

December 11, 2024

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0026

Title: Administrative Plan for the Hazard Mitigation Grant Program

Form Number(s): None

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.**

Federal Emergency Management Agency (FEMA) regulations in 44 CFR 206.437 (accessible at <http://www.ecfr.gov>) require development and updates to the Administrative Plan by Applicants/Recipients as a condition of receiving Hazard Mitigation Grant Program (HMGP) funding under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act) (Pub. L. 93-288, as amended) (42 U.S.C. § 5170c).

The regulation at 44 CFR 206.437 requires a state to have a FEMA-approved Administrative Plan to receive HMGP funding. At its minimum, the Administrative Plan will include the designated State agency or Indian Tribal government that will act as the Recipient, identify the State Hazard Mitigation Officer or Tribal Hazard Mitigation Officer, identify staffing requirements, and establish a guide for implementation activities and procedures to account for non-Federal cost sharing. Additional information requirements are guided by the type of mitigation activities being pursued.

The state, territorial, or Tribal government must establish procedures to guide the administration of the HMGP in the Administrative Plan, as outlined in the listed activities below. FEMA will review the information provided to ensure proper documentation of each activity. The activities include:

1. Designation of the state agency that will have responsibility for program administration.
2. Identification of the State Hazard Mitigation Officer responsible for all matters related to the HMGP.
3. Determination of staffing requirements and sources of staff necessary for the administration of the program.
4. Procedures to identify and notify potential sub-applicants of the availability of HMGP funding.
5. Procedures to establish priorities for selection of mitigation projects.
6. Procedures to provide, as applicable, potential sub-applicants with information on the application process, program eligibility, and deadlines.
7. Procedures to determine sub-applicant eligibility, as applicable.
8. Procedures to provide information for Environmental and Historic Preservation (EHP) and floodplain management reviews in conformance with 44 CFR Part 9 (or FEMA Directive 108-1 and Instruction 108-1-1).
9. Procedures to process requests for advances of funds and reimbursements.
10. Procedures to monitor and evaluate the progress and completion of funded mitigation activities.
11. Process to review and approve cost overruns.
12. Procedures to process appeals.
13. Process to provide technical assistance as required to subrecipients, as applicable.
14. Process to comply with the administrative and audit requirements of 2 CFR Parts 200 and 3002 and 44 CFR Part 206, Subpart N.
15. Procedures to comply with audit requirements of 2 CFR Part 200 Subpart F.
16. Procedures to provide quarterly progress reports to FEMA on funded mitigation activities.

17. Procedures for monitoring and reporting on subrecipient management costs before receiving funding for management costs.¹
18. Outline of roles and procedures to implement the recipient’s authority to address a subrecipient’s noncompliance with grant requirements by providing an opportunity to subrecipients to bring the grant into compliance, if applicable, or by imposing remedy actions or special conditions as outlined in 2 CFR 200.207 and 2 CFR 200.338.
19. Identification whether the plan has been incorporated into the recipient’s Emergency Operations Plan as a separate annex or chapter as required under 44 CFR 206.437(c).
20. For recipients with a Program Administration by States (PAS), procedures on how the recipient will administer delegated activities as outlined in the HMA Guidance (2024) Applicable to disasters declared on or after March 23,2023, at Part 14 Program Administration by States.²
21. The global match cost share strategy is outlined in the HMA Guidance (2024) Applicable to disasters declared on or after March 23,2023, Part 10 Program Specific Guidance, A.10, and provides conditions for applicants to implement the global match cost share strategy.³ The conditions include an explanation of how the applicant will apply this approach in a fair and impartial manner; the requirement to monitor overall award throughout the Period of Performance; and the requirement to address any cost-share shortfalls that may occur during the Period of Performance or at closeout.

The Stafford Act defines a “state” as any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. “Grantee” or “recipient” means the government to which a grant is awarded and which is accountable for the use of the funds provided. (See 2 CFR 200.86 and 44 CFR 206.431 for definition of “grantee”). A Recipient can be any “state”, as defined by the Stafford Act. A “Recipient” can also be a Federally-recognized Tribal government who chooses to be an applicant and become a recipient upon receipt of funds. A Federally-recognized Tribe also has the choice to apply through a state as a sub-applicant and be a subrecipient. The term “Indian tribal government” is defined in the Stafford Act as the governing body of any Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe under the Federally Recognized Indian Tribe List Act of 1994. (See 44 CFR 206.431 for definition of “Indian Tribal government”). In addition, the Sandy Recovery Improvement Act of 2013 (P. L. 113-2) amended the Stafford Act to provide for the Chief Executive of a Federally-recognized Tribe to make a direct request to the President of the United States for a major disaster or emergency declaration. This meant that if it obtained its own major disaster declaration, the Indian tribal government could be a recipient under that

¹ See section 324 of the Stafford Act.

