

August 21, 2025

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0062

Title: State/Local/Tribal Hazard Mitigation Plans

Form Number(s): Not Applicable

General Instructions

A supporting statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The supporting statement must be prepared in the format described below and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the Office of Management and Budget (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 as well.**

Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. § 5165, as amended by the Disaster Mitigation Act of 2000 (DMA 2000), Pub. L. No. 106-390, provides the framework for linking pre- and post-disaster mitigation planning and initiatives with public and private interests to ensure an integrated, comprehensive approach to disaster loss reduction. Title 44 CFR Part 201 provides the mitigation planning requirements for

state, local,¹ tribal,² and territorial³ (SLTT) governments to identify the natural hazards that impact them, to identify actions and activities to reduce any losses from hazards, and to establish a coordinated process to implement the plan, taking advantage of a wide range of resources. This information collection is for FEMA to review SLTT mitigation plans for approval in accordance with its legal requirements in 44 CFR Part 201. FEMA does not maintain the mitigation plans once reviewed, but does maintain a record of the plan's approval status.

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

The purpose of the hazard mitigation plan (plan) requirements is to enable SLTT governments to better understand the risks they face from natural hazards and to make decisions and take actions for their reduction. Implementation of planned, pre-identified, cost-effective mitigation measures will streamline the disaster recovery process. The plan is the demonstration of the goals, priorities, and commitment which serves as a guide for SLTT decision makers as they commit resources to reducing the effects of natural hazards.

In order to be eligible for certain types of Federal Emergency Management Agency (FEMA) non-emergency assistance,⁴ SLTT governments are required to have a plan that meets the criteria established in 44 CFR Part 201. Per 44 CFR Part 201, plans are required to include documentation of the planning process, risk assessment, mitigation strategy, and a maintenance process. SLTTs must review and revise plans to reflect changes in development, progress in mitigation efforts, and changes in priorities, and resubmit the plan for approval within five years in order to continue to be eligible.

SLTT governments use their plans, particularly the mitigation strategy, to guide decision makers as they commit resources to reducing the effects of natural hazards. During the five-year

¹ In accordance with the definitions at 44 CFR§ 201.2, the term “*Local government*” is defined as “any county, municipality, city, town, township, public authority, school district, special district, intrastate district, council of governments (regardless of whether the council of governments is incorporated as a nonprofit corporation under State law), regional or interstate government entity, or agency or instrumentality of a local government; any Indian Tribe or authorized Tribal organization, or Alaska Native village or organization; and any rural community, unincorporated town or village, or other public entity”.

² In accordance with the definitions at 44 CFR§ 201.2, the term “*Indian Tribal government*” means “any Federally recognized governing body of an Indian or Alaska Native Tribe, band, nation, pueblo, village, or community that the Secretary of Interior acknowledges to exist as an Indian Tribe under the Federally Recognized Indian Tribe List Act of 1994, [25 U.S.C. 5131](#). This does not include Alaska Native corporations, the ownership of which is vested in private individuals.”

³ In accordance with the definitions at 44 CFR§ 201.2, the term “state” is defined “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”.

⁴ Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, requires mitigation plans for the Hazard Mitigation Grant Program (HMGP), HMGP Post Fire, Building Resilient Infrastructure and Communities (BRIC), and Safeguarding Tomorrow Revolving Loan Fund (STRLF). The National Flood Insurance Act of 1968, as amended, requires mitigation plans for Flood Mitigation Assistance (FMA); and National Dam Safety Program Act, as amended, requires mitigation plans for the Rehabilitation of High Hazard Potential Dams (HHPD) Grant Program.

planning cycle, local and tribal jurisdictions may experience little change to hazard risk and vulnerability that would significantly alter the existing vulnerability analysis and the associated mitigation actions. The plan update may be small if relatively little has changed, or it may be large if more engagement is needed to bring together partners and stakeholders due to changes in demographics, development, and disaster frequency and intensity.

FEMA does not prescribe the form of the plan. SLTTs submit the plan electronically. FEMA uses a plan review tool checklist to review plans to document compliance with 44 CFR Part 201 and applicable policy requirements.

