

March 28, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - NW157

Title: Generic Clearance for FEMA’s Major Disaster, Emergency Response, Emergency Recovery, and Hazard Mitigation Programs

Form Number(s): Not Applicable

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

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

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Pub. L. 93-288, as amended), 42 U.S.C. §§ 5121-5207 (“Stafford Act”) provides broad authority to the Federal Emergency Management Agency (FEMA) to carry out its mission of helping people before, during, and after disasters.

The National Flood Insurance Act of 1968 (“NFIA”), as amended, and the Flood Disaster Protection Act of 1973, as amended (42 U.S.C. § 4001, et. seq.) authorize FEMA’s National Flood Insurance Program (NFIP), including a wide range of related activities. For instance, the NFIA authorizes FEMA to provide financial assistance for planning and carrying out projects and activities designed to reduce the risk of flood damage to NFIP-insured structures.

There are many laws that condition Environmental and Historic Preservation (EHP) compliance reviews for Federally funded projects. For example, The National Environmental Policy Act (NEPA) (Pub. L. 91-190, Sec. 102 (B) and (C), 42 U.S.C. § 4332) requires the Federal Government to examine the impacts of FEMA funded projects, consider potential alternatives, inform both decision-makers and the public of project impacts through a transparent process, and pursue mitigation if necessary. The National Historic Preservation Act (NHPA), as amended (Pub. L. 89-665, 54 U.S.C. § 306108) asks the Federal Government to take into consideration the effect that the actions undertaken because of the awarded Federal funds have on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. EHP reviews are also governed by Executive Orders. NEPA and NHPA represent only a few of the laws at both the local, state and Federal levels that effect FEMA’s EHP reviews.

FEMA promulgates regulations for implementing the activities described above. These regulations contain a wide range of requirements and criteria relating to the information collection needs of FEMA’s programs, including, but not limited to, those relating to eligibility for receiving assistance, applying for assistance, and reporting.

There is also a wide range of more generally applicable authorities that impact FEMA’s information collection needs related to these activities. Below is a non-exhaustive discussion of several authorities and Executive Orders (EO’s) that are relevant to these information collection needs.

- The Department of Homeland Security (DHS) adopted in its entirety the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200) on December 26, 2014, at 2 C.F.R. Part 3002, and published at 79 FR 75867 (Dec. 19, 2014). 2 CFR 200 contains a wide range of requirements and procedures regarding FEMA’s providing of financial assistance.
- Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act"), Pub. L. 115-435, emphasizes collaboration and coordination to advance data and evidence-building functions in the Federal Government by statutorily mandating Federal evidence-building activities, open government data, and confidential information protection and statistical efficiency.
- EO 14058 directs Agencies to effectively reduce administrative burdens, simplify both public-facing and internal processes to improve efficiency, and empower the

Federal workforce to solve problems. EO 14008 and EO 13985 establish goals and priorities to advance equity. Information collections are necessary to document socioeconomic context and provide data for program evaluation metrics to meet equity, resilience, and risk reduction-related requirements, goals, and priorities. Office of Management and Budget (OMB) outlined reporting criteria in M-21-28 *Interim Implementation Guidance for the Justice40 Initiative*.

FEMA routinely receives additional requirements and direction from Congress, through new legislation, and the President, through Executive Orders, that require changes to previously approved collection instruments. FEMA is proposing moving instruments from currently approved information collections into this new generic information collection to provide the necessary flexibility to update individual existing instruments and create new instruments as new requirements and directions are received from Congress and the President, deliver timely assistance and maintain compliance with the Paperwork Reduction Act.

After this generic information collection is approved, FEMA will begin to move instruments from four existing collections as sub-collections and eventually be able to discontinue those four existing collections. This will allow FEMA to update individual instruments as sub-collections under this generic instead of revising entire information collections and analyze individual instruments for burden reduction. Those four existing information collections are:

- 1660-0017 – Public Assistance Programs
- 1660-0026 – State Administrative Plan for Hazard Mitigation
- 1660-0072 – FEMA Mitigation Grant Programs; and
- 1660-0076 – Hazard Mitigation Grant Programs (HMGP) Application and Reporting.

FEMA also has new instruments in draft form that are not approved under an existing collection and will be added as sub-collections after this generic information collection is approved.

