

September 22, 2026

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0009

Title: The Declaration Process: Requests for Preliminary Damage Assessment (PDA), Requests for Supplemental Federal Disaster Assistance, Appeals, and Requests for Cost Share Adjustments

Form Number(s): FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency

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 Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the Stafford Act), requires that all requests for a declaration by the President that a

major disaster or emergency exists shall be made by the Governor of the affected state or the Chief Executive of an affected Indian tribal government. Section 401(a) of the Act stipulates that such a request shall be based on a finding that the disaster is of such severity and magnitude that effective response is beyond the capabilities of the state and the affected local government, and that Federal assistance is necessary. Section 401(a) further stipulates that as a part of such request, and as a prerequisite to major disaster assistance under this Act, the Governor shall take appropriate response action under state law and direct the execution of the state's emergency plan and shall furnish specific information that must be included in a request for a major disaster declaration. Section 401(a) stipulates that the request must include specific information on the nature and amount of state and local resources which have been or will be committed to alleviate the results of the disaster.

Section 501(a) requires the same information to be provided in requests for declarations of an emergency. The processes for requests for emergency or major disaster declarations are set forth in further detail in 44 C.F.R. 206.35 and 206.36. Section 403(c) of the Act stipulates that in the aftermath of an incident that may qualify under title IV of this Act, the Governor may request the President to direct the Secretary of Defense to utilize resources of the Department of Defense for the purposes of performing on public and private lands any emergency work which is essential to save lives and protect property. Information required to process a request under this section is set forth in 44 C.F.R. 206.34. In the event that a Governor's request for supplemental Federal assistance is denied, the Governor may appeal this denial under the provisions set forth in 44 C.F.R. 206.46. Pursuant to 44 C.F.R. 206.47, a Governor may request an adjustment of the 75 percent Federal share of the eligible cost of permanent restorative work under Section 406 of the Stafford Act and for emergency work under Section 403 and Section 407 of the Stafford Act.

As a result of passage of Section 1110 of the Sandy Recovery Improvement Act of 2013 (SRIA) (P.L. 113-2), Federally recognized Tribes may also submit requests for disaster declarations. The same form is used for both states and Tribes. Previously, a state could make requests on behalf of Tribes.

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.

This collection includes FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency, which asks for the same data that were stated and required in the previous narrative Governor's requests to the President requesting supplemental Federal assistance, through the appropriate

Regional Administrator, combined with the findings of a joint FEMA, state and local Preliminary Damage Assessments (PDA). The PDA is analyzed and provides the basis for a Regional Administrator's Validation and Recommendation, which is submitted to the Associate Administrator of the Office of Response and Recovery. The information is reviewed and evaluated, and the FEMA Administrator formulates a recommendation which is submitted to the President for consideration of a disaster or emergency declaration. The FEMA form eliminates the need for follow-up communications and reporting during a declaration request.

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.

Information in FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency form is received electronically via e-mail. All documentation is submitted in PDF format.

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 collection of information does not impact small businesses or other small entities.

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.

If the information stipulated is not provided in FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency for supplemental Federal assistance, the process of declaring a disaster is delayed until such time as the required information is provided through clarification or an amended Governor or Tribal Chief Executive's request. Any amendments are submitted in a follow-up letter/narrative. With the use of the form, FEMA anticipates less need for amendments.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (*See* 5 CFR 1320.5(d)(2)):

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

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

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

When an incident occurs in a state or Tribal Nation, the Governor or Tribal Chief Executive may request that the President declare an emergency or major disaster. The request should be submitted to the appropriate Regional Administrator and must be submitted within five days after the need for assistance, but no more than 30 days after the occurrence of the incident, in order to be considered.

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 1, 2026, at 91 FR 32409. FEMA received one public comment. One public comment was received, but the comments were not germane to this information collection as they detailed several programmatic issues with the damage assessment process and program evaluation factors. Those comments will be reviewed and considered outside the renewal process.

A 30-day Federal Register Notice inviting public comments was published on September 15, 2026, 91 FR 58465. The 30-Day public comment period closes on October 15, 2026.

- 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.**

Consultations with officials of the state or Tribal Nation seeking a declaration for their particular disaster at various levels of government occur as a result of disaster activity. All information collected as a result of these consultations is used to monitor the effectiveness of the declaration process.

- 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.**

Consultation with Federal, State, Tribal, and local officials' takes place each and every time a request for a PDA is submitted by a State or Tribal Nation. This is necessary to obtain accurate information about the incident and affected areas in order to prepare for and conduct the joint PDA. With the use of the form, FEMA anticipates less of a need for follow-up consultation.

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 adjudicated by the FEMA Privacy Office on June 29, 2026.

This collection is covered by an existing Privacy Impact Assessment (PIA), DHS/FEMA/PIA-013 – Grant Management Programs, approved by DHS on February 19, 2015. System of Record Notice (SORN) coverage is not required.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This 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. 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 andA usual business practices.

Since 2010, the historical number of requests per year have been approximately 100 State requests or 1.79 requests per state per year.

As a result of Section 1109 of SRIA, Federally-recognized Tribal Governments will also submit declaration requests. However, these numbers are much lower on an annual basis. There are 574 Tribes that could theoretically request a declaration as a result of passage of section 1110 of the SRIA. However, our data suggests that in an average year, only 20 declaration requests will come from Tribes. The form is the same for Tribes. Thus, they will expend the same amount of time to fill out a declaration request as States.

FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency, State, Local or Tribal Government (State, Governor): FEMA estimated that 50 respondents completed and submitted 2 responses annually. Based on this, FEMA estimated total annual responses of 100 (50×2). It is estimated that each response will require 9 burden hours to complete. Based on this, FEMA estimated total annual burden hours of 900 (100 annual responses $\times$ 9 burden hours).

FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency, State, Local or Tribal Government (Tribal Nation, Tribal Chief Executive): FEMA estimated that 20 respondents completed and submitted 1 response per year for 20 (20×1) total annual responses annually. It is estimated that each response will require 9 burden hours to complete. Based on this, FEMA estimated total annual burden hours of 180 (20 annual responses $\times$ 9 burden hours).

FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency, State, Local or Tribal Government (State, Support Worker): FEMA estimated that 50 respondents completed and submitted 2 responses annually. Based on this, FEMA estimated total annual responses of 100 (50×2). It is estimated that each response will require 24.80 burden hours (24 hours and 48 minutes) to complete. Based on this, FEMA estimated total annual burden hours of 2,480 (100×24.80).

FEMA Form FF-104-FY-22-232 (formerly 010-0-13), Request for Presidential Disaster Declaration Major Disaster or Emergency, State, Local or Tribal Government (Tribal Nation, Support Worker): FEMA estimated that 20 respondents completed and submitted 1 response per year for 20 total annual responses of 20 (20×1). It is estimated that each response will require 24 burden hours to complete. Based on this, FEMA estimated total annual burden hours of 480 (20×24).

There are no changes in burden hours for this collection.

- 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 for 12a above and 12c below.

- c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.62 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.

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
State, Local or Tribal Government (State, Governor)	Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13)	50	2	100	9	900	\$113.90	\$102,510
State, Local or Tribal Government (Tribal Nation, Tribal Chief Executive)	Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13)	20	1	20	9	180	\$113.90	\$20,502
State, Local or Tribal Government (State, Support Worker)	Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13)	50	2	100	24.8	2,480	\$40.16	\$99,597
State, Local or Tribal Government (Tribal Nation, Support Worker)	Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13)	20	1	20	24	480	\$40.16	\$19,277
Total		140		240		4,040		\$241,886

Note: 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.

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_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.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2024 Occupational Employment and Wage Estimates wage rate for State Government Chief Executives (SOC 11-1011, 99-9200) is \$70.31.² Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$113.90 per hour. Therefore, the burden hour cost is estimated to be \$123,012 ($\$113.90 \times 1,080$ hours) annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2024 Occupational Employment and Wage Estimates wage rate for Office and Administrative Support Occupations (SOC 43-0000) is \$24.79. Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$40.16 per hour. Therefore, the burden hour cost is estimated to be \$118,874 ($\$40.16 \times 2,960$ hours) annually.

The total respondent cost is \$241,886 ($\$123,012 + \$118,874$) annually.

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

Annual Cost Burden to Respondents		
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)

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**

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.

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 recordkeeping, capital, start-up, 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 recordkeeping, capital, start-up, or maintenance 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]	\$0
Staff Salaries: ¹ 5 FEMA Headquarter Senior Officials (GS 15 Step 5) earning \$133.30 (\$91.93 base salary times 1.45 ² multiplier) per hour and requiring an average of 48 hours of review per response. There are a total of 240 responses. $[5 \times \$133.30 \times 48 \times 240 = \$7,678,080]$ 50 preliminary damage assessments (PDA) requiring 11 FEMA Reservists ³ (GS-9 Step 5 equivalent) earning \$55.61 (\$38.35 average wage times 1.45 multiplier) per hour and requiring approximately 54 (48 hours to perform PDA + 6 hours for travel) hours to perform a Joint PDA. $[50 \times 11 \times \$55.61 \times 54 = \$1,651,617]$ The cost to the Federal Government is \$9,329,697	\$9,329,697
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: 50 PDAs with 11 staff per assessment costing \$1,115 per FEMA employee per deployment. $[50 \times 11 \times \$1,115 = \$613,250]$	\$613,250
Printing: [number of data collection instruments annually]	0
Postage: [annual number of data collection instruments x postage]	0
Other:	0
Total	\$9,942,947
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. Accessed February 14, 2023. ² Wage Rate includes a 1.45 multiplier to reflect a fully-loaded wage rate. ³ FEMA used 2023 OPM GS-9 step5 as the equivalent pay for a Band 2 FEMA Reservist.	

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
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (State)				900	900	0
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (Tribal Executive)				180	180	0
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (State, Support Worker)				2,480	2,480	0
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (Tribal, Support Worker)				480	480	0
Total				4,040	4,040	0

Explain: There are no changes in burden hours for this collection.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (State)				\$86,985	\$102,510	\$15,525
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (Tribal Executive)				\$17,397	\$20,502	\$3,105
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (State, Support Worker)				\$86,998	\$99,597	\$12,599
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form FF-104-FY-22-232 (formerly 010-0-13). (Tribal, Support Worker)				\$16,838	\$19,277	\$2,439

Total				\$208,218	\$241,886	\$33,668
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Explain: There was a \$33,668 increase in cost burdens for this update to the information collection because of increase 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.

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.

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.

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