August 14, 2024

Supporting Statement for
Paperwork Reduction Act Submissions

OMB Control Number: 1660-0006

Title: National Flood Insurance Program Policy Forms

Form Number(s):

1) **FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application;**
2) **FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation / Nullification Request Form;**
3) **FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement; and**
4) **FEMA Form FF-206-FY-24-103, e-Flood Insurance Application.**

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.**

Congress created the National Flood Insurance Program (NFIP) through enactment of the National Flood Insurance Act of 1968 (NFIA) (Title XIII of Pub. L. 90-448), found at 42 U.S.C. § 4001, *et seq*) and expanded by the Flood Disaster Protection Act of 1973 (Pub. L. 93-234). The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management requirements that reduce the risk of future flood damages. Communities participate in the NFIP based on an agreement between the community and FEMA. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, FEMA will make flood insurance available within the community as a financial protection against flood losses. Accordingly, the NFIP is comprised of three key activities: flood insurance, floodplain management, and flood hazard mapping.

FEMA, through its direct servicing agent, NFIP Direct, uses the collected information acquired to determine both the eligibility for an NFIP flood insurance policy and the appropriate flood insurance premium. NFIP Direct enters the information collected in these forms and accompanying supporting documentation into the NFIP Direct System, which is uploaded daily into the FEMA Pivot System .

FEMA is introducing a new instrument (FEMA Form FF-206-FY-24-103, e-Flood Insurance Application) with this revision to the collection, which will allow property owners to obtain a quote directly and apply for a policy by submitting necessary information through FEMA's Floodsmart website at www.floodsmart.gov.

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.**

To provide for the continued widespread availability of policies for flood insurance, policies will continue to be marketed through the facilities of licensed insurance agents or brokers in the various States. Applications from agents or brokers are forwarded to a servicing company designated as a fiscal agent by FEMA. Upon review, receipt and examination of the application and required premium, the servicing company will issue the appropriate Federal flood insurance policy.

The following FEMA forms are used to collect the information necessary to issue NFIP policies and to accommodate the changing insurance needs of policyholders. They are to be used in conjunction with the guidance in the NFIP Flood Insurance Manual (https://www.fema.gov/flood-insurance/work-with-nfip/manuals/current) current at the time of the form's completion.

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application: This form is used to obtain building and/or contents coverage for property owners (respondents) through licensed insurance agents writing with the NFIP or through the electronic version of this form.

The application provides property owner and basic information concerning building and foundation type, occupancy, structural variables, building replacement cost, date of construction or substantial improvement, amounts of coverage desired, community map information, and other information necessary for any NFIP policy to be issued. This information confirms a building's eligibility for NFIP flood insurance, helps to ensure the correct risk-based insurance premium for the desired coverage, and provides data used to generate a policy Declarations Page for the policyholder.

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form: The policyholder or insurer submits this form to cancel or nullify an existing NFIP policy.

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement: This form is used to amend existing policy data shown on the policy Declarations Page. Following receipt and processing of the endorsement form, a Revised Declarations Page showing the requested changes is generated.

FEMA Form FF-206-FY-24-103, e-Flood Insurance Application: Agents and property owners may complete this form directly on the floodsmart.gov website to obtain an NFIP flood insurance quote and engage in applying for Federal flood insurance.

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.**

Registered insurance agents/agencies can submit electronic versions of flood insurance forms through the NFIP Direct website. The agent can log into the NFIP Direct's secure website at https://www.nfipdirect.fema.gov/Membership/SignIn/?ReturnUrl=%2f. Agents select the transaction desired and will then be prompted to fill in the information required, which is transmitted electronically. Necessary supporting documentation may also be submitted along with the form in an electronic format, such as a PDF file.

As an alternative to contacting an insurance agent, property owners can request a flood insurance quote directly by using the new e-Flood Insurance Application on the Floodsmart website at www.floodsmart.gov. FEMA is incorporating a flood insurance e-application in response to Presidential Executive Order 14058, Transforming Federal Customer Experience and Service

Delivery to Rebuild Trust in Government (86 FR 71357, December 12, 2021) aimed at transforming Federal customer experience and service delivery to rebuild trust in government-administered programs. By streamlining the flood insurance application electronically, prospective flood insurance policyholders will have an enhanced customer service experience. The ability to obtain flood insurance quotes online from FEMA allows the American public to directly engage in applying for Federal flood insurance, obtain pricing information more readily, reduce administrative burden, and simplify the application process.

FEMA has secured data sources to provide information related to building characteristics such as replacement cost value, geolocation, and building elevations. Use of these automated information sources have reduced the need for property owners to enter such information on the application form and to obtain Elevation Certificates for flood insurance purposes.