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.

Under the applicable statutes, regulations, and policies, FEMA is required to conduct ongoing information collection and monitoring of its programs, conduct program evaluation and development of the programs, and administer program implementation. The collection of information is a primary component of the programs' processes for implementation, including those for receiving requests for assistance and/or reviewing grant applications, grants management and reporting, and closing out grant awards. The program evaluation process

requires continuous program improvement review which requires the collection of information, including for stakeholder outreach.

The collection of information supports all program functions, enabling FEMA to fulfill its statutory responsibilities to provide financial and technical assistance to stakeholders for disaster and emergency relief and hazard mitigation to protect people and property. FEMA provides assistance to state, local, territorial, or Tribal (SLTT) governments, and certain types of private nonprofit (PNP) organizations, to aid with response and recovery from Presidentially declared disasters and emergencies. FEMA provides supplemental Federal grant assistance for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly owned facilities and specific facilities of certain PNP organizations. FEMA also provides financial assistance to SLTTs, and certain types of PNPs in some instances, for hazard mitigation projects and activities, including pre- and post-disaster mitigation, to reduce or eliminate long-term risk to people and property from natural hazard events and their effects. FEMA also provides non-financial technical assistance to support hazard mitigation and community resilience needs. FEMA may also enter into agreements with eligible entities to make capitalization grants to such entities for the establishment of hazard mitigation revolving loan funds. FEMA provides assistance based on authority granted by statutes, executive orders (EOs), regulations, and policies.

FEMA will only submit a collection for approval under this generic clearance if the collection meets the following conditions:

- The information collection supports a FEMA program that is:
 - Authorized under the Stafford Act, the National Flood Insurance Act of 1968, the IJJA, relevant EHP authorities, or Congressional legislation amending those statutes;
 - Funded or directed by Executive Order or other actions of the Office of the President (including OMB); and/or
 - Directed by relevant regulations promulgated or adopted by DHS;
- Provides either financial, non-financial, program management, and/or technical assistance for FEMA's major disaster, emergency response, emergency recovery, and hazard mitigation activities;
- All instruments will undergo usability testing to improve the customer experience for the respondents;
- All instruments will be designed and reviewed to impose as little burden on the respondents to the extent practicable and appropriate;
- The collection of information is voluntary but may be required to obtain benefits;
- The collection of information is non-controversial and does not raise issues of concern to other Federal Agencies; and
- The Agency needs to collect necessary information to perform these activities.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the normal PRA process. To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with Privacy and supporting documentation (e.g., a copy of the comment card). The Agency asks OMB to approve the submission or identify issues within 10 business days upon receipt.

The types of instruments that this generic clearance covers include, but are not limited to:

- **Applications** – Examples include, but are not limited to, Program and project applications; project proposals; intended use plans; hazard mitigation plans, and application instruments designed to track changes in applicant, sub applicant, recipient, letter of interest forms, and cost estimates.
- **Environmental or Historical Preservation (EHP) Reviews** – Examples include, but are not limited to, social documentation, historical documentation, environmental documentation and environmental and historical preservation data, reports, and assessments.
- **Cost Effectiveness Instruments** – Examples include, but are not limited to, benefit cost analysis tools and other information that meets statutory requirements to establish cost effectiveness.
- **Financial Performance, Project Performance, and Program Performance Reporting Instruments** – Examples include, but are not limited to, data, reports, and information to establish project and program performance; project and program performance metric reporting; information requests regarding project eligibility, scope of work, technical feasibility, cost effectiveness, nonfinancial assistance including direct technical assistance, financial reporting forms and requests for financial and project data, quarterly performance reporting (QPR) instruments, financial and performance audits budgets, subrecipient burden reduction and customer satisfaction.
- **Grant Management Instruments** – Examples include, but are not limited to, Notices of Funding Opportunities (NOFO's), templates, program support materials, and new and updated policies, reports, audits, and documentation of fiscal procedures, management costs, and project closeout information; hazard mitigation plan information and assessments; program and project monitoring information.
- **Requests for Information** – Examples include, but are not limited to, instruments intended to elicit specific and substantial information to substantially inform and improve program effectiveness, program delivery processes, improve program continuous improvement processes, and identify needs for new or improved training, resources, and tools, information instruments to gather data to inform, and instruments designed to elicit direct and detailed customer feedback.