44 CFR § 201.4 Standard State Mitigation Plan: States and territories participate in and maintain mitigation plans, as a requirement to receive certain FEMA non-emergency assistance, to guide investment decisions to reduce disaster loss and suffering. States and territories follow the criteria established in 44 CFR § 201.4 and State Mitigation Planning Policy Guide. State mitigation plans are updated every five years and are submitted to the appropriate FEMA regional office for formal review and approval. Approved plans developed under 44 CFR Part 201 are used by FEMA to meet one eligibility requirement for certain FEMA non-emergency assistance.

In accordance with 44 CFR § 201.4(d), the plan “must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities and resubmitted for approval to the appropriate Regional Administrator every 5 years.”

44 CFR § 201.5 Enhanced State Mitigation Plan: To be eligible to receive additional Hazard Mitigation Grant Program (HMGP) assistance to reduce disaster loss and suffering, states, territories and Tribal Nations may follow the criteria established in 44 CFR § 201.5 and applicable state or tribal policy. The enhanced plan is a separate plan type that demonstrates a state, territory or Tribal Nation has a comprehensive mitigation program, effectively uses available mitigation funding, and is capable of managing the increased funding. Enhanced mitigation plans are updated every five years and are submitted to the appropriate FEMA regional office for formal review and approval.

44 CFR § 201.6 Local Mitigation Plan: Like states, local governments, including special districts, engage in and maintain approved mitigation plans as authorized to receive certain FEMA non-emergency assistance as well as guide investment decisions to reduce disaster loss and suffering. Local governments follow the criteria established in 44 CFR § 201.6 and Local Mitigation Planning Policy Guide. Mitigation plans are updated every five years. Local plans must be submitted to a State Hazard Mitigation Officer for initial review and coordination. A state will then send the plan to the appropriate FEMA regional office for formal review and approval. Approved plans developed under 44 CFR Part 201 are used by FEMA to meet one eligibility requirement for certain FEMA non-emergency assistance.

In accordance with 44 CFR § 201.6(d)(3), the plan “must review and revise its plan to reflect changes in development, progress in local mitigation efforts, and changes in priorities, and resubmit it for approval within five years in order to continue to be eligible for mitigation project grant funding.”

44 CFR § 201.3, State Review of Local or Tribal Plan: States review local mitigation plans and then submit the approvable plans to FEMA for review and approval. States may review tribal mitigation plans, if the Tribal Nation is interested in being a subrecipient to the state. States may also use reviews to inform updates of the state mitigation plan, prioritize training and technical assistance, as well as prioritize mitigation project funding.

In some cases, FEMA has delegated local plan approval authority under program administration by states as authorized by the Stafford Act, Section 404(c) of the 42 U.S.C. § 5170c.

44 CFR § 201.7, Tribal Plans: Tribal governments engage in and maintain approved mitigation plans as authorized to receive certain FEMA non-emergency assistance as well as guide investment decisions to reduce disaster loss and suffering. States follow the criteria established in 44 CFR § 201.7 and Local Mitigation Planning Policy Guide.

In accordance with 44 CFR § 201.7(d)(3), the tribe “must review and revise their plan to reflect changes in development, progress in local mitigation efforts, and changes in priorities, and resubmit it for approval within five years in order to continue to be eligible for non-emergency Stafford Act assistance and FEMA mitigation grant funding.”

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.

While FEMA has not implemented a requirement for SLTT governments to use information technology to submit the plans, FEMA encourages SLTT governments to submit electronic file(s) containing the plan and associated Plan Review Tool to the appropriate FEMA regional office for review and approval.

These plans may be submitted in any format the jurisdiction chooses, such as Microsoft Word document (.doc, .docx), Adobe Acrobat portable document format (.pdf), web- and client-based file transfer, or as hardcopy. FEMA encourages SLTT governments to use available technology to develop their plans. All plans in this collection are submitted electronically. FEMA provides guidance and instructions on how to properly draft a plan.

In 2024, FEMA explored application of Generative Artificial Intelligence (GenAI) for hazard mitigation planning through the Planning Assistance for Resilient Communities (PARC) pilot project. The intent was to explore AI use to help SLTTs develop effective, compliant hazard mitigation plans for submission to FEMA for review and approval. Use of GenAI may help streamline development and updates as well as allow SLTTs to focus on increasing plan quality through public engagement and mitigation strategy development. The pilot was designed to create draft planning elements from publicly available, well-researched sources that could be customized to meet each community's unique needs. Since the pilot found gaps in the beta tool requiring further research, refinement and testing, it was not deployed. Future versions of the application could incorporate feedback and scale, facilitating data-driven decision-making for more effective interventions and resource allocations. Currently [DHS](#) has no plans for future research and the pilot is inactive.

