Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0002

Title: Disaster Assistance Registration

Form Number(s): FEMA Forms 90-69 (English), 90-69A (Spanish), Application/Registration for Disaster Assistance, FEMA Forms 90-69B (English), 90-69C (Spanish), Declaration and Release and the new Receipt for Government Property permit

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.

To complete the supporting statement, type in your responses in the white space below each question. Your responses should be full and complete and provide sufficient information to help the OMB desk officer to understand what you are planning to do and why and how the Agency/Federal Government will benefit from and use the information you will be obtaining or soliciting.

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.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended is the legal basis for FEMA to provide financial needs and services to individuals who apply for disaster assistance benefits in the event of a major disaster. 44 CFR, Subpart D, Federal Assistance to Individuals and Households Section 206.110 implement the policy and procedures set forth in section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5174, as amended by the Disaster Mitigation Act of 2000. This program provides financial assistance and, if necessary, direct assistance to eligible individuals and households who, as a direct result of a major disaster or emergency, have uninsured or under-insured, necessary expenses and serious needs and are unable to meet such expenses or needs through other means.

44 CFR Part 206.117 authorize FEMA to provide direct assistance to applicants who is eligible for housing assistance. In order to receive direct assistance for housing (e.g., a mobile home or travel trailer) from FEMA, the applicant must be acknowledge and accept the conditions for using government property. In addition, the applicant must acknowledge that he or she has been informed of the conditions for continued direct housing assistance. To accomplish these notifications, FEMA will use the applicant's household composition data in NEMIS to prepare a Receipt for Government Property.

In addition, FEMA complies with the provisions of Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 8 U.S.C. §§1601 et seq. (Under Section 432. of Title IV, the Attorney General of the United States, after consultation with the Secretary of Health and Human Services, shall promulgate regulations requiring verification that a person applying for a Federal public benefit is a qualified alien and is eligible to receive such benefit.), with respect to determinations of eligibility or disaster assistance for applicants who are not U.S. citizens.

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.

After a major disaster or emergency is declared by the President, a ***Tele-Registration 800 number*** is published for individuals, to call so that they may apply for emergency assistance. FEMA service representatives will interview applicants over the telephone using *a Intranet script,* and record applicants information directly to the ***electronic copy of FEMA Forms 90-69 (Engish) and 90-69A (Spanish) Application/ Registration For Disaster Assistance*** in the National Emergency Management Information System (NEMIS) computer system. In rare circumstances, when the system is not accessible, or when phone lines are down, FEMA representatives will record information using the ***paper versions of FEMA Forms 90-69 (English) and 90-69A (Spanish) Application/Registration For Disaster Assistance***. The paper versions of these forms are entered into NEMIS by FEMA representatives.

In addition to registering over the telephone, applicants may apply for assistance online and check the status of their application submitted to FEMA, using an ***Internet version of FEMA Forms 90-69 (English) and 90-69A(Spanish) Application Registration for***

Disaster Assistance and the "Guide to Disaster Assistance". The information collected via the Internet will be electronically transferred to NEMIS so that information can be stored, and processed according to the legal and administrative policies referenced above.

In order to be eligible to receive FEMA Disaster Assistance, a member of the household must be a citizen, non-citizen national or qualified alien of the United States. ***FEMA Forms 90-69B (English) and 90-69C (Spanish), Declaration and Release*** form is used to certify respondents information and eligibility, after the application process. FEMA Forms 90-69B and 90-69C further informs the respondent of the Privacy Act and Paperwork Burden Disclosure Notice. Once applicants have completed the Declaration and Release form FEMA will notify contract firms for inspection of damaged properties.

Once property inspections are performed, the data is used to determine applicant eligibility for financial assistance. Applicants that are eligible for payment are forward into the NEMIS financial system for transmission to the U.S. Treasury. Applicants who are not eligible are also entered in the NEMIS computer system. Depending on the nature of the disaster/emergency and subsequent losses, individuals may be referred to other agencies and organizations authorized to provide disaster relief assistance, such as the Small Business Administration, the American Red Cross, the Internal Revenue Service, etc.

