

July 5, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0016

**Title: Revision to National Flood Insurance Program Maps:
Application Forms and Instructions for LOMRs and CLOMRs**

Form Number(s): FEMA Form 086-0-27, 086-0-27A, 086-0-27B, 086-0-27C, 086-0-27D, and 086-0-27E

General Instructions

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

Specific Instructions

A. Justification

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

The National Flood Insurance Program (NFIP) is authorized by 42 U.S.C. 4001 *et seq.* (Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973)). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. In 44 CFR 65.3, communities are required to submit technical information concerning flood hazards and plans to avoid potential flood hazards when physical changes occur. In 44 CFR 65.4, communities are provided the right to submit technical information when inconsistencies on maps are identified. In order to revise the Base (1-percent annual chance) Flood Elevations

(BFEs), Special Flood Hazard Areas (SFHAs), and floodways presented on the NFIP maps, a community must submit scientific or technical data demonstrating the need for a revision. The NFIP regulations cited in 44 CFR part 65 outline the data that must be submitted for these requests. This collection serves to provide a standard format for the general information requirements outlined in the NFIP regulations, and helps establish an organized package of the data needed to revise NFIP maps. This collection helps to:

- Ensure all data required to process these requests is received with the initial submittal
- Ensure processing consistency among all requests
- Ensure that submitted data are presented in a manner that will increase processing efficiency
- Reduce the amount of time required to process requests
- Reduce processing costs

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 information collected on FEMA Forms 086-0-27, 086-0-27A, 086-0-27B, 086-0-27C, 086-0-27D, and 086-0-27E is used to determine if such data will result in the modification of BFEs, SFHA, or floodway. Once the information is collected, it is submitted to FEMA for review and is subsequently included on the NFIP maps. These maps are used by communities for compliance with floodplain management regulations, by lenders in determining the application of the mandatory flood insurance purchase requirements, and by insurance agents in determining actuarial flood insurance rates. Respondents can also contact a call center at 1-877-336-2627 for answers to any questions that might come up during the completion of the data collection instruments.

This collection uses a series of six forms, described below:

- a. FEMA Form 086-0-27, Overview and Concurrence Form, provides the basic information regarding the revision request, and requires the signatures of the requester, community official, and a registered professional engineer. This form is required for all revision requests. This form describes the location and nature of the requested NFIP map change, and the data required to support the request.
- b. FEMA Form 086-0-27A, Riverine Hydrology and Hydraulics Form, provides the basic information on the scope and methodology of hydrologic and hydraulic analyses that are prepared in support of the revision request. This form should

be used for revision requests that involve new or revised hydrologic or hydraulic analyses of rivers, streams, ponds, or small lakes.

- c. FEMA Form 086-0-27B, Riverine Structures Form, provides the basic information regarding hydraulic structures constructed in the stream channel or floodplain. This form should be used for revision requests that involve new or proposed channelization, bridges/culverts, dams, or levees/floodwalls.
- d. FEMA Form 086-0-27C, Coastal Analysis Form, provides the basic information on the scope and methodology of the coastal analyses that are prepared in support of the revision request. This form should be used for any revision requests that involve new or revised coastal analyses.
- e. FEMA Form 086-0-27D, Coastal Structures Form, provides the basic information regarding hydraulic structures constructed along the coast. This form should be used for revision requests that involve new or proposed levees/dikes, breakwaters, bulkheads, seawalls, and/or revetments located along the coast.
- f. FEMA Form 086-0-27E, Alluvial Fan Flooding Form, provides the basic information for analyses of alluvial fans. This form should be used for revision requests involving alluvial fans.

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.

The forms are made available on the Internet and can be downloaded from the Web site. The forms can be found at the following Web site address: <https://www.fema.gov/media-library/assets/documents/1343>. The forms are available on the Internet for download in Microsoft Word and Adobe Acrobat format. Alternatively, the collection may be submitted to FEMA electronically via the Online LOMC Tool. All required data to support the request may be submitted using this tool.

