefore 202 responses times 572 hours equals 115,544 total annual burden hours ($202 \times 572 = 115,544$).

FEMA Form FF-207-FY-21-112 (formerly 089-20), Operation Stonegarden (OPSG) Inventory of Operation Orders: is estimated to have 22 respondents times 1 response per year for 22 total annual responses ($22 \times 1 = 22$). It is estimated that each response will require 72 burden hours to complete, therefore 22 responses times 72 hours equals 1,584 total annual burden hours ($22 \times 72 = 1,584$).

FEMA Instruction FI-207-FY-24-100, Urban Area Working Group (UAWG) Overview/Structure (including Point-of-Contact (POC)): is estimated to have 31 respondents times 2 responses per year for 62 total annual responses ($31 \times 2 = 62$). It is estimated that each response will require 1,354 burden hours to complete, therefore 62 responses times 1,354 hours equals 83,948 total annual burden hours ($62 \times 1,354 = 83,948$).

FEMA Instruction FI-207-FY-24-101, Operational Overtime Documentation: is estimated to have 56 respondents times 2 responses per year for 112 total annual responses ($56 \times 2 = 112$). It is estimated that each response will require 4 burden hours to complete, therefore 112 responses times 4 hours equals 448 total annual burden hours ($112 \times 4 = 448$).

FEMA Instruction FI-207-FY-24-102, Multiyear Training and Exercise Plan: is estimated to have 56 respondents times 1 response per year for 56 total annual responses ($56 \times 1 = 56$). It is estimated that each response will require 42 burden hours to complete, therefore 56 responses times 42 hours equals 2,352 total annual burden hours ($56 \times 42 = 2,352$).

FEMA Instruction FI-207-FY-24-103, Urban Area Security Initiative (UASI) Governance Charter: is estimated to have 31 respondents times 2 responses per year for 62 total annual responses ($31 \times 2 = 62$). It is estimated that each response will require 250 burden hours to complete, therefore 62 responses times 250 hours equals 15,500 total annual burden hours ($62 \times 250 = 15,500$).

FEMA Instruction FI-207-FY-24-104, Senior Advisory Committee (SAC) Charter: is estimated to have 56 respondents times 1 response per year for 56 total annual responses (56×1

= 56). It is estimated that each response will require 250 burden hours to complete, therefore 56 responses times 250 hours equals 14,000 total annual burden hours ($56 \times 250 = 14,000$).

FEMA Instruction FI-207-FY-24-105, Urban Area Working Group (UAWG) Allocation

Methodology: is estimated to have 31 respondents times 1 response per year for 31 total annual responses ($31 \times 1 = 31$). It is estimated that each response will require 4 burden hours to complete, therefore 31 responses times 4 hours equals 124 total annual burden hours ($31 \times 4 = 124$).

FEMA Instruction FI-207-FY-24-106, State Homeland Security Program (SHSP) and

Urban Area Security Initiative (UASI) Pass-Through Requirements: is estimated to have 56 respondents times 1 response per year for 56 total annual responses ($56 \times 1 = 56$). It is estimated that each response will require 4 burden hours to complete, therefore 56 responses times 4 hours equals 224 total annual burden hours ($56 \times 4 = 224$).

FEMA Instruction FI-207-FY-24-107, Critical Emergency Supplies: is estimated to have 56 respondents times 1 response per year for 56 total annual responses ($56 \times 1 = 56$). It is estimated that each response will require 42 burden hours to complete, therefore 56 responses times 42 hours equals 2,352 total annual burden hours ($56 \times 42 = 2,352$).

FEMA Instruction FI-207-FY-24-108, SAFECOM Compliance Letter: is estimated to have 56 respondents times 1 response per year for 56 total annual responses ($56 \times 1 = 56$). It is estimated that each response will require 1 burden hours to complete, therefore 56 responses times 1 hours equals 56 total annual burden hours ($56 \times 1 = 56$).

After conducting usability testing there is a 547,500 hour reduction in burden on the OMB inventory. There is other information collected that is required, but the program does not provide a template for them to provide this information. The applicant simply needs to provide it in any format available. For this information, there is not a sure way to capture usability.

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

Please see our response for 12a above and 12c below.

