

September 11, 2026

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0008

Title: Elevation Certificate/Floodproofing Certificate

Form Number(s):

- 1) FEMA Form FF-206-FY-22-152 (formerly 086-0-33), Elevation Certificate**
- 2) FEMA Form FF-206-FY-22-153 (formerly 086-0-34), Floodproofing Certificate**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Flood Insurance Act, 42 U.S.C. 4001 *et seq.*, as implemented by the associated National Flood Insurance Program (NFIP) regulations at Title 44 of the Code of Federal Regulations, requires participating NFIP communities to ensure the elevation

or floodproofing of new or substantially improved structures in designated Special Flood Hazard Areas. As part of the criteria for making flood insurance available in a community, the NFIP requires communities to adopt a floodplain management ordinance that meets or exceeds the minimum standards of the NFIP. These minimum standards are designed to prevent new development from increasing flood hazards and to reduce the flood risk to new and existing buildings. One such minimum standard is that the community require the lowest floor (including any basement) of all new or substantially improved residential buildings be elevated to or above the Base Flood Elevation (BFE). For new and substantially improved non-residential buildings, the community may require the lowest floor be floodproofed up to the BFE provided an engineer or architect certifies that the design and construction meets certain performance standards (in lieu of requiring the lowest floor be elevated). The Elevation Certificate and Floodproofing Certificate are each a convenient way for a community to document building compliance with these locally adopted requirements. These forms can be completed by professionals licensed to certify the relevant information in the state where the subject property is located (for example, in many states only a licensed surveyor or engineer can certify elevation information). Certain sections of the Elevation Certificate may be completed by a property owner or their representative.

Surveyed elevations are required for floodplain management compliance, but the Elevation Certificate is optional to rate a NFIP flood insurance policy. Under the insurance program of the NFIP, Elevation Certificates can be used to provide a building's First Floor Height and other elevation information used for rating. FEMA provides the policyholder the option to provide an Elevation Certificate to determine if it will result in a more favorable flood insurance premium than the FEMA-sourced elevation information.

For NFIP rating purposes, the Elevation Certificate includes a First Floor Height section that property owners can complete (regardless of flood zone) to provide the First Floor Height of a building without incurring the cost of a surveyor. Property owners can also use the Elevation Certificate to identify the location of certain machinery and equipment servicing the building to be considered for a NFIP flood insurance mitigation discount.

For NFIP rating purposes, the Floodproofing Certificate for Non-Residential Structures is submitted with the Flood Insurance Application and Elevation Certificate to certify that the design and construction of a floodproofed non-residential building meets the relevant requirements. It is used to establish eligibility for a NFIP floodproofing premium discount. It also can be used by communities for evidence of floodplain compliance. A completed Floodproofing Certificate for Non-Residential Structures must be completed by engineers or architects and requires the following documentation:

- At least two photographs of the building showing the floodproofing measures in place, including: Photographs of the exterior of the building (all sides).
- Photographs of the components used to provide floodproofing protection (shields, gates, barriers); *and*
- Flood Emergency Plan that includes:
 - Chain of command;
 - Notification procedures;
 - Personnel duties;
 - Location of floodproofing components, install procedures, repair procedures;
 - Evacuation procedures for building occupants;
 - Component maintenance procedures during flooding event;
 - Drill and training program (at least once a year);
 - Regular review and update of Flood Emergency Plan; *and*
- Inspection and Maintenance Plan that includes:
 - Inspection procedures for the entire floodproofing system: wall systems, floor slab, openings, floodproofing components, valve operation, drainage and pump systems, equipment, and tools required to engage floodproofing measures; and
 - Regular review and update of the Inspection and Maintenance Plan.

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-22-152, Elevation Certificate and Instructions are used to document compliance with NFIP elevation standards as locally adopted in the participating community's floodplain ordinance. The standardized format of the Elevation Certificate (FEMA Form FF-206-FY-22-152) provides community officials with data needed to verify building elevation and determine compliance with the community's floodplain management ordinance. FEMA and its state partners verify that local officials are tracking elevation information for new and substantially improved buildings in the floodplain during community compliance audits, which many communities accomplish through the use of the Elevation Certificate. Additionally, FEMA uses the Elevation Certificate (EC) for insurance purposes by providing policyholders the option to submit an EC for premium rating in lieu of the FEMA-

sourced elevation information, if doing so would provide a more favorable premium. FEMA also allows policyholders to use the EC to demonstrate eligibility for the machinery and equipment premium discount.