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 elsewhere, and therefore is not a duplication.

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

This information collection does not have an impact specific to 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 this information were not collected, the NFIP maps could not be revised as required by regulation to reflect current, existing flood hazards. Processing of these requests helps to improve the accuracy of FEMA map products, and the effectiveness of the NFIP. Accurate mapping allows FEMA to be more efficient with its promulgation of all the regulations covering the NFIP.

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

The special circumstances contained in item 7(a) thru 7(h) of the supporting statement are not applicable to this information collection.

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

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

(c) Requiring 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.

(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.

(f) Requiring the use of 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.

(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.

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 May, 9, 2017, volume 82 FR 21547. There were no comments received for this collection of information.

A 30-day Federal Register Notice inviting public comments was published on July, 25, 2017, volume 82 FR 34547. There were no comments received for this collection of information.

(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 conducts several workshops for community officials, engineers, surveyors, and developers every year on the details and requirements of this information request. Attendees use the opportunity to give comments and request clarifications of instructions.

(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's Web site <https://faq.fema.gov/app/ask2> includes a form, in which respondents can provide comments regarding the forms and clarity of instructions. The FEMA Mapping Information Exchange (FMIX) also provides a toll free number (1-877-336-2627) to answer questions and provide an opportunity for respondents to comment on the forms.

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.

To ensure compliance with the Privacy Act of 1974, U.S.C. § 552a (2012), and DHS Privacy Policy Memo 2017-01. FEMA affixes a privacy notice at the top of each of the above referenced forms. The privacy notice states that the information contained in these forms are generally disclosed under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes using this information as necessary and authorized by the routine uses published in DHS/FEMA/NFIP/LOMA-1 National Flood Insurance Program (NFIP): Letter of Map Amendment (LOMA) February 15, 2006, 71 FR 7990, and as detailed in DHS/FEMA/PIA-028 Mapping Information Platform.

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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

FEMA Form 086-0-27- It is estimated that 1,300 forms will be received from State, local and Tribal governments for submission to FEMA. It will take approximately 1 hour for local government officials to complete their portion of the form and 45 minutes for Engineers or Surveyors to complete their portion of the form for a total of 1.75 hours to complete the form and submit to FEMA. Therefore 1,300 responses x 1.75 hours to complete the form is estimated to be 2,275 total burden hours.

FEMA Form 086-0-27A – It is estimated that 1,300 forms will be received from State, local and Tribal governments for submission of

the form to FEMA. It will take approximately 3.5 hours for an Engineer or Surveyor to complete their portion of the form. Therefore 1,300 responses x 3.5 hours is estimated to be 4,550 total burden hours.

FEMA Form 086-0-27B - It is estimated that FEMA will receive 1,170 responses from State, local and Tribal Government for submission of this form to FEMA. 1,170 Engineers or Surveyors will complete their portion of the form and that it will take an average of 7 hours to complete the form. Therefore 1,170 responses x 7 hours is estimated to be 8,190 total burden hours.

FEMA Form 086-0-27C - It is estimated that FEMA will receive 130 responses from State, local and Tribal Government for submission of this form to FEMA. Engineers or Surveyors will complete their portion of the form, which is estimated to take 3.5 hours. Therefore 130 responses x 3.5 hours = 455 total burden hours.

FEMA Form 086-0-27D - It is estimated that FEMA will receive 65 responses from State, Local and Tribal Government for submission of this form to FEMA. Engineers or Surveyors will complete their portion of the form, which is estimated to take 7 hours. Therefore 65 responses x 7 hours = 455 total burden hours.

FEMA Form 086-0-27E - It is estimated that FEMA will receive 26 responses from State, Local and tribal Government for submission of this form to FEMA. Engineers or Surveyors will complete their portion of the form, which is estimated to take 7 hours. Therefore 26 responses x 7 hours = 182 total burden hours.

The estimated number of responses for all forms is based on the number of responses received during the period from March 1, 2016 – February 28, 2017.