- **Requests for Appeals or Arbitrations** – Examples include, but are not limited to, requests for appeals, and requests for arbitrations.
- **Scope of Work Development** – Examples include, but are not limited to, project scope of work, cost effectiveness, and technical documentation; hazard, vulnerability, risk, and resiliency data documentation.
- **Administrative Plans** – Examples include, but are not limited to, state administrative plans, and Tribal administrative plans.
- **Community and Capacity Building Instruments** – Examples include, but are not limited to, community hazard risk information including demographic and social vulnerability information; infrastructure risk and vulnerability information; community resiliency, risk, and environmental and historical preservation data, reports, assessments community, and project contextual information that impacts program and project effectiveness.
- **Surveys and Focus Groups** – Examples include, but are not limited to, public meetings and discussion, stakeholder engagement, surveys, and focus groups intended to elicit information to inform and improve program effectiveness and program delivery processes; survey instruments and data collection instruments intended to elicit specific and substantial information to substantially inform and improve program effectiveness, program delivery processes, improve program continuous improvement processes, and identify needs for new or improved training, resources, and tools; information instruments to gather data to inform ; and instruments designed to elicit direct and detailed customer feedback.
- **Review Panels** – Examples include, but are not limited to, program and project applications; project proposals, intended use plans; hazard mitigation plans project scope of work, cost effectiveness, and technical documentation, hazard, vulnerability, risk, and resiliency data documentation; information necessary to review project/program eligibility and project/program conditions, and collections designed to supplement critical program application information, letter of interest forms; cost estimates, and project budgets.

FEMA has established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

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

The Agency will collect information electronically and/or use online collaboration tools such as online forms, electronic instruments, electronic submissions, or digital signatures to reduce burden among stakeholders. However, flexible information collection strategies are likely necessary to equitably deliver program access to applicants, sub applicants, recipients, subrecipients, entities and loan recipients, and stakeholders that may have limited access to digital resources or have other accessibility needs.

Usability testing is not being conducted on this Generic “Main” Collection. However, usability testing will be conducted on each sub-collection at the time they are submitted.

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.

Before an information request is submitted to collect data or require performance evaluation metrics FEMA shall establish that no similar data is gathered, maintained, or available from other trusted sources. To reduce burden, FEMA will coordinate with electronic systems administrators to prepopulate required information from application data.

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

Small businesses or other small entities may be involved in these efforts, but the Agency will minimize the burden on them of information collections approved under this clearance, asking for only information necessary to implement programs, and using short, easy-to-complete information collection instruments and comply with program legislative, executive order, and policy requirements.

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

The information collections described in Question 2 allows FEMA to provide grants and loans to help SLTTs plan for mitigation and implement mitigation activities to reduce future disaster losses, effectively monitor project and program performance, inform the public, and continuously improve program delivery to meet statutory, regulatory, and executive order requirements. Absent this information collection FEMA’s mission effectiveness will suffer, and program specific missions will be compromised. The Agency mission is established in legislation and regulatory authority to provide an orderly and continuing means of assistance by

the Federal Government to SLTT governments in carrying out their responsibilities to alleviate the suffering and damage caused by disasters.

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

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

The information collected will conform to schedules directed by statutory, regulatory, executive order, and administrative policy requirements. Information may be collected more than quarterly if reporting and monitoring data establishes that project and program conditions vary significantly from scope, schedule, budget, intent, and project effectiveness criteria established in forms, applications, and other project reporting and eligibility documentation. If the Administrator determines that program requirements are not met, the Administrator may collect information more frequently than quarterly to validate program and project eligibility and other requirements.

b. 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.

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

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

d. 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.

e. 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.

- f. 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.

- g. 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 December 11, 2023, at 88 FR 85898. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on March 28, 2024, at 89 FR 21529. The public comment period is open until April 29, 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.

N/A.

- 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.**

N/A.

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

FEMA will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups are the exceptions. In the case of in-person focus groups, FEMA may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely via phone or Internet, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies, who must travel to the agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, FEMA will provide OMB with additional justifications in the request for clearance of these specific activities.

