

October 7, 2026

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0083

Title: Community Disaster Loan (CDL) Program

Form Number(s):

- 1) FEMA Form-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Disaster Loans;**
- 2) FEMA Form-104-FY-22-224 (formerly 116-0-1), Promissory Note;**
- 3) FEMA Form-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security;**
- 4) FEMA Form-104-FY-22-226 (formerly 112-0-3C), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements; and,**
- 5) FEMA Form-104-FY-22-227 (formerly 009-0-15), Application for Loan Cancellation.**

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 Community Disaster Loan (CDL) Program is authorized by Section 417 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. § 5184, and implemented through 44 CFR Part 206, Subpart K. The program authorizes FEMA to provide financial assistance to eligible local governments that have experienced substantial losses of tax and other revenues as a result of a major disaster and demonstrate a need for financial assistance to perform essential governmental functions.

Section 417(a) authorizes loans to eligible local governments, while Section 417(b) establishes limitations on loan amounts based on financial need and the local government's annual operating budget. Section 417(c) provides for cancellation of loan repayment to the extent that the local government's revenues during the three full fiscal years following the disaster are insufficient to meet its operating budget, including additional disaster-related municipal operating expenses. The collection of information is necessary for FEMA to evaluate applicants' eligibility for CDL assistance, determine financial needs, document the terms and conditions of approved loans, establish applicable collateral security arrangements, obtain certifications of compliance with federal requirements, and evaluate requests for loan cancellation.

Certification of Eligibility for Community Disaster Loans (FEMA Form FF-104-FY-22-223). Pursuant to 44 CFR §§ 206.363 and 206.364, FEMA collects information concerning the applicant's legal authority to incur indebtedness, projected disaster-related revenue losses, financial condition, ability to meet operating expenses, and impacts on essential municipal services. This information supports FEMA's determination of eligibility and demonstrated financial need.

Promissory Note (FEMA Form FF-104-FY-22-224). Under 44 CFR § 206.364(d)(2), approved loans are documented through a promissory note identifying the borrower, effective loan date, principal loan amount, interest rate, maturity date, repayment terms, and authorized officials executing the agreement. The form also identifies whether the State will co-sign the loan. This information establishes the terms and conditions of the loan and the borrower's repayment obligations.

Local Government Resolution – Collateral Security (FEMA Form FF-104-FY-22-225).

Pursuant to 44 CFR § 206.364(d)(2)(ii), where the State cannot legally co-sign the promissory note, the local government must pledge acceptable collateral security. FEMA collects information identifying the pledged collateral and documenting the governing body's authorization, adoption, and recording of the resolution to establish the applicable security arrangements.

Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements (FEMA Form FF-104-FY-22-226).

FEMA collects certifications addressing applicable federal requirements, including lobbying restrictions under 31 U.S.C. § 1352, non-procurement suspension and debarment requirements under Executive Orders 12549 and 12689 and 2 CFR Parts 180 and 3000, and drug-free workplace requirements under the Drug-Free Workplace Act of 1988 and applicable implementing regulations. These certifications are intended to document compliance with federal requirements associated with covered financial assistance transactions.

Application for Loan Cancellation (FEMA Form FF-104-FY-22-227). Pursuant to Section 417(c) of the Stafford Act and 44 CFR § 206.366, FEMA collects information necessary to evaluate requests for cancellation of loan repayment obligations. This includes identifying information concerning the approved loan, loan funds drawn, the outstanding loan balance, operating revenues and expenses for the applicable fiscal years, and additional unreimbursed disaster-related operating expenses, to identify the resulting 3-year post-disaster cumulative operating surpluses or deficits, and the amount of cancellation requested. This information supports FEMA's determination of whether the statutory and regulatory cancellation criteria have been satisfied and the amount eligible for cancellation.

The information is obtained primarily from applicant local governments through their authorized representatives and official financial and administrative records, including operating budgets, revenue and expenditure records, financial statements, tax assessment information, governing-body resolutions, and other supporting documentation required under the CDL regulations. These records provide the information necessary for FEMA to evaluate eligibility, administer approved loans, verify compliance with applicable requirements, and determine eligibility for loan cancellation.