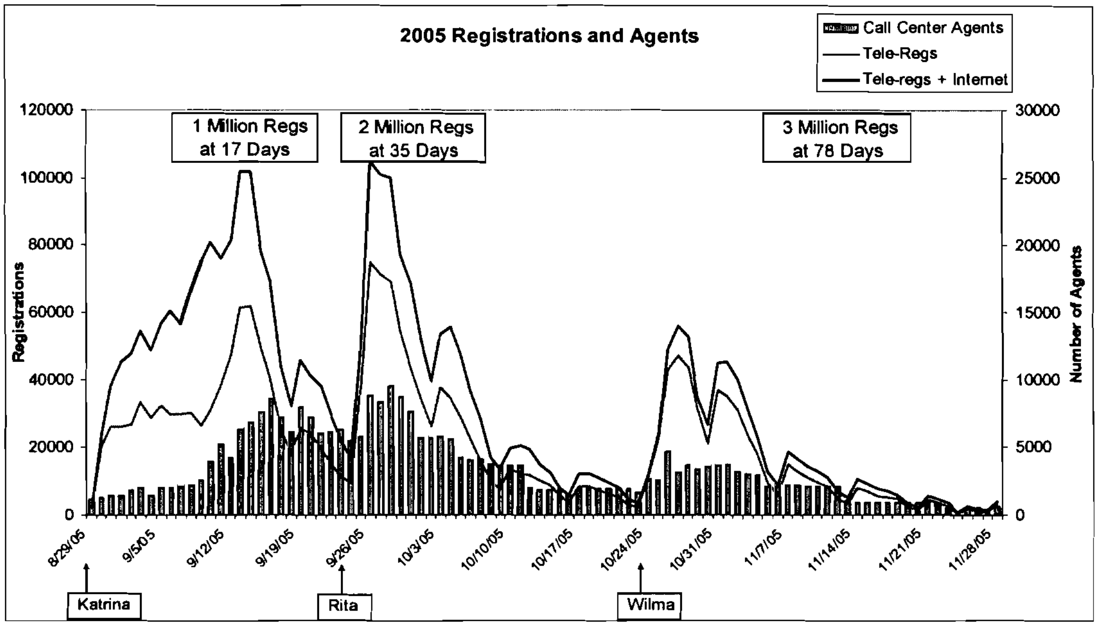
Applicants who qualify for direct assistance for immediate housing (e.g., a mobile home or travel trailer) must acknowledge and accept conditions for using government property. A **Receipt for Government Property (Temporary Housing Unit)** permit was developed for applicants to acknowledge the conditions for continued direct housing assistance. Once an applicant is determined eligible for direct assistance, FEMA will use the applicant's information collected on FEMA Form 90-69 to prepare the Receipt for Government Property (Temporary Housing Unit) which will permit applicants to dwell in temporary housing units. The Receipt for Government Property (Temporary Housing Unit) permits is filed, with the applicants FEMA Form 90-69.

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 registration process is done over the Internet, FEMA's 800 toll free number, or through the submission of a paper form which later entered into the system to be processed. All three of these registrations end up in the National Emergency Management Information System (NEMIS) to be processed in the same manner. NEMIS is an integrated database system used to provide FEMA, States, and other federal agencies with automation and record storage capabilities to perform disaster and non-disaster operations. NEMIS enables rapid and coordinated transition for monitoring an incident, managing declarations, setting up Disaster Field Offices, and providing assistance to communities and individuals affected by the disaster. The rational for this system is to reduce the burden for applicants applying for assistance and to manage disaster information more efficiently and economically.

Historical Background

- During the 2004 Hurricane Season 1 million registrations were taken in 30 days
- During the 2005 Hurricane Season 2 million registrations were taken in 35 days (with record high days where over 100,000 registrations were taken in 1 day).



Planning

FEMA's planning for future Hurricane Seasons included the review of network capacity for the continuation of record high days. As such, FEMA's IT Directorate has provided additional server capacity to the network to support higher application levels for both the 800# and Internet electronic application processes. Steps have also be taken to make systems and websites more intuitive and user friendly, also meeting the requirement for 508 compliance for those with special needs. Finally, a Spanish Internet application process has been added to FEMA.gov to assist those that prefer to register online in Spanish.

