

April 17, 2025

## **Supporting Statement for Paperwork Reduction Act Submissions**

**OMB Control Number: 1660-0112**

**Title: FEMA Preparedness Grants: Transit Security Grant Program (TSGP)  
and Intercity Bus Security Grant Program (IBSGP)**

### **Form Number(s):**

- 1) TSGP Five Year Security Capital and Operational Sustainment Plan, FEMA Form FF-207-FY-21-101;**
- 2) TSGP Investment Justification Background Document, FEMA Form FF-207-FY-21-102;**
- 3) Transit Security Grant Program (TSGP) Investment Justification, FEMA Form FF-207-FY-21-103;**
- 4) TSGP Public Transit Risk Assessment Methodology (PT-RAM) Gap Analysis, FEMA Form FF-207-FY-21-104;**
- 5) TSGP PT-RAM Implementation Plan, FEMA Form FF-207-FY-21-105;**
- 6) PT-RAM, FEMA Form FF-207-FY-21-106;**
- 7) Intercity Bus Security Grant Program (IBSGP) Investment Justification Form, FEMA Form FF-207-FY-23-102;**
- 8) IBSGP Detailed Budget Worksheet, FEMA Form FF-207-FY-23-103,**
- 9) IBSGP Vulnerability Assessment and Security Plan, FEMA Form FF-207-FY-23-104**

### **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 Transit Security Grant Program (TSGP) is a FEMA grant program that focuses on transportation infrastructure protection activities. The collection of information for TSGP is mandated by Section 1406, Title XIV of the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53) (codified at 6 U.S.C. §1135), which directs the Secretary to establish a program for making grants to eligible public transportation agencies for security improvements. Additionally, information is collected in accordance with Section 1406(c) of the Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C. §1135(c)) which authorizes the Secretary to determine the requirements for grant recipients, including application requirements.

The program provides funds to owners and operators of transit systems (which include intra-city bus, commuter bus, and all forms of passenger rail) to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies.

The Intercity Bus Security Grant Program (IBSGP) is a FEMA grant program that focuses on transportation infrastructure protection activities. The collection of information for IBSGP is mandated by Section 1532 of the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53) (codified at 6 U.S.C. §1182), which directs the Secretary to establish a program for making grants to eligible private operators providing transportation by an over-the-road bus for security improvements. Additionally, information is collected in accordance with Section 1532(d) of the Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C. §1182(d)) which authorizes the Secretary to determine the requirements for grant recipients, including application requirements.

This revision adds the three IBSGP instruments to this information collection.

- 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.**

**TSGP Five-Year Security Capital and Operational Sustainment Plan, FEMA Form FF-207-FY-21-101**

Submitted with the application, this document provides a five-year Security Capital and Operational Sustainment Plan regarding each submitted project. This plan must include how the agency proposes to implement capital projects and demonstrate how the agency will sustain the operational investments and capabilities after grant funding has been expended. Requests for Operational Packages (OPacks) will not be funded if the applicant does not have a Security Capital and Operational Sustainment Plan.

**TSGP Investment Justification Background Document, FEMA Form FF-207-FY-21-102**

Submitted with the application, this document provides background information of the eligible grantee such as point of contact information with a summation of the overall program such as critical infrastructure, ridership data and number of vehicles. The data is collected to provide TSGP context and background of each grantee. This information will be shared with program analysts inside TSGP and the national review panel comprised of FEMA officials, federal agencies (e.g. Transportation Security Administration) and national associations.

**TSGP Investment Justification, FEMA Form FF-207-FY-21-103**

Submitted with the application, this document provides narrative detail on proposed investments. These Investment Justifications must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities and the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. The data from the Investment Justification is collected to assist decision-making at all levels, although, it is primarily used by individual application reviewers. The TSGP uses a multi-phase review process. The application data, including the Investment Justification, is evaluated by a national review panel to determine which applications are the highest-scoring and address the program priorities. The national review is comprised of a panel of officials from FEMA (headquarters and regions) and representatives of other national stakeholders such as federal agencies (e.g., Transportation Security Administration, Department of Transportation,) and national associations (e.g., American Public Transportation Association). These reviewers then determine funding for proposed activities identified in the application and Investment Justification based on risk and potential to help achieve core missions of the grant programs.