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

The Assistant Administrator of the Recovery Directorate may approve a CDL for any local government which has suffered a substantial loss of tax and other revenues as a result of a major disaster or emergency and has shown a demonstrated need for financial assistance to perform its governmental functions. Local governments may indicate interest in acquiring a CDL by contacting their Governor's Authorized Representative (GAR). The GAR submits a letter to FEMA requesting activation of the CDL Program for their State and specific disaster declaration(s).

FEMA works directly with each applicant during the evaluation process to ensure the regulatory compliance requirements are met. FEMA assists the applicant in completing the entire application. Along with the completed forms, the applicant submits a Letter of Application

developed by FEMA during the evaluation process indicating their request for assistance in the amount determined by the FEMA evaluator.

The CDL Application Package for the Program includes the following forms completed by each applicant:

FEMA Form-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Disaster Loans; This form is used to certify the eligibility of the local government to receive funds from a CDL.

FEMA Form-104-FY-22-224 (formerly 116-0-1), Promissory Note; This form is used to document the terms, conditions, amount, and interest associated with a CDL. FEMA is removing Part III: Schedule of Loan Increments to be Disbursed to Borrower. It is a table for applicants to list amounts and dates of when they anticipate needing funds. This table has not been populated by loan applicants when submitting the loan applications for several years because the loan is not in place at the time of application and therefore the loan effective date and disbursement dates did not align. Alternately, FEMA guides the loan applicants through how, once the loan is in place and they have access to the loan account, they can initiate the funding requests.

FEMA Form-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security; This form is used to pledge collateral security to FEMA on the Promissory Note for a CDL. Collateral security is required if the State is prohibited from co-signing the promissory note.

FEMA Form-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements; This form is used to certify compliance with important Federal requirements and lists applicants' places of performance.

FEMA Form-104-FY-22-227 (formerly 009-0-15), Application for Loan Cancellation. This form is used to determine if the local government's financial conditions meet cancellation criteria requirements.

The following Standard Forms are required for this collection. The forms are approved for use under the OMB Control Number identified for each.

Standard Form 1199A, Direct Deposit Sign Up Form

(<https://www.gsa.gov/forms-library/direct-deposit-sign-form>) – is used to establish the account at a financial institution to which CDL funds will be transferred. The CDL program office collects this form which FEMA Finance uses to create direct deposit accounts for eligible applicants to

receive loan funds. It is approved for use by the U.S. Department of Treasury under OMB No. 1530-0006.

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.

This information collection does not include electronic or web-based capabilities for submission. While electronic versions of the forms are available to fill out, a hard copy must be printed, signed, and submitted. Once FEMA receives the information, the information is scanned and stored electronically on a FEMA server. FEMA stores the applicant file in the FEMA server by State/Disaster Number/Entity Name (school name, city/borough name, fire district, etc.) and not by POC information as this varies frequently. It is stored in PDF format. Therefore, FEMA does not use personally identifiable information (PII) to pull up the applicant file, but rather the local government's name. This information is never made available over the World Wide Web. Original hard copies are then placed in shredding bins to be discarded. To provide faster service to applicants in terms of filling out the collection instrument, electronic versions of the forms are provided to each applicant by FEMA representatives. These electronic versions are stored internally for the Department of Homeland Security (DHS) at http://on.fema.net/employee_tools/forms/Pages/fema_forms.aspx and may not be downloaded by the applicants. Usability Testing has been conducted on this collection. As a result, a reduction of 455 hours has been recognized and included as an update to the collection.

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.

The information requested is not duplicative, as the forms described above are the only mechanisms used by FEMA to collect the information necessary to administer the CDL program in accordance with Section 417 of the Stafford Act and its implementing regulations at 44 CFR Part 206, Subpart K, as well as other applicable federal requirements. The information request is also specific to each applicant and disaster, reflecting financial conditions and circumstances that vary from one disaster to another. Accordingly, the information previously collected cannot substitute for the information required to evaluate eligibility, administer loans, and determine loan cancellation for a particular disaster.

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 information collection does not have an impact on small businesses, yet it impacts local governments with populations under 50,000. Program's target audience is all local governments impacted by a major disaster declaration. Minimization efforts are applied to all expected respondents, not just small entities. Program staff pre-fills information available in the entity's SAM.gov registration and helps each applicant (local government) fill out the forms. The party responsible at the local government is generally a common position already found in all local governments, regardless of size.