FEMA Form FF-206-FY-22-153, Floodproofing Certificate for Non-Residential Structures is a tool by which a registered professional engineer or architect documents their certification that the nonresidential building design and methods of construction are in accordance with accepted practices for meeting the floodproofing requirements in the community's floodplain management ordinance (as required to obtain a floodproofing credit for flood insurance). The engineer or architect makes a professional design determination that the building is floodproofed, for which they have professional liability. A prudent determination requires: a review of as-built design drawings that includes wall and floor sections, penetration of utilities into the building; a review of the protection of all openings (such as doors and egress); a review of soil conditions at the site; some calculation of loads and flow-rates of water through the soil; and a site visit to verify this information. Most building owners who get this certification will use the services of the original designer of the building who has familiarity with the design.

The information provided on the Elevation Certificate and Floodproofing Certificate assists in FEMA's ability to measure the effectiveness of its regulations in reducing or eliminating damage caused by flooding and the appropriateness of NFIP premium charges for insuring property against the flood hazard.

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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.

The Elevation Certificate and Floodproofing Certificate for Non-Residential Structures can be downloaded from the Internet as text files or PDF files. The surveyor, engineer, or architect completing these forms is required to provide their license information and to affix their seal in certifying the information on the form. The completed forms are either mailed in with the Flood Insurance Application or are scanned and submitted as a scanned document if accompanying a Flood Insurance Application that is submitted electronically.

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 other form and therefore is not duplicated elsewhere. This information is collected on a building when it is built or substantially improved and may then be passed on to subsequent owners. It may also be retained on file in the community or with the NFIP insurer.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any method used to minimize.

This information collection does not have a significant impact on small businesses or other small entities.

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

If the collection of information is not conducted, NFIP communities that currently use the form to document building compliance with elevation requirements would need to create a new form or system to serve this purpose. For NFIP insurance purposes, if the information is not collected policyholders would not be able to provide FEMA with elevation information for NFIP premium rating purposes. This information is collected on a building when it is built or substantially improved and may then be passed on to subsequent owners. It may also be retained on file in the community.

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 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 the 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 1, 2026, at 91 FR 32408. Five public comments were received. One was from Association of State Floodplain Managers (ASFPM), two from the City of Tucson, one from an insurance agent, and one from an anonymous commenter related to this information collection.

Many ASFPM and City of Tucson comments suggested allowing extra space for comments; providing additional wording for clarification; industry standard wording; and adjusting electronic form capabilities to adjust for capacity and to use with other programs. The anonymous commenter was concerned about the use of waivers, and development in flood prone areas. The comment from the insurance agent was in reference to slab on grade construction on the Elevation Certificate (EC) form.

Comment 1 (FEMA-2026-0166-0002):

I recommend to keep collecting the information. In addition I recommend removing waivers, exceptions and similar from all rules and regulations. It invites corruption. In this instance it allows development in flood zones and anything where developers and realtors are involved we know there is corruption. Allowing people to build and live in flood zones id wrong.

FEMA Response to Comment 1: FEMA agrees that continued data collection is important for understanding how floodplain development decisions are made and how those decisions affect public safety, property owners, communities, and long-term flood risk. FEMA provides support for communities participating in the NFIP to ensure that the community enforces its locally adopted floodplain management ordinance in accordance with the NFIP's minimum standards. However, ultimately land use and development decisions are made at the local community level. Therefore, FEMA is not making changes in response to this comment.

Comment 2 (FEMA-2026-0166-0003):

I am an insurance agent who reviews thousands of elevation certificates. The instructions omit the recording of C2b for slab on grade (Diagram 1A and 1B) structures. This recordation of this data for Diagram 1A and 1B is important, particularly, if the wrong Diagram number was selected. The current instructions read "Item C2.b. For Building Diagrams 2A through 9 in any flood zone, including Zones B, C, X, and D, enter the elevation measured at the top of the next higher floor (excluding the attached garage) indicated by the selected Building Diagram (Item A7). For buildings requiring more than two floors or levels to be surveyed, such as those with multiple floors or multi-level enclosures, enter the additional surveyed elevations and floor descriptions in the Section D Comments, and clarify which floors are entered as Item C2.a and C2.b."

I recommend, that all Diagrams should be required to provide C2b, if the building has more than one floor. This provides for rating accuracy, where the wrong diagram number was selected.

FEMA Response to Comment 2: FEMA is not making changes in response to this comment at this time. However, FEMA will consider updating the Elevation Certificate instructions to include Item C2.b (Next Higher Floor) to be completed for all diagram types for multi floor structures. FEMA must evaluate any increased burden or costs to require the next higher floor elevation for all multi floor structures.

Comment 3 (FEMA-2026-0166-0004):

Please send me a copy of the proposed El Cert form for review and comment. Also, please make sure the form is in a couple of formats as not everyone has the expensive version of ADOBE Acrobat application to read the document. Also, City of Tucson requests a version of the form to be used within our permitting application. Also, I would recommend if you have not already ask for colour photos for the attachments for the structure being surveyed. There may be additional comments once we get a copy of the draft El Cert form. Please email a copy to City of Tucson Floodplain Administration. Thanks. - Floodplain Manager / CRS Coordinator

FEMA Response to Comment 3: FEMA will consider the various electronic form capabilities and potential updates to the instructions when producing the revised form. FEMA will review the form instructions regarding photos to require legible/clear photos.