**TSGP Public Transit Risk Assessment Methodology (PT-RAM) Gap Analysis, FEMA Form FF-207-FY-21-104**

Submitted with the PT-RAM Methodology, the Gap Analysis provides grantees a platform to conduct an in-depth evaluation of where the transit system currently is subject to vulnerabilities and lacks capabilities to prevent, mitigate or respond to a threat. Selected areas should address at least one of the TSGP program priorities, such as Cybersecurity or Training and Exercises. The data is collected to provide TSGP context and security risks with each grantee agency. This information will be shared with program analysts inside TSGP.

### **TSGP PT-RAM Implementation Plan, FEMA Form FF-207-FY-21-105**

Submitted with the PT-RAM and the PT-RAM Gap Analysis, the PT-RAM Implementation Plan worksheet assists grantees in developing a plan for implementing initiatives to address the capability gaps identified in the PT-RAM Gap Analysis. The Plan identifies and analyzes goal objectives within the PT-RAM Gap Analysis. This Plan must include how the agency will implement the PT-RAM Gap Analysis goals into tangible steps to reduce high risk and security threats through TSGP funds.

### **PT-RAM, FEMA Form FF-207-FY-21-106**

Included in the TSGP Terms and Conditions Award Package, this document provides a risk baseline against which to measure security and the highest risks over time. The PT-RAM uses simple algorithms to develop an estimate of relative risk for transit awardees in the TSGP. The excel methodology tool must be completed twice over the applicant's period of performance 1) upon receiving the grant, and 2) before closeout of the grant. The tool establishes a process for measuring the risk reduction return on investment associated with the TSGP. It assists in understanding the TSGP's impact and helps system operators in understanding the distribution of risk within their systems. In addition, it gives transit systems a snapshot of their current security posture regarding their various asset types in threats posed within the tool; allowing for measurement of the risk reduction achieved. The collected PT-RAM data is reviewed by TSGP staff and does not drive grant award amounts. It only documents how awarded funds are invested, their impact on security risk, and measure the effectiveness of the solutions procured.

### **IBSGP Investment Justification Form, FEMA Form FF-207-FY-23-102**

The purpose of this form is for applicants to develop a single formal Investment Justification for the IBSGP that addresses the initiative being proposed for funding, including management and administration costs. The Investment Justification must demonstrate how proposed activities address gaps and deficiencies (identified in a current vulnerability assessment) in current programs and capabilities, and link to one or more core capabilities identified in the National Preparedness Goal.

### **FEMA IBSGP Detailed Budget Worksheet, FEMA Form FF-207-FY-23-103**

The Budget Detail Worksheet may be used as a guide to assist applicants in the preparation of the required budget and budget narrative.

### **FEMA IBSGP Vulnerability Assessment and Security Plan, FEMA Form FF-207-FY-23-104**

The purpose of this form is for applicants to certify that they have had a vulnerability assessment completed and a security evaluation preparedness plan developed or updated within the past three years.

- 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 submission of information for the FY 2025 TSGP involves the use of electronic means. Grant applicants must submit their proposals through <https://go.fema.gov/> and upload the TSGP Investment Justification and all other required documents as attachments (in MS Word, Excel or other electronic format) to their TSGP application in the FEMA GO System at <https://go.fema.gov/>. Eligible applicants must apply for funding through this portal accessible on the internet.

FEMA completed a usability test on the TSGP and IBSGP. A total of four (4) persons were selected to participate in the study. All participants were employees of FEMA in varying grant related roles assigned to these surface infrastructure protection programs. None of the participants were currently an active user or had previously used these questioned instruments. Participants found the form easy to understand and navigate. They were confident about using the form as it was self-explanatory. Further the choice options of “yes” and “no” as well as dropdown options made the response selection clear. The participants did not provide any comments for improvement nor were any pain points identified and as a result, no recommendations were made.

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

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

**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.**

Collection requirements for local governmental jurisdictions do not differ from the collection requirements of small entities. The burden on local government jurisdictions and small entities and can be addressed via training and technical assistance provided by FEMA. Webinars are provided either live or recorded by FEMA throughout any given year. FEMA regions are also responsive to the needs of small entities as well as local governments providing in-person or live training, workshops, and answering questions upon request.

**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.**

These data collection elements are required in order to exercise comprehensive financial management and ensure the efficient and effective use of Federal funds. If FEMA was not able to receive information collected from grant recipients, the agency could not fulfill its requirement to ensure funding is provided in a fair and equitable manner to eligible entities as described in the law, to ensure that the funding is being used only for the allowable costs within the grant regulations, and to fulfill our federal monitoring requirements.

**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.**

No collection elements are required more often than quarterly. Most collection elements are only required once per year per grant application.