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

The sub applications under this main generic collection will provide a Privacy Threshold Analysis specific to each program.

If a confidentiality pledge is deemed useful and feasible, FEMA will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the Agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

- 11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly**

considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There will be no questions of sensitive nature collected as part of any of these activities.

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 estimated annualized burden hours and costs for certain FEMA programs the table listed under Question 12c below. The “Form Name / Form No.” column in the table lists general descriptions of the instruments included in this information collection. Instead of listing each individual instrument, instruments are grouped together based on similarity. These generalized descriptions include: Applications; Environment and Historic Preservation (EHP)Reviews; Cost Effectiveness Instruments; Financial Performance, Project Performance, and Program Performance Reporting Instruments; Grant Management Instruments; Requests for Information (RFI); Requests for Appeal or Arbitration; Scope of Work Development (Phased and Scoping Projects); Administrative Plans; Community and Capacity Building Instruments; Continuous Program Improvement Surveys and Focus Groups; and Qualitative, Quantitative, and Technical Review Panels.

FEMA Forms – Applications. FEMA estimates that five hundred seventy-two thousand six hundred twenty (572,620) State, Local, and Tribal Government respondents will complete and submit the Paper Application one (1) time annually. Each response will require 0.6167 hours (37 minutes) for a total of 353,135 (= 572,620 State, Local, and Tribal Government respondents × 1 submission per year × 0.6167 hours, rounded up) total annual burden hours.

FEMA Form – Environment and Historic Preservation (EHP) Reviews. FEMA estimates that six thousand three hundred forty (6,340) State, Local, and Tribal Government respondents will complete and submit the Environment and Historic Preservation (EHP) form one (1) time annually. Each response will require 7.5 hours (450 minutes) for a total of 47,550 (= 6,340 Government respondents × 1 submission per year × 7.5 hours) total annual burden hours.

FEMA Forms – Cost Effectiveness Instruments. FEMA estimates that six thousand three hundred forty (6,340) State, Local, and Tribal Government respondents will complete and submit a Cost Effectiveness Instrument one (1) time annually. Each response will require 7.5 hours (450 minutes) for a total of 47,550 (= 6,340 respondents × 1 submission per year × 7.5 hours) total annual burden hours.

FEMA Forms – Financial Performance, Project Performance, and Program Performance Reporting Instruments. FEMA estimates that two thousand seven hundred fifty-six (2,756) State, Local, and Tribal Government respondents will complete and submit a Financial Performance Monitoring form one (1) time annually. Each response will require 10.7833 hours (647 minutes) for a total of 29,719 (= 2,756 respondents × 1 submission per year × 10.7833 hours) total annual burden hours.

FEMA Forms – Grant Management Instruments. FEMA estimates that sixty-seven thousand two hundred twenty (67,220) State, Local, and Tribal Government respondents will complete and submit a Grant Management Instrument one (1) time annually. Each response will require 1.05 hours (63 minutes) for a total of 70,581 (= 67,220 respondents × 1 submission per year × 1.05 hours) total annual burden hours.

FEMA Forms – Requests for Information. FEMA estimates that three thousand three hundred forty (3,340) State, Local, and Tribal Government respondents will complete and submit a Request for Information form one (1) time annually. Each response will require 3 hours (180 minutes) for a total of 10,020 (= 3,340 respondents × 1 submission per year × 3 hours) total annual burden hours.

FEMA Form – Requests for Appeal or Arbitration. FEMA estimates that one thousand (1,000) State, Local, and Tribal Government respondents will complete and submit a Request for Appeal or Arbitration one (1) time annually. Each response will require 3 hours (180 minutes) for a total of 3,000 (= 1,000 respondents × 1 submission per year × 3 hours) total annual burden hours.

FEMA Form – Scope of Work Development (Phased and Scoping Projects). FEMA estimates that one thousand two hundred (1,200) State, Local, and Tribal Government respondents will complete and submit a Scope of Work Development form one (1) time

annually. Each response will require 40 hours (2,400 minutes) for a total of 48,000 (= 1,200 respondents × 1 submission per year × 40 hours) total annual burden hours.