Comment 4 (FEMA-2026-0166-0005):

Attached please find two documents with detailed recommendations from the Association of State Floodplain Managers (ASFPM) for updates to the Elevation Certificate and the Floodproofing Certificate.

FEMA Response to Comment 4: FEMA agrees with the detailed recommendations provided by ASFPM and will update the form or form instructions accordingly. Most of the recommendations can be addressed by updating the instructions of the forms for clarity. Several comments referenced the functionality of completing the form electronically.

Comment 5 (FEMA-2026-0166-0006):

(1)Under Section D, please provide additional space for registrant's Comments under Section D on page 3 of Elevation Certificate. Reformat Elevation Certificate to push seal square up or shift other text to create more space for surveyor's comment section. Frequently the Comments area is used to describe machinery and equipment servicing the building, and to clarify other aspects of the survey. Both city surveyor and a long-time surveyor consultant (having performed many El Cert's over the last 30 years) are requesting more space under the Comments portion of Section D.

(2)Under Section G - Community Information (recommended for Community Official Completion), our NFIP community's Floodplain Management suggests revising G5 to read:

G5. Floodplain Permit Number/Date Issued: _____ Building
Permit Number/Date issued: _____

The reason for this request is for community Elevation Certificate and permitting archiving purposes; the city engineering staff uses the building permit to place holds on the permit to make sure the pre-slab (Building Under Construction) Elevation Certificate is submitted to verify forms meet elevation requirements prior to pouring concrete. Having both the Floodplain Use Permit and Building Permit numbers on the form helps with research purposes as well.

FEMA Response to Comment 5: The instructions for Section D state that a surveyor, engineer or architect can check the attachments box to provide any additional information

or comments. The attachment can include text as well to complete the comments. FEMA will review the form and determine if more space can be provided for comments.

Regarding the comment on G.5 - FEMA recognizes the need for communities to track and maintain building permit information. However, since this information is handled and maintained by the community and may be handled differently by communities, FEMA recommends that community develop their own processes outside of the Elevation Certificate process to track permit information. Therefore, FEMA is not making changes to G.5 in response to this comment.

A 30-day Federal Register Notice inviting public comments was published on October 7, 2026, at 91 FR 64160. The public comment period is open until November 6, 2026.

b. Describe efforts to consult with people 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 has ongoing interactions with involved users, e.g., insurance agents, company officials, floodplain managers, surveyors, engineers, architects, and others. FEMA works with these same users during the development process. FEMA also worked with representatives from the Community Rating System Task Force and consulted with representatives of the Association of State Floodplain Managers.

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

FEMA has solicited and has received feedback since the last revision of the certificates. FEMA has compiled and reviewed comments on the Elevation Certificate and Floodproofing Certificate from the private sector, including engineers, surveyors, community officials, floodplain managers, insurance company representatives, insurance producers, underwriters, and others.

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) was last approved on January 30, 2025.

The NFIP Direct security system plan complies with the Computer Security Act and OMB Circulars A-123, A-127, and A-130. The NFIP Direct Servicing Agent computer system has protection and control of the data maintained in the system.

This is a privacy sensitive collection because personally identifiable information is collected from members of the public, so Privacy Impact Assessment (PIA) coverage is provided by:

- DHS/FEMA/PIA-045 Hazard Mitigation Planning and Flood Mapping Products and Services Support Systems (June 26, 2017)
- DHS/FEMA/PIA-048 National Flood Insurance Program (NFIP) Direct Servicing Agent (NFIP Direct) (October 31, 2017), and
- DHS/FEMA/PIA-050 NFIP PIVOT System (March 28, 2018).

Information is retrieved by personal identifier, so System of Records Notice (SORN) coverage is provided by:

- DHS/ FEMA-003 – National Flood Insurance Program Files System of Records (79 FR 28747, May 19, 2014), and
- DHS/FEMA-014 Hazard Mitigation Planning and Flood Mapping Products and Services Records System of Records (86 FR 1988, January 11, 2021)

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 people from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature requiring response from respondents.

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-22-152, Elevation Certificate and Instructions is estimated to have 3,350 surveyor respondents' times, 1 response per year for 3,350 total annual responses ($3,350 \times 1 = 3,350$). It is estimated that each response will require 3.75 burden hours to complete, therefore 3,350 responses times 3.75 hours equals 12,563 total annual burden hours ($3,350 \times 3.75 = 12,563$).