- (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.**
- (c) Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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	Form 086-0-27, Overview and Concurrence Form	1,300	1	1,300	1	1,300	\$62.98	\$81,874
Business or other for-profit	Form 086-0-27, Overview and Concurrence Form	1,300	1	1,300	0.75	975	\$67.70	66,008
Business or other for-profit	Form 086-0-27A, Riverine Hydrology and Hydraulics Form	1,300	1	1,300	3.5	4,550	\$67.70	308,035
Business or other for-profit	Form 086-0-27B, Riverine Structures Form	1,170	1	1,170	7	8,190	\$67.70	554,463
Business or other for-profit	Form 086-0-27C, Coastal Analysis Form	130	1	130	3.5	455	\$67.70	30,804
Business or other for-profit	Form 086-0-27D, Coastal Structures Form	65	1	65	7	455	\$67.70	30,804
Business or other for-profit	Form 086-0-27E, Alluvial Fan Flooding Form	26	1	26	7	182	\$67.70	12,321
Total		5,291		5,291		16,107		1,084,308

The wage rate categories above reflect the application of the 1.46 multiplier

According to the U.S. Department of Labor, Bureau of Labor Statistics website (<https://www.bls.gov/oes/current/oes172051.htm>) the 2016 wage rate category for a Civil Engineer (SOC 17-2051) is estimated to be \$62.98 (\$43.14 x 1.46¹) which includes a 1.46

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by major occupational and industry group, June 2017." Available at https://www.bls.gov/news.release/archives/ecec_09082017.htm Accessed December 11, 2017. Calculated

multiplier. Therefore, the estimated burden hour cost to respondents for a Civil Engineer is estimated to be $\$62.98 \times 1,300 = \$81,874$ annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (https://www.bls.gov/oes/current/oes_nat.htm#17-0000) the 2016 wage rate category for Engineer (SOC 17-2000) is estimated to be $\$67.70$ ($\$46.37 \times 1.46$) which includes a 1.46 wage rate multiplier. Therefore, the estimated burden hour cost to respondents for Engineer/Surveyors services is estimated to be $14,807 \times \$67.70 = \$1,002,434$ annually.

The total annual cost burden for this collection is estimated to be $\$1,084,308$.

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

The cost estimates should be split into two components:

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

(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.

Annual Cost Burden to Respondents or Record-keepers

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.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
FEMA Form 086-0-27	0	\$1,300,000	0	\$1,300,000
FEMA Form 086-0-27A	0	\$13,000,000	0	\$13,000,000
FEMA Form 086-0-27B	0	\$5,850,000	0	\$5,850,000
FEMA Form 086-0-27C	0	\$1,300,000	0	\$1,300,000
FEMA Form 086-0-27D	0	\$300,000	0	\$300,000
FEMA Form 086-0-27E	0	\$260,000	0	\$260,000

by dividing total compensation for civilian workers of $\$35.28$ by wages and salaries of $\$24.10$ per hour (yields a benefits multiplier of approximately $1.46 \times$ wages).

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.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Total	\$0	\$22,010,000	\$0	\$22,010,000

The cost to developers for an engineer's or surveyor's services is broken down above for each form. The engineer's services include scoping, surveying cross-sections, developing hydrologic and hydraulic analysis, and preparing work maps and reports documenting the engineering analysis and results.

For FEMA Form 086-0-27, it is estimated that 1,300 Engineers or Surveyors will charge an average of \$1,000 to research the information needed to complete this form. Therefore, the total annual cost for this form is estimated to be $1,300 \times \$1,000 = \$1,300,000$.

For FEMA Form 086-0-27A, it is estimated that 1,300 Engineers or Surveyors will charge an average of \$10,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $1,300 \times \$10,000 = \$13,000,000$. However, this can vary greatly depending on the size of the revision area and complexity of the watercourse.