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 small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection does not have an impact on small businesses. Collection requirements for small governmental jurisdictions do not differ from the collection requirements of larger jurisdictions. FEMA and the states are responsible for aiding jurisdictions as they participate in the program. The burden on small entities can be addressed via training and technical assistance provided by both FEMA and the state. Private non-profit organizations are not required to have a plan.

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.

All hazard mitigation plans must be reviewed, revised, and re-approved every five years by the appropriate FEMA regional office. According to the Stafford Act, the NFIA and the National Dam Safety Program Act, without an approved plan, SLTT governments cannot receive certain non-emergency FEMA assistance, including HMGP, Pre-Disaster Mitigation (PDM), Safeguarding Tomorrow Revolving Loan Fund Program (STRLF) under the Stafford Act, Rehabilitation of High Hazard Potential Dam (HHPD), Grant Program per the National Dam Safety Program Act, and Flood Mitigation Assistance (FMA) under the National Flood Insurance Act (NFIA).

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 often 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 requires respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years. In accordance with 44 CFR § 201.3 mitigation plans are reviewed and updated every five years from date of plan approval in order to continue eligibility for certain FEMA non-emergency assistance. SLTTs establish a process to maintain the mitigation plans over the five-year approval period.

- e. In connection with a statistical survey, that is not designed to produce valid and reliable results than 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 that 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 secrets, 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 April 30, 2025, at 90 FR 17945. FEMA received seven comments. Six comments were submitted anonymously while one comment was submitted by Colorado Division of Homeland Security and Emergency Management (DHSEM).

Five of the anonymously submitted comments shared general program feedback on the value of hazard mitigation planning. **FEMA acknowledges and appreciates these comments.**

Two comments specifically mentioned administrative burden for plan updates. Both comments are included below:

Comment 5 (FEMA-2025-0012-006); Anonymously Submitted:

“Hazard mitigation plans are an essential component to an effective risk reduction strategy for states, tribes, and local jurisdictions. To streamline bureaucratic processes and ensure communities are protected from natural hazards, plan updates should be

limited to the requirements found in 44 CFR 201.5(c)(1) for states, 44 CFR 201.6(d)(3) for locals, and 44 CFR 201.7(d)(3) for tribes. These CFR sections are centered around updating the plan to reflect changes in development, progress in local mitigation efforts, and changes in priorities. This would greatly decrease the current burden placed on states, locals, and tribes to essentially create a new plan every 5 years and undergo a complete plan review process as well as limit the paperwork associated with a plan update.”

Comment 6 (FEMA-2025-0012-0007); Submitted by Colorado DHSEM:

“Hazard mitigation planning is most effective when it reflects current risk information and is strategically focused on the most significant hazards. In Colorado, state agencies and partner organizations maintain subject matter experts who continuously collect and analyze hazard data across a wide range of risks. These efforts support a strong foundation for understanding risk and guiding mitigation strategies across jurisdictions. Critically, risk assessment data tends to remain relatively stable over a five-year period. The current federal requirement to fully update Hazard Mitigation Plans (HMPs) on this fixed interval places undue resource burdens on jurisdictions while diverting focus away from implementation. A more effective policy framework would support the adoption of dynamic, living HMPs centered around an annually updated mitigation action plan, with regular maintenance reviews conducted both annually and following disaster events. This would allow FEMA to increase the lifetime of the HMP from five years to at least seven, if not ten, years. This approach would reduce the number of resources required to keep HMPs current while not allowing plans to stagnate during the five-year lifespan. It would significantly extend the functional lifespan of plans, keeping them relevant and actionable while better aligning with the actual pace of risk evolution and mitigation progress. Additionally, the current requirement for jurisdictions to identify at least one mitigation action per hazard is overly prescriptive and often leads to lengthy lists of actions that are infeasible or lack local support. A risk-based planning framework—which encourages jurisdictions to identify and commit to a limited number of high-impact, feasible mitigation actions—would result in more realistic, implementable strategies. When integrated into an annual and post-disaster review cycle, these strategies would remain flexible, responsive, and aligned with changing conditions and capacities over time. In summary, FEMA should modernize its hazard mitigation planning requirements by embracing a dynamic planning model and regular maintenance cycles built around actionable priorities. These changes would reduce administrative burden, support timely and targeted implementation, and ensure that HMPs evolve in tandem with the risks they are intended to address.”

