

September 7, 2006

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660-0085**

**Title: Crisis Counseling Assistance and Training Program – Immediate  
Services Program**

**Form Number(s): None**

### General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 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 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 (give details as to why this information is being collected). 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.**

Section 416 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Act), Public Law 93-288, as amended, authorizes the President to provide financial assistance to state and local governments for professional counseling services to victims of major disasters in order to relieve mental health problems caused or aggravated by a major disaster or its aftermath. Under the provisions of Section 416 of the Act, FEMA issued the Crisis Counseling Assistance and Training Regulations (44 CFR 206.171).

Section 416 of the Act is the authority under which the President has designated the Department of Health and Human Services, through the Center for Mental Health Services (CMHS), to coordinate with FEMA in administering the Crisis Counseling Assistance and

Training Program (CCP). FEMA and CMHS, Substance Abuse and Mental Health Services Administration, Department of Health and Human Services have signed an interagency agreement under which CMHS provides technical assistance and consultation to States applying for CCP funding.

FEMA and CMHS jointly monitor the State administered CCPs, ensure that the goals of the program for people affected by disasters are met, special problems in the areas where technical assistance might be necessary are identified, grants are properly managed, and technical assistance and guidance are provided on program issues as they relate to crisis counseling assistance. FEMA and CMHS will assess whether the State's plan of services adequately addresses the mental health needs of the disaster victims and determine the amount of supplemental resources needed.

The CCP includes a specific disaster assistance program entitled Immediate Services program. The Immediate Services program provides for funding in response to a State request for the period immediately following a Presidentially-declared disaster, and includes community outreach, consultation and public education, and counseling techniques. This program is available for a limited period of time not to exceed 60 days, unless an application for longer-term funding is submitted. In that case, immediate services funding may be continued until the application has been approved or disapproved.

**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: a) how the information will be shared, if applicable, and for what programmatic purpose.**

FEMA requires that the State complete an ISP Standard Application for CCP that includes the following: (i) The geographical areas within the designated disaster area for which services will be provided; (ii) An estimate of the number of disaster victims requiring assistance; (iii) A description of the state and local resources and capabilities, and an explanation of why these resources cannot meet the need; (iv) A description of response activities from the date of the disaster incident to the date of application; (v) A plan of services to be provided to meet the identified needs; and (vi) A detailed budget, showing the cost of proposed services separately from the cost of reimbursement for any eligible services provided prior to application. The supplemental instructions describe the purposes of each section of the ISP Standard Application. The instructions are used as guidance for completing the ISP Standard application. The following FEMA Grants Administration Forms used to award grants to States for ISP portion of CCP are approved under OMB No. 1660-0025.

1. SF-424, Application for Federal Assistance
2. FEMA Forms, 20-16A, B, C, Summary Sheet for Assurances and Certifications
3. SF-269, Financial Status Report
4. SF-LLL, Disclosure of Lobbying Activities,
5. Audits

FEMA CCP requires a final narrative program report 90 calendar days after the last day of Immediate Services Program funding.

**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.**

At this time, the Immediate Services application is available on the CMHS website at [www.samhsa.gov](http://www.samhsa.gov) and may be electronically downloaded. The application is also available to State departments of mental health through the Internet at the SAMHSA/CMHS website ([www.samhsa.gov](http://www.samhsa.gov)) for downloading. The ISP application can be submitted manually or by email with original signature from the Governor's Authorized Representative.

Under the direction of the Department of Homeland Security, FEMA is in the process of implementing the Emergency Management Mission Integrated Environment (EMMIE) project. The goal of the EMMIE Project is to provide a single grant processing system that will serve all FEMA disaster related grants, including the CCP. This automated application system, which may be available in August 2006, will enhance accessibility and user-friendliness for the ISP application.

**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.**

There are no duplicate programs that exist at the Federal level for the Crisis Counseling Assistance and Training Program, Immediate Services.

**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.**

The State is the only eligible grantee of the CCP. FEMA does not award CCP funds 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.**

Information needs to be collected in order for FEMA and CMHS to assess the State's need for the program and to provide adequate oversight and assure compliance with the terms of the grant. The consequences of not collecting this data would be the inability for FEMA and

CMHS to collect appropriate justification of grant need therefore being unable to provide grant funds to meet the needs of disaster victims.