FEMA Forms – Administrative Plans. FEMA estimates that two hundred forty (240) State, Local, and Tribal Government respondents will complete and submit an Administrative Plan one (1) time annually. Each response will require 8 hours (480 minutes) for a total of 1,920 (= 240 respondents × 1 submission per year × 8 hours) total annual burden hours.

FEMA Form – Community and Capacity Building Instruments. FEMA estimates that two hundred (200) State, Local, and Tribal Government respondents will complete and submit a response once (1) annually. Each response will require 2 hours (120 minutes) for a total of 400 (= 200 respondents × 1 submission per year × 2 hours) total annual burden hours.

FEMA Form – Continuous Program Improvement Surveys and Focus Groups. FEMA estimates that ten thousand (10,000) State, Local, and Tribal Government respondents will partake in a survey or focus group once (1) annually. Each response will require 0.75 hours (45 minutes) for a total of 7,500 (= 10,000 respondents × 1 submission per year × 0.75 hours) total annual burden hours.

FEMA Form – Surveys and Focus Groups. FEMA estimates that 10,000 State, Local, and Tribal Government respondents will take part in one (1) survey or focus groups each year. Each response will require 0.75 hours (45 minutes) for a total of 7,500 (= 10,000 respondents × 1 response per year × 0.75 hours) total annual burden hours.

FEMA Form – Qualitative, Quantitative, and Technical Review Panels. FEMA estimates that 100 State, Local, and Tribal Government respondents will make a submission to a Review Panel once (1) annually. Each response will require 144 hours (8,640 minutes) for a total of 14,400 (= 100 respondents × 1 submission per year × 144 hours) total annual burden hours.

The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise. The total burden to collect the necessary information is estimated to be 633,775 total annual burden hours.

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.

The individual generic instruments will be added to the collection after it is approved by OMB.

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 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

A variety of instruments and platforms will be used to collect information from respondents. Based on the number of collections FEMA expects to conduct over the requested period for this clearance and past generic clearance submissions, FEMA estimates annual burden hours of 732,489.

| 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 Governments | Applications | 572,620 | 1 | 572,620 | 0.6167 | 353,135 | \$62.97 | \$22,236,911 |
| State, Local, or Tribal Governments | Historical and Environmental (EHP) Reviews | 6,340 | 1 | 6,340 | 7.5 | 47,550 | \$62.97 | \$2,994,224 |
| State, Local, or Tribal Governments | Cost Effectiveness Instruments | 6,340 | 1 | 6,340 | 7.5 | 47,550 | \$62.97 | \$2,994,224 |
| State, Local, or Tribal Governments | Financial Performance, Project Performance, and Program Performance Reporting Instruments: | 2,756 | 1 | 2,756 | 10.7833 | 29,719 | \$62.97 | \$1,871,405 |
| State, Local, or Tribal Governments | Grant Management Instruments | 67,220 | 1 | 67,220 | 1.05 | 70,581 | \$62.97 | \$4,444,486 |
| State, Local, or Tribal Governments | Requests for Information | 3,340 | 1 | 3,340 | 3 | 10,020 | \$62.97 | \$630,959 |
| State, Local, or Tribal Governments | Requests for Appeal or Arbitration | 1,000 | 1 | 1,000 | 3 | 3,000 | \$62.97 | \$188,910 |
| State, Local, or Tribal Governments | Scope of Work Development (Phased and Scoping Projects) | 1,200 | 1 | 1,200 | 40 | 48,000 | \$62.97 | \$3,022,560 |
| State, Local, or Tribal Governments | Administrative Plans | 240 | 1 | 240 | 8 | 1,920 | \$62.97 | \$120,902 |
| State, Local, or Tribal Governments | Community and Capacity Building Instruments | 200 | 1 | 200 | 2 | 400 | \$62.97 | \$25,188 |
| State, Local, or Tribal Governments | Surveys and Focus Groups | 10,000 | 1 | 10,000 | 0.75 | 7,500 | \$62.97 | \$472,275 |
| State, Local, or Tribal Governments | Qualitative, Quantitative, and Technical Review Panels | 100 | 1 | 100 | 144 | 14,400 | \$62.97 | \$906,768 |
| Totals | | 671,356 | | 671,356 | | 633,775 | | \$39,908,812 |

Instruction for Wage-rate category multiplier applied to Federal FEMA wages: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.61¹. For example, a non-loaded BLS table wage rate of

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2023.” Available at <https://www.bls.gov/news.release/pdf/ecec.pdf>. The wage multiplier for State, Local, or Tribal Government is calculated by dividing total compensation for State and local Government workers of \$57.60 by Wages and salaries for State and Local Government workers of \$35.69 per hour yielding a benefits multiplier of approximately 1.61. Accessed on August 18, 2023.