FEMA acknowledges and appreciates the comments made; the feedback is being taken under consideration for future policy updates.

A 30-day Federal Register Notice inviting public comments was published on August 21, 2025, at 90 FR 40837. The 30-Day public comment period closes on September 22, 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 Mitigation Planning Program have historically participated in conferences, work groups or other meetings with groups such as the American Planning Association, the Association of State Floodplain Managers, and the National Emergency Management Association, to discuss issues related to mitigation planning.

- 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.**

In accordance with FEMA Policy 112-12, FEMA reviews and updates policies. In 2023, FEMA began formal Consultation with tribal governments as part of the update of the tribal mitigation planning policy. From June 2023 to March 2024, FEMA engaged with Tribal Nations on the update of the Tribal Mitigation Plan Review Guide (December 2017) (https://www.fema.gov/sites/default/files/2020-06/fema-tribal-mitigation-plan-review-guide_12-05-2017.pdf). The “Tribal Mitigation Planning Policy Update: Summary of Feedback Report” (https://www.fema.gov/sites/default/files/documents/fema_tmp-summary-of-feedback.pdf) summarizes verbal and written comments provided through consultations, feedback sessions, and emails.

In 2022, FEMA published updates of the state and local mitigation planning policies, also known as the Plan Review Guides, to reflect recent legislative changes and broader policy updates. Throughout July 2020, FEMA gathered feedback from states, local governments, and members of the public as it pertains to updating the state and local policies.

FEMA conferred with the National Dam Safety Review Board beginning in 2021, as it advises FEMA’s Administrator in setting national dam safety priorities and considers the effects of national policy issues affecting dam safety. Review Board members include FEMA, the Chair of

the Board, representatives from four federal agencies that serve on the Interagency Committee on Dam Safety (ICODS), five state dam safety officials, and one member from the private sector.

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

There is no payment or gift to respondents for this information collection.

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

The Privacy Threshold Analysis (PTA) for the **State/Local/Tribal Hazard Mitigation Plans** was approved by the DHS Privacy Office on March 13, 2024, and is valid through March 13, 2027. There are no assurances of confidentiality provided to the respondents for this information collection.

A Privacy Impact Assessment (PIA) is required for this collection as a privacy-sensitive system and coverage is provided by DHS/ALL/PIA-006 DHS General Contacts List (November 12, 2021).

No System of Records Notice (SORN) is required.

The PTA for the **Risk Analysis and Management (RAM) system** was approved by the DHS Privacy Office on July 18, 2024, and is valid through July 18, 2025. The RAM system migrated to the Cloud environment in October 2024. The RAM-C PTA development is underway.

A PIA is required for this collection as a privacy-sensitive system and coverage is provided by DHS/FEMA/PIA-045 Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems (November 12, 2021).

SORN coverage is required and provided under:

- 1) DHS/FEMA-014 Hazard Mitigation Planning and Flood Mapping Products and Services Records (January 11, 2021),
- 2) DHS/FEMA-003 National Flood Insurance Program (NFIP) Files System of Records (May 19, 2014), and
- 3) DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) (November 27, 2012).

There are no assurances of confidentiality provided to the respondents for this information collection as related to OMB Collection 1660-0062.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The 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. 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.**

To determine the annual burden for this collection, burden hours were calculated separately for 1) New local and tribal plans, 2) Local and tribal plan updates, 3) State review of local and tribal plans, 4) Standard state mitigation plan updates, and 5) Enhanced state mitigation plan updates.

First, FEMA identifies 56 respondents from states, and territories per 44 CFR Part 201, as respondents. Next, FEMA estimates an annual Number of Responses per Respondent. Total Number of Responses is calculated by multiplying the Number of Respondents by the Number of Responses per Respondent.

To calculate the Average Burden per Response (in hours), FEMA uses Hazard Mitigation Assistance (HMA) grant awards to estimate plan development and update costs. These cost estimates are then classified as personnel costs (17.5%), contracting costs (78%), and non-labor costs (4.5%).⁵ FEMA assumes that the equivalent of an Urban and Regional Planner, at a loaded wage rate of \$69.89 would develop and review new plans and updates.⁶ Finally, to calculate

⁵ The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

⁶ The Urban and Regional Planner (Standard Occupational Classification 19-3051) loaded wage rate of \$66.94 is calculated using the Bureau of Labor Statistics, Occupational Employment and Wages, May 2023 mean hourly wage of \$41.32 times a 1.62

hour burden, the percent of costs attributed to personnel costs is divided by the Urban and Regional Planner loaded wage rate.