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

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

The Immediate Services Program is for 60 days of services. A final report is due to FEMA 90 calendar days after the last day of the program. Additional information may be required if FEMA or CMHS are concerned that services being rendered or expenditures do not comply with the terms of the grant. CCP is subject to Federal audit as described in 44CFR 206.171(k).

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

A written response may be required in fewer than 30 days, if FEMA in consultation with CMHS determines that the mental health needs of disaster victims are not being adequately served or for noncompliance with the terms of the grant.

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

Respondents are not required 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.**

Respondents are not required to retain records.

**(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 involve 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 statistical data classification.

**(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 collection does not include a pledge of confidentiality that is not supported by authority established in statute or regulation.

**(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 collection does not require respondents to submit proprietary trade secret, 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 was published for comments on June 26, 2006, volume 71, number 122, Pages 36350-36351. There were no comments received for this information collection.

**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/CMHS provide annual CCP trainings and workshops for state representatives at the Emergency Management Institute in Emmitsburg, Maryland. The objective of the workshop is to train States on how to complete an application successfully and obtain their feedback on the strengths and weakness of the application process. The training is a forum for States to express their concerns with the overall application and forms.

SAMHSA informally obtains feedback from States on overall application, reporting, program strengths and weaknesses. This is done by phone and website communication. SAMHSA is in the process of developing a formal Post-Close Evaluation Protocol and Process to obtain feedback from States on the overall application at the conclusion of a grant program. This Protocol may be available in September 2006.

In addition, a recent report from the Government Accountability Office recommended that FEMA and SAMHSA develop new and more stringent fiscal oversight and review mechanisms for large and complex grants. The Hurricane 2005 season created an

unprecedented number of large, costlier, and complex applications requiring higher level of fiscal oversight. In consultation with CMHS, the budget template in the application has been streamlined consistent with the required SF-424 form for improved accountability. Also, budget tools and guidance have been updated and simplified accordingly. These revisions do not add to the paperwork burden, particularly since the budget templates and tools are integrated in the new automated application system allowing for streamlined application processing and reporting.

**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 and the Center for Mental Health Services (CMHS), Substance Abuse and Mental Health Services Administration, Department of Health and Human Services have signed an interagency agreement under which CMHS provides technical assistance and consultation to States applying for CCP funding. FEMA has trained a cadre of Individual Assistance Program Managers responsible for providing the State with on-site technical assistance and guidance. CMHS and FEMA also developed a series of program guidance, training materials and other publications available electronically through CMHS's website.

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

There are no payment or gift to respondents.

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

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

**11. Provide additional justification for any questions 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 not questions of a sensitive nature involved with this information collection.

**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.

Annual Burden Hours

Project/Activity (Survey, Form(s), Focus Group, etc.)	No. of Respondents	Frequency of Responses	Burden Hours Per Respondent	Annual Responses	Total Annual Burden Hours
	(A)	(B)	(C)	(AxB)	(AxBxC)
CCP/ISP Application	56	1	40 hours	19	760
Narrative Final Reporting	56	1	10 hours	19	190
Training	56	1	32 hours	30	960
<b>TOTAL</b>			<b>82 hours</b>	<b>68</b>	<b>1,910</b>

56 States and Territories are eligible to apply for the CCP upon receiving a federal major disaster declaration designated for individual assistance. FEMA receives an average (over the last three fiscal years) of 19 States that participate annually in the CCP. FEMA receives approximately 19 ISP applications annually. Each state participating in the CCP must submit a final program report 90 days after the last day of immediate services funding.

56 States and Territories are eligible to participate in the annual FEMA training. The number of State Disaster Mental Health Coordinators (or designee) participating in the FEMA annual training is estimated to be 30 students per course.

The following FEMA Grants Administration Forms, used to award grants to States for ISP portion of CCP are approved under OMB No. 1660-0025.

- SF-424, Application for Federal Assistance
- FEMA Forms, 20-16A, B, C, Summary Sheet for Assurances and Certifications
- SF-269, Financial Status Report
- SF-LLL, Disclosure of Lobbying Activities, Audits

- 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 estimates of annualized cost to respondents for the hour burdens

for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.