² The 2024 HMA Guidance is available at Hazard Mitigation Assistance Program and Policy Guide | FEMA.gov (<https://www.fema.gov/grants/mitigation/guide>).

³ See 2 CFR 200.306

declaration. Previously, the Indian tribal government only had the option to be a recipient under the State's disaster declaration.

The Department of Homeland Security (DHS) adopted in its entirety the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200) on December 26, 2014. This rule eliminates overlapping and duplicative requirements for stakeholders, including states, territories and Indian tribal governments, by using general terms such as "recipient" or "pass-through entity." FEMA is also avoiding unnecessary duplication, overlap and the demand for maintenance of requirements under HMGP in two documents, the State Administrative Plan, and the Tribal Administrative Plan. FEMA instead is offering and referring to one common set of requirements in an "Administrative Plan." The term "State Administrative Plan" is now referred to "Administrative Plan for the Hazard Mitigation Grant Program".

- 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 conditions for a FEMA-approved Administrative Plan are defined in 44 CFR 206.437. The regulation requires a state or Tribe to have a FEMA-approved Administrative Plan to receive HMGP funding.

The Administrative Plan for the HMGP is a procedural guide that details how the state, territory, or Tribal government will administer the HMGP. The state, territory, or Tribal government (acting as recipient) must have a current administrative plan approved by the appropriate FEMA Regional Director before receiving HMGP funds. The Administrative Plan may take any form, including a chapter within a comprehensive state, territory, or Tribal mitigation program strategy. The state, territory, or Tribal government may forward an Administrative Plan to FEMA for approval at any time prior to or immediately after the request for a disaster declaration. An approved plan is a prerequisite of receiving HMGP funds and is used by FEMA in determining approval for and the amount of each grant.

- 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.**

States, territories, or Tribal governments may submit the Administrative Plan to FEMA by e-mailing electronic files containing updates at any time prior to a disaster declaration or

immediately after and request approval. The required contents of an Administrative Plan are provided in 44 CFR 206.437. Information on mitigation and FEMA mitigation programs is made available to the public through FEMA's web site at: <http://www.fema.gov/hazard-mitigation-assistance>. Please reference the HMA Program Guidance (2024) for specific information for both the HMGP and the Administrative Plan.

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Usability Testing has been conducted on this collection through the form of collecting qualitative customer feedback. There is no change to the burden hours for this collection at this time.

FEMA regional staff regularly meet with state, territorial, and Tribal staff; receive qualitative feedback on data collection, electronic system, and administrative plan implementation issues. As a direct result of stakeholder interaction and feedback from these customers, the HMGP program eliminated the requirement that states also electronically submit a checklist that previously was required as part of a state administrative plan submission to FEMA. The checklist duplicated conditions and requirements already stated in 44 CFR 206.437. FEMA staff will continue to conduct these feedback sessions and implement future changes and at other times when appropriate.

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.

As a direct result of Fiscal Year (FY) 2023 stakeholder interaction and feedback, the HMGP program has eliminated the requirement that states, territories, and Tribes also submit as part of an administrative plan update a verification checklist that duplicated the requirements already clearly listed in 44 CFR 206.437.

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.

This collection of information does not impact small businesses or other small entities. Some Tribal applicants may meet the definition of small entities. However, this information collection meets a legal requirement and per 44 CFR 206.437 FEMA cannot grant an exception to these requirements for the administration of the HGMP program. FEMA always attempts to reduce, to the extent practical and appropriate, the burden on applicants by only collecting the necessary information.

⁴ The 2024 HMA Guidance is available at Hazard Mitigation Assistance Program and Policy Guide | FEMA.gov (<https://www.fema.gov/grants/mitigation/guide>).

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

The Administrative Plan provides procedural guidance on HMGP administration, and is requisite for states, territories, or Tribal governments' requests for HMGP disaster assistance in the event of a major disaster. Without approval of this information collection for the Administrative Plan allowing for preparation and FEMA approval of the Administrative Plan, FEMA would not be able to provide mitigation assistance under the HMGP to states, territories, and Tribal governments (indicated as "recipients") when a major Presidential disaster declaration was declared.

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 August 19, 2024, at 89 FR 67101. Three public comments were received. Two of the comments discuss policy concerns with the HMGP and are not germane to this information collection. The third public comment is a statement of support from a private non-profit organization and FEMA thanks them for their comment.