Usability testing has been conducted on this collection, but there is no change to this collection due to usability testing at this time. A reduction of 29,151 hours has been recognized and included as an update to the collection as a change in estimate.

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.**

As described in Item 3, FEMA is using existing data sources to feed specific building information (e.g., replacement cost value, geolocation, building elevations) directly into our Pivot system to reduce the number of data elements that the property owner must supply on the forms.

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

This collection of information does not impose any additional burden on small businesses. The use of information technology described in Item 3 is for all respondents.

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 this collection, the NFIP could not provide appropriate flood insurance coverage and effective customer service to property owners in communities participating in the NFIP. This would result in FEMA's inability to meet mandates required by law.

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.**

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, under applicable Federal law and regulation.

   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 statue 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. This information collection does collect PII from applicants as detailed in our Privacy Threshold Analysis.

8. Federal Register Notice:

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

A 60-day Federal Register Notice inviting public comments was published on April 11, 2024, at 89 FR 25642. One public comment discussing wildfires was received, but FEMA considers this comment to not be germane to this NFIP information collection.

Public Comment FEMA-2024-0011-00002: The public comment from WhoPoo App states:

> "According to The LA Times, almost 10% of California wildfires are caused by arson. FEMA has no carveout or exception, nor any liability imposed on the arsonists for natural disasters caused by arson. A college professor. A Caltech grad. A woman in a bikini. And, just this month, a father and son.
> A
> confounding collection of Californians have been accused of contributing to one of the worst wildfire seasons in state history — a season that saw three killed, thousands of homes leveled and more than 2.5 million acres burned.
>
> While fires ignited by downed power lines and lightning have caused widespread destruction in recent years, this last wildfire season was unusual for the number of large

fires that were linked to arson. Wildfire arson arrests have been climbing over the last few years: In 2021, the California Department of Forestry and Fire Protection reported 140 arrests by its law enforcement division — 20 more than last year and double the number of 2019. In California, lawmakers distinguish between two types of arson: willful, malicious arson and reckless arson, such as when a person sets off fireworks in dry brush, Muschetto said. Identifying the source of a wildfire is one of the more technical jobs in law enforcement, and in 2019 — the most recent year for which he had data — the causes of the majority of California's wildfires were undetermined. Electrical equipment accounted for about 12% and lightning 6%.

But arson was also a factor, sparking about 9% of fires in 2019, and roughly 8% to 10% of the state's wildfires in any given year. In 2021, when Cal Fire responded to more than 8,600 fires, that could mean as many as 800 blazes.

One of the alleged arsonists who made national headlines this year was Gary Maynard, a former college professor linked to an "arson-setting spree" near the site of the Dixie fire, the second-largest wildfire in California's recorded history. Please prioritize hiring fire investigators and determinants to reduce false FEMA claims. See https://www.latimes.com/california/story/2021-12-31/is-wildfire-arson-getting-worse-in-california"

FEMA response to FEMA-2024-0011-00002: FEMA does not consider this public comment discussing wildfires to be germane to this NFIP information collection.

A 30-day Federal Register Notice inviting public comments was published on August 14, 2024, at 89 FR 66125. The public comment period is open until September 13, 2024.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

FEMA routinely invites stakeholder input on the policy forms and any other program documentation. FEMA maintains an underwriting mailbox through the NFIP Direct that our stakeholders can contact to ask questions or provide comments.

FEMA representatives also meet quarterly with the Flood Insurance Producer National Committee (FIPNC) and representatives from the Insurance Institute for Business & Home Safety (IBHS) to discuss any aspects of the NFIP that are of concern to them. The FIPNC is comprised of non-government professionals involved with the NFIP and the IBHS is an independent, non-profit, scientific and educational organization wholly supported by the property insurance industry. This information collection, including the forms used, is open to FIPNC and IBHS as a subject of discussion if they so choose.

In addition, NFIP personnel frequently discuss the NFIP Policy Forms at meetings with other involved users, e.g., insurance agents, insurance company officials, mortgage lenders, surveyors, engineers, and others.

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.

Please see our response to 8b above. In addition, FEMA staff meet at least semi-annually with a working group to discuss recommended changes to our guidance documentation, specifically the NFIP Flood Insurance Manual, which includes information for the use of the policy forms. Input includes suggestions received from the NFIP Direct (which works directly with agents who complete the forms on behalf of policyholders), Write Your Own (WYO) insurance companies, agents, and policyholders. We also conduct monthly calls with our WYO industry partners that include a question-and-answer period, during which they can bring up any concerns about the policy forms.

