

January 26, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0016

Title: Revision to National Flood Insurance Program Maps: Application Forms and Instructions for LOMRs and CLOMRs

Form Number(s):

- 1) FEMA Form FF-206-FY-21-100 (formerly 086-0-27), Overview & Concurrence (Form 1);
- 2) FEMA Form FF-206-FY-21-101 (formerly 086-0-27A), Riverine Hydrology & Hydraulics (Form 2);
- 3) FEMA Form FF-206-FY-21-102 (formerly 086-0-27B), Riverine Structures (Form 3);
- 4) FEMA Form FF-206-FY-21-103 (formerly 086-0-27C), Coastal Analysis (Form 4);
- 5) FEMA Form FF-206-FY-21-104 (formerly 086-0-27D), Coastal Structures (Form 5);
and
- 6) FEMA Form FF-206-FY-21-105 (formerly 086-0-27E), Alluvial Fan Flooding (Form 6).

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 National Flood Insurance Program (NFIP) is authorized by 42 U.S.C. § 4001 *et seq.* (see the Housing and Urban Development Act of 1968 (Pub. L. 90-448) and expanded by the Flood Disaster Protection Act of 1973 (Pub. L. 93-234)). The Department of Homeland Security's (DHS's) Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. Communities are required to submit technical information concerning flood hazards and plans to avoid potential flood hazards when physical changes occur (see 44 CFR 65.3). Communities are provided the right to submit technical information when inconsistencies on maps are identified (see 44 CFR 65.4). In order to revise the Base (one-percent annual chance) Flood Elevations (BFEs), Special Flood Hazard Areas (SFHAs), and floodways presented on the NFIP maps, a community must submit scientific or technical data demonstrating the need for a revision. The NFIP regulations outline the data that must be submitted for these requests (see 44 CFR Part 65).

This collection serves to provide a standard format for the general information requirements outlined in the NFIP regulations and helps establish an organized package of the data needed to revise NFIP maps. This collection helps to:

- Ensure all data required to process these requests is received with the initial submittal.
 - Ensure processing consistency among all requests.
 - Ensure that submitted data are presented in a manner that will increase processing efficiency.
 - Reduce the amount of time required to process requests.
 - Reduce processing costs.
- 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.**

The information collected on FEMA Forms FF-206-FY-21-100 (formerly 086-0-27), FF-206-FY-21-101 (formerly 086-0-27A), FF-206-FY-21-102 (formerly 086-0-27B), FF-206-FY-21-103 (formerly 086-0-27C), FF-206-FY-21-104 (formerly 086-0-27D), and FF-206-FY-21-105 (formerly 086-0-27E) is used to determine if such data will result in the modification of BFEs,

SFHA, or floodway. Once the information is collected, it is submitted to FEMA for review and is subsequently included on the NFIP maps. These maps are used by communities for compliance with floodplain management regulations, by lenders in determining the application of the mandatory flood insurance purchase requirements, and by insurance agents in determining actuarial flood insurance rates. Respondents can also contact a call center at 1-877-336-2627 for answers to any questions that might come up during the completion of the data collection instruments.

This collection uses a series of six forms, described below:

FEMA Form FF-206-FY-21-100 (formerly 086-0-27), Overview & Concurrence (Form 1), provides the basic information regarding the revision request, and requires the signatures of the requester, community official, and a registered professional engineer. This form is required for all revision requests. This form describes the location and nature of the requested NFIP map change, and the data required to support the request.

FEMA Form FF-206-FY-21-101 (formerly 086-0-27A), Riverine Hydrology & Hydraulics (Form 2), provides the basic information on the scope and methodology of hydrologic and hydraulic analyses that are prepared in support of the revision request. This form should be used for revision requests that involve new or revised hydrologic or hydraulic analyses of rivers, streams, ponds, or small lakes.

FEMA Form FF-206-FY-21-102 (formerly 086-0-27B), Riverine Structures (Form 3), provides the basic information regarding hydraulic structures constructed in the stream channel or floodplain. This form should be used for revision requests that involve new or proposed channelization, bridges/culverts, dams, or levees/floodwalls.

FEMA Form FF-206-FY-21-103 (formerly 086-0-27C), Coastal Analysis (Form 4), provides the basic information on the scope and methodology of the coastal analyses that are prepared in support of the revision request. This form should be used for any revision requests that involve new or revised coastal analyses.

FEMA Form FF-206-FY-21-104 (formerly 086-0-27D), Coastal Structures (Form 5), provides the basic information regarding hydraulic structures constructed along the coast. This form should be used for revision requests that involve new or proposed levees/dikes, breakwaters, bulkheads, seawalls, and/or revetments located along the coast.

FEMA Form FF-206-FY-21-105 (formerly 086-0-27E), Alluvial Fan Flooding (Form 6), provides the basic information for analyses of alluvial fans. This form should be used for revision requests involving alluvial fans.