Comment 1 (FEMA-2024-0023-0002): The anonymous commentor states:

“I recommend detailed information collection to avoid waste fraud and abuse. Poor planning, unregulated development, greed has led to development in hazard zones, where no development should be located. Instead of endless mitigation, taxpayer money should only be used to retreat and rewild. We should not be replenishing beach sand with Federal tax dollars. We shouldn’t be rebuilding in flood and wildfire zones. We [should] not be building sea walls.”

FEMA Response to Comment 1: The Mitigation Paperwork Reduction Act legal compliance team appreciates your comment and will forward the comment to the FEMA Hazard Mitigation Grant Program. Please, understand that this information collection (1660-0026) is not intended to address policy issues. The content of this information collection addresses FEMA regulations in 44 CFR 206.437 that require development of and updates to the Administrative Plan by Applicants/Recipients as a condition of receiving HMGP funding under Section 404 of the Stafford Act.

Comment 2 (FEMA-2024-0023-0003): The anonymous commenter states:

“The best mitigation would be to not build in flood zones, wildfire areas, and other hazard areas. It would be good to collect information so as to have the best data for decision making.

It is unfair to taxpayers to have to fund most of the mitigation, insurance, recovery, and other expenses to the climate change disasters. It would be cheaper to rewild any area that was totaled, or destroyed by these disasters. Taxpayer’s [shouldn’t] pay to rebuild or repair after one time. Florida is already under water a second time in as many weeks, how many times do we need to get whacked until we learn our lesson.

Retreat and rewild. The entire coast should be rewilded except for necessary docks for commerce and national security, [residences] would be inland one mile from coast.”

FEMA Response to Comment 2: The Mitigation Paperwork Reduction Act legal compliance team appreciates your comment and will forward the comment to the FEMA Hazard Mitigation Grant Program. Please, understand that this information collection (1660-0026) is not intended to address policy issues. The content of this information collection addresses FEMA regulations in 44 CFR 206.437 that require development of and updates to the Administrative Plan by Applicants/Recipients as a condition of receiving HMGP funding under Section 404 of the Stafford Act.

Comment 3 (FEMA-2024-0023-0004): The Smart Home America organization (<https://smarthomeamerica.org>) states in their public comment:

“Smart Home America supports these proposed changes.”

FEMA Response to Comment 3: The Mitigation Paperwork Reduction Act legal compliance team appreciates your comment and will forward the comment to the FEMA Hazard Mitigation Grant Program.

A 30-day Federal Register Notice inviting public comments was published on December 11, 2024, at 89 FR 99890. The public comment period is open until January 10, 2025.

- 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's regional offices solicit stakeholder feedback on the HMGP implementation issues, including the Administrative Plan requirements with its state, territory, and Tribal counterparts in annual training sessions and meetings. FEMA actively solicits national participation of state, territorial and Tribal representatives to engage stakeholders at hazard mitigation hazard mitigation assistance workshops, Tribal consultations, and FEMA regional outreach meetings on such issues as data collection, electronic systems functionality, HMGP policy implementation issues, and administrative plan updates. FEMA's HMGP regional and headquarters staff also elicit stakeholder feedback with National Emergency Management Agency (NEMA) representatives and the Association of Flood Plain Managers (ASFPM) at their annual conference.

FEMA Regional HMGP staff also receives frequent feedback from state and Tribal stakeholders under a FEMA regional responsibility to manage state, territorial, and Tribal HMGP program implementation. FEMA Regional staff also solicit stakeholder feedback regarding updates to the state and Tribal administrative plans as required by the Stafford Act upon a Presidential approval of a state or Tribal disaster declaration request. A Presidentially declared disaster automatically triggers HMGP Regional staff stakeholder engagement on a range of state, territorial, and Tribal administrative plan updates, program implementation issues, and administrative burden issues.

Information is collected under 1660-0026 in response to requirements listed in 44 CFR 206.437. The regulation acts as an information collection instrument. The HMGP program is not aware of plans to change the 44 CFR 206.437 regulation.

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

FEMA has received input about information collections for the HMGP program through meetings between state, local, territorial, and Tribal governments and FEMA Regional Offices. Stakeholder engagement occurs in both regularly scheduled annual national and regional conferences; regularly scheduled meetings with states, territories, and Tribal staff throughout the fiscal year; and in consultations in response to Presidentially declared disaster declarations. The 59 Respondents affected by this data collection are the 59 HMGP recipients, which are the states, and any Indian tribal government choosing to act as a recipient either under its own disaster declaration or the state's disaster declaration. FEMA estimates three Tribal governments per year will be respondents, as very few Tribes choose to administer the grants as recipients.

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 Privacy Threshold Analysis (PTA) for this collection was approved by DHS on June 28, 2024. FEMA Privacy recommends that Privacy Impact Assessment (PIA) coverage is provided by DHS/ALL/PIA-006 General Contacts List (November 12, 2021) and that System of Records Notice (SORN) coverage is not required.