Annual hour burden for each instrument is as follows:

44 CFR §§ 201.3, 201.6 and 201.7, New local and tribal plans – FEMA estimates 1 new local or tribal plans per respondent will be developed annually for a Total Number of Responses equal to 56 Plans (one new plan per respondent x 56 respondents). The estimated Average Burden per Response is 501 hours. The resulting local or tribal plan Total Annual Burden is 28,056 hours (501 hours per new plan x 56 new plans).

FEMA uses HMA grant awards to estimate a new plan average cost of \$191,667. Based on the personnel distribution percentage identified above, FEMA assumes \$33,542 (\$191,667 per new plan x 17.5% of plan) of the average plan cost to be attributed to personnel costs.

Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$1,960,834 (28,056 hours x \$69.89 per hour [rounded to the nearest dollar]).

44 CFR §§ 201.3(d) and (e)(2), 201.6(d)(3) and 201.7(d)(3), Local and tribal plan updates – Based on the current inventory of approved plans, FEMA estimates that 560 local and tribal plans be updated annually (10 plan updates per respondent x 56 respondents). The estimated Average Burden per Response in hours of 296. The resulting local and tribal plan update Total Annual Burden is 165,760 hours (296 hours per plan update x 560 plan updates).

FEMA again used HMA grant awards to estimate a plan update average cost of \$113,347. Based on the personnel distribution percentage identified above, FEMA assumes \$19,836 (\$113,347 per plan update x 17.5% of plan) of the average plan update cost to be attributed to personnel costs.

Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$11,584,966 (165,760 hours x \$69.89 per hour [rounded to the nearest dollar]).

44 CFR §§ 201.3(c) and (e), 201.6(d)(1), and 201.7(d)(1), State review of local and tribal plans – All states must review local and tribal plans. Based on the 1) New local and tribal plan and 2) Plan update estimates above, FEMA estimates 11 Plans per respondent would be reviewed annually for a Total Number of Responses equal to 616 reviews ([1 new plan per respondent + 10 plan updates per respondent] x 56 respondents). FEMA estimates that it takes

multiplier, to account for benefits, rounded to the nearest cent. Available at: <https://www.bls.gov/oes/2023/may/oes193051.htm>.

20 hours to review each plan for a Total Annual Burden of 12,320 hours (20 hours per plan x 616 plans).

FEMA assumes the equivalent to an Urban and Regional Planner at a loaded wage rate of \$69.89 would review local and tribal plans.

This results in a Total Annual Respondent Cost of \$861,045 (12,320 hours x \$69.89 per hour [rounded to the nearest dollar]).

44 CFR §§ 201.3 (c)(3) and 201.4(d), Standard state mitigation plan updates – All states have existing plans and have a choice on whether to submit a standard state mitigation plan or an enhanced state mitigation plan. FEMA estimates that 42 states would submit standard state mitigation plans. Standard state mitigation plans are to be updated every five years. This results in an annual average Number of Responses per Respondent equal to 0.2 (One standard state mitigation plan/five years). The resulting annual Total Number of Responses equals eight standard state mitigation plan updates (42 respondents x 0.2 standard state mitigation plans per respondent [rounded to the nearest Plan count]). The estimated Average Burden per Response is 1,230 hours. For standard state mitigation plan updates, the resulting Total Annual Burden is 9,840 hours (1,230 hours per standard state plan update x 8 standard state plan updates).

Based on HMA grant awards, FEMA estimates a standard state mitigation plan update average cost of \$470,331. Using the personnel distribution percentage identified above, FEMA assumes \$82,308 (\$470,331 per standard state mitigation plan update x 17.5% of plan) of the average standard state mitigation plan cost to be attributed to personnel costs.

Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$687,718 (9,840 hours x \$69.89 per hour [rounded to the nearest dollar]).