- c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be**

multiplied by 1.45 (1.61 for State and local government employees)¹ and this total should be entered in the cell for “Avg. Hourly Wage Rate.” The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03172023.pdf. Accessed March 20, 2023. The national wage multiplier is calculated by dividing total compensation for all workers of \$42.48 by wages and salaries for all workers of \$29.32 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees the wage multiplier is calculated by dividing total compensation for State and local government workers of \$57.60 by Wages and salaries for State and local government workers of \$35.69 per hour yielding a benefits multiplier of approximately 1.61.

Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form 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
State, Local or Tribal Government	Investment Justification for Homeland Security Grant Program (HSGP) / FEMA Form FF-207-FY-21-110 (formerly 089-1)	56	1	56	1,488.50	83,356	\$83.95	\$6,997,736
State, Local or Tribal Government	Operation Stonegarden (OPSG) Operations Order and Budget Template / FEMA Form FF-207-FY-21-111 (formerly 089-16)	202	1	202	572	115,544	\$83.95	\$9,699,919
State, Local or Tribal Government	Operation Stonegarden (OPSG) Inventory of Operation Orders / FEMA Form FF-207-FY-21-112 (formerly 089-20)	22	1	22	72	1,584	\$83.95	\$132,977
State, Local or Tribal Government	Urban Area Working Group (UAWG) Overview/Structure (including Point-of-Contact (POC)) / FEMA Instruction FI-207-FY-24-100	31	2	62	1,354	83,948	\$83.95	\$7,047,435
State, Local or Tribal Government	Operational Overtime Documentation / FEMA Instruction FI-207-FY-24-101	56	2	112	4	448	\$83.95	\$37,610
State, Local or Tribal Government	Multiyear Training and Exercise Plan / FEMA Instruction FI-207-FY-24-102	56	1	56	42	2,352	\$83.95	\$197,450
State, Local or Tribal Government	Urban Area Security Initiative (UASI) Governance Charter / FEMA Instruction FI-207-FY-24-103	31	2	62	250	15,500	\$83.95	\$1,301,225
State, Local or Tribal Government	Senior Advisory Committee (SAC) Charter / FEMA Instruction FI-207-FY-24-104	56	1	56	250	14,000	\$83.95	\$1,175,300

State, Local or Tribal Government	Urban Area Working Group (UAWG) Allocation Methodology / FEMA Instruction FI-207-FY-24-105	31	1	31	4	124	\$83.95	\$10,410
State, Local or Tribal Government	State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) Pass-Through Requirements / FEMA Instruction FI-207-FY-24-106	56	1	56	4	224	\$83.95	\$18,805
State, Local or Tribal Government	Critical Emergency Supplies / FEMA Instruction FI-207-FY-24-107	56	1	56	42	2,352	\$83.95	\$197,450
State, Local or Tribal Government	SAFECOM Compliance Letter / FEMA Instruction FI-207-FY-24-108	56	1	56	1	56	\$83.95	\$4,701
Total		709		827		319,488		\$26,821,018

Note: The “Avg. Hourly Wage Rate” for each respondent include a wage multiplier to reflect a fully-loaded wage rate.

“Type of Respondent should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

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

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for local government employees (NAICS code 999300 Local Government, SOC 11-0000: Management Occupations) is \$52.14 per hour.² Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$83.95 per hour. Therefore, the burden hour cost for all local government employees is estimated to be \$26,821,018 annually (\$83.95 x 319,488 hours = \$26,821,018).

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.)

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/2022/may/naics4_999300.htm

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
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.**