\$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 Urban and Regional Planners category (Standard Occupational Classification 19-3051) that work for Local Government, the mean hourly wage is \$39.11². Including the wage rate multiplier of 1.61 for State and Local Government, the fully loaded wage rate is \$62.97 per hour. Therefore, the annual burden hour cost is estimated to be \$39,908,812 (= \$62.97 per hour x 633,775 hours).

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

The cost estimates should be split into two components:

- a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

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

- b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

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

- 14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection**

² Information on the mean wage rate from the U.S. Department of Labor is available online at: https://www.bls.gov/oes/2022/may/oes_nat.htm . Accessed on August 18, 2023.

of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The anticipated cost to the Federal Government is approximately \$20,801,492 annually. These costs are comprised of contract costs, staff salaries, and computer hardware and software.

| Annual Cost to the Federal Government | |
|--|---------------------|
| Item | Cost (\$) |
| <p>Contract Costs: FEMA contracts the maintenance and enhancements of FEMA GO (Mitigation eGrants data collection is maintained until the program is closed out but will no longer be enhanced). The annual cost of this maintenance contract with IBM, Inc. is \$3,000,000 for the sustainment/maintenance of the FEMA GO system. No contract costs are associated with the legacy Public Assistance (PA) and other HMA legacy electronic systems.</p> | \$3,000,000 |
| <p>Staff salaries* for Pre-disaster staff: 50 GS-13, Step 5 employees spending approximately 100% of their time annually to collect and review data for the pre-disaster programs under this collection. [50 × \$133,692 annual salary × 1 × 1.45¹ wage multiplier = \$9,692,670]</p> <p>25 GS-13, Step 5 employees spending approximately 25% of their time on planning, review, and evaluation of program performance. [25 × \$133,692 annual salary × 0.25 × 1.45 wage multiplier = \$1,211,584]</p> <p>[\$9,203,803 + \$1,150,475 = \$10,354,278]</p> | \$10,904,254 |
| <p>Staff salaries for Post-disaster HMA electronic systems: 2 GS-11 Step 5 employees spending 0.6333 hours each reviewing 2,000 project application narratives. [2 × \$44.94 hourly wage × 0.6333 × 1.45 wage multiplier × 2,000 = \$165,071]</p> <p>1 GS-11 Step 5 employee spending 0.6333 hours each reviewing 1,000 project application narratives. [1 × \$44.94 hourly wage × 0.6333 × 1.45 wage multiplier × 1,000 = \$41,268]</p> <p>3 GS-11 Step 5 employees spending 100% of their time reviewing and recalculating the benefit-cost determination. [3 × \$93,798 annual salary × 1 × 1.45 wage multiplier = \$408,021]</p> <p>13 GS-12 Step 5 employees spending 100% of their time managing environmental reviews. [13 × \$112,425 annual salary × 1 × 1.45 wage multiplier = \$2,119,211]</p> <p>4 GS-11 Step 5 employees spending 100% of their time conducting audits. [4 × \$93,798 annual salary × 1 × 1.45 wage multiplier = \$544,028]</p> <p>\$165,071 + \$41,268 + \$408,021 + \$2,119,211 + \$544,028 = \$3,227,599.</p> | \$3,227,599 |
| <p>Staff Salaries for HMGP Electronic Systems: 1 GS-11 Step 5, employee reviewing 1,534 project narrative for 2 hours each. [1 × \$44.94 hourly wage × 2 hours × 1.45 wage multiplier × 1,534 total narratives = \$199,920]</p> <p>1 GS-11 Step 5 employee reviewing and recalculating 1,534 benefit-cost determinations for 3 hours each. [1 × \$44.94 hourly wage × 3 hours × 1.45 wage multiplier × 1,534 cost/benefit determinations = \$299,880]</p> <p>1 GS-12 Step 5 employee managing 1,534 environmental reviews for 13 hours each. [1 × \$53.87 hourly wage × 13 hours × 1.45 wage multiplier × 1,534 environmental reviews = \$1,557,700]</p> <p>4 GS-11 Step 5 employees conducting 59 audits at 25 hours each. [4 × \$44.94 hourly wage × 25 hours × 1.45 wage multiplier × 59 environmental reviews = \$384,462]</p> <p>\$199,920 + \$299,880 + \$1,557,700 + \$384,462 = \$2,441,962.</p> | \$2,441,962 |
| <p>Staff salaries for legacy PA electronic systems: 12 GS-12 Step 5 employees spending approximately 52% of their time reviewing information to process projects. [12 × \$112,425 annual salary × 0.52 × 1.45 wage multiplier = \$1,017,221]</p> | \$1,017,221 |
| 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 | \$50,000 |
| Total | \$21,641,036 |
| 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 the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