44 CFR §§ 201.3 (c)(2) and 201.5, Enhanced State Mitigation Plan New and Updates – States may choose to submit an enhanced state mitigation plan. FEMA estimates that 16 states would submit enhanced state mitigation plans. Enhanced state mitigation plans are to be updated every five years. This results in an annual Number of Responses per Respondent equal to 0.2 (One enhanced state mitigation plan/5 years). The resulting Total Number of Responses equals three enhanced state mitigation plan updates (16 respondents x 0.2 enhanced plans per respondent [rounded to the nearest plan count]). The estimated Average Burden per Response is 1,060 hours. For enhanced state mitigation plan updates, the resulting Total Annual Burden is 3,180 hours (1,060 hours per enhanced state mitigation plan update x 3 enhanced state mitigation plan updates).

Based on HMA grant awards, FEMA estimates an enhanced state mitigation plan update average cost of \$405,424. Using the personnel distribution percentage identified above, FEMA assumes \$70,949 (\$405,424 per enhanced state mitigation plan update x 17.5% of plan) of the average enhanced state mitigation plan cost to be attributed to personnel costs.

Multiplying the Total Annual Burden in hours by the Urban and Regional Planner loaded wage rate results in a Total Annual Respondent Cost of \$222,250 (3,180 hours x \$69.89 per hour [rounded to the nearest dollar]).

FEMA calculates a Total Annual Burden in hours of 219,156. The associated Total Annual Respondent Cost is \$15,316,813.

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 responses 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 (1.62 for State and local government employees)⁷ 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.

⁷ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03142025.pdf. Accessed March 14, 2025. The national wage multiplier is calculated by dividing total compensation for all workers of \$47.20 by wages and salaries for all workers of \$32.52 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 \$63.46 by Wages and salaries for State and local government workers of \$39.22 per hour yielding a benefits multiplier of approximately 1.62.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name/ Form Number	No. of Respondents	No. of Responses per Respondent ¹	Total No. of Responses ²	Avg Burden per Response (hours)	Total Annual Burden (hours)	Avg Hourly Wage Rate ³	Total Annual Respondent Cost ⁴
Local or Tribal Government	New Local and Tribal Plans / 44 CFR §§ 201.3, 201.6 and 201.7	56	1	56	501	28,056	\$69.89	\$1,960,834
Local or Tribal Government	Local and Tribal Plan Updates / 44 CFR §§ 201.3(d) and (e)(2), 201.6(d)(3) and 201.7(d)(3)	56	10	560	296	165,760	\$69.89	\$11,584,966
State Government	State Review of Local and Tribal Plans / 44 CFR §§ 201.3(c) and (e), 201.6(d)(1), and 201.7(d)(1)	56	11	616	20	12,320	\$69.89	\$861,045
State Government	Standard State Plan Updates / 44 CFR §§ 201.3 (c)(3) and 201.4(d)	42	0.2	8	1,230	9,840	\$69.89	\$687,718
State Government	Enhanced State Plan Updates / 44 CFR §§ 201.3 (c)(2) and 201.5	16	0.2	3	1,060	3,180	\$69.89	\$222,250
Total		224		1,243		219,156		\$15,316,813

¹ Standard State Plan Updates and Enhanced State Plan Updates Number of Responses per Respondent represents an annual average over 5 years (1 Plan update/5 years = 0.2).

² Standard State Plan Updates Total Number of Responses is rounded to the nearest plan.

³ The “Avg. Hourly Wage Rate” for each respondent includes a 1.62 multiplier to reflect a loaded wage rate and rounded to the nearest cent.

⁴ Rounded to the nearest dollar

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.62. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.62, and the entry for the “Avg. Hourly Wage Rate” would be \$68.87.

According to the U.S. Department of Labor, Bureau of Labor Statistics,⁸ the May 2024 Occupational Employment and Wage Estimates wage rate for Urban and Regional Planners (SOC 19-3051) is \$43.14. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$69.89 per hour. Therefore, the annual burden hour cost is estimated to be \$15,316,813 annually (\$69.89 x 219,156 hours [rounded to the nearest dollar]).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. The cost of purchasing or contracting out

⁸ 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/tables.htm>. Accessed May 13 2025

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
New Local and Tribal Plans / 44 CFR §§ 201.3, 201.6 and 201.7	\$8,855,000			\$8,855,000
Local and Tribal Plan Updates / 44 CFR §§ 201.3(d) and (e) (2), 201.6(d)(3) and 201.7(d) (3)		\$49,510,160	\$2,856,560	\$52,366,720
State Review of Local and Tribal Plans / 44 CFR §§ 201.3(c) and (e), 201.6(d)(1), and 201.7(d)(1)				
Standard State Plan Updates / 44 CFR §§ 201.3 (c)(3) and 201.4(d)		\$2,934,864	\$169,320	\$3,104,184
Enhanced State Plan Updates / 44 CFR §§ 201.3 (c) (2) and 201.5		\$948,693	\$54,732	\$1,003,425
Total	\$8,855,000	\$53,393,717	\$3,080,612	\$65,329,329

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.**

See our response to 13b below.