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.

Failure to conduct this information collection will result in FEMA's inability to implement the mandates of the Stafford Act and its implementing regulations. Furthermore, collecting this information is vital for affected communities with open presidential disaster declarations, to establish their eligibility for CDLs and keep essential government services open and available to these communities. The forms included in this collection are the mechanism for applicants to apply for a loan. If forms do not exist, local governments would lose the ability to apply. Without the loan, they would not have the needed funding to continue operations and would not be able to provide their essential services to the communities they represent.

The information collection process is a manual process. The CDL Program has been in pursuit of digital software which would help automate the process, information collection process and reduce the burden on the applicants. Software can assist FEMA to pre-populate some of the data required in this collection. An example of a form that could be eliminated should software be made available to the CDL Program is FEMA Form FF-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements. This form captures the local government's places of business among other certifications. With a digitalized system, this information can be either pulled from other databases or captured earlier thus removing the need for the actual form. This change alone can reduce burden by 26 minutes per responder, or 22 annual hours per the projections below.

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 is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d) (2). Forms are filled only once per loan request and 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.

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

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

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

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

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

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

This information collection does not include a statistical survey.

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

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

g. That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

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

- h. Requiring respondents to submit proprietary trade secret(s), 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 August 4, 2026, 91 FR 49435. The 60-Day public comment period closed on October 5, 2026. FEMA received one comment for this information collection. The commenter expressed concern regarding the removal of Part III of the Community Disaster Loan Promissory Note, asserting that it has practical utility for maintaining reliable cash-flow projections for Federal direct loans.

FEMA is removing Part III, the projected disbursement schedule, because it does not provide a reliable or operational basis for loan disbursements. The change replaces an advanced estimate of potential future borrowing with a process that evaluates the applicant's actual financial need when each disbursement is requested.

At the time an applicant executes the Promissory Note, the loan is not yet effective, and the effective date may not be known. Further, CDL assistance is based on projected disaster-related revenue losses and operating expenditures that may occur over a period of up to four fiscal years. A schedule completed at the time of note execution would therefore consist of estimated dates and amounts based on conditions that may change materially before a disbursement is needed. The information in Part III was not used as the controlling basis for authorizing, timing, or processing disbursements.

Under the revised process, FEMA will assess the local government's current financial condition and demonstrated need at the time it requests a disbursement. This approach is more practical than relying on a prospective schedule prepared before the loan becomes effective. It also recognizes that a CDL creates indebtedness for the local government. If current revenues or other available funding sources are sufficient to meet operating obligations, the local government should not draw loan funds and incur interest expense unnecessarily. Loan funds should be drawn only when the local government cannot meet eligible operating obligations from available resources at the time of the requested disbursement.

This real-time assessment strengthens stewardship of Federal funds by helping ensure that disbursements reflect actual, documented need. It also may reduce unnecessary borrowing and associated interest costs for participating local governments. FEMA therefore concludes that removing Part III improves the practical utility of the information collection by eliminating a speculative schedule that is not used to control disbursements and relying instead on current financial information relevant to each disbursement request.

FEMA also recognizes the commenter's concern regarding Federal credit-subsidy estimation and cash-flow projections under the Federal Credit Reform Act. Removal of the Part III schedule from the Promissory Note does not eliminate FEMA's projected-disbursement reporting or its responsibility to provide information needed for credit-subsidy cost estimation and related budgetary processes. FEMA will continue to provide projected disbursement information to the appropriate Federal stakeholders using established forecasting methodologies, including historical CDL disbursement experience and updated assumptions as warranted. This approach supports more reliable estimates because it is informed by actual program experience and current disbursement activity, rather than by nonbinding estimates developed before a loan becomes effective.

Accordingly, FEMA does not anticipate a change in the time or cost burden associated with the information collection as a result of removing Part III. The revision removes an element that did not serve as an effective disbursement-control mechanism while retaining the information and processes necessary to support responsible loan administration and Federal credit-subsidy estimation.

A 30-day Federal Register Notice inviting public comments was published on October 21, 2026, 91 FR 66574. The 30-Day public comment period closes on November 20, 2026.