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

There are no requirements for respondents to prepare a written response to this collection of information in fewer than 30 days after receipt of it.

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

There are no requirements for a respondent 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.**

Records must be retained for three years after grant close-out. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.

- 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 December 18, 2024, at 89 FR 102932. FEMA received zero public comments.

A 30-day Federal Register Notice inviting public comments was published on April 17, 2025, 90 FR 16148. The 30-Day public comment period closes on May 16, 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 meets with the American Public Transportation Association (APTA) and the American Bus Association (ABA), national associations that represent this entity, as well as individual grantees, through regular program-specific conferences and workshops. Additionally, teleconferences and e-mail communications are also used. These consultations focus on the nature of information needed by FEMA to manage the grant programs. There were no recommendations for changes received.

- 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 consults on a regular basis with its rail, intra-city bus, ferry, and Amtrak operator stakeholders on a variety of issues. These consultations involve discussions regarding the nature of the information needed by FEMA to manage the grant programs. Partners offer comments and suggestions about their reporting practices. The most common area of concern is performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements that FEMA uses. There were no recommendations for changes received.

- 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 the TSGP was completed by FEMA and adjudicated by the DHS Privacy Office on July 8, 2024, and is still valid. A Privacy Threshold Analysis (PTA) for the IBSGP was completed by FEMA and adjudicated by the DHS Privacy Office on February 27, 2023, and is still valid.

The TSGP Investment Justification, FEMA Form FF-207-FY-102 and the IBSGP Investment Justification Form, FEMA Form FF-207-FY-102 are privacy sensitive collections requiring Privacy Impact Assessment, PIA coverage. This form is covered by an existing PIA,

DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015. No Privacy Act Statement nor SORN coverage is required for the form.

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 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 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.**

The TSGP is an existing grant program that uses the forms outlined in this collection. The program provides funds to owners and operators of transit systems (which include intra-city bus, commuter bus, and all forms of passenger rail) to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise.

**FEMA Form FF-207-FY-21-101, TSGP Five-Year Security Capital and Operational Sustainment Plan:** is estimated to have 123 respondents (local transit agency representatives) times 1 response per year for 123 total annual responses ( $123 \times 1 = 123$ ). It is estimated that

each response will require 5 burden hours to complete, therefore 123 responses times 5 hours equals 615 total annual burden hours (123 x 5 = 615).

**FEMA Form FF-207-FY-21-102, TSGP Investment Justification Background Document:** is estimated to have 123 respondents (local transit agency representatives) times 1 response per year for 123 total annual responses (123 x 1 = 123). It is estimated that each response will require 3 burden hours to complete, therefore 123 responses times 3 hours equals 369 total annual burden hours (123 x 3 = 369).

**FEMA Form FF-207-FY-21-103, TSGP Investment Justification:** is estimated to have 123 respondents (local transit agency representatives) times 1 response per year for 123 total annual responses (123 x 1 = 123). It is estimated that each response will require 15 burden hours to complete, therefore 123 responses times 15 hours equals 1,845 total annual burden hours (123 x 15 = 1,845).

**FEMA Form FF-207-FY-21-104, TSGP PT-RAM Gap Analysis:** is estimated to have 123 respondents (top government executives) times 1 response per year for 123 total annual responses (123 x 1 = 123). It is estimated that each response will require 15 burden hours to complete, therefore 123 responses times 15 hours equals 1,845 total annual burden hours (123 x 15 = 1,845).

**FEMA Form FF-207-FY-21-105, TSGP PT-RAM Implementation Plan:** is estimated to have 123 respondents (top government executives) times 1 response per year for 123 total annual responses (123 x 1 = 123). It is estimated that each response will require 15 burden hours to complete, therefore 123 responses times 15 hours equals 1,845 total annual burden hours (123 x 15 = 1,845).

**FEMA Form FF-207-FY-21-106, TSGP PT-RAM Risk Assessment Methodology:** is estimated to have 123 respondents (top government executives) times 1 response per year for 123 total annual responses (123 x 1 = 123). It is estimated that each response will require 72 burden hours to complete, therefore 123 responses times 72 hours equals 8,856 total annual burden hours (123 x 72 = 8,856).

The IBSGP is an existing grant program that uses the forms outlined in this collection. The program provides funds to owners and operators of private bus organizations to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies. The burden hour estimates shown on the following pages are based upon internal and external subject matter expertise.