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

FEMA does not provide payments or gifts to respondents.

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

FEMA limits the disclosure of the information collected to the NFIP Direct acting as the Government's fiscal agent, to routine users, to the insured's agent of record, and the mortgagee listed on the flood insurance policy. The NFIP Direct system security plan complies with the Computer Security Act of 1987 (Pub L. 100-235); OMB Memorandum M-16-17; OMB Circular A-123, Management's Responsibility for Enterprise Risk Management and Internal Control (July 15, 2016); and Circular No. A-130, Managing Information as a Strategic Resource (July 28, 2016). The NFIP Direct System has protection and control of the data maintained in the system.

A Privacy Threshold Analysis was approved by the Department of Homeland Security (DHS) on February 21, 2023. A Privacy Act Notice was also approved by DHS on February 21, 2023. A

System of Records Notice (SORN), DHS/ FEMA-003 – National Flood Insurance Program Files System of Records Notice (79 FR 28747, May 19, 2014) has been completed. The NFIP Direct System is currently covered by DHS/FEMA/PIA-048 National Flood Insurance Program (NFIP) Direct Servicing Agent (NFIP Direct) System, October 31, 2017, and DHS/FEMA/PIA-050 NFIP PIVOT System, March 28, 2018.

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

There are no questions of a sensitive nature.

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

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

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application: is estimated to have 45,986 property owners (respondents), times 1 response per year for 45,986 total annual responses (45,986 x 1 = 45,986). It is estimated that each response will require 0.2167 burden hours, or 13 minutes, to complete, therefore 45,986 responses times 0.2167 hours equals 9,965 total annual burden hours (45,986 x 0.2167= 9,965).

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form: is estimated to have 14,656 property owners (respondents), times 1 response per year for 14,656 total annual responses (14,656 x 1 = 14,656). It is estimated that each response will require 0.1500 burden hours, or 9 minutes, to complete, therefore 14,656 responses times 0.1500 hours equals 2,198 total annual burden hours (14,656 x 0.1500 = 2,198).

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement: is estimated to have 123,531 property owners (respondents), times 1 response per year for 123,531 total annual responses (123,531 x 1 = 123,531). It is estimated that each response will require 0.1333 burden hours, or 8 minutes, to complete, therefore 123,531 responses times 0.1333 hours equals 16,467 total annual burden hours (123,531 x 0.1333 = 16,466.68, rounded up to 16,467).

FEMA Form FF-206-FY-24-103, e-Flood Insurance Application: is estimated to have 100 property owners (respondents), times 1 response per year for 100 total annual responses (100 x 1 = 100). It is estimated that each response will require 0.1167 burden hours (7 minutes) to complete, therefore 100 responses times 0.1167 hours equals 12 total annual burden hours (100 x 0.1167 = 11.67 burden hours, rounded up to 12).

After conducting usability testing there is no change to the burden hours as listed in the OMB inventory due to usability testing at this time. A reduction of 29,151 hours has been recognized and included as an update to the collection as a change in estimate.

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

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

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.61 for State and local government employees)[1] and this total should be entered in the cell for "Avg. Hourly Wage Rate." The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs

[1] Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03172023.pdf. Accessed March 20, 2023. The national wage multiplier is calculated by dividing total compensation for all workers of $42.48 by wages and salaries for all workers of $29.32 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 $57.60 by Wages and salaries for State and local government workers of $35.69 per hour yielding a benefits multiplier of approximately 1.61.

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
Individual, business, non-profit, State, local, or Tribal Government	FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application	45,986	1	45,986	0.2167	9,965	$45.65	$454,902
Individual, business, non-profit, State, local, or Tribal Government	FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form	14,656	1	14,656	0.1500	2,198	$45.65	$100,339
Individual, business, non-profit, State, local, or Tribal Government	FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement	123,531	1	123,531	0.1333	16,467	$45.65	$751,719
Individual, business, non-profit, State, local, or Tribal Government	FEMA Form FF-206-FY-24-103, e-Flood Insurance Application	100	1	100	0.1167	12	$45.65	$548
Total		**184,273**		**184,273**		**28,642**		**$1,307,508**

Note: The "Avg. Hourly Wage Rate" for each respondent include a wage multiplier to reflect a fully-loaded wage rate.
"Type of Respondent should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

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, the May 2023 Occupational Employment and Wage Estimates the mean hourly wage rate for All Occupations (SOC 00-0000) is estimated to be $31.48.[2] Including the wage rate multiplier of 1.45, the fully loaded wage rate is $45.65. Therefore, the estimated burden hour cost to respondents is estimated to be $45.65 x 28,642 (+1 due to rounding)= $1,307,508 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.)