**ANNUAL COST TO RESPONDENTS**

<b>Program</b>	<b>Burden Hrs.</b>	<b>Mean Hr. Rate<sup>(1)</sup> (\$)</b>	<b>Average Cost per Respondent<sup>(2)</sup> (\$)</b>	<b>Annualized Cost All Respondents (\$)</b>
State Disaster Mental Health Coordinator	1,910	\$37.09	\$70,841.90	\$70,841.90
<b>Total</b>	1,910		\$70,841.90	\$70,841.90

This is based on an average of 19 Immediate Services grants being awarded during a fiscal year and an annual total burden of 1,910 hours at \$37.09 per hour for a total of \$70,841.90. (The \$37.09 hourly rate is based on an annual salary of \$77,140.)

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

- 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.

There are not Operation and Maintenance cost 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 storage facilities.**

There is no Capital and Start-up-Cost 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.

**ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

Item	Cost (\$)
Contract Costs [Specify what is for and what is included, I.e S/W development, survey, etc.]	0
Staff Salaries [one GS-12, one GS-14, 40 hours per ISP]	\$53,450.92
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing	0
Postage	0
Other (Training)	\$ 3,989.12
<b>Total</b>	<b>\$ 57,439.92</b>

The FEMA Region Crisis Counseling Coordinator and the CMHS Project Officer provides technical assistance to States on the development of the Immediate Services Application. Technical assistance is provided on-site and/or off-site by telephone and electronic correspondence. The duration of an on-site visit depends on the size and scope of the disaster and the individual needs of the State. The FEMA Region Crisis Counseling Coordinator also monitors and closes out the Immediate Services Program. It is estimated that one FEMA Region Crisis Counseling Coordinator GS-12 (\$26.53 per hour) spends approximately 40 hours per ISP x 19 Immediate Services grants during a fiscal year for on site and/or off-site technical assistance = \$20,162.80. A CMHS Project Officer spends approximately 40 hours per ISP x 19 Immediate Services grants at GS-14 (\$43.80 per hour) = \$33,288.00. The total cost for technical support to the ISP is estimated to be \$53,450.80.

FEMA/CMHS provide one annual CCP trainings and workshops for state representatives at the Emergency Management Institute in Emmitsburg, Maryland. The objective of the workshop is to train States on how to complete an application successfully and obtain their feedback on the strengths and weakness of the application process. One GS-13 (\$37.06 per hour) and two GS-14s (\$43.80 per hour) who are FEMA employee and CMHS Project Officer spends 32 hours each per course training for the Immediate Services Program. The cost for CCP training estimated to be \$3,989.12.

Therefore, the total cost for Immediate Services Program staff salaries is estimated to be \$57,439.92. There is no other government program cost involved with this information collection.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping hour and cost burden. A**

**program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.**

There has been a decrease from 2246.95 hours to 1910 (-335.77 hours) for this collection of information. This adjustment in burden hours is due to the following information collection activities:

The number of responses for the ISP was increased by 2 responses. The burden hours for ISP continued to be 40 hours (+80 hours = 760 hours total). The training hours was increased by +16 hours. The number of responses for training was decreased by 4 (+416 hours = 960 hours total). The Final Report was increased by 2 responses. The burden hours for the report continued to be 10 hours (+20 hours = 190 hours total).

Recordkeeping burden hours (-800) were decreased from this collection. These burden hours that were captured in the past OMB submission was program specific to the State of New York disaster for FEMA-1391-DR. There are no recordkeeping requirements for Crisis Counseling Immediate Service Program, so therefore the recordkeeping burden hours (-800) have been removed.

The following FEMA grant forms have been captured in the previously approved OMB collection 1660-0025, FEMA Grant Administration Forms for the Crisis Counseling Program for Immediate Services; (1) SF-424, Application for Federal Assistance (-12.75 hours); (2) FF-20-16A thru C, Summary Sheet for Assurances and Certifications (-28.9 hours); (3) SF-LLL, Disclosure of Lobbying Activities (-2.8 hours); and SF-269, Financial Status Report (-8.5 hours). Therefore; a total of -51.77 hours have been decreased from this information collection.

**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 results that will be used for tabulation or publication for this information collection.

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

A valid OMB control number, expiration date and burden disclosure notice will be displayed in all collection's material.

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

This collection does not seek exception to the certification statement referenced above.

**B. Collections of Information Employing Statistical Methods.**

There is no statistical methodology involved in this collection.