August 22, 2025

Supporting Statement for
Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0086

Title: National Flood Insurance Program –Ask the Advocate Web Form

Form Number(s): FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(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.

Section 24 of the Homeowner Flood Insurance Affordability Act of 2014 (Pub. L. 113–89, codified at 42 U.S.C. 4033), requires the Federal Emergency Management Agency (FEMA) to designate a Flood Insurance Advocate that would advocate for the fair treatment of National Flood Insurance Program (NFIP) policyholders and property owners by: (1) providing education and guidance on all aspects of the NFIP, (2) identifying trends affecting the public, and (3) making recommendations for NFIP program improvements to FEMA leadership. Pursuant to this authority, FEMA established the Office of the Flood Insurance Advocate (OFIA) on December 22, 2014.

Members of the public regularly contact OFIA seeking assistance on the NFIP. OFIA seeks to facilitate the timely and effective management of these inquiries by creating a web form on OFIA's web page at https://www.fema.gov/flood-insurance/advocate. The web form will allow users to provide information that includes all the data necessary for OFIA to perform its Congressionally-mandated duties and responsibilities.

The Federal Insurance Directorate determined the Mortgage Portfolio Protection Program (MPPP) form is no longer necessary due to the implementation of Risk Rating 2.0 and therefore will not be renewed under this effort. This revision removes both the Financial Assistance/Subsidy Arrangement Notice of Acceptance and MPPP Agreement Receipt for Materials instruments from this information collection, as they are no longer needed. This revision also corrects a technical error within ROCIS that inflates the burden imposed by the remaining FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form.

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

FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form: Consumers who submit an inquiry to OFIA will be required to fill-out ten (10) informational fields on the proposed Ask the Advocate web form. These fields include: (1) First name, (2) Last name, (3) Email address, (4) Confirm email address, (5) How did you hear of Advocate's office (pull-down list), (6) Contact role (list field), (7) State (pull-down list), (8) ZIP code, (9) Subject (of inquiry) and (10) Questions/Comment (regarding inquiry). An eleventh (11^{th}) field is a security CAPTCHA field intended to distinguish human from machine input as a way of thwarting spam and automated extraction of data from websites.

When a consumer submits this information, the data will be collected and stored on OFIA's DHS/FEMA-approved Customer Relationship Management (CRM) cloud-based environment hosted by Salesforce.

Once OFIA receives this information, the inquiry will be assigned a system-generated "Case number", and then the case is assigned to an OFIA Advocate Representative (FEMA employee). Using the data collected from the Ask the Advocate web form, the Advocate Representative will research the customer's inquiry and offer education and guidance to help the customer navigate the NFIP process.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form: allows members of the public to submit responses to FEMA electronically and ensure that FEMA receives the information necessary to respond to promptly respond to the inquiry.

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.

This information collection does not have an impact on small businesses or other small entities. The web form is normally filled out by individual stakeholders and/or policyholders; the form does not tend to be used by small businesses or entities, unless they are contacting the Advocate about a specific question relating to their business/entity flood insurance policy or a related question.

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.

Without **FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form**, members of the public will be less likely to submit the information necessary for OFIA to provide a timely and fulsome response to their inquiry. Incomplete responses could make it more likely that OFIA will need seek additional information from members of the public, thus delaying resolution of the inquiry.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

This information collection does not require respondents to report information more than quarterly.

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

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

This information collection does not require respondents to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

This information collection does not include a statistical survey.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

This information collection does not use a statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge,

or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection does not require respondents to submit trade secrets or other confidential information.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on June 6, 2025, at 90 FR 24150. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August 22, 2025, at 90 FR 41093. The public comment period is open until 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.

The NFIP routinely meets with a wide range of participants at several insurance trade organization meetings (at least 4 times a year) each year. These trade organization meetings provide a forum for information to be exchanged related to all matters related to insurance. Representative of NFIP also attend stakeholder meetings and other related activities several times each year. From these meetings FEMA learns of methods to better administer its program.

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.**

Respondents to this information collection and FEMA meet each year at an annual NFIP conference. This conference provides a forum for comments, questions and concerns to be presented and addressed. The NFIP is able to take the results and improve its customer service. FEMA also accepts comments via telephone at a toll-free number (877) 336-2627.

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

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

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

A Privacy Threshold Analysis (PTA) for OFIA's Ask the Advocate Web Form was approved by the DHS Privacy Office on June 25, 2024.

This form is covered by Privacy Impact Assessment (PIA), DHS/ALL/PIA-006 DHS General Contacts Lists.