[2] Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2023/may/oes_nat.htm

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
[Form Name/#]				
Total	$0	$0	$0	$0

The cost estimates should be split into two components:

a. **Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred**.

There are no operation and maintenance costs for 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 storge facilities.**

There are no capital and start-up costs for 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: Expenses directly supporting the processing of the forms, including underwriting, customer service, and data entry.	$8,800,000
Staff Salaries: 2 GS-12, Step 5; 2 GS-13, Step 5; and 1 GS-14, Step; for a total of 5 employees spending approximately 1.9% of time annually analyzing NFIP forms to determine if any changes are needed and responding to program changes and program experiences. GS-12, Step 5 ($112,425) at 1.9% time x 1.45 loaded wage rate x 2 employees = $6,195	$17,913

GS-13, Step 5 ($133,692) at 1.9% time x 1.45 loaded wage rate x 2 employees = $7,366 GS-14, Step 5 ($157,982) at 1.9% time x 1.45 loaded wage rate = $4,352	
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 (not to exceed)	$
Total	**8817913**
[1] Office of Personnel Management 2024 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/2024/DCB.pdf. Accessed January 2, 2024. [2] Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

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

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

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

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	**Program Change (hours currently on OMB Inventory)**	**Program Change (New)**	**Difference**	**Adjustment (hours currently on OMB Inventory)**	**Adjustment (New)**	**Difference**
FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application			0	3,812	9,965	6,153
FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form			0	4,645	2,198	-2,447
FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement			0	43,171	16,467	-26,704
FEMA Form FF-206-FY-24-103, e-Flood Insurance Application		12	12			0
Total	**0**	**12**	**12**	**51,628**	**28,630**	**-22,998**

Explain: There is an overall reduction of 22,986 burden hours in this collection. Two instruments had a reduction in the expected number of respondents based on a decrease in the number of instruments submitted lead to a 29,151 burden hour reduction (-2,447 + -26,704 = -29,151). That reduction is mitigated by an increase in the number of respondents for a third instrument and the addition of a fourth instrument to the collection leading to a 6,165 burden hour increase (6,153 + 12= 6,165) and the overall reduction of 22,986 burden hours (-29,151 + 6,165).

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application – The burden hours increased by 6,153 based on the increased number of applications submitted (9,965 – 3,812 = 6,153).

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form – The burden hours decreased by 2,447 based on the decreased number of cancellation forms submitted (4,645 – 2,198 = 2,447).

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement – The burden houses decreased by 26,704 based on the decreased number of endorsement forms submitted (16,467 – 43,171 = -26,704).

FEMA Form FF-206-FY-24-103, e-Flood Insurance Application – The burden hours for this new form are estimated to be 12 hours (100 x 0.1167 = 11.67, rounded up to 12).

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**
FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application	$0	$0	$0	$154,805	$454,902	$300,097
FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form	$0	$0	$0	$188,633	$100,339	-$88,294
FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement	$0	$0	$0	$1,753,174	$751,719	-$1,001,455
FEMA Form FF-206-FY-24-103, e-Flood Insurance Application	$0	$548	$548	$0	$0	$0
Total	**$0**	**$548**	**$548**	**$2,096,612**	**$1,306,960**	**-$789,652**

Explain: There was an increase in the wage rate from $43.15 in 2023 to $45.65 in 2024.

FEMA Form FF-206-FY-21-117 (formerly 086-0-1), Flood Insurance Application – The increase in the annual cost burden is due to the increase in the number of applications submitted (from 17,593 to 45,986). The cost burden has increased by $300,097, from $154,805 to $454,902.

FEMA Form FF-206-FY-21-118 (formerly 086-0-2), Flood Insurance Cancellation/Nullification Request Form – The decrease in the annual cost burden is due to the decrease in the number of cancellation forms submitted, from 30,964 to 14,656. The cost burden has decreased by $88,294, from $188,633 to $100,339.

FEMA Form FF-206-FY-21-119 (formerly 086-0-3), Flood Insurance General Change Endorsement – The decrease in the annual cost burden is due to the decrease in the number of endorsement forms submitted, from 323,865 to 123,531. The cost burden has decreased by $1,001,455, from $1,753,174 to $751,719.

FEMA Form FF-206-FY-24-103, e-Flood Insurance Application – The annual cost burden for this new form is estimated to be $548, from $0 to $548.

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 no to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This information collection is not seeking approval to not display the expiration date for OMB approval.

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

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