- 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 forms are made available on the Internet and can be downloaded from the Web site. The forms can be found at the following Web site address:

<https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-2>. The forms are available on the Internet for download in Adobe Acrobat format. Alternatively, the collection may be submitted to FEMA electronically via the Online LOMC Tool. All required data to support the request may be submitted using this tool.

Usability Testing has been conducted on this collection. As result, there is a reduction of 1,474 burden hours to this collection at this time.

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

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

- 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.**

Community participation in the National Flood Insurance Program (NFIP) is voluntary. A CLOMR required by the NFIP per 44 CFR 65.12 would need to be submitted to FEMA for a NFIP participating community.

FEMA accepts paper and electronic submissions for CLOMRs and LOMRs, and has specialists at the FEMA Mapping and Insurance eXchange (FMIX) Customer Care Center to help all communities and the public with any questions about flood hazard mapping and insurance. The FMIX hours of operation are Monday through Friday, 8:00 am to 7:00 pm Eastern Time. Self-service options are available 24 hours a day, 7 days a week.

- 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 this information were not collected, the NFIP maps could not be revised as required by regulation to reflect current, existing flood hazards. Processing of these requests helps to

improve the accuracy of FEMA map products, and the effectiveness of the NFIP. Accurate mapping allows FEMA to be more efficient with its promulgation of all the regulations covering the NFIP.

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

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

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

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

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

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

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

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

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

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

This information collection does not include a statistical survey.

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

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

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

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

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

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

8. Federal Register Notice:

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

A 60-day Federal Register Notice inviting public comments was published on October 26, 2023, at 88 FR 73604. One public comment supporting this information collection was received.

Comment 1 (FEMA-2023-0029-0002): The commentor stated "I support this information collection[.]"

FEMA Response to Comment 1: FEMA thanks the commentor for their support.

A 30-day Federal Register Notice inviting public comments was published on January 26, 2024, at 89 FR 5252. The public comment period is open until February 26, 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 conducts several workshops for community officials, engineers, surveyors, and developers every year on the details and requirements of this information request. Attendees use the opportunity to give comments and request clarifications of instructions.

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

The FEMA Mapping and Insurance eXchange (FMIX) provides an email address, a live chat function, and a toll-free number (1-877-336-2627) to answer questions and provide an opportunity for respondents to comment on the forms.

- 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.**

A Systems Privacy Threshold Analysis (PTA) for this information collection is currently active, but the Forms PTA has expired. An updated Forms PTA was submitted to DHS for review on January 19, 2024.

Privacy Impact Assessment (PIA) and Systems of Records Notice (SORN) coverage will be provided by existing PIAs and SORNs once DHS approves the PTA.

- 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. Consolation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

FEMA Form FF-206-FY-21-100 (formerly 086-0-27), Overview & Concurrence (Form 1): is estimated to have 1545 respondents times 1 response per year for 1545 total annual responses. It is estimated that each response will require 1.75 burden hours to complete (approximately 1 hour for local government officials to complete their portion of the form and 45 minutes for Engineers or Surveyors to complete their portion of the form), therefore 1545 responses times 1.75 hours equals 2704 total annual burden hours.

FEMA Form FF-206-FY-21-101 (formerly 086-0-27A), Riverine Hydrology & Hydraulics (Form 2): is estimated to have 1481 respondents times 1 response per year for 1481 total annual responses. It is estimated that each response will require 3.5 burden hours to complete, therefore 1481 responses times 3.5 hours equals 5184 total annual burden hours.

FEMA Form FF-206-FY-21-102 (formerly 086-0-27B), Riverine Structures (Form 3): is estimated to have 892 respondents times 1 response per year for 892 total annual responses. It is estimated that each response will require 7 burden hours to complete, therefore 892 responses times 7 hours equals 6244 total annual burden hours.

FEMA Form FF-206-FY-21-103 (formerly 086-0-27C), Coastal Analysis (Form 4): is estimated to have 109 respondents times 1 response per year for 109 total annual responses. It is estimated that each response will require 3.5 burden hours to complete, therefore 109 responses times 3.5 hours equals 382 total annual burden hours.

FEMA Form FF-206-FY-21-104 (formerly 086-0-27D), Coastal Structures (Form 5): is estimated to have 10 respondents times 1 response per year for 10 total annual responses. It is

estimated that each response will require 7 burden hours to complete, therefore 10 responses times 7 hours equals 70 total annual burden hours.

FEMA Form FF-206-FY-21-105 (formerly 086-0-27E), Alluvial Fan Flooding (Form 6): is estimated to have 7 respondents times 1 response per year for 7 total annual responses. It is estimated that each response will require 7 burden hours to complete, therefore 7 responses times 7 hours equals 49 total annual burden hours.

The estimated number of responses for all forms is based on the number of responses received during the period from October 1, 2022 – September 30, 2023.

After conducting usability testing there is a reduction of 1,474 burden hours to what is listed in the OMB inventory.

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

Please see our response 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

Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent
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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 1.45. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the "Avg. Hourly Wage Rate" would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for a Civil Engineer (SOC 17-2051) is estimated to be \$46.82 per hour.² Including the wage rate multiplier of 1.45, the fully loaded wage rate is \$67.89. Therefore, the estimated burden hour cost to respondents for a Civil Engineer is estimated to be $\$67.89 \times 1,545 = \$104,890$ annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for an Engineer (SOC 17-2000) is estimated to be \$51.53 per hour.³ Including the wage rate multiplier of 1.45, the fully loaded wage rate is \$74.72. Therefore, the estimated burden hour cost to respondents for an Engineer is estimated to be $\$74.72 \times 13,088$ (minus \$1 due to rounding) = \$977,934 annually.

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/oes_nat.htm

³ 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/oes_nat.htm

Annual Cost Burden to Responder

Data Collection	*Annual Capital Start-Up Cost (investments in overhead,	*Annual Operations and Maintenance Cost (such as recordkeeping,
Activity/Instrument		

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 \$26,430,000 in annual operation or maintenance costs associated with this information collection.

The cost to developers for an engineer's or surveyor's services is broken down above for each form. The engineer's services include scoping, surveying cross-sections, developing hydrologic

and hydraulic analysis, and preparing work maps and reports documenting the engineering analysis and results.

For FEMA Form FF-206-FY-21-100 (formerly 086-0-27), Overview & Concurrence (Form 1), it is estimated that 1,545 Engineers or Surveyors will charge an average of \$1,200 to research the information needed to complete this form. Therefore, the total annual cost for this form is estimated to be $1,545 \times \$1,200 = \$1,854,000$.

For FEMA Form FF-206-FY-21-101 (formerly 086-0-27A), Riverine Hydrology & Hydraulics (Form 2), it is estimated that 1,481 Engineers or Surveyors will charge an average of \$12,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $1,481 \times \$12,000 = \$17,772,000$. However, this can vary greatly depending on the size of the revision area and complexity of the watercourse.

For FEMA Form FF-206-FY-21-102 (formerly 086-0-27B), Riverine Structures (Form 3), it is estimated that 892 Engineers or Surveyors will charge an average of \$6,000 to produce the technical data required to complete this form. However, this can vary greatly depending on the size of the revision area and complexity of the watercourse. Therefore, the total annual cost for this form is estimated to be $892 \times \$6,000 = \$5,352,000$.

For FEMA Form FF-206-FY-21-103 (formerly 086-0-27C), Coastal Analysis (Form 4), it is estimated that 109 Engineers or Surveyors will charge an average of \$12,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $109 \times \$12,000 = \$1,308,000$.

For FEMA Form FF-206-FY-21-104 (formerly 086-0-27D), Coastal Structures (Form 5), it is estimated that 10 Engineers or Surveyors will charge an average of \$6,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $10 \times \$6,000 = \$60,000$.

For FEMA Form FF-206-FY-21-105 (formerly 086-0-27E), Alluvial Fan Flooding (Form 6), it is estimated that 7 Engineers or Surveyors will charge an average of \$12,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $7 \times \$12,000 = \$84,000$.

The total annual cost burden to the respondents is estimated to be $\$1,854,000 + \$17,772,000 + \$5,352,000 + \$1,308,000 + \$60,000 + \$84,000 = \$26,430,000$ annually.

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 [Description below]: See directly below.	\$18,500
Staff Salaries: 1 GS12 Step 5 employee in Washington DC spending approximately 5% of their time annually to the review, coordination, and approval of the final submission for MT-2 forms.** \$112,425 annual salary x 1.45 wage rate = \$163,016; \$163,016 fully loaded wage x 0.05 of time = \$8,150.81 (rounded up to \$8,151).	\$8,151
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	\$26,651
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.	

The contractor costs are estimated to be \$18,500. This cost includes call center staff responding to an average of 3,200 calls per year that pertain to this collection. Most of these calls are from respondents who require assistance with completing the forms and interpreting the instructions. Based on historical call center data, calls pertaining to the forms lasts an average of 6 minutes. Based on an average loaded rate of \$50.00 per hour for a junior level NFIP analyst, the contractor costs for responding to these calls is \$16,000. The contract costs associated with completing and submitting the required documents for this collection is estimated to be \$2,500. This includes 50 hours and is based on an average loaded rate of \$50.00 per hour.

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	Program Change (hours currently on	Program Change

Explain: The overall decrease in burden hours of 1,474 hours is primarily due to a decrease in the number of applications submitted for riverine and coastal areas compared to the previous estimate. FEMA takes in what applications are submitted and the number of applications change from year-to-year and these are FEMA's best, current estimates.

Itemized Change		
Data Collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program (New)

Explain: The overall burden cost has gone down by \$1,485. The decrease in burden cost stems mainly from the general decrease in the number of overall applications and applications submitted for riverine areas, and offset by the general increase in hourly wages.

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

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

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

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

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