- 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.**

To determine the annual cost for this collection, separate estimates were calculated for 1) New local and tribal plans, 2) Local and tribal plan updates, 3) State review of local and tribal plans, 4) Standard state mitigation plan updates, and 5) Enhanced state mitigation plan updates.

To calculate Annual Start-Up Costs, Annual Operations and Maintenance Costs, and Annual Non-Labor Costs, FEMA again uses mitigation plan development and update costs estimates based on HMA grant awards. These cost estimates are broken out between personnel costs (17.5%), contracting costs (78%), and non-labor costs (4.5%).⁹ FEMA uses the percent of grant money attributed to contracting costs to calculate Annual Operational and Maintenance Costs and the percent attributed to non-labor costs to calculate Non-Labor costs.

44 CFR §§ 201.3, 201.6 and 201.7, New local and tribal plans – FEMA estimates a new average local or tribal mitigation plan cost of \$191,667, an increase from the prior estimate of \$113,611. As the development of a new plan is a one-time cost, FEMA categorizes such costs as Start-Up Costs. Based on the contracting and non-labor cost distribution identified above, FEMA estimates the start-up cost for new local and tribal plans to be \$158,125 (($\$191,667$ per plan \times 78% of plan contracting) + ($\$191,667$ per plan \times 4.5% of plan non-labor)). Multiplying the average costs by the new local and tribal plan Total Number of Responses results in a total Annual Start-Up Cost of \$8,855,000 ($\$158,125$ Start-Up Cost per plan \times 56 plans).

44 CFR §§ 201.3(d) and (e)(2), 201.6(d)(3) and 201.7(d)(3), Local and tribal plan updates – FEMA estimates a new average local and tribal plan update cost of \$113,347, an increase from the prior estimate of \$79,502. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$88,411 ($\$113,347$ per plan update \times 78% of plan update [rounded to the nearest dollar]) and the non-labor costs to be \$5,101 ($\$113,347$ per plan update \times 4.5% of plan update [rounded to the nearest dollar]). Multiplying these average costs by the local and tribal plan update Total Number of Responses results in an Annual Operations and Maintenance Cost of \$49,510,160 ($\$88,411$ operations and maintenance cost per plan update \times 560 Plan updates) and an Annual Non-Labor Cost of \$2,856,560 ($\$5,101$ non-labor cost per plan update \times 560 plan updates). As a result, the Total Annual Cost to Respondents for local and tribal plan updates is \$52,366,720 ($\$49,510,160$ + $\$2,856,560$).

44 CFR §§ 201.3(c) and (e), 201.6(d)(1), and 201.7(d)(1), State review of local and tribal plans – No annual cost burden for FEMA is associated with State review of local and tribal plans.

⁹ The breakdown between personnel costs, contracting costs, and non-labor costs is calculated using the average distribution between these categories found in PDM grants awards (rounded to the nearest percent); however, only those grant awards which provided a sufficient breakdown of such costs were used to estimate the distribution.

44 CFR §§ 201.3 (c)(3) and 201.4(d), Standard state mitigation plan updates – FEMA estimates an average standard state mitigation plan update cost of \$470,331, an increase from the prior estimate of \$281,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$366,858 (\$470,331 per standard state mitigation plan update x 78% of Plan update) and the non-labor costs to be \$21,165 (\$470,331 per standard state mitigation plan update x 4.5% of plan update [rounded to the nearest dollar]). Multiplying these average costs by standard state mitigation plan update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$2,934,864 (\$366,858 operations and maintenance cost per standard state mitigation plan Update x 8 standard state mitigation plan updates) and an Annual Non-Labor Cost of \$169,320 (\$21,165 non-labor cost per standard state mitigation plan update x 8 standard state mitigation plan updates). As a result, the Total Annual Cost to Respondents for standard state mitigation plan updates is \$3,104,184 (\$2,934,864 + \$169,320).