- b. Describe efforts to consult with individuals 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 confers with the GAR and other State Representatives. FEMA did not receive any complaints regarding the process or the forms required to implement the loan application and application for loan cancellation processes. Each GAR and State Representative was satisfied with the process and results. During the provision of loans after Hurricane Katrina and subsequent disasters, FEMA has worked with more than 37 GARs to utilize these forms to administer over 471 loans providing over \$2.6 billion in loans.

- 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.**

FEMA consulted with representatives of State and local government applicants and borrowers during the current three-year approval period.

From June through August 2026, FEMA conducted virtual consultations, through Zoom meetings, with representatives of the City of Asheville and the Town of Spruce Pine, North Carolina, including the Governor's Authorized Representative (GAR) and other State representatives. These consultations occurred in connection with the first activation of the Community Disaster Loan (CDL) Program in North Carolina. FEMA discussed the CDL forms, requested information, and application process. FEMA also held in-person preliminary discussions with other potential North Carolina applicants in November 2025.

On October 25, 2024, FEMA reviewed all CDL forms with newly hired State staff in Texas who were processing new loan requests and preparing GAR recommendations. FEMA discussed the purpose of the forms, information collection requirements, and procedures for completing and submitting the forms. Texas staff were invited to provide feedback on the clarity and usability of the forms while processing loan requests for GAR recommendation.

On October 14, 2026, FEMA transmitted the CDL forms to one California applicant and began consultations with the local government regarding its application for a loan under a major disaster declaration. FEMA provided the applicable forms and discussed the information collection requirements. These consultations remain ongoing as FEMA works with the applicant to address questions regarding completion and submission of the forms.

In June 2025, FEMA discussed applicable requirements, processes, and forms with representatives of the Town of Nichols and the State of South Carolina during loan-cancellation discussions.

These consultations gave respondents and their representatives an opportunity to raise questions or concerns regarding the requested information, forms and instructions, recordkeeping requirements, and loan application and cancellation processes. FEMA also offers each new applicant an opportunity to discuss the forms and related concerns when it transmits CDL

application materials. No circumstances precluded FEMA from consulting with representatives of affected State and local governments during this approval period. Representatives participating in completed consultations did not identify complaints or recommend changes to the information collection, loan application process, annual maintenance requirements, or loan-cancellation process. FEMA will consider feedback received through the ongoing California consultation, future consultations, and written submissions to the CDL Program Office by email or postal mail.

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 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.

The updated Privacy Threshold Analysis (PTA) was approved by FEMA's Privacy Office on August 12, 2026.

Privacy Impact Assessment (PIA) coverage is provided by DHS/FEMA/PIA – 013 Grant Management Programs (March 16, 2020).

System of Records Notice (SORN) coverage is provided by DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Load Programs (79 FR 16015, March 24, 2014).

The information collected is provided voluntarily and may be disclosed to DHS personnel, state officials or other agents who require such information to provide disaster relief. The CDL Program obtains authorities from the Stafford Act in Section 417 and 44 CFR 206.360-367.

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 individuals 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.**

The number of potential respondents is 50 based upon a likely average loan amount below \$2 million and a ceiling authority of \$5 million. Applicants must only respond one time per disaster. Burden hours were estimated based upon historical experience dating back a decade or more as well as recent experience implementing the program. A usability test was performed by at least four individuals to evaluate the estimated burden for each form. That test confirmed the burden of hours estimated. The CDL Analyst fills out most of the forms on behalf of the potential loan applicant. Utilizing information gathered during the intake and other meetings, plus the information the local government registered in SAM.gov, the CDL Analyst fills out the forms with information already available. Applicants fill out the remainder of the forms and places seals and signatures on the forms. An email explaining how to process and validate the data already in the form is sent to the applicant.

FEMA Form-104-FY-22-223 (formerly 090-0-1), Certification of Eligibility for Community Loans: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 2 burden hours to complete, therefore 50 responses times 2 hours equals 100 total annual burden hours ($50 \times 2 = 100$).

FEMA Form-104-FY-22-224 (formerly 116-0-1), Promissory Note: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 2 burden hours to complete, therefore 50 responses times 2 hours equals 100 total annual burden hours ($50 \times 2 = 100$).

FEMA Form-104-FY-22-225 (formerly 085-0-1), Local Government Resolution – Collateral Security: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 3 burden hours to complete, therefore 50 responses times 3 hours equals 150 total annual burden hours ($50 \times 3 = 150$).

