

November 13, 2009

## 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): FEMA Form 003-0-1 (Formerly 90-146)**

### 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. 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 survivors of major disasters in order to relieve mental health problems caused by 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.

The State collects the information to demonstrate a need for supplemental professional counseling services that are required for survivors of major disasters because existing resources are inadequate. These services are required in order to relieve mental health problems caused by or aggravated by a major disaster or its aftermath. The State's plan of services addresses the mental health needs of the disaster survivors and determines the amount of supplemental resources needed. The nature of the information being collected is to ensure that the goals of the program are met; special problems in the areas where technical assistance and guidance as they relate to crisis counseling assistance are identified and that the grants are properly managed.

**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 CCP includes a specific disaster program entitled Immediate Services Program (ISP). 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.

**FEMA Form 003-0-1** - FEMA requires that the State complete an ISP Application for the 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 survivors requiring assistance; (iii) A description of the state and local resources and capabilities, and an explanation of why these resources cannot meet the need; (ix) 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 (a separate Excel worksheet titled "ISP Budget Table Worksheet" provides a narrative on what information should be provided but is not required to be completed – the actual budget information is Part V of FEMA Form 90-146), 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 Application. The instructions are used as guidance for completing the ISP Application. The burden includes the time required for training to complete the application.

**Final Report Narrative** - FEMA CCP requires a final narrative program report 90 calendar days after the last day of Immediate Services funding.

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

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

**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.mentalhealth.samhsa.gov](http://www.mentalhealth.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 at [www.samhsa.gov](http://www.samhsa.gov) for downloading. The ISP application can be submitted by email with original signature from the Governor's Authorized Representative or it may be manually submitted via mail.

**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 survivors.

**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 reporting requirements 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.**

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 survivors 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 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 inviting public comments was published on July 17, 2009, Volume 74, Number 136, pp. 34768]. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on October 26, 2009, Volume 74, Number 205, pp. 55060]. No comments were received. See attached copy of the published notice included in this package.

**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 weaknesses 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.

**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 trains, mentors and provides guidance to a cadre of Individual Assistance Specialists 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 is no payment or gift to respondents.

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

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

**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 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 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. 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 receives an average (over the past three years) of 15 States that participate annually in the CCP. FEMA receives an average of 15 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.

**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. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. 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.**

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State Disaster Mental Health Coordinator	CCP/ISP application and training/FE MA Form 003-0-1	15	1	72 hours	1080 hours	\$55.30	\$59,724.00
State Disaster Mental Health Coordinator	Final Report Narrative	15	1	10 hours	150 hours	\$55.30	\$8,295.00
<b>Total</b>					<b>1,230</b>		<b>\$68,019.00</b>

\* Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

**Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.4. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.4, and the entry for the “Avg. Hourly Wage Rate” would be \$59.51.**

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for State Disaster Mental Health Coordinator is estimated to be \$55.30 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents’ State Disaster Mental Health Coordinator is estimated to be \$68,019.00 annually.

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

**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 no 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.

**Annual Cost Burden to Respondents or Record-keepers**

<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost</b> (investments in overhead, equipment and other one-time expenditures)	<b>*Annual Operations and Maintenance Cost</b> (such as recordkeeping, technical/professional services, ect.)	<b>Annual Non-Labor Cost</b> (expenditures on training, travel and other resources)	<b>Total Annual Cost to Respondents</b>
	0.00	0.00	0.00	0.00
<b>Total</b>				

**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**

<b>Item</b>	<b>Cost (\$)</b>
Contract Costs [Describe]	0



Staff Salaries [one GS-12 (@\$43.20/hr (times 1.4 multiplier = 60.48) and one GS-14 @\$63.99/hr (times 1.4 multiplier = 89.59), 40 hours each per ISP]	<b>\$90,042.00</b>
Facilities [cost for renting, overhead, ect. 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 [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other (Training)	<b>\$5,880.00</b>
<b>Total</b>	<b>\$95,922.00</b>

The FEMA Region Crisis Counseling Specialist and the CMHS Project Officer provides technical assistance 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 Specialist also monitors and closes out the Immediate Services Program. It is estimated that one FEMA Region Crisis Counseling Specialist GS-12 (\$60.48 per hour) spends approximately 40 hours per ISP x 15 Immediate Services grants during a calendar year for on and off-site technical assistance = \$36,288.00. A CMHS Project Officer GS-14 (\$89.59 hour) spends approximately 40 hours per ISP x 15 Immediate Services grants during a calendar year for on and off site technical assistance = \$53,754.00. The total cost for technical support to the ISP is estimated to be \$90,042.00

FEMA/CMHS provide one annual CCP training and workshop 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 (\$56.84 per hour) and two GS-14s (\$63.45 each per hour) who are FEMA employee and CMHS Project Officer spend 32 hours each per course training at this workshop. The cost for the training is estimated to be \$5,880.00.

Therefore, the total cost for Immediate Services Program staff salaries is estimated to be \$69,444.00. 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 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.**

There was a decrease from 1,910 hours to 1,230 (-680 hours) for this collection of information. This adjustment in burden hours is due to the following collection activities:

The number of responses for the ISP used previously was based on the total number of 56 States and Territories that are eligible to apply for the CCP upon receiving a federal major disaster declaration designated for Individual Assistance (IA). The number used for this submission is based on an average taken from ISP applications received over the past three years, bringing the number of respondents to 15 States that participate annually in the CCP and an average of 15 ISP applications received annually.

The 32 burden hours for training were combined with the 40 burden hours for the preparation of the ISP application for a total of 72 hours burden per response. These hours were previously listed as a separate line item. The Final Report remains at 10 hours.

There are no recordkeeping burden hours for the Crisis Counseling Immediate Services Program, so there are no recordkeeping burden hours to report.

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
CCP/ISP Application and Training				760	1,080	+320
Final Report Narrative				190	150	-40
Training				960	0	-960
<b>Total(s)</b>				<b>1,910</b>	<b>1,230</b>	<b>-680</b>

**Explain:** The difference in the annual burden hours results from a decrease in the estimated number of respondents, from 19 to 15 (more accurately reflecting the expected number of respondents). The hour burden for the CCP/ISP Application and Training is

inclusive of the previously separate cost burden for training (and the reason why the hour burden for the training is listed as “0”).

<b>Itemized Changes in Annual Cost Burden</b>						
<b>Data collection Activity/Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
CCP/ISP Application and Training				\$28,188.40	\$59,724.00	+\$31,535.60
Final Report Narrative				\$7,047.10	\$8,295.00	+\$1,247.90
Training				\$35,606.40	\$0	-\$35,606.40
<b>Total(s)</b>				<b>\$70,841.90</b>	<b>\$68,019.00</b>	<b>-\$2,822.90</b>

**Explain:** The difference in the annual cost burden results from a decrease in the estimated number of respondents, from 19 to 15 (more accurately reflecting the expected number of respondents). This decrease produces a drop in cost burden, but the change in wage rate category to include the 1.4 multiplier reduces the overall drop in cost burden. The cost burden for the CCP/ISP Application and Training is inclusive of the previously separate cost burden for training (and the reason why the cost burden for the training is listed as “0”).

**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 of data 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.**

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 “Certification for Paperwork Reduction Act Submissions”.

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

There is no statistical methodology involved in this collection.