44 CFR §§ 201.3 (c)(2) and 201.5, Enhanced State Mitigation Plan New and Updates – FEMA estimates an average enhanced state mitigation plan update cost of \$405,424, a reduction from the prior estimate of \$524,000. Based on the grant award distribution percentages identified above, FEMA estimates the operations and maintenance portion of the cost to be \$316,231 (\$405,424 per enhanced state mitigation plan update x 78% of plan update [rounded to the nearest dollar]) and the non-labor costs to be \$18,244 (\$405,424 per enhanced state mitigation plan update x 4.5% of plan update). Multiplying these average costs by enhanced state mitigation plan update Total Number of Responses results in an Annual Operations and Maintenance Costs of \$948,693 (\$316,231 operations and maintenance cost per enhanced state mitigation plan update x 3 enhanced state mitigation plan updates) and an Annual Non-Labor Cost of \$54,732 (\$18,244 non-labor cost per enhanced state mitigation plan update x 3 enhanced state mitigation plan updates). As a result, the Total Annual Cost to Respondents for enhanced state mitigation plan updates is \$1,003,425 (\$948,693 + \$54,732).

FEMA estimates the Total Annual Cost to Respondents as \$65,329,329 (\$8,855,000 [new local and tribal plans] + \$52,366,720 [local and tribal plan updates] + \$3,104,184 [standard state plan updates] + \$1,003,425 [enhanced state plan updates]).

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 not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Describe]	\$0
Staff Salaries: [Based on an average GS 12 Step 5 hourly pay rate of \$55.07 x 1.45 multiplier ² = \$79.85 spending approximately 120 hours to review and approve 11 state standard and enhanced mitigation plan updates, and 40 hours to review and approve 616 new and updated local and tribal plans for this data collection.] [[\$79.85 x 120 x 11 = \$105,402] + [\$79.85 x 616 x 40 = \$1,967,504]] = \$2,072,906	\$2,072,906
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	\$0
Total	\$2,072,906
¹ Office of Personnel Management 2025 Hourly Pay Tables, MD-VA-WV-PA. Available at: Salaries & Wages - https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf . 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
New Local and Tribal Plans / 44 CFR 201.6-102.7				40,208	28,056	(12,152)
Local and Tribal Plan Updates / 44 CFR 201.6-102.7				112,448	165,760	53,312
State Reviews of Local and Tribal Plans / 44 CFR 201.3				11,200	12,320	1,120
Standard State Plan Updates / 44 CFR 201.4				7,104	9,840	2,736
Enhanced State Plan Updates / 44 CFR 201.5				4,968	3,180	(1,788)
Total	0	0	0	175,928	219,156	43,228

Explain: There has been an overall increase of 43,228 burden hours. This increase is mainly due to the increase in the overall number of jurisdictions served by this program, and it is mitigated by a general decrease in the number of overall plans as some were consolidated into multi-jurisdictional plans. Per 44 CFR § 201.6(a)(4), local governments may collaborate to create a multi-jurisdictional plan. One participating community should be designated as the lead jurisdiction. When FEMA HMA planning grants are used, the lead jurisdiction is often the subrecipient. FEMA encourages the lead jurisdiction to gain buy-in for adoption early in the planning process, using letters of commitment. A participating jurisdiction that does not adopt the plan will not be considered to have an approved plan.

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
New Local and Tribal Plans / 44 CFR 201.6-102.7				\$2,352,168	\$1,960,834	-\$391,334
Local and Tribal Plan Updates / 44 CFR 201.6-102.7				\$6,578,208	\$11,584,966	\$5,006,758
State Reviews of Local and Tribal Plans / 44 CFR 201.3				\$655,200	\$861,045	\$205,845
Standard State Plan Updates / 44 CFR 201.4				\$415,584	\$687,718	\$272,134
Enhanced State Plan Updates / 44 CFR 201.5				\$290,628	\$222,250	-\$68,378
Total(s)				\$10,291,788	\$15,316,813	\$5,025,025

Explain: There is an overall increase of \$5,025,025 due to a combination of the increase of burden hours to this collection and the general increase in 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.

There are no outline plans for tabulation and publication of data for this information collection.

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

This collection does not seek approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

FEMA does not request an exception to the certification of this information collection. There is no statistical methodology involved in this collection.