**FEMA Form FF-207-FY-23-102, IBSGP Investment Justification Form:** is estimated to have 56 respondents (businesses) times 1 response per year for 56 total annual responses (56 x 1 =

56). It is estimated that each response will require 5 burden hours to complete, therefore 56 responses times 5 hours equals 280 total annual burden hours (56 x 5 = 280).

**FEMA Form FF-207-FY-23-103, IBSGP Detailed Budget Worksheet:** is estimated to have 56 respondents (businesses) times 1 response per year for 56 total annual responses (56 x 1 = 56). It is estimated that each response will require 5 burden hours to complete, therefore 56 responses times 5 hours equals 280 total annual burden hours (56 x 5 = 280).

**FEMA Form FF-207-FY-23-104, IBSGP Vulnerability Assessment and Security Plan:** is estimated to have 56 respondents (businesses) times 1 response per year for 56 total annual responses (56 x 1 = 56). It is estimated that each response will require 5 minutes (or 0.0833 burden hours) to complete, therefore 56 responses times 0.0833 hours equals 5 total annual burden hours (56 x 0.0833 = 5).

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

Please see our response for 12a above and 12c below.

- c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.61 for State and local government employees)<sup>1</sup> 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	TSGP Five-Year Security Capital and Operational Sustainment Plan / FEMA Form FF-207-FY-21-101	123	1	123	5	615	\$60.55	\$37,238
State, Local,	TSGP Investment	123	1	123	3	369	\$60.55	\$22,343

<sup>1</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at [https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](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.

and Tribal Governments	Justification Background Document / FEMA Form FF-207-FY-21-102							
State, Local, and Tribal Governments	TSGP Investment Justification / FEMA Form FF-207-FY-21-103	123	1	123	15	1,845	\$60.55	\$111,715
State, Local, and Tribal Governments	TSGP PT-RAM Gap Analysis / FEMA Form, FF-207-FY-21-104	123	1	123	15	1,845	\$105.34	\$194,352
State, Local, and Tribal Governments	TSGP PT-RAM Implementation Plan / FEMA Form, FF-207-FY-21-105	123	1	123	15	1,845	\$105.34	\$194,352
State, Local, and Tribal Governments	TSGP Public Transit Risk Assessment Methodology (PT-RAM) / FEMA Form, FF-207-FY-21-106	123	1	123	72	8,856	\$105.34	\$932,891
Business or other for-profit	IBSGP Investment Justification Form / FEMA Form FF-207-FY-23 102	56	1	56	5	280	\$79.47	\$22,252
Business or other for-profit	IBSGP Detailed Budget / FEMA Form FF-207-FY-23 103	56	1	56	5	280	\$79.47	\$22,252
Business or other for-profit	IBSGP Vulnerability Assessment and Security Plan / FEMA Form FF-207-FY-23 104	56	1	56	0.0833	5	\$79.47	\$397
<b>Total</b>		<b>906</b>		<b>906</b>		<b>15,940</b>		<b>\$1,537,792</b>

Note: The “Avg. Hourly Wage Rate” for each respondent include a wage multiplier to reflect a fully loaded wage rate.

**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, Local, or Tribal Governments as Local Transit Agency Representatives (SOC 33-3052) is estimated to be \$37.61 per hour.<sup>2</sup> Including the wage rate multiplier of , the fully loaded wage rate is \$60.55. Therefore, the estimated burden hour cost to State, Local, or Tribal Governments as Local Transit Agency Representatives (SOC 33-3052) is estimated to be \$171,296 (\$60.55 x 2,829 hours) annually.

<sup>2</sup> 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](https://www.bls.gov/oes/2023/may/oes_nat.htm)

The wage rate for Top Executives (SOC 11-1000) is estimated to be \$65.43 per hour.<sup>3</sup> Including the wage rate multiplier of , the fully loaded wage is \$105.34. Therefore, the estimate annual burden hour cost to respondents Top Executives (SOC 11-1000) is estimated to be \$1,321,596 (\$105.34 x 12,546 hours) annually.

The wage rate for Management of Companies and Enterprises - Project Management Specialists (SOC 13-1082) is estimated to be \$54.81 per hour.<sup>4</sup> Including the wage rate multiplier of , the fully loaded wage rate is \$79.47. Therefore, the estimated burden hour cost to respondents Management of Companies and Enterprises - Project Management Specialists (SOC 13-1082) is estimated to be \$44,901 (\$79.47 x 565 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 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
<b>Total</b>	\$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 cost burdens related to operation costs, maintenance costs, or the purchase of services.