FEMA Form-104-FY-22-226 (formerly 090-0-1), Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements: FEMA estimated 50 respondents times 1 response(s) per year for 50 total annual responses ($50 \times 1 = 50$). It is estimated that each response will require 26 minutes or 0.4333 burden hours to complete, therefore 50 responses times 0.4333 hours equals 22 total annual burden hours ($50 \times 0.4333 = 22$).

FEMA Form-104-FY-22-227 (formerly 090-0-15), Application for Loan Cancellation: FEMA estimated 60 respondents times 1 response per year for 60 total annual responses ($60 \times 1 = 60$). It is estimated that each response will require 3 burden hours to complete, therefore 60 responses times 3 hours equals 180 total annual burden hours ($60 \times 3 = 180$).

- 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 (1.62 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 to paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Type of Respondent	Estimated Annualized Burden Hours and Costs							
	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
Local Government	Certification of Eligibility for a Community Disaster Loan	50	1	50	2	100	54.33	\$5,433

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.

	/ FEMA Form-104-FY-22-223 (formerly 090-0-1)							
Local Government	Promissory Note / FEMA Form-104-FY-22-224 (formerly 116-0-1)	50	1	50	2	100	54.33	\$5,433
Local Government	Local Government Resolution - Collateral Security / FEMA Form-104-FY-22-225 (formerly 085-0-1)	50	1	50	3	150	54.33	\$8,150
Local Government	Certification Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace Requirements / FEMA Form-104-FY-22-226 (formerly 112-0-3C)	50	1	50	0.4333	22	54.33	\$1,195
Local Government	Application for Loan Cancellation / FEMA Form-104-FY-22-227 (formerly 009-0-15)	60	1	60	3	180	54.33	\$9,779
Total		260		260		552		\$29,990

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 2025 Occupational Employment and Wage Estimates wage rate for local government employees All Occupations SOC-00-0000 is estimated to be \$33.54 per hour.² Including the wage rate multiplier of 1.62, the fully-loaded wage rate is \$54.33 per hour. Therefore, the burden hour cost is estimated to be \$29,990 annually ($552 \times 54.33 = 29,990$).

- 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 or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
Total	\$0	\$0	\$0	\$0

The cost estimates should be split into two components:

- a. **Operation and Maintenance and purchase of services component.** These estimates should consider 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 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.**

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.

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 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:	\$0
Staff Salaries:	
2 GS 12 Step 5 (\$116,071) at 10% time x 1.45 loaded wage rate = \$ 33,661	\$80,961
1 GS 14 Step 5 (\$163,104) at 20% time x 1.45 loaded wage rate = \$ 47,300	
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 (not to exceed)	\$0
Total	\$80,961
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.pdf . Accessed January 09, 2026.	
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 104-FY-22-223, Certification of Eligibility for Community Disaster Loan			0	100	100	0
FEMA Form 104-FY-22-224, Promissory Note			0	100	100	0
FEMA Form 104-FY-22-225, Local Government Resolution - Collateral Security			0	150	150	0
FEMA Form 104-FY-22-226 Certification Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace			0	22	22	0
FEMA Form 104-FY-22-227, Application for Loan Cancellation			0	180	180	0
Total	0	0	0	552	552	0

Explain: There is no expected hourly burden change per form. Removing Part III of FF-104-22-224, Promissory Note, will not yield any changes due to the impracticality of its use. There is no expected burden change because the section is not being used. That is the driver for removing the entire section on the form.

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 104-FY-22-223, Certification of Eligibility for Community Disaster Loan				\$4,674	\$5,433	\$759
FEMA Form 104-FY-22-224,				\$4,674	\$5,433	\$759

Promissory Note						
FEMA Form 104-FY-22-225, Local Government Resolution - Collateral Security				\$7,011	\$8,150	\$1,139
FEMA Form 104-FY-22-226 Certification Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; And Drug-Free Workplace				\$1,028	\$1,177	\$149
FEMA Form 104-FY-22-227, Application for Loan Cancellation				\$8,413	\$9,779	\$1,366
Total	\$0	\$0	\$0	\$25,800	\$29,990	\$4,190

Explain: The Annual Cost Burden increased by \$4,190 due to increases in the average wage rate.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

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

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

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