For FEMA Form 086-0-27B, it is estimated that 1,170 Engineers or Surveyors will charge an average of \$5,000 to produce the technical data required to complete this form. However, this can vary greatly depending on the size of the revision area and complexity of the watercourse. Therefore, the total annual cost for this form is estimated to be $1,170 \times \$5,000 = \$5,850,000$.

For FEMA Form 086-0-27C, it is estimated that 130 Engineers or Surveyors will charge an average of \$10,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $130 \times \$10,000 = \$1,300,000$.

For FEMA Form 086-0-27D, it is estimated that 60 Engineers or Surveyors will charge an average of \$5,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $60 \times \$5,000 = \$300,000$.

For FEMA Form 086-0-27E, it is estimated that 26 Engineers or Surveyors will charge an average of \$10,000 to produce the technical data required to complete this form. Therefore, the total annual cost for this form is estimated to be $26 \times \$10,000 = \$260,000$.

The total annual cost burden to the respondents is estimated to be $\$1,300,000 + \$13,000,000 + \$5,850,000 + \$1,300,000 + \$300,000 + \$260,000 = \$22,010,000$

annually.

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 [Description below.]	\$18,500
Staff Salaries [1 GS12 Step 1 employee in Washington DC (annual salary \$79,720 fully loaded \$116,391 = \$79,720 x 1.46), spending approximately 5% of their time annually to the review, coordination, and approval of the final submission for MT-2 forms.] \$116,391 x .05 = \$5,819.56	\$5,819.56
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
Printing [189 MT-2 forms annually @ 0.6572 per]	\$124.21
Postage [mailing 189 MT-2 forms as requested @ 0.61 per]	\$115.29
Other	0
Total	\$24,559.06

Note: The "Avg. Annual Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

The contractor costs are estimated to be \$18,500. This cost includes call center staff responding to an average of 3,200 calls per year that pertain to this collection. Most of these calls are from respondents who require assistance with completing the forms and interpreting the instructions. Based on historical call center data, calls pertaining to the forms lasts an average of 6 minutes. Based on an average loaded rate of \$50.00 per hour for a junior level NFIP analyst, the contractor costs for responding to these calls is \$16,000. The contract costs associated with completing and submitting the required documents for this collection is estimated to be \$2,500. This includes 50 hours and is based on an average loaded rate of \$50.00 per hour.

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).

“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
Form 086-0-27, Overview and Concurrence Form				1,925	2,275	350
Form 086-0-27A, Riverine Hydrology and Hydraulics Form				3,025	4,550	1,525
Form 086-0-27B, Riverine Structures Form				6,930	8,190	1,260
Form 086-0-27C, Coastal Analysis Form				110	455	345
Form 086-0-27D, Coastal Structures Form				110	455	345
Form 086-0-27E, Alluvial Fan Flooding Form				110	182	72
Total(s)				12,210	16,107	3,897

Explain:

Increase in burden hours is primarily due to an increase in the number of applications submitted compared to the previous estimate. The proposed updates to the forms are minor and do not result in any changes in burden hours.

Itemized Change in Annual Cost Burden

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
Form 086-0-27, Overview and Concurrence Form				\$111,458	\$147,882	\$36,424
Form 086-0-27A, Riverine Hydrology and Hydraulics Form				\$187,647	\$308,035	\$120,388
Form 086-0-27B, Riverine Structures Form				\$429,868	\$554,463	\$124,595
Form 086-0-27C, Coastal Analysis Form				\$6,823	\$30,804	\$23,981

Form 086-0-27D, Coastal Structures Form				\$6,823	\$30,804	\$23,981
Form 086-0-27E, Alluvial Fan Flooding Form				\$6,823	\$12,321	\$5,498
Total(s)				\$749,442	\$1,084,308	\$334,866

Explain:

Increase in cost burden is primarily due to an increase in the number of applications submitted compared to the previous estimate as well as increased wage rates over time.

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

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

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

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

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

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

B. Collections of Information Employing Statistical Methods.

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION.