

July 16, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0023

Title: National Flood Insurance Program (NFIP) Compliance Audit Reports

Form Number(s):

- 1) FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E)), Community Assistance Visit (CAV) Report; and**
- 2) FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact (CAC) Report; and**
- 3) FEMA Form FF-206-FY-24-100, National Flood Insurance Program (NFIP) Compliance Audit Report.**

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 National Flood Insurance Program (NFIP), codified as 42 U.S.C. 4001, *et seq.*, is authorized by Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the NFIP, and a major objective of the NFIP is to assure that participating communities are achieving the flood loss reduction objectives through implementation and enforcement of adequate land use and control measures. Sections 1315 and 1361 provide the basis for FEMA's process to evaluate how well communities are implementing their floodplain management programs. 44 CFR 59.22 directs the respondent to submit evidence of the corrective and preventive measures taken to meet the flood loss reduction objectives.

Historically, the two key methods FEMA used in determining community assistance needs were through the Community Assistance Contact (CAC) and Community Assistance Visit (CAV), which serve to provide a systematic means of monitoring community NFIP compliance. Through the CAC and CAV, FEMA can also determine to what extent communities are achieving the flood loss reduction objectives of the NFIP. By providing assistance to communities, the CAC and CAV also serve to enhance FEMA's goals of reducing future flood losses, thereby achieving the cost-containment objective of the NFIP.

FEMA is moving away from CAV and CAC reports to the newly designed process of NFIP Compliance Audits in response to a report issued on May 5, 2020, by the Government Accounting Office (GAO) entitled "National Flood Insurance Program: FEMA Can Improve Community Oversight and Data Sharing". This report was based on a study conducted by the GAO and gave several recommendations including the following: assess different approaches for ensuring compliance with NFIP requirements and ensure data on community visits are up-to-date and complete. While the new NFIP Compliance Audit process aligns with the old CAV and CAC processes, it is more organized, more consistent, more transparent, and allows for better documentation. The main efficiency gained in the new process is that it's a progressive audit which allows for varying depths of investigation based on the community's needs. Also new is a compliance score. These two improvements will allow FEMA to better utilize limited resources to achieve increased community compliance.

FEMA is changing the name of this collection to match the upcoming transition from the CAC and CAV reports to the NFIP Compliance Audits, and added the NFIP Compliance Audit as an instrument to this collection. The CAC and CAV reports will remain as

instruments in this collection as FEMA transitions to the NFIP Compliance Audits over the next few years.

FEMA is also adding the collection of information from NFIP-participating communities in order to comply with the Endangered Species Act. The information may include the impact of the proposed development on the natural floodplain functions, the amount of fill, compensatory storage information, the amount of impervious surface, the area in which clearing/grading may occur, the number of trees removed, and other information related to hydraulic connections.

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

FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E), Community Assistance Visit (CAV) Report is a report based on a CAV which is recorded in the Community Information System (CIS). CIS is an online database and the official system of record for many NFIP activities. A CAV is a scheduled visit to a NFIP community for the purposes of conducting a comprehensive assessment of the community's floodplain management program, to assist the community in understanding the NFIP and its requirements and implementing effective flood loss reduction measures. The CAV Report provides a simplified method to notate what, if any, problems exist with a community's floodplain management process, what actions the community might need to undertake to correct the problem(s), and how FEMA can possibly assist in any corrective action. Over the next few years FEMA will be phasing out the use of the CAV Report as we plan to transition to the new NFIP Compliance Audit process by July 1, 2025. CAVs started or otherwise in progress before the transition will have to continue within the old process until all issues are officially resolved and the CAV can be closed. After all CAVs have been closed and the Agency fully transitions to the new process, the CAV Reports will continue to be housed in the CIS database for historical reference.

FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact (CAC) Report is a report based on a CAC which is recorded in CIS. A CAC is a brief call or visit with a NFIP community for the purpose of establishing or reestablishing contact to determine if program-related problems exist and to offer assistance. The CAC Report provides the actions that the community will take, if required, to resolve any minor issues with their floodplain management processes, and the report also will determine if a full CAV is required. Over the next few years FEMA will be phasing out the use of the CAC Report as we plan to transition to the new NFIP

Compliance Audit process by July 1, 2025. CACs started or otherwise in progress before the transition will have to continue within the old process until all issues are officially resolved and the CAC can be closed. After all CACs have been closed and the Agency fully transitions to the new process, the CAC Reports will continue to be housed in the CIS database for historical reference.

FEMA Form FF-206-FY-24-100, National Flood Insurance Program (NFIP)

Compliance Audit Report is a report based on the new NFIP Compliance Audit process which will be recorded in CIS. An NFIP Compliance Audit is a progressive audit of a community's floodplain management program. It consists of a community Self-Assessment, a full ordinance review, and a diagnostic assessment. If the community scores below a certain threshold on this assessment, indicating a poor floodplain management program, the auditor can delve deeper into the community's program with an enhanced community assistance visit or a full evaluation. The NFIP Compliance Audit Report provides a score to reflect what, if any, problems exist with a community's floodplain management program.

Information sharing occurs between FEMA and the State partners, who collect the information for FEMA under an annual cooperative agreement, through different tabs and fields in CIS.

The Floodplain Management Division at FEMA Headquarters is currently undergoing a redesign of NFIP compliance, including CACs and CAVs. Many changes are proposed, including doing away with the terms CAC and CAV and introducing the terms Diagnostic Evaluation and Full Evaluation in their place. The auditor will ask a predetermined set of questions and the answers will be recorded in a spreadsheet and uploaded into what is currently called the CAV Report and CAC Report in CIS. This redesign is not expected to be finalized and in use until after this collection's current expiration date and is being coordinated to align with the redesign capabilities of CIS.

A decrease of 11,998 burden hours has been recognized and included as an update to the collection due to the redesign of this information collection to an electronic audit system.

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.

FEMA has converted FEMA Forms FF-206-FY-21-141 (formerly 086-0-28(E)) and FF-206-FY-21-142 (formerly 086-029(E)) into an on-line database (DHS Integrated Security and Access Control System) called the Community Information System (CIS). The CIS allows for direct entry of the information into the on-line Account and Password Protected system at URL: <https://sso.fema.net/cis/homepage.action>.

The CIS database is currently being redesigned to accommodate all the recent programmatic changes at FEMA including the transition from CAVs and CACs to the new NFIP Compliance Audit process. It will not be implemented until after the submittal of this PRA documentation.

The usability testing helps DHS programs and service teams make sure what they build actually helps the people and organizations the Department serves, per Executive Order 14058. Usability testing is a method used to learn how easy or difficult it is for people to use a service by observing them completing “real life” tasks within the service. The goal is to identify your users’ pain points and create solutions that are user-focused to produce a service that is easy to use. Ten state partner staff and two regional FEMA staff, across 7 states in 15 communities were engaged. They all had familiarity with the process in general and the opportunity to take approximately six hours of training.

Most participants found the instrument relatively easy to use, as it is a simple Excel spreadsheet and prompts are given. Most comments were of a minor nature involving how we asked a question. We took suggestions on how to better word many of our questions. A few comments were more substantive like some participants wanted to include higher standards in the score. However, the FEMA Leadership voted not to include those at this time. Some participants wanted to score the ordinance review and the as-built violations found. We could not accommodate this request at this time as it is out of our budget for this contract cycle. It will be reconsidered in the near future. Approximately 97% of the 450 comments given have already been incorporated into the Tools. After implementation of the new process and tools starting July 1, 2025, we will collect user feedback and update the tools as needed on a yearly basis if we can obtain contracting resources to do so. Otherwise, the comments will be incorporated every three years as per the new policy-update cycle.

A document discussing our usability testing efforts more thoroughly is included as a supplemental document with this revision request.

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.

Some of the information collected is currently duplicated by another means (National Violations Tracker), but in future iterations of the CIS, we hope to automate some of this process and therefore eliminate duplication of efforts.

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.

This information collection does not have an impact on small businesses or other small entities, because most if not all State NFIP Coordinating Offices are part of larger state agencies, which under a cooperative agreement with FEMA, collect data and enter it into the CIS either as a CAV Report, CAC Report, or NFIP Compliance Audit Report.

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 the information discussed above is not collected, FEMA would not know the extent to which approximately 22,600 communities participating in the NFIP are adhering to the obligation of implementing a floodplain management program as agreed to when joining the NFIP. The core of this agreement is that FEMA, as a requirement under the National Flood Insurance Act, will provide flood insurance coverage if communities adopt and enforce floodplain management regulations.

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 require respondents to retain certain permanent records, according to FEMA's Records Disposition Schedule FIA 14-1.

- 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 March 28, 2024, at 89 FR 21534. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on July 16, 2024, at 89 FR 57921. The public comment period is open until August 15, 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 regularly receives input from State officials involved with floodplain management on the information collected during CACs and CAVs, and will regularly receive input on the information collected during the NFIP Compliance Audit process after implementation, which is proposed for July 1, 2025. As mentioned above, FEMA's Floodplain Management Division is redesigning aspects of the NFIP Compliance process through a Compliance Committee which consists of representatives from each FEMA Regional Office, a Floodplain Management Division project manager, and a Regional FEMA Floodplain Management & Insurance Branch Chief Sponsor. This Committee regularly provides feedback on the information collected for the new proposed NFIP Compliance Redesign that will eventually replace the current CAC and CAV Reports. The process was piloted in the summer of 2022, and seven (7) volunteer states provided feedback afterwards. Feedback was collected after presentations at every Regional Community Assistance Program (CAP) Conference, the Association of State Floodplain Managers (ASFPM) Conference, Hazard Mitigation Workshop, and other venues. Through these engagements, policy issues on the process are discussed and, when appropriate, incorporated into future years' guidance.

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 NFIP is a voluntary program in which a community agrees to periodic audits of their program through the CAV and CAC process, and soon through the NFIP Compliance Audit process.

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

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

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

An Privacy Threshold Analysis (PTA) was approved by the Department of Homeland Security on January 2, 2024.

Privacy Impact Assessment (PIA) coverage is provided by several existing PIAs:

- DHS/FEMA/PIA-011 – National Flood Insurance Program (NFIP) Information Technology Systems;
- DHS/FEMA/PIA-050 – National Flood Insurance Program (NFIP) PIVOT System;
- DHS/FEMA/PIA-045 – Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems; and
- DHS/FEMA/PIA-052 – Grants Management Modernization (GMM).

System of Record Notification (SORN) coverage is provided by several existing SORNs:

- DHS/FEMA-003 – National Flood Insurance Program Files (79 FR 28747, May 19, 2014);
- DHS/ALL-004 – General Information Technology Access Account Records System (GITAARS) (77 FR 70792, November 27, 2012); and
- DHS/FEMA-014 – Hazard Mitigation Planning and Flood Mapping Products and Services Records System of Records (86 FR 1988, January 11, 2021).

There are no assurances of confidentiality provided to the respondents for this information collection.

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 are no questions of a sensitive nature.

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

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

FEMA Form FF-206-FY-21-141 (formerly 086-0-28(E)), Community Assistance Visit (CAV) Report is estimated to have 1 respondent times 1 response per year for 1 total annual response ($1 \times 1 = 1$). It is estimated that each response will require 1 burden hour to complete, therefore 1 response times 1 hour equals 1 total annual burden hour ($1 \times 1 = 1$)

FEMA Form FF-206-FY-21-142 (formerly 086-0-29(E)), Community Assistance Contact (CAC) Report is estimated to have 1 respondent times 1 response per year for 1 total annual response ($1 \times 1 = 1$). It is estimated that each response will require 1 burden hour to complete, therefore 1 response times 1 hour equals 1 total annual burden hour ($1 \times 1 = 1$).

FEMA FF-206-FY-24-100, National Flood Insurance Program (NFIP) Compliance Audit Report is estimated to have 100 respondents times 40 responses per year for 4,000 total annual responses ($100 \times 40 = 4,000$). It is estimated that each response will require 12 burden hours to complete, therefore 4,000 responses times 12 hours equals 48,000 total annual burden hours ($4,000 \times 12 = 48,000$)

The previous estimate of burden hours included the time burden required to perform CAV and CAC audits and provide technical assistance and follow up. The new NFIP Compliance Audit process separates the audit from the follow up process. Based on this,

FEMA anticipates having sufficient data to conduct usability testing after implementing the NFIP Compliance Audit process by Summer of 2025.