<sup>3</sup> 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](https://www.bls.gov/oes/2023/may/oes_nat.htm)

<sup>4</sup> 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](https://www.bls.gov/oes/2023/may/oes_nat.htm)

- 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 cost burdens related to capital or start-up costs.

- 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 (\$)
<b>Contract Costs</b>	\$0
<b>Staff Salaries</b> 10 GS-13 Step 5 employees spending approximately 60% of time annually for administrative and financial data collection. [(10 employees x \$136,658) <sup>1</sup> x 1.45 loaded wage rate <sup>2</sup> x 60% of time = \$1,188,925]	\$1,188,925
<b>Facilities</b> [cost for renting, overhead, etc. for data collection activity]	
<b>Computer Hardware and Software</b> [cost of equipment annual lifecycle]	
<b>Equipment Maintenance</b> [cost of annual maintenance/service agreements for equipment]	
<b>Travel</b>	
<b>Total</b>	<b>\$1,188,925</b>

<sup>1</sup> Office of Personnel Management 2025 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/2025/DCB.pdf>. Accessed January 13, 2025.

<sup>2</sup> 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
TSGP Five-Year Security Capital and Operational Sustainment Plan / FEMA Form FF-207-FY-21-101	0	0	0	615	615	0
TSGP Investment Justification Background Document / FEMA Form FF-207-FY-21-102	0	0	0	369	369	0
TSGP Investment Justification/ FEMA Form FF-207-FY-21-103	0	0	0	1,845	1,845	0
TSGP PT-RAM Gap Analysis / FEMA Form, FF-207-FY-21-104	0	0	0	1,845	1,845	0
TSGP PT-RAM Implementation Plan / FEMA Form, FF-207-FY-21-105	0	0	0	1,845	1,845	0
TSGP PT-RAM / FEMA Form, FF-207-FY-21-106	0	0	0	8,856	8,856	0
IBSGP Investment Justification Form / FEMA Form FF-207-FY-23-102	0	280	280	0	0	0
IBSGP Detailed Budget / FEMA Form FF-207-FY-23-103	0	280	280	0	0	0
IBSGP Vulnerability Assessment and Security Plan / FEMA Form FF-207-FY-23-104	0	5	5	0	0	0
<b>Total</b>	<b>0</b>	<b>565</b>	<b>565</b>	<b>15,375</b>	<b>15,375</b>	<b>0</b>

**Explain:** There is an increase of 565 annual burden hours due to the addition of the three IBSGP instruments to 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
TSGP Five-Year Security Capital and Operational Sustainment Plan / FEMA Form FF-207-FY-21-101	\$0	\$0	\$0	\$31,980	\$37,238	\$5,258
TSGP Investment Justification Background	\$0	\$0	\$0	\$19,188	\$22,343	\$3,155

Document / FEMA Form FF-207-FY-21-102						
TSGP Investment Justification/ FEMA Form FF-207-FY-21-103	\$0	\$0	\$0	\$95,940	\$111,715	\$15,775
TSGP PT-RAM Gap Analysis / FEMA Form, FF-207-FY-21-104	\$0	\$0	\$0	\$180,330	\$194,352	\$14,022
TSGP PT-RAM Implementation Plan / FEMA Form, FF-207-FY-21-105	\$0	\$0	\$0	\$180,330	\$194,352	\$14,022
TSGP PT-RAM / FEMA Form, FF-207-FY-21-106	\$0	\$0	\$0	\$865,585	\$932,891	\$67,306
IBSGP Investment Justification Form / FEMA Form FF-207-FY-23-102	\$0	\$22,252	\$22,252	\$0	\$0	\$0
IBSGP Detailed Budget / FEMA Form FF-207-FY-23-103	\$0	\$22,252	\$22,252	\$0	\$0	\$0
IBSGP Vulnerability Assessment and Security Plan / FEMA Form FF-207-FY-23-104	\$0	\$397	\$397	\$0	\$0	\$0
<b>Total</b>	<b>\$0</b>	<b>\$44,901</b>	<b>\$44,901</b>	<b>\$1,373,353</b>	<b>\$1,492,891</b>	<b>\$119,538</b>

**Explain:** There is an increase of \$44,901 in annual costs due to the addition of three IBSGP instruments to this collection and an increase of \$119,538 in annual costs due to the general increase in hourly wages; for a total increase of \$164,439 in annual costs.

**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 does not request an extension to the certification of this information collection.

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