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

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

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

| Itemized Changes in Annual Burden Hours | | | | | | |
|---|---|----------------------|----------------|---|------------------|------------|
| Data Collection Activity/Instrument | Program Change (hours currently on OMB inventory) | Program Change (new) | Difference | Adjustment (hours currently on OMB inventory) | Adjustment (new) | Difference |
| Applications | | 353,135 | 353,135 | | | |
| Historical and Environmental (EHP) Reviews | | 47,550 | 47,550 | | | |
| Cost Effectiveness Instruments | | 47,550 | 47,550 | | | |
| Financial Performance, Project Performance, and Program Performance Reporting Instruments: | | 29,719 | 29,719 | | | |
| Grant Management Instruments | | 70,581 | 70,581 | | | |
| Requests for Information | | 10,020 | 10,020 | | | |
| Requests for Appeal or Arbitration | | 3,000 | 3,000 | | | |
| Scope of Work Development (Phased and Scoping Projects) | | 48,000 | 48,000 | | | |
| Administrative Plans | | 1,920 | 1,920 | | | |
| Community and Capacity Building Instruments | | 400 | 400 | | | |
| Surveys and Focus Groups | | 7,500 | 7,500 | | | |
| Qualitative, Quantitative, and Technical Review Panels | | 14,400 | 14,400 | | | |
| Totals | | 633,775 | 633,775 | | | |

Explain: This is a new information collection. Therefore, no historical data is available and all the estimates in this information collection are new.

| 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 |
| Applications | | \$22,236,911 | \$22,236,911 | | | |
| Historical and Environmental (EHP) Reviews | | \$2,994,224 | \$2,994,224 | | | |
| Cost Effectiveness Instruments | | \$2,994,224 | \$2,994,224 | | | |
| Financial Performance, Project Performance, and Program Performance Reporting Instruments | | \$1,871,405 | \$1,871,405 | | | |
| Grant Management Instruments | | \$4,444,486 | \$4,444,486 | | | |
| Requests for Information | | \$630,959 | \$630,959 | | | |
| Requests for Appeal or Arbitration | | \$188,910 | \$188,910 | | | |
| Scope of Work Development (Phased and Scoping Projects) | | \$3,022,560 | \$3,022,560 | | | |
| Administrative Plans | | \$120,902 | \$120,902 | | | |
| Community and Capacity Building Instruments | | \$25,188 | \$25,188 | | | |
| Surveys and Focus Groups | | \$472,275 | \$472,275 | | | |
| Qualitative, Quantitative, and Technical Review Panels | | \$906,768 | \$906,768 | | | |
| Totals | | \$39,908,812 | \$39,908,812 | | | |

Explain: This is a new information collection. Therefore, no historical data is available and all the estimates in this information collection are new.

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

FEMA will not use complex analytical techniques. FEMA under this generic collection will use practical data collection processes and reduce burden through simple and effective data collection strategies. FEMA will employ practical data collection strategies and simple analytical methodologies common in social, financial, and economic research that are designed to evaluate program compliance, program and project effectiveness, program and project costs and technical feasibilities to meet statutory, regulatory, executive order, and policy requirements.

Each program will develop practical data collection methodologies and reporting metrics as required by legislative, executive order, DHS, and OMB guidance.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

FEMA programs will display the expiration date of OMB approval of this information collection.

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

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