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 to 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_03132024.pdf. Accessed March 13, 2024. The national wage multiplier is calculated by dividing total compensation for all workers of \$45.42 by wages and salaries for all workers of \$31.29 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 \$60.56 by Wages and salaries for State and local government workers of \$37.53 per hour yielding a benefits multiplier of approximately 1.61.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, or Tribal Government	Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))	1	1	1	1	1	\$49.20	\$49
State, Local, or Tribal Government	Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))t	1	1	1	1	1	\$49.20	\$49
State, Local, or Tribal Government	National Flood Insurance Program (NFIP) Compliance Audit Report / FEMA Form FF-206-FY-24-100	100	40	4,000	12	48,000	\$49.20	\$2,361,600
Total		102		4,002		48,002		\$2,361,698

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

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2023 Occupational Employment and Wage Estimates mean wage rate for Community and Social Service Occupations (SOC 21-0000) in the local government is \$30.56 per hour.² Including the wage rate multiplier of 1.61, the fully-loaded wage rate is \$49.20 per hour. Therefore, the burden hour cost is estimated to be \$2,361,698 annually (\$49.20 × 48,002).

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

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/2023/may/oes_nat.htm

burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
[Form Name/#]				
Total	\$0	\$0	\$0	\$0

The cost estimates should be split into two components:

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

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

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

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries: ¹ 35 GS-12, Step 5 employees spending approximately 35% of time annually performing the community contacts and visits; monitoring, reviewing, writing, and approving the reports for this data collection. GS 12, Step 5 [35 × \$112,425 × 0.35 × 1.45 = \$1,996,949] ²	\$1,996,949
Facilities [work occurs in the field, at telework locations, and inside federal facilities that are already rented]	\$0
Computer Hardware and Software Five percent of total floodplain management database [\$1,290,000 × 0.05 = \$64,500]	\$64,500
Equipment Maintenance: Five percent of sum of all equipment costs estimated in each region's spend plan [\$68,800 × 0.05 = \$3,440]	\$3,440
Travel ³ [sum of all CAV/CAC related travel estimated in Regions' spend plan for FY24]	\$151,667
Printing [mostly emailed]	\$0
Postage [mostly emailed]	\$0
Other	\$0
Total	\$2,216,556
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. ³ For CAV/CAC related travel, FEMA used the average travel expenses for FY24-FY26. FEMA estimated travel expenses of \$5,000 for FY24, \$225,000 of travel expenses for FY25, and \$225,000 of travel expenses for FY26.	

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
Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))	30,000	1	-29,999			
Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))t	30,000	1	-29,999			
National Flood Insurance Program (NFIP) Compliance Audit Report / FEMA Form FF-206-FY-24-100	0	48,000	48,000			
Total	60,000	48,002	-11,998	0	0	0

Explain: Annual burden hours decreased by -11,998. This was due to burden hour decrease of -59,998 hours collectively for the Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E)) and Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E)). This decrease was offset by burden hour increase of 48,000 hours, which was due to the addition of National Flood Insurance Program (NFIP) Compliance Audit Report / FEMA Form FF-206-FY-24-100.

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
Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E))	\$1,252,800	\$49	-\$1,252,751			
Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E))t	\$1,252,800	\$49	-\$1,252,751			
National Flood Insurance Program (NFIP) Compliance Audit Report / FEMA Form FF-206-FY-24-100	\$0	\$2,361,600	\$2,361,600			
Total	\$2,505,600	\$2,361,698	-\$143,902	\$0	\$0	\$0

Explain: Annual burden costs decreased by -\$143,902. This was due to collective burden decrease of -\$2,505,600 for the Community Assistance Visit (CAV) Report / FEMA Form FF-206-FY-21-141 (formerly 086-0-28 (E)) and Community Assistance Contact (CAC) Report / FEMA Form FF-206-FY-21-142 (formerly 086-0-29 (E)). These decreases were offset by burden cost increase of \$2,361,600 from the addition of

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 publish the information collection in any format.

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 statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.