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 is no similar information available that can be used for the purposes of this information collection.

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 NEMIS system is designed in such a way that small business owners are referred immediately to the Small Business Administration (SBA) for disaster assistance. Many of the questions in the NEMIS computer systems is not necessary for businesses. Once NEMIS identify a business registration, these applicants are referred to SBA. Therefore the burden for businesses is minimal.

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 will be collected only when the President has declared a major disaster or emergency that has affected individuals and families. To fulfill the mandates of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended and provide all victims with disaster assistance for which they are eligible, registration information must be collected. Without this collection, disaster victims would have to make inquiries to government agencies/departments, active in the disasters, to determine program availability appropriate to their needs. Additionally, applicants for Housing Assistance, Other Needs Assistance, and SBA loans would have to file separate registrations or intake documents with individual agencies/departments, greatly increasing paperwork burdens.

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.

There are no requirements for 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.

There are no requirements for 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.

There are no requirements for respondents to submit more than an original and two copies of any documents.

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

There are no requirements to respondents to retain 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.

There is no statistical survey, involved with this collection of information.

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

There are no requirements to use 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this information collection.

(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.

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this collection.

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 this collection on December 4, 2006, volume 71, number 232, pages 70416 – 70417. 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 frequently work with persons outside of the agency, who serve in a partnership role to facilitate our assistance or to provide other forms of assistance to disaster victims. Following are some key outside organizations and their role in this process:

The U.S. Treasury uses address information from the registration to send financial assistance awarded to applicants. Inspection Contract Firms use data to schedule and perform inspections. They also gather the signed 90-69 B/C Declaration and Release forms. State's Other Needs Assistance Program Offices – Based on income, insurance and need, applicants' information is shared with State Other Needs Assistance Program Offices in Joint disasters where the state has opted to direct their own Other Needs Assistance Program.

Small Business Administration – Based on income, insurance, and need, applicants' information is shared with the Small Business Administration for consideration of 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.

Under Executive order 12862, Federal Agencies are to develop a customer service orientation for use in the implementation of their programs. In accordance with Executive Order 12862, FEMA review customer service performance and provide customer service feedback through the Disaster Assistance Customer Satisfaction Survey. The data collection for this survey is approved under *OMB No. 1660- 0036, FEMA Public Assistance Program Evaluation and Customer Satisfaction Surveys and Individual Assistance Customer Satisfaction Surveys.*

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

There is no payment or gift to respondents for this data collection.

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

The individual will be advised of the Privacy Act prior to providing any personal information. During the registration process the registrar or the individual reads the Privacy Act regarding authority to collect information, primary purposes, and routine uses of the information. The individual is advised that the information may be given to various federal and State agencies, insurers or lenders, as well as specific organizations and agencies from which the individual is directly seeking assistance. A compilation of the individual's responses in the form of the 90-69/A, *Application/Registration for Disaster Assistance,* is mailed to each individual; however, the Privacy Act Statement is not included mailed.

At the time of inspection, the 90-69B/C, *Declaration and Release,* which includes the Privacy Act Statement and Paperwork Burden Disclosure Notice, is presented to the individual for signature. The individual is further advised that he/she must provide private information, such as family financial status, to determine possible eligibility for assistance. Finally, the individual is advised that the information may be shared with state and local government agencies to promote hazard mitigation measures designed to reduce repetitive loss from disasters and to prevent the duplication of benefits between federal and state agencies.

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.