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.

Usability Testing has been conducted on this collection through the form of collecting qualitative customer feedback. There is no change to the burden hours for this collection at this time.

The Administrative Plan for the Hazard Mitigation Grant Program: is estimated to have 35 respondents times 2 responses per year for 70 total annual responses ($35 \times 2 = 70$). It is estimated that each response will require 8 burden hours to complete, therefore 70 responses times 8 hours equals 560 total annual burden hours ($70 \times [8 = 560]$).

Please note that FEMA estimates that out of the 56 States and Territories that currently have Administrative Plans in place, plus 3 Tribal direct Applicants/Recipients, 35 States/Territories/Indian tribal governments (federally recognized) will update their Administrative Plan each year. Since the 59 States/Territories/Indian tribal governments already have plans in place, the burden hour and cost calculations assume updates to existing plans. New state and Tribal Administrative plans are not expected.

FEMA regional staff regularly meet with state, territorial, and Tribal staff to receive qualitative feedback on state administrative plan update issues and other HMGP program implementation issues. As a direct result of FY 2023 stakeholder interaction and feedback, the HMGP program has eliminated the requirement that states, territories and Tribes also submit a verification checklist. The checklist duplicated conditions and requirements already stated in 44 CFR 206.437.

Elimination of the checklist does not save a significant amount of quantifiable burden hours; however, elimination of the checklist avoids potentially confusing duplicative requests for information; and lowers stakeholder informational and psychological costs. The FEMA Records Management Branch regards the 44 CFR 206.437 regulation as an information collection instrument. HMGP is not aware of FEMA plans or efforts to change the 44 CFR 206.437 regulation.

- b. If this request for approval covers more than one form, provide separate indoor 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)⁵ 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.

| 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, and Tribal Governments | Administrative Plan/No Form | 35 | 2 | 70 | 8.00 | 560 | \$66.53 | 37,257 |
| Total | | 35 | | 70 | | 560 | | \$37,257 |

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 wage rate for State government Urban and Regional Planner (SOC 19-3051) is \$41.32 per hour.⁶ Including the wage rate multiplier of 1.61 for State and local government employees, the fully loaded wage rate is \$66.53. Therefore, the burden hour cost to respondents is estimated to be \$37,257 ($\66.53×560 hours) 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.)**

| Annual Cost Burden to Respondents or Recordkeepers | | | | |
|--|------------------------|--------------------|------------------|----------------------|
| Data Collection | *Annual Capital Start- | *Annual Operations | Annual Non-Labor | Total Annual Cost to |

⁵ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03132024.pdf. Accessed July 1, 2024. 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

⁶ 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

| Activity/Instrument | Up Cost (investments in overhead, equipment, and other one-time expenditures) | and Maintenance Costs (such as recordkeeping, technical/professional services, etc.) | Cost (expenditures on training, travel, and other resources) | Respondents |
|---------------------|---|--|--|-------------|
| | | | | |
| Total | \$0 | \$0 | \$0 | \$0 |

The cost estimates should be split into two components:

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

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

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

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

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

| Annual Cost to the Federal Government | |
|--|-----------------|
| Item | Cost (\$) |
| Contract Costs: | \$0 |
| Staff Salaries: 1 GS 12, step 5 employee in Washington DC spending approximately 13% of their time annually to reviewing and approving 70 Administrative Plans revisions at 4 hours each for this data collection ($\$112,425^1 \times 0.13 \times 1.45^2 = \$21,192$). 1 GS-15 step 5, reviewing and giving approval notification at 30 minutes per plan for this data collection ($\$185,824/\text{yr.} \times 1.45 \times 0.02 = \$5,389$). Total = ($\$21,192 + \$5,389 = \$26,581$) | \$26,581 |
| 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 | \$26,581 |
| 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 July 1, 2024. ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate. | |

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

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

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

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

| Itemized Changes in Annual Burden Hours | | | | | | |
|---|---|----------------------|------------|---|------------------|------------|
| Data Collection Activity/Instrument | Program Change (hours currently on OMB inventory) | Program Change (new) | Difference | Adjustment (hours currently on OMB inventory) | Adjustment (new) | Difference |
| Administrative Plan | 0 | | | 560 | 560 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 |

Explain: There is no change to the burden hours for this collection.

| 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 |
| Administrative Plan | \$0 | \$0 | \$0 | \$32,704 | \$37,257 | +\$4,4553 |
| Total | | | | \$32,704 | \$37,257 | +\$4,553 |

Explain: There is a change in annual cost burden of \$4,553 to the applicant due to increases in average 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, no 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”.