FEMA Form FF-206-FY-22-152, Elevation Certificate and Instructions is also estimated to have 165 All-Occupations respondents' times, 1 response per year for 165 total annual responses ($165 \times 1 = 165$). It is estimated that each response will require 1 burden hour to complete, therefore 165 responses times 1 hour equals 165 total annual burden hours ($165 \times 1 = 165$).

The total estimated annual burden hours for FEMA Form FF-206-FY-22-152 is **12,728** ($12,563 + 165 = 12,728$).

FEMA Form FF-206-FY-22-153, Floodproofing Certificate for Nonresidential Structures is estimated to have 2 architect/engineer respondents times 1 response per year for 2 total annual responses ($2 \times 1 = 2$). It is estimated that each response will require 3.25 burden hours to complete, therefore 2 responses times 3.25 hours equals 7 total annual burden hours ($2 \times 3.25 = 6.5$, rounded up to 7).

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 refer to the responses to Question 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 Item13.

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
Businesses - Surveyors (Contracted by the property owner)	Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152 (	3,350	1	3,350	3.75	12,563	\$56.16	\$705,538
Businesses - All Occupations (Contracted by the property owner)	Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152	165	1	165	1	165	\$48.63	\$8,024
Businesses - Architects/Engineers (Contracted by the property owner)	Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153	2	1	2	3.25	7	\$74.47	\$521
Total		3,517		3,517		12,735		\$714,083

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 Statistics², the May 2025 Occupational Employment and Wage Estimates wage rate for Surveyors (SOC: 17-1022)

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/eccec_03202026.pdf. Accessed May 15, 2026. The national wage multiplier is calculated by dividing total compensation for all workers of \$48.78 by wages and salaries for all workers of \$33.45 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 \$65.68 by Wages and salaries for State and local government workers of \$40.49 per hour yielding a benefits multiplier of approximately 1.62..

is \$38.73. Including the wage rate multiplier of 1.45, the fully loaded wage rate is estimated at \$56.16 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$705,538 (\$56.16 x 12,563 hours).

The wage rate for All Occupations (SOC: 00-0000) is \$33.54. Including the wage rate multiplier of 1.45, the fully loaded wage rate is estimated at \$48.63 per hour. Therefore, the estimated annual burden hour cost to property owners who complete the Elevation Certificate for the First Floor Height measurement only is estimated to be \$8,024 (\$48.63 x 165 hours).

The total estimated annual respondent cost for FEMA Form FF-206-FY-22-152 is **\$713,562** (\$705,538 + \$8,024).

The wage rate for Architecture and Engineering Occupations (SOC: 17-0000) is \$51.36. Including the wage rate multiplier of 1.45, the fully loaded wage rate is estimated at \$74.47 per hour. Therefore, the estimated annual burden hour cost is estimated to be \$521 (\$74.47 x 7 hours).

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 May 2025 National 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, 2026.

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
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153	\$0	\$0	\$0	\$0
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$0

a. Operation and Maintenance and purchase of services component. These estimates should consider costs 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 collection.

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

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

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expenses 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: Data Entry Keyers (SOC: 43-9021) 197 hours (3,352 forms at .059 hour) at \$32.22 (\$22.22 ¹ x 1.45 loaded wage rate) = \$6,347 Insurance Underwriters (SOC: 13-2053)- 335 hours (3,352 forms at .10 hour) at \$63.32 (\$43.67 x 1.45 loaded wage rate) = \$21,212	\$27,559
Staff Salaries: 1 GS 12 Step 5- 34 hours at \$80.65 (\$55.62 ² x 1.45 ³ loaded wage rate) = \$2,742 1 GS 13 Step 5- 34 hours at \$95.90 (\$66.14 x 1.45 loaded wage rate) = \$3,261 1 GS 14 Step 5- 34 hours at \$113.32 (\$78.15 x 1.45 loaded wage rate) = \$3,853	\$9,856
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	\$37,415
¹ Office of Personnel Management 2026 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/2026/DCB_h.pdf . Accessed January 09, 2026. ² Office of Personnel Management 2026 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/2026/general-schedule/ Accessed January 21, 2026 ³ 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 a Federal Government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152	0	0	0	12,728	12,728	0
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153	0	0	0	7	7	0
Total	0	0	0	12,735	12,735	0

Explain: There are no changes to the burden for this collection.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Elevation Certificate and Instructions FEMA Form FF 206-FY-22-152	\$0	\$0	\$0	\$609,976	\$713,562	\$103,586
Floodproofing Certificate for Nonresidential Structures FEMA Form FF 206-FY-22-153	\$0	\$0	\$0	\$448	\$521	\$73
Total	\$0	\$0	\$0	\$610,424	\$721,586	\$103,659

Explain: The \$103,659 change to the Annual Cost Burden is due to the general increase in wage rates reported by the Bureau of Labor Statistics.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions.”