Respondents are not required to provide additional justification for questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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 (A)	Frequency of Responses (B)	Burden Hours Per Respondent (C)	Annual Responses (AxB)	Total Annual Burden Hours (AxBxC)
Tele-Registration Application Registration for Disaster Assistance	1,151,255	1	18 min	1,151,255	345,377

Internet Application Registration for Disaster Assistance **(English and Spanish)**	515,487	1	18 min	515,487	154,646
Paper version of FEMA Form 90-69 and 90-69A **(English and Spanish)**	51,549	1	18 min.	51,549	15,465
	1,718,291			**1,718,291**	515,488
FEMA Form 90-69B and 90-69C, Declaration and Release **(English and Spanish)**	64 %	1	2 min.	1,099,706	36,657
Receipt for Government Property (Temporary Housing Unit) **(English and Spanish)**	1%	1	10 min.	17,183	2,864
TOTAL	**1,718291**			**2,835,180**	**555,009**

It has been estimated that a total of **1,718,291** applicants will apply for Disaster Assistance.

The number of respondents using the **FEMA 1-800 number** for completing *FEMA Forms 90-69 and 90-69 A* (English and Spanish) is historically estimated to be **67%** (1,151,255) of the total numbers of applications for disaster assistance registration. It has been estimated that it takes approximately 18 minutes for applicants to complete a registration through calling the FEMA 1-800 number.

The number of respondents using **the internet** for completing *FEMA Form 90-69 and 90-69* (English and Spanish) is historically estimated to be **30%** (515,487) of the total numbers of applications for disaster assistance registration. It has been estimated that it takes approximately 18 minutes for applicants to complete a registration through the FEMA Internet website.

The number of respondents using ***FEMA Form 90-69A paper*** **(English and Spanish)** is historically estimated to be **3%** (51,549) of the total numbers of applications for disaster assistance registration. It has been estimated that it takes approximately 18 minutes for applicants to complete a registration with a FEMA representative using a paper form.

It has been estimated that historically approximately **64%** (1,099,706) of applicants will complete ***FEMA Form 90-69 B and C*** **(English and Spanish)** once they have registered for disaster assistance. This numbers of applications will results in property inspections. It has been estimated that it takes approximately 2 minutes for applicants to review and sign the FEMA Form 90-69 B or C for Declaration and Release.

The number of respondents for ***Receipt for Government Property*** **(English and Spanish)** is estimated to be **1%** (17,183) of the total numbers of applications for disaster assistance registration. Historically, approximately 1% of the total numbers of applications for disaster assistance results in the awarding of direct assistance (e.g., mobile home or travel trailer). It has been estimated that it takes approximately 10 minutes for applicants to review and sign the Receipt for Government Property permit.

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

Program	Burden Hrs	Mean Hr. Rate ($)	Average Cost per Respondent ($)	Annualized Cost All Respondents ($)
Individuals and Households	555,009	$18.90	$5.67	10,489,670.
Total				**10,489,670**

It is estimated that the annualized hour burden cost to respondents for the hour burdens will be approximately $10,489,670. for completing the Disaster Assistance Registration applications for this collection of information. Respondents are individuals and families who have applied for assistance as a result of a declaration of a major disaster or emergency.

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:

There are no recordkeeping requirements to respondents for this collection of information.

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 no operation and maintenance and purchase of services component to respondents for this collection of information.

b. Capital and Start-up-Cost should include, among other items,

preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no capital and start-up-cost to respondents for this collection of information.

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
Contractor Cost (343 remote contract personnel performing Tele-Registration at $14 per hour to support the 1.2M annual Tele-Registrations)	3,438,490
Staff Salaries (190 GS-5 @ $14 per hour supporting the projected 1.2M annual Tele-Registrations)	1,934,150
Facilities (leasing a temporary Disaster Assistance Tele-Registration Center)	2,000,000
Computer Hardware and Software (estimated annual cost for 190 FEMA workstations used to take registrations @ 166.31 each)	31,599
Equipment Maintenance (estimated to be 10% of the Computer Hardware and Software cost (31,599)	3,159
Travel (10 FEMA staff @ $5,000 per employee to travel to remote sites to provide start-up assistance to contract supervisory personnel managing the Teleregistration call center)	50,000
Printing (approximately 1,200,000 Disaster Assistant Guides and 1,200,000 FEMA Form 90-96)	6,000,000
Postage (cost of mailing 1.2M FEMA Form 90-69 and applicant Disaster Assistant guides to individuals based on annual registration projections)	1,800,000
Other (Security badges and headsets for 343 employees @ $10 each)	3,430
Total	**$15, 257, 669**