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: Fourteen (14) Grade 13 - Step 5 (GS 13-05) employees in the Washington, DC area at \$126,949 spending approximately 60% of time annually monitoring grant compliance. ¹ \$133,692 x 1.45 wage multiplier ² = \$193,853,.40 fully loaded wage rate; \$193,853,.40 x 0.60 of time = \$116,312.04 per employee; \$116,312.04 x 14 employees = \$1,628,368.56(rounded up to \$1,628,369) total salaries.	\$1,628,369
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel (not to exceed)	\$0
Total	\$1,628,369
¹ Office of Personnel Management 2024 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/2024/DCB.pdf . Accessed January 2, 2024.	
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)	Difference
Investment Justification for Homeland Security Grant Program (HSGP) / FEMA Form FF-207-FY-21-110 (formerly 089-1)				83,356	83,356	0
Operation Stonegarden (OPSG) Operations Order and Budget Template / FEMA Form FF-207-FY-21-111 (formerly 089-16)				115,544	115,544	0
Operation Stonegarden (OPSG) Inventory of Operation Orders / FEMA Form FF-207-FY-21-112 (formerly 089-20)				1,584	1,584	0
Urban Area Working Group (UAWG) Overview/Structure (including Point-of-Contact (POC)) / FEMA Instruction FI-207-FY-24-100				83,948	83,948	0
Operational Overtime Documentation / FEMA Instruction FI-207-FY-24-101				448	448	0
Multiyear Training and Exercise Plan / FEMA Instruction FI-207-FY-24-102				2,352	2,352	0
Urban Area Security Initiative (UASI) Governance Charter / FEMA Instruction FI-207-FY-24-103				15,500	15,500	0
Senior Advisory Committee (SAC) Charter / FEMA Instruction FI-207-FY-24-104				14,000	14,000	0
Urban Area Working Group (UAWG) Allocation Methodology / FEMA Instruction FI-207-FY-24-105				124	124	0
State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) Pass-Through Requirements / FEMA Instruction FI-207-FY-24-106				224	224	0
OPSG Daily Activity Report/ FEMA Form FF-207-FY-21-113 (formerly 089-0-27)				547,500	0	-547,500
Critical Emergency Supplies / FEMA Instruction FI-207-FY-24-107				2,352	2,352	0
SAFECOM Compliance Letter / FEMA Instruction FI-207-FY-24-108				56	56	0
Total	0	0	0	866,988	319,488	-547,500

Explain: The reduction of 547,500 burden hours for this collection was accomplished by removing one instrument (OPSG DAR, FEMA Form FF-207-FY-21-113 (formerly 089-0-27)) from the collection because FEMA does not collect any information with that instrument. CBP uses that instrument to collect information needed to fulfill other CBP

requirements regarding OPSG. CBP has been informed of their need to obtain their own approval from OMB to collect the requested information. Additionally, several instruction documents address required information, and the program does not provide a template for them to provide this information. The applicant simply needs to provide it in any format available. For this information, there is not a sure way to capture usability.

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
Investment Justification for Homeland Security Grant Program (HSGP) / FEMA Form FF-207-FY-21-110 (formerly 089-1)				\$5,819,082	\$6,997,736	\$1,178,654
Operation Stonegarden (OPSG) Operations Order and Budget Template / FEMA Form FF-207-FY-21-111 (formerly 089-16)				\$8,066,127	\$9,699,919	\$1,633,792
Operation Stonegarden (OPSG) Inventory of Operation Orders / FEMA Form FF-207-FY-21-112 (formerly 089-20)				\$110,579	\$132,977	\$22,398
Urban Area Working Group (UAWG) Overview/Structure (including Point-of-Contact (POC)) / FEMA Instruction FI-207-FY-24-100				\$5,860,410	\$7,047,435	\$1,187,025
Operational Overtime Documentation / FEMA Instruction FI-207-FY-24-101				\$31,275	\$37,610	\$6,335
Multiyear Training and Exercise Plan / FEMA Instruction FI-207-FY-24-102				\$164,193	\$197,450	\$33,257
Urban Area Security Initiative (UASI) Governance Charter / FEMA Instruction FI-207-FY-24-103				\$1,082,055	\$1,301,225	\$219,170
Senior Advisory Committee (SAC) Charter / FEMA Instruction FI-207-FY-24-104				\$977,340	\$1,175,300	\$197,960
Urban Area Working Group (UAWG) Allocation Methodology / FEMA Instruction FI-207-FY-24-105				\$8,656	\$10,410	\$1,754
State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) Pass-Through Requirements / FEMA Instruction FI-207-FY-24-106				\$15,637	\$18,805	\$3,168
OPSG Daily Activity Report/ FEMA Form FF-207-FY-21-113 (formerly 089-0-27)				\$38,220,975	\$0	-\$38,220,975
Critical Emergency Supplies / FEMA Instruction FI-207-FY-24-107				\$164,193	\$197,450	\$33,257
SAFECOM Compliance Letter / FEMA Instruction FI-207-FY-24-108				\$3,909	\$4,701	\$792
Total	\$0	\$0	\$0	\$60,524,431	\$26,821,018	-\$33,703,413

Explain: The reduction of \$33,703,413 in burden costs for this collection is based on the previously discussed removal of the burden hours for one instrument mitigated by a slight increase in general wage rates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

17. If seeking approval no 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. FEMA will display the expiration date for OMB approval of this information collection.

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 Submission.”