OFIA does not intend to disclose any customer personal information outside of DHS. DHS may need to disclose the information outside of the Department, which will be consistent with DHS/FEMA-003 National Flood Insurance Program Files System of Records Notice (SORN), published in the Federal Register at 79 FR 28747 on May 19, 2014.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of sensitive nature.

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

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

FEMA Form FF-206-FY-21-121, Ask the Advocate Web Form: is estimated to have 1,000 respondents times 1 response per year for 1,000 total response (1,000 x 1 = 1,000). It is estimated that each response will require 0.0833 hours (5 minutes) burden hours to complete, therefore 1,000 responses times 0.0833 hours equals 83 total annual burden hours (1,000 x 0.0833 = 83.3 (rounded down)).

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)[1] and this total should be entered in the cell for "Avg. Hourly Wage Rate". The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

[1] Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_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**	**Total No. of Responses**	**Avg. Burden per Response (in hours)**	**Total Annual Burden (in hours)**	**Avg. Hourly Wage Rate**	**Total Annual Respondent Cost**
Individuals and Households; Private Sector, for profit	Ask the Advocate Web Form, FEMA Form FF-206-FY-21-121	1,000	1	1,000	0.0833	83	$47.36	$3,931
Total		**1,000**		**1,000**		**83**		**$3,931**

Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.45. For example, a non-loaded BLS table wage rate of $42.51 would be multiplied by 1.45, and the entry for the "Avg. Hourly Wage Rate" would be $61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics[2], the May 2024 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) is $32.66. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is $47.36 per hour. Therefore, the amended annual burden hour cost is estimated to be $3,391 ($47.36 × 83 hours = $3,931).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

[2] Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://data.bls.gov/oes/#/industry/000000

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**
Total	**$0**	**$0**	**$0**	**$0**

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 system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**

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

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

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

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

Annual Cost to the Federal Government	
Item	**Cost ($)**
Contract Costs [Describe]	
Staff Salaries* Ask the Advocate web form, 1 GS 13 Step 5 employees in Washington, DC spending approximately 20% of time annually monitoring the program, including quality review of Salesforce data and adherence to program guidelines ($136,658 x 0.20 x 1.45[2] = $39,631).	$39,631
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Postage [annual number of data collection instruments x postage]	
Other	
Total	**$39,631**
[1] Office of Personnel Management 2025 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at Pay & Leave : Salaries & Wages - OPM.gov. Accessed February 24, 2025. [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 the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

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

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

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

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	**Program Change (hours currently on OMB Inventory)**	**Program Change (New)**	**Difference**	**Adjustment (hours currently on OMB Inventory)**	**Adjustment (New)**	**Difference**
Financial Assistance/Subsidy Arrangement Notice of Acceptance / No Form	46	0	-46			
Mortgage Portfolio Protection Program Agreement Receipt for Materials / No Form	125	0	-125			
Ask the Advocate Web Form, FEMA Form FF-206-FY-21-121				39,200	83	39,117
Total(s)	125	0	-171	**39,200**	**83**	**-39,117**

Explain: With the elimination of the Financial Assistance/Subsidy Arrangement Notice of Acceptance, there is a decrease of 46 burden hours to this collection. With the elimination of The MPPP Agreement Receipt for Materials, there is a decrease of 125 burden hours to this collection. Those two removals net a 171 burden hour reduction.

The Ask the Advocate Web Form, FEMA Form FF-206-FY-21-121, has a slight increase of 27 burden hours due an increase in expected responses from 700 to 1,000 per year.

However, FEMA also noticed an error in ROCIS with our last revision (and current inventory) where the Total Annual Burden (56 hours) from the Supporting Statement A was entered into ROCIS as the Average Burden per Response (0.0833). This technical edit results in a burden decrease of 39,144 burden hours, offset by the increase of 27 burden hours discussed above for an overall decrease of 39,117 for this instrument.

With the elimination of two instruments providing a 171 burden hour decrease, plus the change in estimate plus corrections for the remaining instrument providing a 39,117 burden hour decrease, there is a total decrease of 39,288 burden hours 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**
Financial Assistance/Subsidy Arrangement Notice of Acceptance / No Form	$1,237	$0	-$1,237			
Mortgage Portfolio Protection Program Agreement Receipt for Materials / No Form	$7,121	$0	-$7,121			
Ask the Advocate Web Form, FEMA Form FF-206-FY-21-121				$1,471,960	$3,931	$1,468,029
Total(s)	**$8,358**	**$0**	**-$8,358**	**$1,471,960**	**$3,931**	**$1,468,029**

Explain: The changes in annual cost burden follow the changes to burden hours discussed above, plus a slight overall increase due to 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.

FEMA does not intend to employ the use of statistics or the publication thereof 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.

FEMA will display the expiration date for OMB approval of this information collection.

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

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

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.