This above table outlines estimated expenses to support the projected 1.2M average annual applications for Federal assistance. Contractor cost covers remote call center surge staff (343) hired on a temporary basis to handle overflow registrations that FEMA can not support. Staff salaries is projected expense for 190 FEMA staff assigned to take the initial part of the 1.2M registration load. Facilities expense is estimated to be $2M for a temporary call center facility leased for one year. Computer Hardware and Software expense supports the 190 FEMA personnel with workstations to perform registration intake. Equipment maintenance covers repair and replacement for the 190 workstations at 10% of the equipment cost. Travel is projected for 10 FEMA staff to provide orientation for remote call center management staff at the start-up of remote facilities. Printing cost is estimated for Disaster Assistance Guides and completed 90-69 forms that are mailed to applicants. Postage covers the mailing of the printed documents. Other expense covers the cost for FEMA and remote call center staff security badges.

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.

Changes in Hour Burden		
Data Collection Activity/Instrument	**Program Changes (hours)**	**Adjustments (hours)**
Tele-Registration Application		+200,200
Internet Application		+154,646
Paper FEMA Form 90-69 and 90-69A		+7824
FEMA Form 90-69B and 90-69C		+26,362
Receipt for Government Property	+2,864	
Total	+2,864	389,032

The Disaster Assistance Registration process has been optimized to flow in a logical and efficient manner for applicants and staff gaining efficiencies in the registration process. Streamlining and optimization of the process has resulted in a decrease in the average time for processing Disaster Assistant Applications while the number of responses has increased. The burden hour for this data collection have increased from 163,113 burden hours to 557,009 hours **(+391,896)** and from 482,584 responses to 1,718,291 (+1,235,707)) responses. The following data collection activities have caused an increase in burden hour estimates.

During the last OMB submission the Tele-Registration intake burden hours and the FEMA Form 90-69 and 90-69A burden hours were combined. The previous burden hour was estimated to be 5% (7824) for FEMA Form 90-69 and 90-69A and 95% (200,200) for Tele-Registration, which was estimated to have a total burden of 163,113 hours.

The current estimate for Tele-Registration is 1,151,255 responses and 345,377 burden hours. Therefore an adjustment of +145,177 burden hours has been estimated for this information.

The current estimates for FEMA Form 90-69 and 60-69A have estimated to be 51,549 responses and 15,465 burden hours. Therefore an adjustment of +720,000 responses and +208,024 burden hours have been revised in for this information.

The Internet Application Registration burden estimates have been included in this Information Collection Request (ICR). Applicants register for disaster assistance on-line using the internet. An adjustment increase of +515,487 responses and +154,646 total burden hours has been estimated for use the internet application for Disaster Assistance Registration.

Depending on the nature of the disaster/emergency and subsequent losses, individuals may be referred to other agencies and organizations authorized to provide disaster relief assistance. FEMA Form 90-69B and 90-69C responses was previously estimated to be308,854 (64% of 482,584) which had an burden hour estimated of 10,295 hours. Due to the increase in the number of response for this submission, The number of response is estimated to be 1,099,706 responses (64% of 1,718,291) and 36,657 burden hours. Therefore this data have a difference of +26,362 hours and +790,852 responses.

The Receipt for Government Property (English and Spanish) is new information that is captured as a program change for this data collection. The number of responses for this new information is estimated to be 1% (17,183) of the total numbers of applications for disaster assistance registration. The burden hour for this data collection is estimated to be +2,864 hours. In order to receive direct assistance for housing (e.g., a mobile home or travel trailer) from FEMA, the applicant must be acknowledge and accept the conditions for using government property authorized under 44 CFR 206.117..

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 is no collection of information whose results will be published for tabulation and publication.

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.

There is no certification exception for this collection of information.

B. Collections of Information Employing Statistical Methods.

There are no statistical methods involved with this collection of information.

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole

and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection has been conducted previously, include the actual response rate achieved during the last collection.

The collection of information does not employ statistical methods.

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.