

March 27, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0159

Title: Generic Clearance for Notice of Loss and Proof of Loss

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)(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 (FEMA) (hereafter the “Agency”) seeks the +Office of Management and Budget’s (OMB) approval of a generic clearance to collect information on damage resulting from certain fires where the United States has determined it is responsible and established an office to resolve claims, including, but not limited to, the following: personal injury, property losses, financial losses, business interruptions, and any other losses determined by the Administrator under appropriate statutory authority.

44 C.F.R. Part 269: Implementing Information Collection

The Hermit’s Peak/Calf Canyon Fire (“the Fire”) and other major fires provide some context for this generic clearance request. On September 30, 2022, Congress passed the Hermit’s Peak/Calf Canyon Fire Assistance Act (“Act”) authorizing FEMA to establish a claims office to receive, evaluate, process, and pay actual compensatory damages to persons and entities that suffered injuries from the Hermit’s Peak/Calf Canyon Fire (the “Fire”). (Pub. L. No. 177-180, 136 Stat. 2114 (2022)). 44 CFR Part 296 is implemented by authority of the Act requiring the Agency to establish a process to receive, evaluate, process, and pay actual compensatory damages for injuries suffered from the Fire. This process results in an information collection from the public requiring OMB approval.

To initiate a claim for fire losses under the Act, the claimant files a Notice of Loss (NOL) with the Claims Office (hereafter “CO”). CO will provide the claimant with written acknowledgement that the claim has been filed and the claim number.

Upon acknowledgment of the NOL, claimants will have 150 days under the Act to complete a Proof of Loss (POL) providing detailed information regarding their injuries and supporting the claim. The Agency has a total of 180 days under the Act from the date of acknowledging the NOL to provide a determination on the claim. After review of the signed POL the Claims Reviewer will develop a recommendation and submit a report to the Authorized Official for review and determination on the claim. In making its determination, the Agency must determine: (1) whether the claimant is an injured person; (2) whether the claimed injury resulted from the Fire; (3) whether the person(s) is otherwise eligible to receive any amount determined; and (4) whether sufficient funds are available for payment and, if so, the amount.

FEMA is not predicting future fires caused by government action. However, the principles of preparedness would suggest that given its role as an emergency response and mitigation agency, it is appropriate to proactively establish general approval of agency claims program administration. This approval request seeks to accomplish such general approval.

Generic Clearance Appropriate for FEMA Claims Administration

5 C.F.R. § 1320.10 of the Paperwork Reduction Act calls for 90 days of public comment concerning individual clearance of collections of information from the public. This could result in, at minimum, a 90-day delay for individual program requests to establish future claims programs. The generic request seeks to ensure the agency is effective and able to meet claimant/survivors’ needs as those needs arise.

Generic clearances allow for conducting more than one information collection using very similar methods. Generic clearances still require the initial generic collection to go through the established PRA process but allow for quicker clearance of later associated collections. FEMA submits this generic approval request to avoid future delays in claims program establishment for PRA reasons.

FEMA will provide the following for OMB to assess the utility and burden associated with future requests under this generic clearance:

- a. Explanation of the specific use of information in the given context, the questions that it proposes to use, and the existing or new information collection form it will use,
- b. Description of the subpopulation to whom the questions will be administered, the estimated number of respondents, and the analysis the program will do with the collected information.
- c. How the data will be protected, and if the Agency expects to disseminate the statistics outside of the Agency, the process it will use to conduct non-disclosure review.
- d. FEMA will include the ICR number if the information is being added to an existing form.

In the future, FEMA and OMB may agree on a standardized template for this information.

- 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 purpose of the information collection is to allow the Agency to evaluate, process and pay actual compensatory damages for injuries suffered in major fire incidents caused by Federal action such as those experienced as a result of the Hermit's Peak/Canyon Fire. The Agency's policy is to provide expeditious resolution of damage claims for those injured by the Fire. The policy requires sensitivity to claimants' situations in administering the process.

Collection data provided by claimants will be used in the following ways: for compensation, duplication of benefit reviews, and to improve, revise and/or modernize claims processing:

- Information collected will be used to ensure efficient and consistent processing of all claims associated with the Fire. To avoid duplication of benefits and to address unmet needs of claimants, claims office claimant files will be shared outside of the Agency;
- The Agency will modernize the process by providing options to file a claim by mail, electronically, or in person.
- Claimants do not have to apply to FEMA disaster assistance in order to submit a claim with CO. Any injured person can file a NOL to bring a claim under the Act that must include a brief description of each injury;

The Agency will only submit a collection for approval under this generic clearance if the collection meets the following conditions: The Agency's overall claims data collected for the purpose of providing expeditious consideration and settlement of claims for injuries suffered as a result of a major fire and where FEMA has been required to establish a Claims Office. To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation. The submission will have automatic approval unless OMB identifies issues within 5 business days.

- The following is typical claim information:
 - Type of Claim
 - Individual or Household
 - Names
 - Relationship to Primary Claimant
 - Is the Claimant and household members a member of an Indian Tribe
 - Business
 - Government
 - Indian Tribe
 - Not-for-Profit
 - Claimant Contact Information
 - Name
 - Current and Damaged Property Address
 - Telephone Number
 - Fax Number
 - Email Address
 - Losses
 - Loss of Property
 - Business Loss
 - Financial Loss
 - Personal Injury
 - Insurance and Other Assistance
 - Verification of Truth
 - Signatures
 - Name of Third-Party Representation
- Information gathered will be used to approve or deny claims for compensation.

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 anticipates development and use of an online filing system in the near future.

Collecting information electronically and/or use online collaboration tools to reduce burden.

- 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.**

For each request under this Generic Clearance, if there is any additional duplication of similar information, it will be identified and justified.

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

Small businesses or other small entities may submit claims for damages suffered as a result of the Fire, but FEMA will minimize the burden of information collections approved under this clearance by providing contact information for members of the public seeking to participate in agency claims programs. Any assistance provided to small businesses or entities will be detailed in the specific “child” application.

- 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.**

Providing this information is mandatory if the claimant seeks compensation under the Act pursuant to regulations at 44 CFR part 296. Claimants who do not provide this information will not be compensated under the Act. The information required to be provided on the NOL and POL is generally available to the claimant, as it relates specifically to their injuries resulting from the Fire. The Agency will assign a Navigator and Claims Reviewer to assist those claimants with the claims process after they submit the NOL, including obtaining supporting documentation that might not otherwise be generally available to the claimant and to assist in completing the POL. The Agency anticipates the Navigator and Claims Reviewer support will help reduce the burden on claimants in this process.

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

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

- 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 May 5, 2023, at 88 FR 29144. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August 11, 2023, at 88 FR 54632. The public comment period is open until September 11, 2023.

- 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.**

The Agency regularly meets with and participates in inter-Agency working groups to determine perspectives on the availability of data and frequency of collection, recordkeeping, disclosure, and reporting format.

- 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 Agency must complete initial consultations with representatives of those from whom information is to be obtained or those who must compile records and anticipates ongoing engagement as part of the information collection.

Congress tasked the Agency with providing expeditious consideration and settlement of claims for injuries as a result of the Fire. There are usually deadlines that are set by Congress around the claims process. First, the Agency was required to publish regulations establishing the process within 45 days of the Act's enactment. Claimants have two years from the date the regulation was published to submit their NOL to FEMA. Once the NOL is filed, Claimants will only have 150 days to submit their POL for review by the CO. The POL documents the losses suffered by Claimants in detail to allow the CO to complete review and issue a determination on the claim.

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

No payment is issued directly as a result of the NOL or POL.

The Agency will provide compensation payments as part of the Act, as appropriate, at the conclusion of the process. Claimants will sign a Release and Certification form for partial payment at the start of the process. Partial payments cannot be appealed, and acceptance of the partial payment does not affect the claimant's ability to pursue an appeal, arbitration, or other options under the Act for the remaining portion of a claim. A Release and Certification form will also have to be signed for final payment if the claimant is satisfied with the written determination of the Authorized Official.

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

Respondents' confidentiality is protected under the Privacy Act of 1974, Pub Law No. 93-579, 88 Stat 1896 (Dec. 31, 1974), codified at 5 U.S.C. § 552a (2018), which is the principal law governing the handling of personal information in the federal government. Respondents' personally identifiable information will be protected per the requirements of the Privacy Act. In addition, per the requirements of the Privacy Act, respondents are provided assurance of confidentiality through Privacy Threshold Analysis; Privacy Impact Assessments ; System of Records Notices; and Privacy Act Statements provided to respondents.

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

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

1660 – 0159 – Generic Clearance for Notice of Loss and Proof of Loss

the requested period for this clearance and past generic clearance submissions, FEMA estimates annual burden hours of 2,929,962.

1660 – 0159 – Generic Clearance for Notice of Loss and Proof of Loss

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
	Notice of Loss Initial Estimate	114,900	1	114,900	0.75	86,175	\$43.15	\$3,718,451
	Proof of Loss Initial Estimate	114,900	1	114,900	22.5	2,585,250	\$43.15	\$111,553,538
	Banking Information Initial Estimate	114,900	1	114,900	0.3333	38,296	\$43.15	\$1,652,472
	Administrative Appeal Request Initial Estimate	114,900	1	114,900	0.75	86,175	\$43.15	\$3,718,451
	Administrative Appeal Withdrawal Request Initial Estimate	114,900	1	114,900	0.1667	19,154	\$43.15	\$826,495
	Final Payment Release and Certification Form Entity Initial Estimate	114,900	1	114,900	0.25	28,725	\$43.15	\$1,239,484
	Partial Payment Release and Certification Form Entity Initial Estimate	114,900	1	114,900	0.25	28,725	\$43.15	\$1,239,484
	Request for Arbitration Initial Estimate	114,900	1	114,900	0.1667	19,154	\$43.15	\$826,495
	Request to Reopen Claim Initial Estimate	114,900	1	114,900	0.1667	19,154	\$43.15	\$826,495
	Request to Supplement Claim Initial Estimate	114,900	1	114,900	0.1667	19,154	\$43.15	\$826,495
Total		1,149,000		1,149,000		2,929,962		\$126,427,860

Note: The “Avg. Hourly Wage Rate” for each respondent include a 1.45 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.

Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45 for not-for-profit institutions, for-profit businesses, and individuals and households.¹ Multiply the non-loaded “Avg. Hourly Wage Rate” by 1.61 for State,

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

Local or Tribal Government. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45 for not-for-profit institutions and 1.61 for State, Local, or Tribal Government, and the entry entries for the “Avg . Hourly Wage Rate” would be \$61.64 and \$68.44 respectively.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2022 Occupational Employment and Wage Estimates of the average wage for All Occupations (SOC 00-0000) is \$29.76 per hour. Including the wage rate multipliers of 1.45, the fully-loaded hourly wage rate is \$43.15 (29.76×1.45) for individuals and households.

The annual burden hour cost is estimated to be \$126,427,860 (2,929,962,732,489 Hours x \$43.15 = 126,427,860).

- 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:

Annual Cost Burden to Respondents		
Data Collection Activity/In	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional

- a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating,**

group, March 2023.” Available at <https://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed on April 21, 2023. The wage multiplier for not-for-profit institutions and individuals and households 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. 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.

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 Accessed on July 14, 2023.

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.**

1660 – 0159 – Generic Clearance for Notice of Loss and Proof of Loss

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs: Vendor to process claims and build system of record	\$53,990,155
Staff Salaries: 45 of GS 12, Step 5 employees in Washington, DC locality spending approximately 100% of time annually inputting processing SPA requests for the data collection. [45 × \$106,759 × 1.45 = \$6,966,025]	\$6,966,025
Facilities: Lease for Santa Fe - \$1,000,000 Lease for Mora - \$39,822.02 Lease for Las Vegas - \$750,000 Security Guards for Santa Fe, Mora, and Las Vegas \$1,000,000 [\$1,000,000 + \$39,822.02 + \$750,000 + \$1,000,000 = \$2,789,822]	\$2,789,822
Computer Hardware and Software [cost of equipment annual lifecycle]: Copiers and printers = \$15,000 Office copiers = \$40,000 Telecom Services - phones, laptops, internet at \$3,000/month = \$36,000 (\$15,000 + \$40,000 + \$36,000 = \$91,000)	\$91,000
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]: Servers, building start up, badges, phones, laptops = \$640,000	\$640,000
Travel (not to exceed): Travel from DC to NM 34 Federal staff making six (6) trips per year at \$2,500/trip. (34 × 6 × \$2,500 = \$510,000)	\$510,000
Other: Office Supplies = \$116,000	\$116,000
Total	\$65,103,002
¹ Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf . Accessed April 21, 2023 ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

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

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

1660 – 0159 – Generic Clearance for Notice of Loss and Proof of Loss

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
Notice of Loss	0	0	0	21,544		
Proof of Loss	0	0	0	646,313		
Banking Information	0	0	0	9,574		
Request to Supplement Claim	0	0	0	21,544		
Administrative Appeal Request	0	0	0	4,788		
Administrative Appeal Withdrawal Request	0	0	0	7,181		
Final Payment Release and Certification Form Initial Estimate	0	0	0	7,181		
Partial Payment Release and Certification Form Initial Estimate	0	0	0	4,788		
Request for Arbitration	0	0	0	4,788		
Request to Reopen Claim	0	0	0	4,788		
Total	0	0	0	732,489		

Explain: FEMA is revising the instruments already submitted under this generic collection and has several more to add. We are asking to increase the allotted number of burden hours to accommodate both this round of revision and another planned round of revision.

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
Notice of Loss	\$0	\$0	\$0	\$929,624	\$3,718,451	\$2,788,827
Proof of Loss	\$0	\$0	\$0	\$27,888,406	\$111,553,538	\$83,665,132
Banking Information	\$0	\$0	\$0	\$413,118	\$1,652,472	\$1,239,354
Request to Supplement Claim	\$0	\$0	\$0	\$929,624	\$3,718,451	\$2,788,827
Administrative Appeal Request	\$0	\$0	\$0	\$206,602	\$826,495	\$619,893
Administrative Appeal Withdrawal Request	\$0	\$0	\$0	\$309,860	\$1,239,484	\$929,624
Final Payment Release and Certification Form Initial Estimate	\$0	\$0	\$0	\$309,860	\$1,239,484	\$929,624
Partial Payment Release and Certification Form Initial Estimate	\$0	\$0	\$0	\$206,602	\$826,495	\$619,893
Request for Arbitration	\$0	\$0	\$0	\$206,602	\$826,495	\$619,893
Request to Reopen Claim	\$0	\$0	\$0	\$206,602	\$826,495	\$619,893
Total	\$0	\$0	\$0	\$31,606,900	\$126,427,860	\$94,820,960

Explain: The increase in cost burden directly follows the increase in burden hours.

- 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 outlined plans for tabulation and publication of data for this information collection beyond the Act's requirement to submit annual reports to Congress describing the claims submitted under the Act.

- 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.

- 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".